

Appendix A: List of stakeholders that responded to the ULEZ consultation

- Age UK London
- Alliance of British Drivers
- Association of Vehicle Recovery Operators
- Autogas
- Baroness Jenny Jones AM
- Better Bankside
- Brewery Logistics Group
- British Lung Foundation
- British Motorcyclists Federation
- Brixton BID
- BVRLA
- BYD UK
- Calor Gas
- Camden Town Unlimited
- Campaign for Better Transport (London)
- CBI
- CEMEX
- City of London Corporation
- Clean Air in London
- ClientEarth
- Climate Change Centre Reading
- Community Transport Association
- Confederation of Passenger Transport UK
- Cross River Partnership
- DAF Trucks
- DHL
- Direct Line
- Doosan Babcock
- Ealing Community Transport Charity
- Ealing Transition Initiative
- Environmental Industries Commission
- Environmental Protection UK
- European Rescue & Recovery Initiative
- Federation of British Historic Vehicle Clubs
- Federation of Small Businesses
- FirstGroup
- Ford Motor Company
- Freight Transport Association
- Friends of Capital Transport Campaign
- Friends of the Earth
- Global Action Plan
- GMB
- Greenpeace
- HCT Group
- Heathrow Airport Ltd
- Hertfordshire County Council
- Imperial College London
- Institute of Air Quality Management
- Jim Fitzpatrick MP
- John Lewis Partnership
- Justine Greening MP
- Kingston and Sutton Shared Environment Service
- Land Securities
- Leonie Cooper AM
- Licensed Private Hire Car Association
- Licensed Taxi Drivers' Association
- Living Streets
- London Assembly Conservative Group
- London Assembly Environment Committee
- London Assembly Green Party Group
- London Assembly Labour Group
- Association of Directors of Public Health for London and the London Environment Directors' Network (joint response)
- London Borough of Barking and Dagenham
- London Borough of Brent
- London Borough of Camden
- London Borough of Croydon
- London Borough of Ealing
- London Borough of Enfield
- London Borough of Hackney

- London Borough of Hammersmith & Fulham
- London Borough of Haringey
- London Borough of Havering
- London Borough of Hounslow
- London Borough of Islington
- London Borough of Lambeth
- London Borough of Lewisham
- London Borough of Redbridge
- London Borough of Richmond upon Thames
- London Borough of Southwark
- London Borough of Tower Hamlets
- London Borough of Waltham Forest
- London Borough of Wandsworth
- London Bus Museum
- London City Airport
- London Councils
- London Cycling Campaign
- London Fire Brigade
- London First
- London Forum of Amenity and Civic Societies
- London Sustainability Exchange
- London Tourist Coach Operators Association
- London TravelWatch
- Merton Conservatives Council Group
- Motorcycle Action Group
- Motorcycle Industry Association
- Musicians' Union
- National Association of Road Transport Museums
- National Association of Wedding Car Professionals
- National Express
- National Franchised Dealers Association
- New West End Company
- Private Hire Board
- RAC
- Road Haulage Association
- Royal Borough of Greenwich
- Royal Borough of Kensington and Chelsea
- Royal Mail Group
- Rt Hon Joan Ryan MP
- Seb Dance MEP
- Society of Motor Manufacturers and Traders (SMMT)
- Stephen Knight (Former AM)
- Sustrans
- Team London Bridge
- The Air We Breathe
- The Clapham Society
- The Crown Estate
- The London Taxi Company
- The Original London Sightseeing Tour
- Uber
- UK Health Alliance on Climate Change
- UK Health Forum
- UKLPG
- Unite the union
- University College London
- UPS
- Urban Partners
- Volvo
- Waitrose
- West End Community Network
- Westminster City Council

Appendix B: List of stakeholders invited to respond

- Confederation of Business Industry (CBI)
- Federation of Small Businesses
- London Chamber of Commerce and Industry (LCCI)
- London First
- London City Airport
- Canary Wharf Group
- British Property Federation (BPF)
- EEF
- Institution of Civil Engineers (ICE)
- Civil Engineering Contractors Association (CECA)
- Angel BID
- Argall BID
- E11 BID
- Ilford BID
- Stratford Original
- London Riverside BID
- Bexleyheath BID
- Orpington 1st
- Bromley BID
- Croydon BID
- Purley BID
- Beddington Industrial Area
- Successful Sutton BID
- KIPPA BID
- Love Wimbledon
- Willow Lane BID
- Streatham BID
- Brixton BID
- Clapham BID
- Garratt Business Park
- Kingstonfirst
- Twickenham BID
- Hammersmith BID
- West Ealing BID
- Make it Ealing
- Harrow Town Centre BID
- Camden Town BID
- Euston Town BID
- Fitzrovia BID
- New West End Company
- Baker Street Quarter Partnership
- Hampstead BID
- Marble Arch BID
- Paddington BID
- Piccadilly and St James's BID
- Heart of London Business Alliance
- Victoria BID
- Northbank BID
- inmidtown BID
- Cheapside BID
- Hatton Gardens BID
- Farringdon BID
- Vauxhall One
- South Bank BID
- We are Waterloo
- Better Bankside
- Team London Bridge
- Putney BID
- The Aldgate Partnership
- car2go
- Carplus
- Enterprise Car Club
- DriveNow
- E-Car
- Hertz 24/7
- Zipcar
- Abellio West London Ltd t/a Abellio Surrey
- Afternoon Tea Bus Tour
- Airport Bus Express
- Big Bus London
- Brookline
- Buzzlines
- Centaur
- Chalkwell
- Clarkes Coaches
- Confederation of Passenger Transport UK
- London Duck Tours
- easyBus
- First (route 702)
- Ghost Bus Tours
- Golden Tours
- Green Line (Arriva)
- Kings Ferry
- London City Tour

- Metroline
- Quality Line
- Stagecoach
- Sullivan Buses
- Tellings Golden Miller Coaches
- Tower Transit
- Addison Lee
- Chauffeur and Executive Association
- Frazer Nash
- GMB
- Karsan
- London Cab Drivers Club
- Licensed Private Hire Car Association (LPHCA)
- Licensed Taxi Drivers' Association
- Private Hire Board
- The London Taxi Company (LTC)
- Nissan
- Penso
- Unite the union
- BVRLA
- Association of Vehicle Recovery Operators (AVRO)
- Waterfall Garage Services Ltd
- Mercedes-Benz UK
- Volvo
- Dennis Eagle
- Scania Great Britain
- MAN Truck & Bus Company UK
- DAF Trucks
- Iveco
- Renault Trucks UK
- BYD UK
- Tevva
- Daimler
- BD Auto
- Ford Motor Company
- Low Carbon Vehicle Partnership
- Capita
- SMMT
- DHL
- Institute of Couriers
- UPS
- Hitachi Capital
- CEMEX
- Skanska
- FM Conway
- SECBE
- Considerate Constructors Scheme
- Construction Clients' Group
- Build UK
- Road Haulage Association
- Rail Freight Group
- London Cycling Campaign
- Campaign for Better Transport (London)
- London TravelWatch
- Clean Air in London
- Environment Agency
- Friends of the Earth
- Greenpeace
- Living Streets
- Natural England
- Sustrans
- Carbon Trust
- ClientEarth
- Low Carbon Vehicle Partnership
- Air Quality Consultants
- King's College Hospital
- Environmental Protection UK
- Green Alliance
- London Sustainability Exchange
- Asthma UK
- British Lung Foundation
- Next Green Car/Ecolane Consultancy
- Transport & Environment
- Access in London
- Age UK London
- Business Disability Forum
- Community Transport Association
- Connect
- Disability Rights UK
- DisabledGo
- Friends of Capital Transport Campaign
- Greater London Forum for Older People
- Transport for All
- Valuing People (TfL's learning disability group)
- Whizz-Kidz
- Scope
- Disabled Motoring UK

- Independent Disability Advisory Group (TfL)
- National Council for Voluntary Youth Services
- Emissions Analytics
- Policy Exchange
- King's College London
- Institute for Public Policy Research
- Guide Dogs
- RNIB
- Alzheimer's Society
- Leonard Cheshire
- Centrepoint
- Department for Environment Food & Rural Affairs (Defra)
- London Clinical Senate
- Disablement Association Barking and Dagenham (DABD)
- Barnet Community Transport
- Bexley Accessible Transport Scheme
- Brent Community Transport
- Croydon Accessible Transport
- Ealing Community Transport Charity
- Enfield Community Transport
- Hackney Community Transport
- Harrow Community Transport
- Havering Community Transport Limited
- Hillingdon Community Transport
- Hounslow Community Transport
- Westway Community Transport
- Richmond and Kingston Accessible Transport
- Lewisham Community Transport Scheme
- Merton Community Transport
- Sutton Community Transport
- Tower Hamlets Community Transport
- Community Transport Waltham Forest
- Wandsworth Community Transport
- Gareth Bacon AM
- Jennette Arnold AM
- Len Duvall AM
- Navin Shah AM
- Nicky Gavron AM Londonwide
- Tony Arbour AM
- Andrew Boff AM
- Tom Copley AM
- Joanne McCartney
- Onkar Sahota AM
- Fiona Twycross AM
- Shaun Bailey AM
- Kemi Badenoch AM
- Sian Berry AM
- Leonie Cooper AM
- Unmesh Desai AM
- Tony Devenish AM
- Florence Eshalomi AM
- David Kurten AM
- Keith Prince AM
- Caroline Russell AM
- Peter Whittle AM
- Steve O'Connell AM
- Caroline Pidgeon AM
- Andrew Dismore AM
- David Lammy MP
- Greg Hands MP
- Tom Brake MP
- Nick Hurd MP
- Karen Buck MP
- Chuka Umunna MP
- Gavin Barwell MP
- Joan Ryan MP
- Iain Duncan Smith MP
- Jim Fitzpatrick MP
- Zac Goldsmith MP
- Theresa Villiers MP
- Stephen Hammond MP
- Jeremy Corbyn MP
- Stephen Timms MP
- Barry Gardiner MP
- Clive Efford MP
- Harriet Harman MP
- Gareth Thomas MP
- Stephen Pound MP
- Diane Abbott MP
- Jim Dowd MP
- Siobhain McDonagh MP
- Boris Johnson MP
- Tania Mathias MP
- Paul Scully MP

- Andy Slaughter MP
- Meg Hillier MP
- Emily Thornberry MP
- Vicky Foxcroft MP
- Kate Hoey MP
- Virendra Sharma MP
- James Berry MP
- Victoria Borwick MP
- Wes Streeting MP
- Mike Freer MP
- Catherine West MP
- Keir Starmer KCB QC MP
- Tulip Siddiq MP
- Matthew Pennycook MP
- Mike Gapes MP
- Kate Osamor MP
- Margaret Hodge DBE MP
- Rupa Huq MP
- John McDonnell MP
- Teresa Pearce MP
- Rosena Allin-Khan MP
- Helen Hayes MP
- Stella Creasy MP
- Lyn Brown MP
- Jane Ellison MP
- London Borough of Barnet
- London Borough of Barking and Dagenham
- London Borough of Bexley
- London Borough of Brent
- London Borough of Bromley
- London Borough of Camden
- City of London
- London Borough of Croydon
- London Borough of Ealing
- London Borough of Enfield
- Royal Borough of Greenwich
- London Borough of Hackney
- Royal Borough of Kensington and Chelsea
- London Borough of Hammersmith & Fulham
- London Borough of Haringey
- London Borough of Harrow
- London Borough of Havering
- London Borough of Hillingdon
- London Borough of Hounslow
- London Borough of Islington
- Royal Borough of Kingston upon Thames
- London Borough of Lambeth
- London Borough of Lewisham
- London Borough of Newham
- London Borough of Merton
- London Borough of Redbridge
- London Borough of Richmond upon Thames
- London Borough of Southwark
- London Borough of Sutton
- London Borough of Tower Hamlets
- London Borough of Waltham Forest
- London Borough of Wandsworth
- Westminster City Council

Appendix C: Summary of stakeholder responses

C1. Political representatives

Baroness Jenny Jones

- C1.1 Jenny Jones supports the introduction of the ES, and the earlier introduction and expansion of the ULEZ (including a higher charge for non-compliant vehicles). Baroness Jones advocates further measures to improve London's air quality, including banning diesel vehicles from more polluted areas; opposing the expansion of Heathrow Airport; not building any more roads including Silvertown Tunnel; increasing bus provision; increasing support for cycling; and any other measures which reduce traffic.

Jim Fitzpatrick MP

- C1.2 Jim Fitzpatrick MP supports the development of Enderby Wharf, but he is concerned about the pollution caused by ships running their diesel generators. He would like the proposals to allow the ships to use these generators to be reconsidered.

Justine Greening MP

- C1.3 Justine Greening MP is supportive of efforts to improve London's air quality but is concerned that the proposed introduction of the ES would not provide enough of a notice period for the residents and businesses affected. She supports the potential introduction of the ULEZ in 2019 but recognises concerns that people are currently working to a date of 2020; she proposes examining use of a grace period or reduced charges, in particular for small businesses.
- C1.4 Ms Greening is concerned that an expansion of the ULEZ up to the South Circular would cut her constituency in two, both creating confusion and increasing emissions in streets outside the boundary. She supports the principle of expanding the ULEZ Londonwide for heavy vehicles but recommends working with local businesses to mitigate any negative impacts, for example through a grace period.

Leonie Cooper AM

- C1.5 Leonie Cooper AM fully supports the new ES, with the same parameters as the Congestion Charge zone. She notes the disabled and residents' exemptions. Ms Cooper supports the ULEZ proposals, including bringing it forward to 2019, or even to 2018 and the extension of the boundary to Londonwide for heavy vehicles as early as 2019. She does not agree with the proposals to extend the ULEZ up to the North and South Circular Roads for all vehicles as early as 2019, as she believes the ULEZ for all vehicles should cover the whole of Greater London (the current LEZ boundary). If the ULEZ does go to the North and South Circular Roads, she believes the A232 would make a better boundary than the A205 roads.

- C1.6 Ms Cooper highlights that Assembly Members have been contacted by constituents from across London who would like to benefit from cleaner air but would not be covered under the current zone. There is a coalition of Londoners who would be supportive of bolder policy actions. Ms Cooper supports meaningful policy from Whitehall, including a diesel scrappage scheme and full devolution of Vehicle Excise Duty (VED) 'Road Tax' to London. She believes the Government should be supporting lower income families to switch to less polluting vehicles.

London Assembly Conservative Group

- C1.7 London Assembly Conservative Group support the introduction of ULEZ within the existing Congestion Charging Zone, but opposed the extension of ULEZ up to the North and South Circular roads.
- C1.8 They stated that the proposals would fail to tackle pollution hotspots and will penalise drivers and businesses in non-polluting areas. They called for an alternative approach targeted at the worst-hit areas where pollution.
- C1.9 They believe that the money would be more effectively spent on hybrid buses and a loan scheme for converting 10,000 black cabs to low-emission LPGs. They believed that the impact on small businesses within the extended zone would be severe.
- C1.10 They recommend introducing local freight consolidation plans, the expansion of electric vehicle infrastructure in London, a diesel scrappage scheme, and extension of the London Boiler Cashback scheme.

London Assembly Environment Committee

- C1.11 The Committee supports the ES as proposed. They support the earlier 2019 introduction of the ULEZ in the central zone and urge that the formal consultation on the ULEZ changes be conducted soon. They also fully support the extension of the ULEZ Londonwide for heavy vehicles specifically from 2019. For light vehicles, they support the expansion to a zone within the North and South Circular Roads as a minimum, and again at an earlier date, preferably 2019.
- C1.12 They would support further consideration of wider boundary options, and the most preferable option would be for a Londonwide ULEZ for all vehicles. They note demand from outer boroughs to be included in the zone. They would like an earlier dis-exemption of diesel vehicles in the central zone considered and a statement of intent for zero emissions standards in 2025.
- C1.13 The Committee supports a nationally funded diesel scrappage scheme and the devolution of VED to London. They state the focus should be on traffic reduction and other sources of emissions, such as PHVs, river transport and non-transport sources.
- C1.14 The GLA Conservatives do not want to go beyond the original ULEZ proposals and are against the introduction of an ES.

- C1.15 The UKIP GLA members agree, but would consider a ULEZ for Heathrow Airport in 2022. They would also like to see a reduction in PHVs and a reduction in cycling infrastructure which they claim increases congestion leading to air pollution. The UKIP members would also like to see more regulation of secondary diesel engines, such as refrigerated lorries. They believe that a reduction in immigration would also help alleviate congestion and reduce pollution.

London Assembly Green Party Group

- C1.16 Caroline Russell AM supports the introduction of the ES but suggests that more should be done to tackle diesel emissions including banning diesel engines. She suggests that residents should not benefit from a discount because it would not deter residents from driving polluting vehicles. She supports the early introduction of the ULEZ in central London and suggests that Londoners should be able to comment about the expansion of the ULEZ to the whole of London (for all vehicles). She believes that the expanded ULEZ (for all vehicles) should be introduced as early as possible (2019).
- C1.17 Ms Russell suggests that a road pricing scheme which considers emissions, time of day and distance travelled may work better than the ULEZ/ES. She thinks that this would be a fairer system that allows for essential journeys but discourages non-essential car journeys.

London Assembly Labour Group

- C1.18 The London Assembly Labour Group fully supports the new ES, with the same parameters as the Congestion Charge zone. They note the disabled and residents' exemptions. They support the ULEZ proposals, including bringing it forward to 2019, or even to 2018 and the extension of the boundary to Londonwide for heavy vehicles as early as 2019. They do not agree with the proposals to extend the ULEZ up to the North and South Circular Roads for all vehicles as early as 2019, as they believe the ULEZ for all vehicles should cover the whole of Greater London (the current LEZ boundary). If the ULEZ does go to the North and South Circular Roads, they believe the A232 would make a better boundary than the A205 roads.
- C1.19 The Group highlights that Assembly Members have been contacted by constituents from across London who would like to benefit from cleaner air but would not be covered under the current zone. There is a coalition of Londoners who would be supportive of bolder policy actions. They support meaningful policy from Whitehall, including a diesel scrappage scheme and full devolution of VED 'Road Tax' to London. They believe the Government should be supporting lower income families to switch to less polluting vehicles.

Merton Conservatives Council Group

- C1.20 Merton Conservatives Council Group supports the ES proposal and the ideas to expand and bring forward the ULEZ. They request that more action

should be taken on idling and taxi and PHV emissions in outer London. They also request a faster uptake of hybrid, electric and hydrogen buses.

Rt Hon Joan Ryan MP

- C1.21 Joan Ryan MP supports a Londonwide ULEZ for all vehicles so that the outer London boroughs, such as her constituency of Enfield North, are covered and her constituents gain the associated health improvements. She highlights Bullsmoor Lane, which has been shown to have particularly high levels of nitrogen dioxide and PM₁₀ due to congestion. Ms Ryan would also like to ensure that the measures' detrimental impact on poorer households is mitigated for.

Seb Dance MEP

- C1.22 Mr Dance MEP strongly supports the introduction of the ES in October 2017. He also supports residents continuing to be liable for the ES at the discounted rate of £1 during the ULEZ 'sunset' period and the exemption for historic vehicles. He supports the inclusion of L-Category and 9+ seater vehicles in the scheme.
- C1.23 Mr Dance supports bringing the ULEZ forward to 2019. He states that the daily charge for light vehicles in an expanded zone should be the same as that for light vehicles in the central zone at £12.50. He strongly supports the expansion of the ULEZ to Londonwide for heavy vehicles in 2019. He also states that taxis should be included in the air quality proposals. He would like part of the revenue raised to fund a scrappage or retrofit programme for taxis. He states that retrofit technology is available for as little as £200 per vehicle, and this could significantly reduce NO_x tailpipe emissions.

C2. Boroughs

City of London Corporation

- C2.1 The City of London Corporation supports the principle of the ES but suggests that taxis and PHVs should be included in the scheme. They suggest that the residents' discount would not encourage compliance and a sliding scale of charges throughout the 'sunset period' should be considered. They support, in principle, the early introduction of the ULEZ in 2019 and the expansion of the zone Londonwide for HGVs.

Kingston and Sutton Shared Environment Service

- C2.2 The Kingston and Sutton Shared Environment Service supports the ES, the introduction of the ULEZ in the CCZ in 2019 and the expansion of the ULEZ up to the North and South Circular Roads, which they believe could be implemented in 2020. They believe the daily charge for the inner London ULEZ should be lower than £12.50. They support a Londonwide expansion of the ULEZ for heavy vehicles in 2020. They suggest the potential for a

gradation of discounts be explored for residents who live just outside whatever ULEZ boundary is implemented.

London Borough of Barking and Dagenham

- C2.3 The London Borough of Barking and Dagenham believes that the proposals to improve air quality do not go far enough. They believe that the ULEZ should be expanded to cover all vehicles Londonwide and should be introduced before 2019. They believe that implementation of the ULEZ for all vehicles up to the North and South Circular Roads will increase congestion immediately outside the boundary and fail to tackle pollution on roads such as the A12 and A13.
- C2.4 The Council believes that under the current charging proposals, heavy vehicles are charged too much in comparison to diesel cars, which, as a group, are responsible for a larger proportion of emissions. They believe that discounts for residents are too generous and will do little to discourage use of private vehicles.

London Borough of Brent

- C2.5 The London Borough of Brent supports the introduction of the ES, including the ES standards and the charging level, however they suggest the scheme should operate 24 hours a day, seven days a week. The Council supports the early introduction of the ULEZ in central London from 2019, but has concerns about the expansion of the zone up to the North and South Circular Roads. As the expanded zone would cut through the borough, they believe this could have negative impacts on residents and businesses. They suggest that the boundary should be reviewed to incorporate other town centre areas outside the proposed zone which suffer from high levels of NO₂ concentrations.

London Borough of Camden

- C2.6 The London Borough of Camden supports the introduction of the ES and suggests that the scheme should be operated 24 hours a day, seven days a week, and should adopt a Euro 5/V standard for diesel vehicles. The Council therefore calls on the Mayor and TfL to reassess the current age limit for taxis in London, and also to reassess the proposals to give taxis exemption from the ES. It believes if the 15-year age limit is retained, including taxis in the ES would help encourage taxi drivers to move towards newer and less emitting vehicles.
- C2.7 On the ULEZ, the Council supports an early introduction of the scheme in central London from 2019 and supports the widening of the ULEZ scheme, suggesting that it could be extended Londonwide for all vehicles whilst adopting the current proposed emission standards. For both the ES and the ULEZ, the Council supports the residents' discount being introduced at the start of the scheme, but suggests that it should reduce throughout the 'sunset period'. The Council supports the Mayor's call for a national scrappage scheme.

London Borough of Croydon

- C2.8 The London Borough of Croydon strongly supports the ES and the earlier implementation and expansion of the ULEZ. They request that Low Emission Bus Zones on London Road and in Croydon town centre be introduced if the Londonwide expansion does not occur. They request further work on the extension of the tram network.

London Borough of Ealing

- C2.9 The London Borough of Ealing supports the proposals for the ES, but raises concerns about the proposed exemptions for PHVs, historic and Showman's vehicles and the discounted rate for residents. They support the Londonwide expansion for heavy vehicles and bringing forward the central zone to 2019 and request monitoring data for this. They support an expansion of the ULEZ for all vehicles, but would like this to be considered for all of London.
- C2.10 The Council requested further detail of the impact of the North and South Circular Road boundary and associated modelling. They raise concerns with the Euro standards and request that the Mayor works with government to investigate more robust methods of testing and enforcement. They state that the standard for motorcycles should be raised to Euro 4 in line with other petrol vehicles. They welcome the proposals for buses and request that a Low Emission Bus Zone be introduced on Haven Green. They request that the Mayor investigates encouraging smaller vehicles over larger vehicles in London.

London Borough of Enfield

- C2.11 The London Borough of Enfield believes the ULEZ for all vehicles should be expanded to cover all of London and does not support its expansion only up to the North and South Circular Roads. The Council believes that this would displace traffic onto local roads and lead to poorer air quality in the borough. The Council broadly supports the ES but believes it should be supported by a national diesel scrappage scheme. They believe it should operate 24 hours a day, seven days a week, rather than just during Congestion Charge zone hours, and that residents should not be subject to a discount. They support the earlier introduction of the ULEZ subject to exemptions and support, in particular for small businesses.

London Borough of Hackney

- C2.12 The London Borough of Hackney supports the ES and a Londonwide expansion of the ULEZ but calls for a clear roadmap to set out the types of vehicles to be affected over time and a clear commitment to progressively strengthening emissions standards to achieve compliance within a reasonable timescale. The Council supports the introduction of an ES in October 2017 but believes it should operate 24 hours a day, seven days a week, to reduce pollution resulting from the night time economy. They suggest that the residents' discount should be gradually reduced during the 'sunset period' and support the inclusion of the L-Category vehicles, 9+ seater vehicles and PHVs in the ES scheme. They suggest the standard for

diesel vehicles should be Euro 5/V, as this will have a much more positive effect on the air quality in central London.

- C2.13 The Council supports bringing forward the introduction of the ULEZ to 2019 and its extension for all vehicles beyond the Congestion Charge zone, but to a Londonwide boundary. They state that a boundary based on the North and South Circular Roads would have limited Londonwide impact. The Council requests that air pollution issues are tackled on a more ambitious level, and suggests that the scheme could be introduced gradually with progressive increases in charges in time or by area. The Council strongly supports the overall principal of expanding the ULEZ Londonwide for heavy vehicles, but believes the scheme should effectively be applied to all private vehicles and all roads.
- C2.14 The Council suggests that other measures should be considered including a ban on all diesel vehicles within London, VED retention, workplace parking levies, and reductions in parking spaces. It would support a diesel scrappage scheme for the worst polluting vehicles but suggests that this might not be best value for money and that investment in alternatives such as cycling and walking might be preferable.

London Borough of Hammersmith & Fulham

- C2.15 The London Borough of Hammersmith & Fulham (LBH&F) believes that more action is required to tackle poor air quality across the Capital. They support the instruction of the ES but suggest that the ES standard should be set at Euro 5/V for both petrol and diesel engines. They further suggest the Mayor reviews the proposed exemptions (taxis, PHVs, historic and Showman's vehicles etc) to realise the full benefits of the scheme.
- C2.16 The LBH&F supports plans to include the borough within the ULEZ, although, similarly to their views on the ES, they do not support the proposed exemptions. They further suggest that the ES standards should be stricter and that further incentives for electric vehicles should be put in place to encourage their uptake. They state that more should be done to encourage active travel in order to reduce non-tailpipe emissions such as brake, clutch and tyre wear.

London Borough of Haringey

- C2.17 The London Borough of Haringey supports the introduction of the ES but believes it should be in force 24 hours a day including weekends. They do not support the residents' discount for the ES. They believe the ES should be related to the emissions of the vehicle rather than the Euro standards and should differentiate between petrol and diesel vehicles. They support bringing forward the ULEZ to 2019 and, in principle, the extension of the ULEZ up to the North Circular Road. They propose an extension of Low Emission Bus Zones to some of the borough's busiest roads. They support the idea of a diesel scrappage scheme and propose the Mayor investigates a boiler scrappage scheme.

London Borough of Havering

- C2.18 The London Borough of Havering welcomes the Mayor's prioritisation of air quality and supports the principle of the ES proposals. However, they are keen to develop a further understanding of the impact that the proposals would have on outer London in relation to volumes of traffic and the effect on parking spaces and key interchanges and junctions.
- C2.19 The Council also supports, in principle, bringing forward the implementation of the ULEZ to 2019 and the extension of the ULEZ boundary up to the North and South Circular Roads. They urge that TfL undertakes to ensure that residents and businesses understand how these proposals affect them at the earliest possible opportunity.
- C2.20 The Council also points to specific areas of concern within the borough, such as Gallows Corner, where congestion and traffic pollution require specific intervention and redesign to yield improvements. They highlight the need to improve public transport links, including improved bus links and cleaner buses in support of air quality measures.

London Borough of Hounslow

- C2.21 The London Borough of Hounslow agrees with the principle of the ES from October 2017 and the early introduction of the ULEZ in 2019 in central London. They support extending the measures to all polluting vehicles to deliver the most effective emissions reductions in inner and outer London. They believe that the extended ULEZ boundary for all vehicles should include the North and South Circular Roads and operate 24 hours a day, seven days a week. They express concerns that the proposed extended ULEZ boundary for all vehicles of up to the North and South Circular Roads would create a potential obstacle to residents making intra-borough journeys into Chiswick, if their vehicles are non-compliant with the proposed emissions standards. They are also concerned that the proposed boundary will cause traffic displacement and exacerbate poor air quality in and around Chiswick and Brentford.
- C2.22 The Council suggests that a number of different charging zones or 'cordons' could be created which could even extend outside the boundary of the M25. They strongly oppose the exemptions and the discount for residents of 90 per cent and suggest that any discount should be reduced on a sliding scale over a period of two to three years.
- C2.23 The Council requests that more work is done to lobby the Government to improve air quality with complementary measures such as raising taxes on diesel fuel, diesel cars and vehicles, in order to encourage and incentivise the use of alternative fuels and hybrid vehicles. The Council also requests that TfL and bus operators fulfil their obligations and replace heavily polluting and old diesel buses with diesel/electric hybrids.

London Borough of Islington

- C2.24 The London Borough of Islington supports the introduction of the ES but believes fewer vehicles should be exempt. They also believe the ES should apply 24 hours a day, seven days a week rather than only during the hours of the Congestion Charge. They support an earlier introduction of the ULEZ and its expansion, and state that the ULEZ should be introduced at least as far as the North and South Circular Roads by 2019 at the latest. They support calls for the ULEZ to be expanded to cover the whole of London. The Council supports the introduction of ULEZ standards for heavy vehicles across the whole of London by 2019 at the latest.

London Borough of Lambeth

- C2.25 The London Borough of Lambeth supports the introduction of the ES but suggests that it should be set at a daily charge of £12.50 and operate 24 hours a day, seven days a week. They oppose the residents' discount for the ES but support all other proposed exemptions. The Council believes that the ULEZ should be introduced in central London as soon as possible, but they have requested more information on the expansion of the scheme up to the North and South Circular Roads. They raised concerns about the borough being segregated by the proposed expansion and requested further information about enforcement. They believe that a standard charge for the ULEZ should be applied to light vehicles. They support proposals for a national scrappage scheme to help small businesses and diesel drivers comply with the introduction of the ES and the ULEZ.

London Borough of Lewisham

- C2.26 The London Borough of Lewisham is supportive of the proposed measures, although they believe the ULEZ should be expanded to cover all of London for all vehicles. On the ES they wish to understand the modelling, the financial impact and possible support to businesses and residents. They support the introduction of the ULEZ in the CCZ in 2019 but seek assurances on the modelling and financial impact of the measures and the mitigation actions to be put in place.
- C2.27 The Council would only support expansion of the ULEZ as far as the South Circular if highway assignment modelling proves that air quality would not be worsened anywhere else in the borough (including the South Circular itself) as a result. The Council would only support the introduction of the ULEZ in 2019 up to the North and South Circular Roads if analysis showed the financial burden on residents and business was not too great. The Council would expect any revenue generated from charging schemes to be used to fund public transport infrastructure, in particular the Bakerloo line extension.

London Borough of Redbridge

- C2.28 The London Borough of Redbridge supports the ES proposal and the principal of introducing the ULEZ in central London in 2019, instead of 2020. However, they only support the extension of the ULEZ if the Mayor meets the cost of upgrading the Council's vehicle fleet, where their vehicles do not

meet the ULEZ emissions standard, or provides more time for the Council to comply.

- C2.29 The Council opposes the extension of the ULEZ up to the North and South Circular Roads as they do not believe that this will adequately address the vehicle emissions problem and may cause further congestion. They are concerned that the extension of the ULEZ to the North and South Circular Roads for all vehicles may not deliver the best air quality results for Redbridge residents. They are also concerned that the A12 may be used as a boundary (or free route) for extending the ULEZ, increasing congestion and air pollution in their borough.
- C2.30 The Council supports the extension of the ULEZ for all vehicles to the boundary of the existing Londonwide LEZ. They are of the view that this boundary is supported with adequate camera technology to ensure enforcement of the ULEZ standards for all vehicles across all of London including Redbridge. They state that a uniform approach to the ULEZ across London would be more effective in addressing the substantial contribution of vehicle NO₂ emissions to the regional exceedance problem.
- C2.31 The Council supports a diesel vehicle scrappage scheme, the proposal that TfL double-decker hybrid buses would be delivered a year early and the implementation of 'clean bus corridors' (now called 'Low Emission Bus Zones').

London Borough of Richmond upon Thames

- C2.32 The London Borough of Richmond upon Thames supports measures to improve air quality, drawing attention to its own Air Quality Action Plan and stressing that measures proposed by the GLA should support this. The borough raises concerns over local traffic impacts from the proposed extended ULEZ boundary for all vehicles. They are concerned about the potential for increased traffic on the South Circular in addition to site traffic from new developments. The borough would therefore like to see detailed traffic modelling and assurances that traffic impacts are not being displaced or increased.
- C2.33 The Council also raised concerns over displaced traffic and increased pollution levels in Richmond and Twickenham town centres as these would be outside the extended inner London ULEZ. They also questioned what infrastructure would be required to enforce the ULEZ at Kew Gardens. They also raised concerns about the impact of increased road journey demand from the new Heathrow runway and questioned whether this should be included in a separate emission zone.
- C2.34 The Council requested for other pollutants to be considered as part of the consultation, noting that the current increase in NO₂ was caused by a drive to decrease CO₂. They support the use of low emission buses and suggested that buses that travel through town centres with high NO₂ concentrations be prioritised for early upgrade. They also argued that a better enforced LEZ would deliver better outcomes, capturing areas of high pollution that a ULEZ may not.

London Borough of Southwark

- C2.35 The London Borough of Southwark supports the introduction of the ES in 2017. The Council supports the proposals to expand the ULEZ and its earlier introduction, but believes the ULEZ should cover all of London for all vehicles. The Council supports exemption for 9+ seater vehicles, but opposes exemptions for historic vehicles.

London Borough of Tower Hamlets

- C2.36 The London Borough of Tower Hamlets strongly supports the introduction of a £10 ES in the central Congestion Charge zone and supports the £12.50 ULEZ charge. They strongly support expanding the ULEZ to inner London as this would mean that the whole of the borough would be included in the zone. It would also mean that all its residents would benefit from the residents' discount, which they strongly support. Whilst they support bringing the ULEZ forward to 2019, they state that this should include the extension up to the North and South Circular Roads to prevent non-compliant vehicles diverting onto the highly polluted Commercial Road, which is located on the edge of the Congestion Charge zone. They also support extending the ULEZ Londonwide for heavy vehicles in 2019 using the LEZ boundary.
- C2.37 The Council raised concerns over the fixed river crossing and the possibility of creating an exempt corridor. If this were the case, they stated that they would not support using the Blackwall Tunnel as this would create a protected corridor and increase pollution in the area. They call for further information and assessment in the next consultation, including the modelling of displaced traffic and its impact on air quality outside of the zone, a cost benefit analysis of all proposals and an equalities impact assessment to review demographics. They would also welcome further analysis on the impact on small businesses and the emissions implications and a diesel scrappage scheme for small businesses.

London Borough of Waltham Forest

- C2.38 The London Borough of Waltham Forest supports any action to improve air quality and health, but sees the ES as a milestone rather than a concrete improvement in itself.
- C2.39 The Council supports residents' liability for the ES, however they are concerned that the surcharge will negatively impact those on lower incomes as they are most likely to have older vehicles. They would support a yearly reduction to the residential charge to lessen the impact on those with lower incomes. They suggest including taxis in the charge. In principle, they support the early implementation of the central ULEZ and the expansion of the ULEZ. However, they are concerned that the current boundary would increase traffic displacement, congestion and pollution in Waltham Forest. Therefore, it would prefer including the North and South Circular Roads and extending the boundary to the M25.
- C2.40 The Council felt that this would create a clearer boundary for the ULEZ and prevent a protected corridor on the North and South Circular Roads and on

the A12. They call for TfL and the GLA to improve pedestrian and cycling infrastructure and to ring-fence some of the revenue from the ES and the ULEZ to reduce the pollution exposure of at-risk schools. They would also like the GLA and TfL to take ownership of the charging network for electric vehicles.

London Borough of Wandsworth

- C2.41 The London Borough of Wandsworth is generally supportive of the earlier introduction of the ULEZ and welcomes the ES to help reduce NO_x emissions and improve public health. However, they note that the limited reduction in NO_x emissions in combination with the number of exemptions and discounts may limit possible benefits from the scheme. They state that the Mayor should invest in public transport and active travel, lobby the Government for a diesel scrappage scheme and promote the Office for Low Emission Vehicles grant to help reduce the cost of purchasing low emission vehicles and mitigate the impact of the scheme on small and medium enterprises (SMEs). They note that concerns from its response to the previous consultation still exist, particularly over the ULEZ boundary. They are also concerned about the impact on residents, SMEs and the borough's vehicle fleet.
- C2.42 The Council supports a Londonwide ULEZ for heavy vehicles due to the health benefits, but questions the lack of information on compliance costs for businesses and requests that these are provided in future consultations. They are also concerned about supporting the ULEZ extension up to the North and South Circular Roads due to the lack of detail currently available and suggest that the M25 may be a more suitable boundary. They call for the full impacts of the scheme to be carefully considered and defined. They state that more information on NO₂ compliance should be provided for the 2017 statutory consultation and that a clear boundary should be defined. They also suggest alternative policies, including a diesel scrappage scheme, a change to VED and other vehicle regulations, be considered.

Royal Borough of Greenwich

- C2.43 The Royal Borough of Greenwich welcomes the Mayor's commitment to improve air quality across the Capital and supports the proposed ES in October 2017 as well as the implementation of an extended ULEZ in 2019. However, they strongly oppose the proposed extension of the ULEZ up to the North and South Circular Roads for all vehicles and believe it should be Londonwide so that the zone covers the whole of the Royal Borough of Greenwich. They also believe that the North and South Circular Roads would not present an obvious and easily understood boundary and are concerned about additional congestion from traffic crossing the South Circular in Woolwich to the North Circular in Newham.
- C2.44 The Council strongly supports a Londonwide ULEZ for HGVs, however they note that confusion may be caused between the upgraded GLA-wide LEZ and the existing and proposed changes to the ULEZ. They also welcome

policies which focus on improving emissions from buses and support the Mayor's proposals for a diesel scrappage scheme.

Royal Borough of Kensington and Chelsea

- C2.45 The Royal Borough of Kensington and Chelsea supports the earlier implementation of the ULEZ in 2019 and the Londonwide ULEZ for heavy vehicles, as well as the expansion of the ULEZ up to the North and South Circular Roads. They support the principle of the ES but have reservations on the current proposal to treat petrol and diesel vehicles equally; they propose some degree of differentiation between petrol and diesel to send a clear public signal on diesel emissions.

Westminster City Council

- C2.46 Westminster City Council states that the proposals will not be sufficient for achieving adequate air quality in central London, but welcomes efforts to improve it. They note that air quality plans are currently being developed or revised in London and nationwide and highlight that boroughs cannot be held responsible for not reaching local air quality standards. They state that public awareness of air quality in London has increased, but some aspects are not widely understood.
- C2.47 The Council felt that the ULEZ and the ES rely too heavily on Euro standards that have not delivered the desired emissions savings and call for a more robust, evidence supported approach. They call for the Mayor to be clear about how and why the measures are being applied and suggest a change to VED to discourage the use of diesel. They highlight that they have been trialling their own local parking plans including a diesel surcharge. They also state that the emissions initiatives being introduced by different levels of government may cause confusion.
- C2.48 The Council supports a £10 charge for the ES starting on 23 October 2017; however they question the inclusion of petrol vehicles in the scheme. This is because they suggest that pre-Euro 4 petrol vehicles could be a cheaper alternative for replacing older diesel vehicles and that reducing emissions from diesel vehicles should be prioritised. They support the 90 per cent residents' discount, but welcome further discussion about how to implement the long discount period. They also have concerns about exempting PHVs and do not support exempting taxis. They suggest that ULEZ revenue should be ring-fenced for sustainable travel infrastructure. They also call for the 2017 consultation to include a cost benefit analysis and more information on local air quality benefits, in order to understand the impact of different options.

C3. Other local authorities

Hertfordshire County Council

- C3.1 Hertfordshire County Council supports measures to improve air quality in London, although requests further detailed information on the proposals to extend the ULEZ up to the North and South Circular Roads. They also raised concerns that the expansion may generate additional traffic in their county.

London Councils

- C3.2 London Councils supports the overall principle of the ES, but believes it should apply 24 hours a day, seven days a week, without any exemptions and a sliding scale of discounts for residents. They believe a Euro 5/V diesel standard would be more appropriate. They support bringing forward the ULEZ to 2019, and note the majority support of boroughs for expanding the ULEZ Londonwide for all vehicles. They raise some concerns about the impact on the North and South Circular Roads from a scheme that only extends up to these roads, instead of Londonwide. Further details on the impact of and rationale for the boundary are requested.
- C3.3 They raise concerns about the use of the Euro standards as a basis of the ULEZ because of poor real-world driving performance. They would like to see any revenue ring-fenced for the promotion of sustainable travel and measures to improve air quality. They support a diesel scrappage scheme and reforms to VED to discourage the use of diesel, alongside more measures to improve the infrastructure for walking, cycling and public transport. They believe that there should be more alignment of health, transport and green infrastructure policies.

C4. Government organisations

Association of Directors of Public Health for London and the London Environment Directors' Network (joint response)

- C4.1 The Association of Directors of Public Health for London and the London Environment Directors' Network strongly support the proposals and urge that they are implemented as soon as possible, and with minimal exemptions. They wish consideration to be given to a ban on diesel vehicles and request that schemes should be Londonwide to avoid unintended consequences of diverting traffic. They request that further consideration is given to the impact of construction and development on air pollution and that additional action is taken to promote active travel.

London Fire Brigade

- C4.2 The London Fire Brigade supports measures to improve air quality in London and has already taken steps to replace vehicles to ensure that they are compliant when the ULEZ is introduced in 2020. Should the implementation

date be brought forward to 2019, there would be 52 vehicles in their fleet that would not be compliant.

C5. Academic

Imperial College London

- C5.1 Imperial College London supports the ES in 2017, and the expansion of the ULEZ up to the North and South Circular Roads with implementation in 2019. They support the expansion of the ULEZ for heavy vehicles Londonwide. Imperial suggests investigating reducing the ULEZ charges or relaxing standards for HGVs at night, to incentivise increased night time operations and re-timing of deliveries. They also highlight that smoother driving, with reduced acceleration and braking events, will reduce emissions and should form part of future actions.

University College London

- C5.2 University College London (UCL) welcomes the Mayor's efforts to improve air quality and supports the expansion of the ULEZ to include inner London in 2019. UCL also supports the Londonwide ULEZ for heavy vehicles to capture the most polluting vehicles. UCL have also taken a number of steps to encourage cycling and freight consolidation in order to lower their emissions.

C6. Business organisations/Business Improvement Districts (BIDS)

Better Bankside

- C6.1 Better Bankside supports the ES in 2017, and the expansion of the ULEZ up to the North and South Circular Roads with implementation in 2019. They support the expansion of the ULEZ for heavy vehicles Londonwide. Better Bankside would support efforts to ensure early compliance for PHVs and coaches, and encourage the uptake of low and zero emission vehicles.

Brewery Logistics Group

- C6.2 The Brewery Logistics Group opposes a residents' discount but suggests that one should be provided for HGVs. They oppose bringing forward the ULEZ to 2019 and suggest that more time is required to update fleets in order to comply.

Brixton BID

- C6.3 The Brixton BID supports the introduction of the ES, but feels that October 2017 is too early as people need more time to comply. They support residents continuing to be liable for the ES, at the discounted rate of £1, during the ULEZ 'sunset period'. They strongly oppose the exemption of

historic tax class vehicles and Showman's vehicles. They strongly support bringing forward the ULEZ to 2019 and expanding it up to the North and South Circular Roads. They believe that the daily charge should be lower than £12.50 for light vehicles. They also support expanding the ULEZ Londonwide for heavy vehicles in 2019.

Camden Town Unlimited

- C6.4 Camden Town Unlimited supports the ES in 2017 and implementation of the ULEZ in 2019. They support the expansion of the ULEZ up to the North and South Circular Roads in 2021, and support its expansion Londonwide for heavy vehicles from 2020. They believe that measures to assist small businesses in transitioning to electric or hybrid vehicles should be put in place.

CBI

- C6.5 The CBI highlights that London's air quality is vital to the Capital's attractiveness as a place to live, work and do business. They welcome the Mayor's proposals, but believe that they must be supported by clear and consistent policies and infrastructure that helps to maintain business growth. They highlight haulage companies as having to cope with a number of demands and regulations. They also highlight that other regulated emissions, such as PM, carbon monoxide, hydrogens and NO_x are tackled in a joined-up approach with CO₂.
- C6.6 The CBI would like Euro standard regulations 'future proofed' for when we leave the European Union. They state that businesses have geared up to a 2020 introduction of the ULEZ, and bringing this forward by a year will have both a financial and operational impact on all firms, particularly SMEs and those with specialist vehicles. They are concerned about the reduced resale value of non-Euro 6/VI vehicles.
- C6.7 The CBI states that key infrastructure barriers, such as charging points and hydrogen refuelling, must be addressed to increase greater take-up of low emission vehicles. Incentives should be considered to encourage the early adoption of cleaner and greener vehicles, including lobbying the Government for support for small and medium sized businesses to renew their fleet. They state that low emission regulations in the Capital are in line with regulations and policies across the country. They also suggest a strategy which looks at tackling high-carbon heating and at the River Thames as an underutilised piece of infrastructure that can be used to reduce the number of HGVs on the Capital's roads. They believe business and government should also be working together to reduce the number of vehicles on the road overall. This might include looking at re-timing and shared deliveries of goods or the role of disruptors.

European Rescue & Recovery Initiative

- C6.8 The European Rescue & Recovery Initiative (ERRI) supports the principle of measures to improve London's air quality. They believe that the introduction

of the ES in 2017 would be too early, and likewise for the proposed 2019 start date for the ULEZ, due to lack of available Euro 6/VI vehicles. They support the principle of expanding the boundaries of the ULEZ after 2021. The ERRI are concerned about the impact of the ULEZ proposals on recovery operators, and propose exemptions for recovery operators licensed through their voluntary Recovery Operators Licensing Scheme (ROLS).

Federation of Small Businesses

- C6.9 The Federation of Small Businesses would like to see air quality improvements, but not at a disproportionately high cost to business, damaging jobs, business viability and the economy as a whole. They feel that current charging mechanisms do more harm than good to London's competitiveness and that action should be taken before small businesses are priced out of London. Small business use large goods vehicles (LGVs), so differentiation should be made between essential and non-essential journeys.
- C6.10 They oppose bringing forward the ULEZ to 2019, as this doesn't allow for changes to fleets without significant cost hardship, possible business failures, jobs losses or even the loss of the business owner's home due to it being used to secure business lending. They would like to see a three-year 'sunset period' with a 90 per cent discount made available to small and micro businesses based in the areas covered by the ULEZ, similar to the one being suggested for residents. They would also like a scrappage scheme. They also point to a number of other cost increases that small businesses are currently, or will be, facing, including the forthcoming business rates revaluation in April 2017.

London First

- C6.11 London First supports measures to improve air quality in London and supports the introduction of an ES. They support the proposed changes to the ULEZ and welcome further information in further stages of consultation. London First suggests that more should be done to encourage low and zero tailpipe emission vehicles and that more should be done to encourage the use of public transport, cycling and walking to reduce emissions.
- C6.12 They make reference to the challenge for London's freight industry which they believe will have greater cost implications than for individuals. They also make reference to potential congestion in and around the North and South Circular Roads should the zone be extended and welcome further modelling work as part of future consultation. They suggest that the Mayor should review congestion beyond 2020, including reviewing the nature and scale of the Congestion Charging scheme.

New West End Company

- C6.13 The New West End Company supports the ES in 2017 and implementation of the ULEZ in 2019. They support the expansion of the ULEZ up to the

North and South Circular Roads in 2021, and support its expansion Londonwide for heavy vehicles after 2021.

Team London Bridge

- C6.14 Team London Bridge supports measures to improve air quality in London and suggests that walking and cycling should be promoted. They strongly support measures for the ULEZ but suggest that specific consideration should be given to Guy's Hospital with respect to the health needs of the patients.

British Vehicle Rental and Leasing Association (BVRLA)

- C6.15 The BVRLA supports the ULEZ generally but has concerns regarding the impact of bringing forward the requirement on SMEs, due to the lack of availability of second-hand Euro 6/VI vehicles. The BVRLA believes that any measures should not penalise diesel vehicles due to improvements in emissions from newer vehicles, and that there should not be conflict between climate change and air quality measures. The BVRLA proposes other air quality measures such as improving traffic flow and increasing the use of car clubs in London. The BVRLA supports a diesel scrappage scheme and suggests that the incentives behind a scheme could include car rental journeys or car club membership.

West End Community Network

- C6.16 The West End Community Network believes that it is essential that the Mayor acts to improve air quality in London. They therefore strongly support the Mayor's introduction of the ES in 2017 and the expansion of the ULEZ to the North and South Circular Roads in 2020. They also support the three-year 'sunset period' for residents, the exemption of historic vehicles and the exemption of 9+ seater vehicles.

C7. Businesses

Autogas

- C7.1 Autogas supports the ES in 2017, and bringing forward and expanding the ULEZ up to the North and South Circular Roads for all vehicles as well as Londonwide for HGVs in 2019. Autogas believes that Liquid Petroleum Gas (LPG) can play an important role in improving London's air quality. They suggest that the requirement for all newly registered taxis to be zero emission capable from 2018 will displace polluting diesel taxis to other parts of the UK, and highlight their work converting diesel taxis to LPG.

Calor Gas

- C7.2 Calor Gas supports the ES and the earlier introduction of the ULEZ in central London. They support the expansion of the ULEZ up to the North and South Circular Roads for all vehicles as well as Londonwide for heavy vehicles in

2020. They suggest that LPG can play an important role in improving London's air quality and highlight their work on a potential diesel to LPG conversion for taxis in London.

CEMEX

- C7.3 CEMEX supports the introduction of the ES in 2017, however it believes that the ULEZ should be introduced in 2020 or at the end of 2019 in order to give commercial drivers more time to comply. They are concerned about the effect the proposals will have on self-employed drivers who may not be able to afford to upgrade their vehicle. They therefore believe that future London targets should be planned in a way that works with the freight industry and manufacturers and provide longer lead times. This would involve working with manufacturers on vehicle specifications so that policies are aligned with vehicles that can be ordered in good time.

Direct Line

- C7.4 The Direct Line Group supports the proposed ES and the expansion of the ULEZ up to the North and South Circular Roads for all vehicles as well as Londonwide for HGVs. They support exemptions for recovery vehicles.

Doosan Babcock

- C7.5 Doosan Babcock supports our efforts to reduce air pollution from transport and requests further action and consideration of the pollution impact of decentralised energy.

Ford Motor Company

- C7.6 Ford opposes the ES, the earlier introduction of the ULEZ and the expansion of the ULEZ Londonwide for heavy vehicles.

Heathrow Airport Ltd

- C7.7 Heathrow Airport Ltd welcomes the new measures proposed by the Mayor to tackle poor air quality in London and supports extending the ULEZ from central London up to the North and South Circular Roads for all vehicles, as early as 2019. Heathrow Airport Ltd highlights its own plans to create a ULEZ for airport vehicles by 2025 and develop plans for an emission charging scheme for all vehicles accessing the airport.

John Lewis Partnership

- C7.8 The John Lewis Partnership supports the ES but believes it should operate 24 hours a day, seven days a week. They believe there should be no exemptions to the charge. They oppose bringing forward the ULEZ to 2019, but support its expansion up to the North and South Circular Roads for all vehicles as well as Londonwide for heavy vehicles in 2021.

Land Securities

- C7.9 Land Securities supports the ES in 2017, as well as bringing forward and expanding the ULEZ up to the North and South Circular Roads for all vehicles as well as Londonwide for heavy vehicles in 2019.

London City Airport

- C7.10 London City Airport welcomes the Mayor's measures to improve air quality in London including the early introduction of the ULEZ in central London. They raised concerns about the expansion of the ULEZ up to the North and South Circular Roads, stating that staff at the airport on early or late shifts need to drive because of the unavailability of public transport. They suggest that a discount should be offered to them.

The London Taxi Company (LTC)

- C7.11 The LTC is supportive of the Mayor's and TFL's focus on improving air quality in London and expresses support for bringing forward the introduction of the ULEZ to 2019, extending the boundary Londonwide for heavy vehicles, and extending the ULEZ boundary from central London up to the North and South Circular Roads for all vehicles as early as 2019. They support additional measures such as diesel scrappage and charging the most polluting private vehicles, but request more ambitious air quality measures.
- C7.12 The LTC suggests that improved infrastructure for cleaner vehicles is required, including dedicated charging facilities for taxis in the right locations. They state that commercial operators cannot move to electric vehicles without dedicated charge points and encouragement for the uptake of zero emission capable vans. In addition, the LTC states that the private hire sector should follow the taxi sector's lead by meeting the same emissions standard by 2018 or be forced to pay the full range of congestion and emissions charges for entering central London. The LTC calls for a package of support and regulation to provide incentives and give drivers confidence to transition to zero emission capable and electric vehicles.

National Franchised Dealers Association

- C7.13 The National Franchised Dealers Association believes that the introduction of the ES in 2017 would be too early. They support the expansion of the ULEZ up to the North and South Circular Roads for all vehicles from 2021 but are opposed to extending it Londonwide for HGVs. They support the exemption of 9+ seater vehicles.

Royal Mail Group

- C7.14 The Royal Mail Group's vehicle fleet is largely made up of diesel vehicles and it has been purchasing Euro 6/VI vehicles to date, with life expectancies to 2025. They request that this date is carried forward for these types of vehicles. They request financial assistance from the Government including for a national scrappage scheme.

The Crown Estate

- C7.15 The Crown Estate supports the introduction of the ES, and the earlier introduction and expansion of the ULEZ. They believe that reducing traffic levels and congestion is also key to improving London's air quality.

UKLPG

- C7.16 UKLPG supports the objective of addressing air pollution and the Mayor's plans to introduce an ES for older polluting vehicles. UKLPG also supports the idea of a national diesel scrappage scheme and VED retention to aid these proposals. UKLPG notes that electric vehicles have a limited capacity to address London's immediate air quality concerns and suggests that greater use of LPG Autogas powered vehicles offers an immediate mid-term solution to transition from the worst polluting vehicles on London's roads to cleaner sources. They also advocate the conversion of existing diesel taxis.

Volvo

- C7.17 Volvo has no concerns regarding the implementation of the ES. They are concerned that the earlier introduction of the ULEZ in the CGZ would negatively impact on users, in particular van operators given that the introduction of Euro 6/VI for vans was in 2016. For Londonwide ULEZ standards for heavy vehicles, and the expansion of the ULEZ up to the North and South Circular Roads, they believe Euro 5/V could be used from 2019 with Euro 6/VI introduced in 2022. Volvo highlights the air quality consultation progressing in parallel with the upcoming consultation on direct vision standards, and highlights that both plans may involve changes in 2019/2020.

Waitrose

- C7.18 Waitrose supports the ES but believes it should operate 24 hours a day, seven days a week. They believe there should be no exemptions to the charge. They oppose bringing forward the ULEZ to 2019, but support its expansion up to the North and South Circular Roads for all vehicles as well as Londonwide for heavy vehicles in 2021.

C8. Coach and bus operators

BYD UK

- C8.1 BYD UK strongly supports the introduction of the ES and the ULEZ, however they believe that the earlier start date and the extension of the ULEZ boundary need to be backed by more demanding emission goals to promote the movement to ultra low emission vehicles. They believe that the Mayor should adopt a framework of progressively increasing incentives for genuine zero emission vehicles and impose penalties for combustion engines on commercial and private vehicle owners.

- C8.2 BYD UK supports the ambitious plans for low emission buses, taxis and PHVs, however they believe that these standards do not go far enough to improve London's air quality. They are therefore calling on TfL to make all single and double-decker buses entering London zero emission capable, to eliminate emissions from taxis and PHVs and introduce a charge for all non-zero emission vehicles entering London.

Confederation of Passenger Transport UK

- C8.3 The Confederation of Passenger Transport UK is supportive of the principle of improving air quality in central London. They are opposed to the ES as it does not target the vehicles causing the most pollution. They request that coaches that currently comply with the LEZ standards should be exempt from the ES. They are opposed to any proposals that bring forward the implementation of the ULEZ in central London from its planned date of 2020 as this does not provide sufficient lead-in time for the purchase of new vehicles or the retrofit of existing Euro IV and V vehicles as no certification scheme currently exists.
- C8.4 They request a moratorium for vehicles for which retrofit equipment has been ordered but that is yet to be delivered. Exemptions for wheelchair accessible coaches are requested. They are opposed to the expansion of the zone in 2019 and request that this be delayed until 2020 at the earliest, with temporary exemptions for operators running contracted services for educational private hire contracts, as the cost of running these services will become uneconomical and a shift towards private car use may occur as a result. They request financial support for operators running educational contract services akin to those provided for taxis. They also raise concerns around how the scheme will be enforced and request clarification on how compliant vehicles will be identified.

Ealing Community Transport Charity

- C8.5 Ealing Community Transport (ECT) supports the Mayor's vision to improve the quality of the air and the health of Londoners including the introduction of the ES and the proposals for the ULEZ in central London. Due to the specialist nature of the vehicles used in their fleets, ETC normally operates a 10 year vehicle replacement programme for accessible minibuses. ECT urges the Mayor to consider a longer transition period for the extension of the ULEZ up to the North and South Circular Roads or a longer transition before the ULEZ charges apply to specialist accessible minibuses. ECT suggests that the proposed implementation date for a wider ULEZ would disproportionately affect vulnerable groups in society.

FirstGroup

- C8.6 FirstGroup states that bringing forward the introduction of the ULEZ to 2019, from 2020, would have a marginal effect on their commercial service operations. However, the proposed options for the extension of the ULEZ boundary are a cause of concern. They believe that extending the ULEZ from central London to Londonwide for heavy vehicles as early as 2019

would render some commercial bus services economically unviable. This is on the basis that some relatively new vehicles (three to five years old) which are not currently being considered for replacement would need a costly conversion to meet Euro 6/VI standards. First believes that it is likely that this cost would be passed on to passengers, and service frequency reduced to relieve part of the cost burden. This would also be the case for commercial services entering a Londonwide ULEZ for only a very small portion of their journey, such as services to Heathrow Airport from outside of the Greater London boundary.

- C8.7 First requests that exemption is considered in such cases. First requests that further clarification is provided on details of a Euro 6/VI equivalent through using commercially available retrofit technology, and asks for a requirement that TfL buses are subject to retrofitting to the same standards and timelines, to ensure that commercial services are not subject to an unfair competitive disadvantage. First suggests that extending the ULEZ from central London up to the North and South Circular Roads for all vehicles would have a similar, though less costly impact on commercial bus services. They suggest that the congested conditions in which vehicles often operate will mean that the full benefits of the reduced emissions from Euro 6/VI vehicles are unlikely to be realised.

HCT Group

- C8.8 HCT Group supports the principle of improving London's air, but states that proposals could negatively impact community transport users who are vulnerable. They suggest that an exemption should be offered to community transport providers.

London Tourist Coach Operators Association

- C8.9 The London Tourist Coach Operators Association (LTCOA) supports the ES. They support the proposed expansion of the ULEZ up to the North and South Circular Roads for light vehicles and Londonwide for heavy vehicles, but from 2023 at the earliest for heavy vehicles. The LTCOA are neutral regarding the earlier introduction of the ULEZ in central London, but highlight potential challenges to its members in purchasing compliant vehicles.

National Express

- C8.10 National Express considers achieving a concerted shift away from cars and to public transport fundamental to meeting air quality targets, and believes that the ULEZ must place greater emphasis on traffic management and congestion reduction. National Express would like to see the ULEZ implemented in 2020 as originally set out, with a five-year lead time for any extension of its boundary. They consider 2019 to be too tight a timescale for implementation due to low availability of compliant vehicles, and call for clarity regarding Euro V retrofit solutions.
- C8.11 National Express believes that the approach to emissions reduction should be more nuanced, and suggest that charging structures for the ES and the

ULEZ could be based on emissions per passenger. They state that vehicles such as coaches can reduce air pollution by taking cars off the road. They believe that expansion of the ULEZ Londonwide for heavy vehicles in 2019 would not incentivise mode shift. However, they would not be opposed to expansion of the ULEZ after 2020, and highlighted the opportunity of bringing Heathrow Airport into the zone in the future.

The Original London Sightseeing Tour

- C8.12 The Original London Sightseeing Tour supports the ES but believes the proposed implementation date is too early. They oppose bringing forward the start date for the ULEZ but support its expansion up to the North and South Circular Roads for all vehicles and Londonwide for HGVs after 2021.

C9. Environmental groups

Clean Air in London

- C9.1 Clean Air in London calls for an emissions-based road user charging scheme to make London fossil fuel-free by 2030. As part of this, they believe that diesel should be banned in the most polluted places in London from January 2020 and from all of London by 2024. There should be no discounts or exemptions from Congestion Charging for PHVs, residents or other vehicles. Penalties for violating the ban could include points on licences, impounding vehicles or jail for persistent offenders. They also urge London to comply fully with the World Health Organization (WHO) guidelines for air quality and the science-based targets to achieve the most ambitious goals for greenhouse gas reductions set by the Paris Agreement, including setting and reporting on indicators to deliver this.

ClientEarth

- C9.2 ClientEarth supports the proposals to introduce the ES and make changes to the ULEZ, but believes these measures should go further to ensure compliance with the air quality legal limits in the shortest timeframe possible. They state that the ES should apply to all diesel cars or all diesel vehicles if technically feasible. Higher charge levels should also be considered. They believe that the Mayor and TfL should also look at the feasibility of a zero emission zone in the CCZ.

Climate Change Centre Reading

- C9.3 The Climate Change Centre Reading made suggestions including using traffic regulation measures to prohibit unnecessary idling and introducing car free-days.

Environmental Industries Commission

- C9.4 The Environmental Industries Commission suggests that consideration should be given to businesses needing to update their fleet in order to comply with the ULEZ proposals, in particular the use of retrofit technologies.

Environmental Protection UK

- C9.5 Environmental Protection UK welcomes the Mayor's efforts to improve air quality and they support the ES. They request information as to whether it will lead to compliance with the requirements of the Air Quality Directive in the shortest possible time as recognised in the recent ClientEarth High Court case. They are supportive of the principles of an earlier introduction and expansion of the ULEZ, although state that the scheme must be thoroughly developed and the complexities and impact of its implementation must be fully investigated and understood.
- C9.6 They raise concerns about the expanded zone not worsening air quality on the North and South Circular Roads. They also state that the Woolwich Ferry would not be an appropriate boundary for an inner London ULEZ. Further detail is sought on the impact of the boundary with regards to the boroughs it divides. On the Londonwide expansion for heavy vehicles they raise concerns that referring to this as a ULEZ will create confusion with the inner and central London ULEZ. They also state the scheme should be kept under review due to concerns about the effectiveness of the Euro 6 diesel standard for cars.

Friends of the Earth

- C9.7 Friends of the Earth supports the proposals for an ES and an earlier and extended ULEZ but believe the measures should go further to ensure compliance with the air quality legal limits in the shortest timeframe possible. They would like all diesel cars, and possibly diesel vehicles to be included within the charge, with no exemption for PHVs, and the introduction of the ULEZ in 2018, across the widened zone. They state that the ULEZ should be Londonwide for all vehicles and that a stronger standard in central London should be considered. London should phase out diesel by 2025 in line with other cities.
- C9.8 They state that complementary action is needed to reduce vehicle movements including freight consolidation and improvements to walking, cycling and public transport. They state that Silvertown Tunnel and additional road crossings should be cancelled and replaced by non-road crossings. They support a diesel scrappage scheme and call on the Government to restrict the sale of diesel and introduce measures to discourage the uptake of diesel vehicles.

Greenpeace

- C9.9 Greenpeace strongly supports the proposals to introduce the ES and bring forward and expand the ULEZ. They believe exemptions should be avoided except in the case of necessity. They state that the expanded ULEZ should

be brought in as soon as possible, although for vehicles with less cleaner alternatives or the ability to switch to public transport this could be at a later date than for cars. In addition, they suggest a ban on diesel by 2025, including diesel Euro 6/VI vehicles purchased after a certain date in the charge, a scrappage scheme allowing free public transport or subsidised access to car sharing, a lower level charge for all vehicles except the cleanest to help meet CO₂ targets, a reduction in taxi and PHV numbers and a daytime ban on private vehicles in central London, making it a zero emission zone.

Institute of Air Quality Management

- C9.10 The Institute of Air Quality Management supports and welcomes the Mayor's efforts to tackle air pollution. They support the principle of the ES as an early signal, but would like to see a distinction between petrol and diesel vehicles, with either a lower petrol standard or a higher diesel standard. They support the principle of expanding the ULEZ, recognising the need to balance the benefits to the population with the costs to individuals and businesses. They raise some issues over the naming of the zone and the potential for confusion with Defra's Clean Air Zones, ultra low emission vehicles and the existing Low Emission Zone.

London Sustainability Exchange

- C9.11 The London Sustainability Exchange strongly supports the introduction of the ES and the expansion of the ULEZ, with it being implemented as soon as possible. They support a number of the 100 per cent discounts and exemptions, although they believe that the residents' discount is too high. They also believe that the ULEZ should be extended Londonwide for all vehicles in order to tackle a number of pollution hotspots, such as Heathrow Airport. They believe that more monitoring and modelling needs to be completed with Euro standards updated accordingly. They recommend a number of other supporting policies, such as improving electric vehicle infrastructure, as well as policies to encourage behaviour change and improve planning regulations.

The Air We Breathe

- C9.12 The Air We Breathe strongly supports the proposals. In addition they call for a ban on diesel by 2022 in central London and by 2025 across the wider ULEZ. They also call for more powers to fine idling vehicles.

C10. Freight organisations

DHL

- C10.1 DHL welcomes the opportunity to comment on the Mayor's proposals to improve air quality in London and agrees that reducing harmful emissions should be a top priority for the Capital and for cities across the UK. DHL supports the Euro 6/VI standard in principle, but notes the cost of expanding

the zone and implementing it early to businesses, due to an increased spend on vehicles to ensure compliance. The company called for sustainable regulatory incentives to support return on investment and noted the current complex regulatory systems of environmental charging zones, TfL and borough regulations and parking and delivery constraints.

- C10.2 DHL suggests a temporary discount to the Congestion Charge for compliant vehicles and the reduction of other road freight costs such as reforming the London Lorry Control scheme, improving loading facilities and increasing access to bus lanes over private cars in off-peak hours. DHL also calls for a nationwide alignment of cleaner air initiatives and claims that proposals such as Cycle Superhighways and land use planning could impact congestion and air pollution. They also state that alternative fuel vehicles are more expensive to buy and that incentives should be provided for operators as a separate matter due to their current niche status.

Freight Transport Association

- C10.3 The Freight Transport Association (FTA) accepts the introduction of the ES and welcomes the inclusion of smaller vehicles. The FTA does not support the introduction of the ULEZ in 2019 without a significant increase in support for the industry, in particular small operators, to comply.

Road Haulage Association

- C10.4 The Road Haulage Association supports the proposed ES, but is opposed to the earlier introduction of the ULEZ. They oppose expansion of the ULEZ up to the North and South Circular Roads. They state that Euro VI HGVs will be on course to be adopted by 2019 and further regulation will not be necessary.

UPS

- C10.5 UPS welcomes the Mayor's proposals to improve air quality in London and agrees that reducing harmful emissions should be a top priority for the Capital and for cities across the UK. UPS generally supports the overall extension of the ULEZ and reducing emissions, but would prefer to maintain the 2020 start date as businesses have been working to that timescale and it also fits in with Defra's creation of Clean Air Zones.
- C10.6 The company supports the ES for non-Euro IV vehicles and supports Euro VI diesel as the minimum compliance standard because this aligns with the emissions standards for Clean Air Zones. UPS suggests that the lack of charging capacity may be preventing private investment in electric vehicles and draws attention to its own investment in charging infrastructure in Kentish Town, plus other difficulties of private investment in vehicle charging. Finally, the company urges the Mayor to consider how an increased vehicle charging infrastructure can be achieved.

C11. Health organisations/charities

Age UK London

- C11.1 Age UK welcomes the Mayor's plan to improve air quality in London. They are part of an initiative to encourage older people to take outdoor exercise, particularly walking and highlight the risk to this health benefit due to air pollution, especially in poorer areas.

British Lung Foundation

- C11.2 The British Lung Foundation (BLF) believes that extensive and ambitious action is needed to bring London's pollution to a safe level. They support the introduction of the ES to target the oldest and most polluting vehicles and the implementation of a wider ULEZ. The BLF suggests that the ES should apply to all polluting vehicles from October 2017 and that standards should be increased progressively to ensure that quick change is effectively encouraged, particularly during any 'sunset period'.
- C11.3 In addition, the BLF states that the ES should apply based on actual emissions, rather than the purpose of the vehicle, and expresses concern that vehicles with 9+ seats may be exempt from the charge. Nevertheless, the BLF urges that care should be taken so that those who have pre-existing health conditions who require use of a vehicle, but are not recognised as Blue Badge holders, are not penalised. The BLF supports the introduction of the ULEZ to central London in 2019. They also state that expansion to the boundary of the North and South Circular Roads should be the minimum considered, but that ideally the zone would be bounded by pollution modelling, and would take account of pollution hotspots and potentially vulnerable places.
- C11.4 The BLF also suggests that continued monitoring should take place in public areas such as schools to inform the assessment of the impact of the air quality measures and to enable additional actions such as public health alerts and health advice. The BLF requests that these measures are accompanied by a Londonwide public health campaign on air pollution and continued work to reduce usage of motor vehicles.

UK Health Alliance on Climate Change

- C11.5 The UK Health Alliance on Climate Change supports the introduction of the ES in 2017 and implementation of the ULEZ in 2019. They believe the ULEZ should be Londonwide, with emissions standards continuously strengthened.

UK Health Forum

- C11.6 The UK Health Forum supports the introduction of the ES and the proposed changes to the ULEZ scheme.

C12. Motoring groups

British Motorcyclists Federation (BMF)

- C12.1 The BMF feels that people need more time to comply with the ES. They strongly support the exemption of historic tax class vehicles and oppose including L-Category vehicles in the ES. They think the daily charge for the ULEZ in central London should be lower than £12.50 for light vehicles. They support expanding the ULEZ Londonwide for heavy vehicles, but feel it should be later than 2021. The BMF is concerned that the ULEZ would cover deprived areas of London where support staff such as cleaners live, and that they will be disproportionately affected by the charge and are less able to find a replacement vehicle. They would like motorcycles to be exempt from the charge in the interest of reducing congestion and social exclusion.

DAF Trucks

- C12.2 DAF Trucks understands that action needs to be taken to improve London's air quality. However, they believe that expanding the current Congestion Charge zone and increasing the charge for light vehicles would have more impact on air quality, congestion and road safety compared to the introduction of the ULEZ. They are concerned that the new ULEZ standards would have a significant financial impact on commercial fleets who may have upgraded their vehicles to a compliant Euro V model as recently as 2013. They state that the proposed charges for light vehicles and HGVs would encourage the use of more vans in place of fewer, more productive lorries. They also believe that a shift to zero emission goods vehicles requires financial incentives and that clear future timings for the introduction of a zero emission zone are required.

Motorcycle Industry Association

- C12.3 The Motorcycle Industry Association (MCIA) believes that charging motorcycles £12.50 to enter inner London under an expanded ULEZ would negatively impact on motorcyclists without improving air quality, and propose that motorcycles should be exempt from any expanded ULEZ. The MCIA would not support the Londonwide extension of the ULEZ for heavy vehicles if the ULEZ only covered the CCZ for other vehicles.

Motorcycle Action Group

- C12.4 The Motorcycle Action Group supports the development of policies to improve air quality that do not involve the introduction of new and additional road user charges. They argue that blanket taxes have the greatest impact on the poorest, many of whom ride cheap old scooters as the most sustainable mode for work or study, and have less impact on the rich. They state that Congestion Charging has failed to deliver a reduction in congestion and that London's Low Emission Zone charging scheme has failed to improve air quality. In their view, motorcycles and mopeds that are legally fit for UK should be exempt as they are part of the solution to the problem.

C12.5 They do not agree with the way pollution has been quantified in terms of deaths in London. They stress the importance of the efficiency of vehicular movement on London's roads being key to improving air quality. They would like traffic lights to be retimed for when there are fewer pedestrians. They attribute cycling and pedestrian infrastructure to an increase in air pollution. They also point to our own investigation of motorcycle emissions published in 2011, which they say proves that the use of motorcycles and mopeds has a positive role in helping to improve air quality and that their impacts are statistically insignificant.

National Association of Wedding Car Professionals

C12.6 The National Association of Wedding Car Professionals wishes to ensure that the exemptions for wedding cars secured previously for the ULEZ are continued in any revisions to the scheme. They would like to meet the Mayor or relevant officers to discuss this.

RAC

C12.7 The RAC agrees with the principle of targeting the most polluting vehicles via the ES, but believes people should be allowed an additional year to change their vehicle, or be given incentives. They say the ES standard should be Euro 3 for petrol rather than Euro 4. They agree that residents should be liable for a discounted surcharge throughout the ULEZ 'sunset period', but state that residents should be exempt from ULEZ thereafter.

C12.8 The RAC disagrees with the expansion of the ULEZ to the North and South Circular Roads on the basis that the air quality issues in these areas do not justify the additional impacts on residents and businesses and the cost of enforcement. They state that additional Low Emission Neighbourhoods that target the most polluting areas should be supported. They disagree with bringing forward the date of the ULEZ to 2019 and suggest that additional action could be taken on buses as an alternative. They request that roadside recovery vehicles should receive a 100 per cent discount for the ULEZ.

Society of Motor Manufacturers and Traders (SMMT)

C12.9 The SMMT recognises the challenge of air pollution, however they call for the Mayor and TfL to implement practical and feasible solutions to improve London's air quality. The SMMT supports the introduction of the ULEZ in the Congestion Charge zone in 2020 as this focuses on the areas with the greatest concentrations of NO_x and gives the public sufficient time to adapt or change vehicles.

C12.10 The SMMT is concerned that the modest emissions savings gained through the ES could be outweighed by the cost for vehicle users in London to comply. They are also concerned that the 2017 introduction date may not give sufficient time for consumers and businesses with fleets to adapt. The SMMT also believe that the implementation of the ES along with other phased changes to the ULEZ may be confusing to the public. They therefore

call on the Mayor and TfL to ensure the new measures are communicated in a clear and simple way.

C12.11 The SMMT highlights the importance of ensuring that new proposals are implemented in the wider context of other road transport initiatives so that manufacturers and suppliers can take a holistic view of vehicle provision and suitability. The SMMT welcomes further investigation into Londonwide ULEZ standards for HGVs, but believes that this should be supported by evidence of emissions savings. They also believe that a shift to zero emission goods vehicles requires financial incentives and that clear future timings for the introduction of a zero emission zone are required.

C12.12 The SMMT does not believe that a national scrappage scheme would be effective and believes that locally targeted policies, including measures to encourage fleet renewal under a national framework, would be more effective in reducing air pollution. They also suggest further proposals such as using motoring taxation and VED to reduce CO₂ emissions.

C13. Taxi and private hire organisations

GMB

C13.1 The GMB agrees that emissions in London are far too high and need to be lowered as a matter of urgency, however, it believes that the existing proposals are too farfetched. They are opposed to the ES as it will affect the poorest drivers and are opposed to any exemptions for commercial enterprises. They have concerns about the impacts of a ULEZ scheme that operates 24 hours a day, seven days a week, and which is expanded up to the North and South Circular Roads, but suggest a potentially expanded Congestion Charge scheme at peak times.

C13.2 They support the expansion of the ULEZ for heavy vehicles Londonwide as soon as possible. They request that Euro 5 PHVs should be exempt from the ULEZ. In addition, they suggest numerous alternative policy suggestions including but not limited to proposing certain types of battery, banning HGVs during the day to reduce congestion and emissions and improving safety for cyclists, considering smaller buses, higher charges for HGVs, rephrasing traffic lights and restricting the number of PHV drivers.

Licensed Private Hire Car Association

C13.3 The Licensed Private Hire Car Association (LPHCA) supports the introduction of an ES in principle, and supports expanding the ULEZ Londonwide for heavy vehicles, but is concerned about the impact on owners of specialist or converted vehicles in London and requests that the current exemptions for PHVs remain. The LPHCA supports a residents' discount and 'sunset period', an exemption for historic vehicles and Showman's vehicles, but feels that bringing the introduction dates forward isn't the best way to meet the objectives of an ES and ULEZ.

- C13.4 The LPHCA opposes the introduction of the ES in October 2017 as it believes more time is needed for users to meet the standards. Similarly, they believe that the early introduction of the ULEZ would penalise those drivers who are least able to afford to change their vehicles.
- C13.5 The LPHCA believes that more time is needed for vehicle manufacturers to make appropriate vehicles available and that there are other wide-ranging measures available that could be taken to improve air quality immediately. It expresses concerns that a penalty based system where users are unable to comply will not achieve the desired reduction in air pollution. As an alternative immediate measure, the LPHCA suggests that road space should be thoroughly reviewed to achieve air quality improvements.

Licensed Taxi Drivers' Association

- C13.6 The Licensed Taxi Drivers' Association (LTDA) supports the introduction of the ES in 2017, the introduction of the ULEZ up to the North and South Circular Roads in 2019 and across all of London for heavy vehicles. The LTDA believes that air quality in central London could be improved by capping the number of PHVs in central London, abolishing the Congestion Charge exemption for HGVs, and bringing forward the requirement for new PHVs to be zero emission capable to 2018 (in line with new taxis).

Private Hire Board

- C13.7 The Private Hire Board supports the principle of charging vehicles to improve air quality but believes the introduction of these measures is too soon and that they need to be offset by incentives and compensation to help affected vehicle owners. They do not support an early implementation of the ULEZ, but would support a later expansion if scrappage schemes were in place. They believe that PHVs should be exempt and that more infrastructure is needed to encourage the uptake of electric and hydrogen fuelled vehicles.

Uber

- C13.8 Uber is supportive of the ES and the expansion of the ULEZ for all vehicles up to the North and South Circular Roads. They raise some concerns with the proposal to bring forward the implementation of the ULEZ to 2019, stating that if there is insufficient charging infrastructure then non-compliant diesel PHVs are likely to switch to Euro 6 instead of electric vehicles. Additionally there are likely to be less affordable electric vehicles available in 2019 than in 2020. They request that wheelchair accessible PHVs should receive a similar 'sunset period' to disabled tax class vehicles to avoid incentivising car use. Further consideration should also be given to encouraging ridesharing to reduce congestion.

Unite the Union

- C13.9 The Cab Section of Unite the Union responded. Unite broadly agrees with the new proposals and fully supports the Mayor's initiatives to improve air quality in London. But there are three issues for which the Unite Cab Section

believes the Mayor could go further: extending the ULEZ to the whole of the GLA area, increasing the zero emission range for a zero emission capable vehicle to at least a 50 mile range and higher zero emission capable standards for PHVs.

C14. Transport campaign groups

Alliance of British Drivers

- C14.1 The Alliance of British Drivers (ABD) is opposed to the implementation of the ULEZ. The ABD believes the consultation is fraudulent and that the ES/ULEZ may be a money-making scheme for TfL.

Association of Vehicle Recovery Operators

- C14.2 The Association of Vehicle Recovery Operators opposes the ES, the earlier introduction of the ULEZ and the expansion of the ULEZ up to the North and South Circular Roads for all vehicles and Londonwide for heavy vehicles. They support exemptions to the ES for historic and Showman's vehicles, L-Category vehicles and minibuses. They ask that special consideration is given to specialist vehicles, including recovery vehicles, in any planned changes due to the high cost of equipment and the financial burden on recovery operators to change vehicles.

Campaign for Better Transport (London)

- C14.3 The Campaign for Better Transport supports the ES and potential expansions to the ULEZ, and also suggests that measures need to be taken to reduce emissions from air travel.

Community Transport Association

- C14.4 The Community Transport Association supports the Mayor's measures to improve air quality. However, they are concerned that the proposed ULEZ could limit community transport operators who may not be able to afford to upgrade their vehicle. They support the 100 per cent discount for Blue Badge holders for the ES but also believe that the discount should extend to vehicles that have a disabled tax class eg Dial-a-Ride.

Friends of Capital Transport Campaign

- C14.5 The Friends of Capital Transport Campaign supports the introduction of the ES and bringing forward the ULEZ to 2019. They support the extension of the ULEZ up to the North and South Circular Roads from 2020, and the expansion Londonwide for heavy vehicles from 2019. The Friends of Capital Transport Campaign believes that air quality should be improved through reducing the need to travel and improving public transport infrastructure.

Global Action Plan

C14.6 Global Action Plan believes that it is essential that the Mayor acts to improve air quality in London. They therefore strongly support the Mayor's introduction of the ES in 2017 and the expansion of the ULEZ up to the North and South Circular Roads in 2019. They support the three-year 'sunset period' for residents and the exemption of 9+ seater vehicles, but strongly oppose the exemption of historic vehicles. They also strongly support the expansion of the ULEZ Londonwide for HGVs by 2019. They believe that the emphasis should be on reducing emissions from HGVs, buses and taxis, as well wider supporting policies such as encouraging behaviour change and engaging with health professionals.

Living Streets

C14.7 Living Streets supports the ES and bringing forward the introduction of the ULEZ, but does not think that the existing measures go far enough. They would therefore like to see stronger action to reduce NO_x and other pollutants. It notes that proposals included in the current consultation, such as the resident and PHV exemptions, will reduce the impact of the ULEZ scheme. They claim that vehicle emission levels can be manipulated to pass tests and are worried that particulate matter emissions are not addressed. Moreover, it claims that 'clean diesel' is misleading and that cleaner diesel vehicles should not be encouraged.

C14.8 The organisation says that watering down the original proposals does not recognise the public mandate for change. In calling for a ban of all diesel vehicles and encouraging walking, cycling and public transport, Living Streets would like to see regular monitoring of air pollution and further action if levels do not decrease.

London Cycling Campaign

C14.9 The London Cycling Campaign supports the Mayor's aspirations to improve air quality in London and supports all of the proposals as set out in the consultation for the ES and the ULEZ, but would like to see all of the ULEZ proposals implemented in 2019. They suggest that more should be done to make walking and cycling more attractive to encourage modal shift.

The London Forum of Amenity and Civic Societies

C14.10 The London Forum of Amenity and Civic Societies welcomes the Mayor's proposal to introduce the ES and is supportive of the principles of the earlier introduction and expansion of the ULEZ. However, they believe that the boundaries need to be extended beyond the North Circular and especially the South Circular Roads to cover emissions hotspots further out, such as Heathrow Airport. They welcome the strengthening of the Londonwide Low Emission Zone for HGVs (extending the ULEZ Londonwide for heavy vehicles) as these vehicles are especially polluting. They support the introduction of low emission taxis and buses and the introduction of clean bus corridors.

C14.11 The London Forum of Amenity and Civic Societies also supports the Mayor's wish to have more control of VED, however it states that such powers would need to be clearly outlined. They also support the use of differential parking charges for low emission vehicles to deter the use of more polluting vehicles. However, they are against the introduction of a scrappage scheme as they believe that this rewards people who own more polluting vehicles.

London TravelWatch

C14.12 London TravelWatch strongly supports the objective of cleaning London's air. They feel that the best way to improve air pollution would be to reduce the volume of traffic. They would like a combined road user/pollution charge, and believe that the central area should have less exemptions/discounts and longer hours of operation. In the medium term, they suggest a charge tackling pollution and congestion could be introduced, and that a new road user charging regime could be introduced for PHVs to trial future schemes. They support cycling and walking initiatives, but are concerned they do not reduce traffic demand, and are to the detriment of other road users, leading to more congestion. They would like improved walking and cycling access to and from public transport, especially for short journeys.

C14.13 TravelWatch warns that we need to consider that electric vehicle charging points take away pavement space from pedestrians, reducing the minimum two metres as suggested by Department for Transport guidance. They are concerned about the lack of available coaches with compliant engines. They are supportive of bus priority routes. They would also like a commitment to electrify more rail lines, to reduce the need for polluting diesel trains.

Sustrans

C14.14 Sustrans highlights the urgent need to address the 'dire' air quality in London and supports introducing the ES as early as possible with minimum exceptions. With regard to the ULEZ, they support an early introduction in 2019 and the expansion of the zone to the North and South Circular Roads for all vehicles and Londonwide for heavy vehicles. Additionally, they call for expanding the ULEZ to Greater London by 2025, tackling pollution hotspots in outer London, banning diesel in London by 2025, expanding the ES area, and a strategy to promote active travel. Sustrans highlighted the importance of increasing walking and cycling and reducing motor travel and welcomed the Mayor's announcement of £770m of cycling investment. Finally, they noted the benefits of walking and cycling to mental and physical wellbeing and the local environment.

C15. Other

Cross River Partnership

C15.1 The Cross River Partnership welcomes the Mayor's efforts to improve air quality. They support the ES as a stepping stone to the implementation of the ULEZ and the wider proposals to bring forward and expand the ULEZ.

They suggest that revenue from the ES should be used to support residents and business in reducing emissions from travel and complying with the standards. They say that there should also be a focus on reducing the overall demand for travel through delivery and servicing plans and increasing active travel that the BIDs can help to deliver.

Ealing Transition Initiative

- C15.2 The Ealing Transition Initiative did not make any specific comments relating to the consultation proposals. However, they outlined their vision for the future of the borough including banning diesel emissions, changing to electric technology and reducing car ownership through car-pooling initiatives.

Federation of British Historic Vehicle Clubs

- C15.3 The Federation of British Historic Vehicle Clubs neither supports nor opposes the ES, or the early implementation or expansion of the ULEZ. They do wish to preserve the exemption for historic vehicles.

London Bus Museum

- C15.4 The London Bus Museum supports the Mayor's plans to introduce the ULEZ in inner London and believes that improving public transport and the use of low emission buses will help achieve better air quality. They also support the exemption of historic vehicles and would like this to be extended to all historic vehicles regardless of their taxation class. They strongly believe that reducing traffic congestion is important to improve traffic flow and London's air quality, and therefore welcome initiatives that reduce the number of delivery vans and lorries in central London during the hours of the Congestion Charge.

Musicians' Union

- C15.5 The Musicians' Union (MU) supports the Mayor's efforts to reduce pollution but has serious concerns about the impact of these proposals on its members. The use of a vehicle is often essential to members' work, particularly those who have to travel to work with large instruments. They are most often unable to pass the Congestion Charge on to the hirer. The MU notes that the relatively low incomes of musicians and the extra charges proposed in the consultation would therefore make it difficult for its members to replace older vehicles.
- C15.6 The MU believes that this would result in fewer musicians being able to work within the charging zone, which would have a cultural impact on central London. The MU proposes that the charge be waived or that perhaps a scale of charges be introduced for essential workers who have no choice but to travel by car.

National Association of Road Transport Museums

- C15.7 The National Association of Road Transport Museums supports measures to improve air quality, including the expansion of the ULEZ up to the North and South Circular Roads, the ES and the earlier implementation of the ULEZ. They strongly support the exemption for historic vehicles due to the educational and cultural importance of these vehicles. They are concerned that the consultation fails to highlight how little the total mileage of historic vehicles contributes to pollution and that this may lead to calls for their exclusion from the Capital. They are concerned that the Londonwide ULEZ will place an unnecessary short-term burden on vehicle operators.

Stephen Knight (Former Assembly Member)

- C15.8 Stephen Knight supports bringing forward the implementation date of the ULEZ to 2019 and its extension beyond the current Congestion Charging zone area. He supports the ES proposal, but suggests this charge should be gradually increased leading up to the introduction of the ULEZ to ensure a progressive implementation of the two proposed schemes. Mr Knight expresses concern that the current proposal for the ES unnecessarily introduces confusion into the system by having a different set of emission standards to the ULEZ.
- C15.9 Mr Knight suggests that the emissions standards proposed for cars should be revised to consider real life emissions, with Euro 6 diesel vehicles not considered as ultra low emission and that manufacturers should be incentivised to stop producing diesel cars. Reserving the 'ultra low emission' status for new zero emission plug-in or fuel cell electric vehicles is recommended and Mr Knight also supports increasing the number of parking spaces for electric vehicles allocated in new developments as part of the London Plan. Mr Knight opposes the exemption for PHVs from the ULEZ and the ES.

The Clapham Society

- C15.10 The Clapham Society welcomes the Mayor's proposal to introduce the ES and is supportive of the principles of an earlier introduction and expansion of the ULEZ. However, they believe that the boundaries need to be extended beyond the North Circular and especially the South Circular Roads to cover emissions hotspots further out, such as Heathrow Airport. They welcome the strengthening of the Londonwide Low Emission Zone for HGVs (extending the ULEZ Londonwide for heavy vehicles) as these vehicles are especially polluting. They support the introduction of low emission taxis and buses and the introduction of clean bus corridors.
- C15.11 The Clapham Society also supports the Mayor's wish to have more control of VED, however it states that such powers would need to be clearly outlined. They also support the use of differential parking charges for low emission vehicles to deter the use of more polluting vehicles. However, they are against the introduction of a scrappage scheme as they believe that this rewards people who own more polluting vehicles.

Urban Partners

C15.12 Urban Partners highlights the importance of air quality for its community and welcomes the Mayor's steps to improve it. They support the expansion of the ULEZ up to the North and South Circular Roads, as this would enable the inclusion of Euston Road, and they also support the earlier introduction date. They also encourage TfL to have widespread and early engagement with users so that people understand how they will be impacted by the scheme and can effectively plan ahead for the future. Urban Partners encourages healthier walking routes such as their 'Wellbeing Walk' route which avoids unhealthy and more polluted walking routes, and invites the Mayor to visit their website.

Appendix D: Consultation questionnaire

Part 1 – Emissions Surcharge

Q1: To what extent do you support or oppose the introduction of a new £10 Emissions Surcharge on the Congestion Charge to discourage the use of older, more polluting vehicles in central London to improve air quality and health?

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Don't Know

Q2: We are proposing that the Emissions Surcharge will start on 23 October 2017 as the earliest possible operational date for implementing the scheme. Do you agree with this implementation date?

- Yes
- No – People need more time to comply
- Don't Know
- I do not think the emission surcharge should be introduced at all

Q3: Following the start of ULEZ in central London, to what extent do support or oppose residents continuing to be liable for the Emission Surcharge, at the discounted rate of £1, during the ULEZ sunset period (for the first 3 years, while residents do not pay the ULEZ charge)?

- Strongly support residents continuing to be liable
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Don't Know

Q4: To what extent do you support or oppose the exemption of historic tax class vehicles?

- Strongly support
- Support

- Neither support nor oppose
- Oppose
- Strongly oppose
- Don't Know

Q5: To what extent do you support or oppose the exemption of Showmans vehicles?

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Don't Know

Q6: Do you support or oppose including L-Category vehicles (eg three wheeled vehicles and quadricycles) that currently pay the congestion charge?

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Don't Know

Q7: Do you support or oppose including 9+ seater vehicles, such as coaches, buses and minibuses?

- Support the inclusion of all 9+ seater vehicles
- Support the inclusion of coaches and buses only
- Support the inclusion of minibuses only
- Oppose the inclusion of all 9+ seater vehicles
- Oppose the inclusion of coaches and buses
- Oppose the inclusion of minibuses
- Neither support nor oppose
- Don't know

Part 2 – Bringing ULEZ forward to 2019

Q8: Do you support or oppose the idea of bringing forward the introduction of the central London ULEZ to 2019 to improve air quality and health?

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose
- Don't know

Part 3 – Expanding ULEZ to inner London

Q9: Do you support the overall principle of expanding ULEZ (up to but not including) the North and South Circular roads for all vehicles?

- Yes
- No
- Don't Know

Q10: When do you think the expansion of ULEZ (up to but not including) the North and South Circular roads for all vehicles should be introduced? Please choose the year you think would be most appropriate.

- 2019
- 2020
- 2021
- Later than 2021
- I do not support the expansion of ULEZ
- Don't Know

Q11: An expanded ULEZ will affect many more cars, vans and motorcycles. Do you think the daily charge for the ULEZ in inner London (between the Congestion Charge zone and the North and South Circular roads) should be the same or different to the current charge for the ULEZ in central London?

- The daily charge should be the same for light vehicles at £12.50.
- The daily charge should be lower than £12.50 for light vehicles.
- I do not support the expansion of ULEZ

Part 4: Expanding ULEZ Londonwide

Q12: Do you support or oppose the overall principle of expanding ULEZ London-

wide for heavy vehicles?

- Strongly support
- Support
- Neither support nor oppose
- Oppose
- Strongly oppose

Q13: When do you think the expansion of ULEZ London-wide for heavy vehicles should be introduced? Please choose the year that you think would be the most appropriate.

- 2019
- 2020
- 2021
- Later than 2021
- I do not support the expansion of ULEZ

Part 5 – Further comments

Q14: If you have any further comments about any of the proposals to improve air quality in London, please write these in the box below.

[Free Text Box]

Part 6 – About you

15. What is your name?

16 What is your email address?

This is optional, but if you enter your email address then you will be able to return to edit your response at any time until you submit it. You will also receive an acknowledgement email when you complete the consultation..(for online respondents only)

What is your postcode (of your home or business)?

18. In what capacity are you responding to this consultation?

- As an individual
- As a taxi (black cab) driver/owner
- As a private hire vehicle (PHV)/minicab driver/operator/owner
- As a representative of a Government Organisation
- As a representative of a business
- As a representative of a community or voluntary organisation
- As a representative of a campaign group

19. If responding on behalf of an organisation, business or campaign group, please provide us with the name:

20. If you have selected 'taxi or PHV' in the question above, please indicate which of the following best describes you.

- Taxi driver – All London driver
- Taxi driver – Suburban driver
- Taxi vehicle owner
- Private hire operator
- Private hire driver
- Private hire vehicle owner

21. How did you hear about this consultation?

- Received an email from TfL
- Read about the consultation on the TfL website

- Read about it in the press
- At the Regent Street Motor Show
- Through social media
- Other (please specify below)

22. What do you think about the quality of this consultation (for example, the information we have provided, any printed material you have received, any maps or plans, the website and questionnaire etc.)?

- Very good
- Good
- Acceptable
- Poor
- Very poor

Part 7: Travelling in London

23. What types of transport do you use in central London? (please tick all that apply)

- Vehicles for private use
- Vehicles for commercial use
- Taxi (black cab)
- PHV (minicab)
- Bus
- Bike
- Walk
- Tube

24. Do you drive in the Congestion Charge Zone, if so, how often?

- every day
- 3-6 days a week
- 1-2 days a week
- 1-2 days a month
- Less than once a month
- Never

25. Do you drive within the area inside the north and south circular roads?

- every day
- 3-6 days a week
- 1-2 days a week
- 1-2 days a month
- Less than once a month
- Never

Appendix E: Stakeholder meetings

Date	Event	Description	Stakeholder(s)
July 2016			
15 July	Campaign for Better Transport meeting	Catch up to discuss current planning issues	Campaign for Better Transport
21 July	Confederation of Passenger Transport UK meeting	Regular meeting	Confederation of Passenger Transport
25 July	BVRLA		BVRLA
August 2016			
10 August	Central Sub-regional panel	Regular meeting of borough officers and other reps for central London	Boroughs – central region
September 2016			
1 September	SMMT	Meeting with Deputy Mayor	SMMT
1 September	London First	Regular catch up	London First
6 September	Living Streets stakeholder meeting	Mayor's Transport Strategy (MTS) meeting with Living Streets	Tom Platt, Head of Policy and Communications; Jeremy Leach, Chair, Living Streets Group
8 September	West Sub-regional panel		London borough officers
8 September	Freight Forum Steering Group		Freight Transport Association (FTA), Road Haulage Association (RHA), Chartered Institute of Logistics and Transport, DHL, Rail Freight Group, London First, London Chamber of Commerce and Industry (LCCI), Federation of Small Businesses, London Councils
11 September	Independent Disability Advisory Group (IDAG)	Presentation to TfL's advisory panel	IDAG
13 September	Community Transport briefing	Presentation to regular Community Transport meeting	Community Transport Group representatives
16 September	London Travelwatch (LTW)	Meeting to discuss the MTS – air quality added to the agenda	LTW

Date	Event	Description	Stakeholder(s)
19 September	London City Airport meeting	Meeting to discuss the ULEZ expansion	London City Airport
20 September	SMMT Electric Vehicles Group	Plenary to discuss electric vehicles industry	Vehicle manufacturers, charge point manufacturers, operators, academics, government
22 September	Bus Network Seminar	Annual borough meeting to discuss bus issues	Borough leaders, officers, cabinet members
22 September	South Bank Employers' Group (SBEG)	Presentation at regular event for SBEG members	SBEG members
28 September	Recovery vehicles working group	Regular meeting with recovery vehicles industry	Vehicle recovery firms
29 September	LPHCA Road Show	Annual roadshow event	PHV operators and PHV trade associations
October 2016			
18 October	Consultation event	Breakfast briefing for launch of the consultation	Representatives from health, environment, business, freight, voluntary, boroughs, and MPs
06 October	Central panel	Regular meeting of borough officers and other reps for central London	Boroughs – central region
11 October	London Councils engagement group	Meeting to discuss widening/tightening the ULEZ	Boroughs, London Councils
12 October	Florence Eshalomi AM and Leonie Cooper AM briefing	Meeting with Labour leads for transport and the environment to discuss proposals	Assembly Members, researchers
12 October	Labour researcher briefings	Meeting with Labour researchers to discuss proposals	Labour researchers
25 October	BVRLA	Policy discussion about issues affecting the vehicle rental sector	BVRLA
13 October	London First	London First meeting	London First
14 October	Federation of Small Businesses (FSB)	Air quality meeting	FSB
17 October	Greener by Design	Royal Aeronautical Society's annual environmental conference	
21 October	Freight Forum	Meeting, hosted by TfL's Commissioner, of around	Freight industry including FTA, DHL,

Date	Event	Description	Stakeholder(s)
		60–80 stakeholders from across the freight and fleet industry, businesses and the boroughs	RHA; business including LCCI, London First, FSB; boroughs and the Department for Transport
November 2016			
2 November	Freight in the City Expo	TfL is the headline sponsor, and we have speakers and exhibition space	Freight and business
5 November	Regent Street Motor Show	TfL/Go Ultra Low have a section at the event to explain the ULEZ	Freight stakeholders
9 November	GLA Mayor's Transport Strategy event	Presentation from the Deputy Mayor followed by thematic workshops – including on the environment	Boroughs, business, academic, transport, environmental, accessibility
9 November	Transport Association dinner	Presentation on air quality initiatives	Freight operators
10 November	Future of London events series	External event on the future of transport which forms part of the MTS series	Boroughs, business, academic, transport, environmental, accessibility
11 November	Sub-regional mobility forum	Presentation on air quality	Boroughs
24 November	CBI Air quality briefing	Presentation on air quality	CBI, Uber, Gatwick Airport, G4S, SMMT, Royal Mail, Siemens, UPS, O'Donovan Waste Disposal, Ford, The Crown Estate
29 November	London Councils ULEZ event	Additional London Councils event to discuss boroughs' issues with the ULEZ	Borough transport officers and councillors from Hackney, Islington, Camden, Southwark, Redbridge, Waltham Forest, RBKC, Wandsworth, and Richmond
December 2016			
1 December	Business Improvement Districts policy briefing	Meeting with BID chief executives to discuss air quality	Cross River Partnership, Angel BID, New West End Company, Baker Street Quarter Partnership, Waterloo BID, Marble Arch BID, Better Bankside, Camden BID

Date	Event	Description	Stakeholder(s)
3 December	TfL's Youth Participation Day	Annual youth event which featured a panel discussion on the future of London as well as a workshop event on promoting active travel	Representatives of youth organisations, TfL Youth Panel, UK Youth Parliament, Whizz-Kidz etc
5 December	PHV meeting	Air quality meeting with the PHV trade	PHV operators and PHV trade associations
6 December	BVRLA roundtable		BVRLA members, car clubs, operators, BT, RAC Foundation, FTA, Royal Mail, John Lewis

Appendix F: Glossary of terms

Air pollutants: Generic term for substances emitted that have adverse effects on humans and the ecosystem

Auto Pay: Auto Pay is an account system that allows drivers to register with TfL and pay the Congestion Charge automatically each month via direct debit or a payment card

ANPR (Automatic Number Plate Recognition): A system which uses cameras to identify vehicles from their licence plates

CC (Congestion Charge), CCZ (Congestion Charging zone): An area in central London where a daily charge (£11.50) applies to vehicles using the zone Monday to Friday, 07:00 to 18:00

CO₂ (carbon dioxide): Principal greenhouse gas related to climate change

CCMES (Mayor's Climate Change Mitigation and Energy Strategy): Statutory document outlining the Mayoral plans to reduce CO₂ emissions and encourage renewable energy

Limit values: Legal maximum levels of atmospheric concentrations of air pollutants

Economic and Business Impact Assessment (EBIA): Assessment that identifies and assesses impacts on London's economy as a result of the ES, its potential impacts on small to medium sized enterprises (SMEs) and the monetised health benefits of the scheme

Environmental Impact Assessment (EIA): Assessment that identifies and assesses the impacts of the ES across a range of environmental issues including: air quality, noise, climate change, biodiversity, cultural heritage, landscape, townscape and the urban realm, material resources and wastes

Euro standards: Standards set by the European Union for the maximum emissions of air pollutants for new vehicles sold within EU member states. They range from Euro 1–6 for light vehicles, with 6 being the most recent and Euro I–VI for heavy vehicles

EV (electric vehicle): Vehicle which uses an electric motor for propulsion. Includes both pure electric vehicles that run solely from batteries and plug-in hybrid electric vehicles that have an attached petrol or diesel engine to power the battery engine

Equality Impact Assessment (EqIA): Assessment that identifies and assesses impacts on equality issues, in particular those groups of people with protected characteristics or who are socio-economically disadvantaged

Greenhouse gas: Gases that absorb heat, contributing to climate change. The most significant of which is CO₂

Health Impact Assessment (HIA): Assessment that identifies and assesses impacts of the ES on the health and wellbeing of the population of Greater London

and the ability to access health-related facilities and services. The assessment also addresses equalities issues and thus has some overlap with the EqIA

HGV (heavy goods vehicle): Type of truck weighing >3.5T

Integrated Impact Assessment (IIA): The IIA identifies and assesses the impacts and the likely effects on equality, the economy, and the environment arising from the proposed ES

LAEI (London Atmospheric Emissions Inventory): Database of emissions sources and information about rates of emissions for air pollutants emitted within and around London

LEZ (Low Emission Zone): A charging zone across most of Greater London for vehicles that do not meet emissions standards for PM₁₀

LGV (light goods vehicle): Also known as a light commercial vehicle; designed and constructed for the carriage of goods and weighing less than 3.5T

MAQS (Mayor's Air Quality Strategy): Statutory document outlining the Mayor's plans to reduce air pollution

NO_x (nitrogen oxides): A generic term for nitrogen dioxide (NO₂) and nitrogen monoxide (NO), which can form NO₂ in the atmosphere. Euro standards set limits for vehicle emissions of NO_x

NO₂ (nitrogen dioxide): A gas formed by combustion, identified as an air pollutant harmful to human health. The European limit values measure concentrations of NO₂ in the air

OLEV (Office for Low Emission Vehicles): Cross governmental office set up to support the development of the low emission vehicle sector

PHV (private hire vehicle): Licensed vehicles that are available for hire on a pre-booked basis. Also known as minicabs

Plug-in hybrid: A vehicle which combines conventional internal combustion and electric propulsion with batteries charged from an electric power source

PM (particulate matter): A mixture of various solid and liquid particles of various chemical compositions suspended in the air

PM₁₀ (particulate matter <10 microns in diameter): Particulate matter that is harmful to human health and subject to EU limit values

PM_{2.5} (particulate matter <2.5 microns in diameter): The smallest and most harmful form of particulate matter; also subject to EU limit values

Sensitive receptors: Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, housing for the elderly and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides, and other pollutants

Taxi (black cab): A specialist vehicle licensed by TfL to ply for hire in London. Most taxis are licensed to carry five passengers although some are licensed to carry six

VED (Vehicle Excise Duty): Annual charge levied for vehicles to use the public highway. Banded according to engine size or CO₂ emissions

Zero emission capable vehicle (ZEC vehicle): A vehicle that is constructed to be capable of operating in zero emission mode for at least part of its operating cycle. The zero emission mode may be augmented by an internal combustion engine configured to extend the driving range of the vehicle, either by propelling the driven wheels or by powering an on-board generator

Appendix G: Public and business free text analysis

Code	Count
Theme: Suggested supporting policy	4,355
Improve public transport	648
Improve provision for cyclists, eg more cycle lanes, cycle parking, extension of the Santander Cycles scheme	618
Support for low emission buses	425
Improve pedestrian environment, eg pedestrianisation, wider pavements	327
Ban idling	251
Improve provision for EVs, eg more EV charging infrastructure	246
Plant more trees and encourage wildlife	147
Address pollution from non-transport sources, eg diesel generators, home energy efficiency	143
Support measures to discourage single-occupancy vehicles, eg car sharing, shared taxi schemes, or higher charges for single-occupancy vehicles	107
Improve vehicles available to purchase	95
Convert all buses, taxis and HGVs to EVs	74
Introduce car-free days	66
Introduce incentives for using zero emission vehicles and public transport and for cycling as well as charges	66
Reduce the number of buses	66
Reduce traffic levels in London	59
Support consolidation centres for deliveries	52
Introduce local monitoring and displays of pollution levels	50
Support for low emission HGVs	46
Support for electric/low emission trains	44
Make parking more difficult, eg higher charges, fewer spaces, more enforcement	43
Introduce more park and ride schemes	39
Reduce off-peak bus frequency/size to ease congestion	39
Include charges for noise pollution	34
Ban/reduce/tax planes flying over London	30
Strict controls on roads by schools/hospitals etc	30
Introduce on-street vehicle emissions testing	28
Implement a Londonwide 20mph zone	27
Invest in alternative fuel research	27
Penalise manufacturers of polluting vehicles, not motorists	26
Introduce a marketing strategy to support modal shift	25
Stricter controls on construction	23

Code	Count
Support for electric trams	23
Improve education about the dangers of pollution	22
Support for low emission delivery vehicles	21
Ban smoking in public spaces	20
Protect the green belt	20
Include a charge for cruise ships docked in London and stop increases in numbers	19
Introduce more traffic calming measures	19
Build more river crossings	16
Cap the number of vehicles a household can own or introduce an extra tax for more vehicles	15
Improve bus lanes	14
Utilise river and rail for freight	14
Extend HGV defective exhaust reporting system to non-HGVs	11
Install air filters in existing infrastructure	11
Promote sharing lifts to school/walking buses	11
Support for low emission coaches	11
Limit the number of times residents can use their car each month	10
Support for stop/start engine technology	10
Better enforcement of speed limits	8
Build bigger car parks by stations	8
Make public transport free	8
Encourage use of electric bikes	7
Increase taxation of company cars	7
Reduce cut-throughs/rat running on residential streets	7
Set up a system to pay the ULEZ automatically	7
Impose a tax on new buyers of diesel vehicles	6
Reduce the number of coaches in central London	6
Support wider use of air masks	6
Encourage flexible working/school times	5
Encourage the use of petrol-electric hybrids	5
Ensure exhausts are at the top of large vehicles, eg HGVs and buses, to take pollution away from street level	5
Quantify aircraft pollution	5
Support use of cargo bikes	5
Assure good customer support for payment queries	4
Concern for personal safety on public transport	4
Force manufacturers to buy back polluting diesel vehicles	4
Improve London road connections	4
Increase the tax on diesel	4

Code	Count
Introduce a network of hydrogen filling stations	4
Make public transport free when pollution hits a certain level	4
Support 24/7 tube on all lines	4
Support carbon capture	4
Ban fireworks	3
Reduce red route speed limits	3
Support for low emission emergency service vehicles	3
Use DVLA records rather than having to register vehicles	3
Utilise tube at night for freight	3
Add a surcharge to road tax for the most polluting vehicles	2
Better rail access to Heathrow Airport	2
Do not introduce any new polluting ferries	2
Introduce a tourist tax	2
Introduce more Low Emission Neighbourhoods	2
Publicise the London ULEZ nationally for those who only drive into London occasionally	2
Stop taxis from using bus lanes	2
Support for low emission motorcycles	2
Advertise emissions of vehicles when sold, including for second-hand vehicles	1
Allow vehicles with three or more occupants to use bus lanes	1
Ban fires in gardens	1
Ban perfumed air	1
Ban revving of supercars	1
Ban sale of low quality diesel within the M25	1
Build more river crossings for public transport/pedestrians/cyclists only	1
Make it compulsory for all TfL staff to travel to work on public transport	1
Create dedicated car pool lanes	1
Create local hubs through planning policy reducing the need to travel	1
Display timers at traffic lights so drivers can turn off their engines	1
Extend the hours of bus lane restrictions	1
Extend Oyster Travelcard zones	1
Extend Westminster's tradesmen parking scheme	1
Focus on air quality on red routes	1
Increase housing density	1
Introduce a charge for dangerous vehicles eg with poor sight lines	1
Introduce a charge for empty properties	1
Introduce a TfL fitness tracker app linked to Oyster discounts	1
Levy fines on the most polluting vehicles	1
Oppose road based infrastructure development until the ULEZ is	1

Code	Count
implemented	
Restrict operation of London Heliport	1
Support a toll charge for the Blackwall Tunnel	1
Support supermarket deliveries in London	1
Tunnel the South Circular Road	1
Theme: Principle of a ULEZ	3,520
Support measures to improve air quality in London	1,126
Support introduction of a ULEZ	1,114
Oppose the ES	774
Support tougher measures on air quality than proposed	348
Oppose the ULEZ because emissions from the manufacture of new vehicles outweigh those saved from low emissions	128
Request for a long-term plan for the ULEZ to guide drivers transitioning to low emission vehicles	30
Theme: Discounts and exemptions	2,107
Support exemption for motorcycles	479
Oppose exemption for taxis and PHVs	153
Oppose residents' discount	117
Support exemption for private vehicles	116
Oppose any exemptions	97
Oppose exemption for taxis	96
Support exemption for historic vehicles	96
Oppose exemption for motorcycles	80
Support exemption for residents	65
Oppose exemption for buses	55
Support exemption for Blue Badge holders	55
Support residents' discount	51
Include aircraft in the ULEZ	50
Support exemption for petrol vehicles	45
Oppose exemption for PHVs	43
Oppose exemption for historic vehicles	39
Support exemption for EVs	30
Reduce the age cars have to be to qualify as historic	25
Support discount for historic vehicles	24
Oppose exemption for HGVs	21
Residents' discount should be lower	21
Support exemption for LPG vehicles	19
Support inclusion of river traffic	19
Discounts and exemptions are confusing/complicated	18
Oppose exemption for Blue Badge holders	17

Code	Count
Support exemption for charitable vehicles	17
Oppose exemption for diesel cars	16
Concern regarding abuse of exemptions, eg residents, disabled	15
Support exemption for camper vans	15
Support exemption for critical workforce eg nurses	14
Support exemption for emergency service vehicles	14
Support exemption for coaches	12
Support exemption for light vehicles	11
Support exemption for vehicles with 9+ seats	10
Oppose exemption for commercial vehicles	9
Support exemption for commercial vehicles	9
Support exemption for pensioners	9
Support exemption for school vehicles	9
Charges should only be for diesel vehicles	8
Support exemption for buses	8
Oppose exemption for diesel trains	7
Oppose exemption for private vehicles	7
Oppose exemption for river boats	7
Support exemption for hybrid vehicles	7
Include all vehicles, regardless of age	6
Oppose exemption for all vehicles with 9+ seats	6
Support exemption for roadside recovery vehicles	6
Oppose exemption for government cars	5
Oppose exemption for hybrid cars using their combustion engine	4
Support exemption for delivery companies	4
Support exemption for HGVs	4
Oppose exemption for coaches	3
Residents' discount should come in the form of an Oyster discount	3
Residents with Euro 6 diesel engines to be exempt	3
Support discount for vehicles with cycle safety devices	3
Support exemption for small city cars eg Smart car	3
Oppose exemption for hybrid vehicles	2
Oppose exemption for military vehicles	2
Oppose exemption for tax exempt vehicles	2
Support exemption for tax exempt vehicles	2
Support exemption for residents leaving London	2
Support exemption for tourists	2
Oppose exemption for plug-in hybrid electric vehicles (PHEVs)	1
Support discount for Blue Badge holders	1

Code	Count
Support discount for motorcycles	1
Support exemption for drivers under 21	1
Support exemption for cars still within their warranty period	1
Support exemption for diesel vehicles	1
Support exemption for horseboxes	1
Support exemption for PHEVs	1
Support exemptions for Reduced Pollution Certificate holders	1
Support short-term exemptions	1
Theme: Impact of proposals	1,823
Concern regarding the disproportionate impact on poorer people	1,010
Concern regarding the impact on small businesses	331
Concern regarding the impact of the ES on owners of older cars	158
Concern regarding the impact on elderly drivers	60
Concern regarding the impact of the ES on commercial/delivery drivers	51
Concern regarding increased pollution in outer London	40
Concern regarding the disproportionate impact on private cars	34
Concern regarding the impact on coach operators	34
Concern regarding the impact on disabled drivers	32
Negative impact on the second-hand car market	26
Concern regarding the disproportionate impact on diesel cars	19
Concern regarding the impact on carers	15
Concern regarding the negative impact on London's economy	8
Need to monitor the impact of the ULEZ to assess its effectiveness	3
Concern for an increase in van traffic due to the high charge for HGVs	2
Theme: Alternative policy suggestion	1,571
Improve traffic flow eg increase road space, reduce roadworks, reduce bus lanes, relocate cycle lanes, synchronise traffic lights	673
Oppose investment in cycle lanes as they cause congestion and worsen pollution	257
Encourage motorcycle use	159
Oppose Heathrow Airport expansion	118
Introduce incentives for low emission vehicles instead of a charging scheme	80
Stricter controls on cyclists eg road fund/licence/compulsory insurance	57
Limit London's economic and population growth	31
Oppose 20mph speed limits as they cause congestion and pollution	31
Oppose construction of Silvertown Tunnel	24
Remove speed humps	21
Higher tax for purchasing polluting vehicles instead of the ES	18
Offer incentives for businesses to be based outside central London/let	17

Code	Count
employees work from home	
Put the extra charge on fuel instead	17
Increase the number of car parking spaces	15
Oppose Garden Bridge	11
Make diesel more expensive than petrol	10
Oppose London City Airport expansion	9
Encourage use of petrol cars	6
Introduce charges UK-wide	4
Concern regarding pedestrianisation of Oxford Street	3
Support for stringent laws limiting polluting vehicles	3
Oppose Enderby Wharf construction	2
Introduce flying cars	1
Reduce rail and river travel	1
Stop High Speed Two (HS2) construction	1
Stop the London Lorry Control scheme	1
Use autonomous vehicles for deliveries	1
Theme: Timescales	1,436
Implement proposals as soon as possible	1,056
Need longer transition time for compliance	121
Change TfL-owned vehicles to zero emission first	53
Implement later, due to Brexit	31
Lengthen the 'sunset period' for residents	29
Speed up programme of replacing diesel buses	23
Lengthen the 'sunset period' for commercial vehicles	22
Charges should only apply to cars bought after the introduction of the ULEZ	19
2019 is too soon to expand the ULEZ up to the North and South Circular Roads	15
Implement for commercial vehicles first	13
Do not bring implementation forward to before 2020	10
Introduce charge for diesel vehicles before petrol	10
Lengthen the 'sunset period' for diesel vehicles	5
Reduce the 'sunset period' for residents	5
HGVs should be given more time to comply	4
Implement the ULEZ in central London to check it works before expanding	4
Phase-in charges for HGVs depending on company/fleet size	4
'Sunset period' should only be for three years from the date the ULEZ is announced	4
Introduce a rolling date for the exemption of historical vehicles	2
Change government vehicles to zero emission first	1

Code	Count
Focus on smaller vehicles first	1
Lengthen the 'sunset period' for small businesses	1
Oppose the 'sunset period' for residents	1
Phase-in stricter controls on emissions levels	1
Support for a 'sunset period' for people outside the ULEZ but within the M25	1
Theme: Costs	1,381
Concern that the ULEZ is another tax	889
Further increase in the costs of living	155
Concern that commercial drivers will pass on costs to consumers	150
Concern regarding the high cost of frequently buying new vehicles to comply	123
The ULEZ would make car owning prohibitively expensive	29
Concern over the cost of implementation	22
Costs of the ULEZ outweigh the small benefits	7
Car owners who purchased cars under the Euro 5 standard are unfairly hit due to higher car depreciation	6
Theme: Ban vehicles	1,217
Ban diesel vehicles	294
Ban polluting vehicles rather than charge	180
Ban non-EVs from central London	84
Ban diesel buses	82
Ban HGVs during peak times	70
Ban HGVs from London during the day	61
Ban private vehicles from central London	60
Ban non-EVs from London	49
Ban deliveries during the day	44
Ban diesel vehicles from central London	40
Ban odd/even number plates on certain days	26
Ban HGVs from central London	24
Check and ban cars with defective/modified exhausts	22
Ban private vehicles from school zones at pick up/drop off periods	19
Ban private vehicles	18
Ban vehicles from London	18
Introduce greater restrictions on HGVs	13
Ban private diesel vehicles from London	12
Ban private vehicles from central London during peak hours	11
Ban commercial vehicles at rush hour	9
Ban HGVs Londonwide	8
Ban coaches from inner London	7

Code	Count
Ban two-stroke vehicles	7
Reduce the number of HGVs in central London	7
Restrict the number of HGVs in the Congestion Charge zone during key commuting hours	7
Ban 4x4s, SUVs, and other large cars from London	6
Ban vehicles within five blocks of Oxford Circus station	6
Ban HGVs from residential roads	5
Ban vehicles at peak times	4
Reduce the number of HGVs in London	4
Ban polluting vans	3
Ban pre-1997 vehicles from London	3
Ban diesel vehicles over five years old	2
Ban non-residents or delivery traffic from the ULEZ	2
Ban use of company cars	2
Ban diesel HGVs	1
Ban diesel vehicles during peak times	1
Ban HGVs from the North/South Circular Roads unless delivering to inner London	1
Ban LGVs from London on Sundays	1
Ban non-EVs from parks eg Hyde Park, Richmond Park	1
Ban tourist buses	1
Ban use of low cost red diesel	1
Ban vehicles over five years old	1
Theme: Charging levels	967
ES should be determined by emissions of a car not by age or size	297
Support higher charge for diesel vehicles	125
Support charge for all diesel vehicles regardless of age	93
Support higher rate for the ES	84
Oppose the daily surcharge, should be a per mile charge	57
Charge vehicles based on size	38
Support higher charge for HGVs	37
Oppose a 24/7 ULEZ	27
Support higher charge for 4x4s	25
Support higher charge for commercial vehicles	22
Make it clear what the charges will be for each vehicle before they are introduced	19
Support higher charge for buses	14
Suggest higher charge in central Congestion Charge zone than in inner London	13
Support a 24/7 ULEZ	12

Code	Count
Support higher surcharge for more expensive vehicles	12
Concern that impractically high charges could endanger the success of the scheme	10
Support for a reduced charge for HGVs travelling at night	10
Support higher charge for private vehicles	9
Support a lower rate for the ES	9
Charges to rise when pollution levels are higher (similar to Uber system)	8
Charge should be means tested	7
Charge should increase over time	6
Support higher charge for coaches	6
Support charge for diesel trains	5
Charge commuters from outside London to enter outer London	4
Support same charge level for all vehicles	4
Charge HGVs more during peak hours	3
Support higher charge for construction vehicles	3
Levy an additional charge on vehicle purchases to support low emissions policies	2
HGVs to have a yearly licence rather than paying daily	1
Higher charge for those driving through London	1
Only charge the ES in the inner zone during peak hours	1
Oppose lower charge for outer London	1
Support higher charge for two-stroke vehicles	1
Support the same charge for the central Congestion Charge zone and inner London	1
Theme: Boundary	963
ULEZ should be Londonwide (to M25)	307
Oppose expanding the ULEZ up to the North and South Circular Roads	189
Support expanding the ULEZ up to the North and South Circular Roads	125
Concern about increased traffic and pollution at the boundary	81
Support inclusion of the North and South Circular Roads within the ULEZ	75
Extend zone to include Heathrow Airport	25
Support for an extension further south than the South Circular Road	25
Support a Londonwide ULEZ for HGVs	24
Unfair to have different rules in London to the rest of the UK	17
Oppose Londonwide ULEZ	13
Support expanding the ULEZ up to the North and South Circular Roads for HGVs only	13
Concern about rat-running if the North and South Circular Roads are included in the ULEZ	11
ULEZ should be UK-wide	11

Code	Count
Extend the ULEZ to A roads eg A40, A4	10
Boundary should be chosen according to air quality readings	8
Include a transition area for those living on the border who do not get a discount	6
North Circular Road extends much further than the South Circular	6
The ULEZ central zone should extend further west	6
The Blackwall Tunnel and access road should be exempt	3
The Congestion Charge zone and the ULEZ are becoming too complicated	3
Support inclusion of the South Circular Road but not the North Circular	2
Support a Londonwide ULEZ for vehicles with 9+ seats	2
Utilise old Inner London Education Authority (ILEA) boundary to prevent cutting through boroughs	1
Theme: Financial assistance	789
Support shift to EVs with subsidised cars, tax breaks, ability to use bus lanes, free parking, free charging points etc	260
Support car scrappage scheme	218
Revenue raised from charging should be used for projects to improve air quality, eg low emission technologies, tree planting, public transport, cycling	165
Support vehicle retrofit fund	62
Support financial assistance for commercial drivers/haulage companies to replace their vehicles	39
Support tax credit to ease financial burden	26
Revenue from charging should be used to improve roads	14
Provide evidence of where the revenue raised is spent	5
Theme: Taxis and PHVs	738
Support for low emission taxis/PHVs	366
Cap PHV numbers	144
Ban polluting taxis	116
Cap taxi and PHV numbers	37
Introduce a taxi scrappage/retrofit scheme	22
Limit the amount of time taxis can travel empty	11
Ban Uber	7
Cap taxi numbers	6
Increase number of taxi ranks/waiting areas for PHVs	6
Oppose exemptions for PHVs from outside London	5
Prevent taxis from using bus lanes	3
Support exemption for taxis	3
Concern regarding the impact on taxi drivers	2
Introduce an Uber-style demand-responsive system for taxis to reduce wasted miles	2

Code	Count
Make sure taxis are zero emissions capable by 2019	2
Support higher charge for taxis/PHVs	2
Allow PHVs to use bus lanes	1
Ban PHVs	1
Give taxis a 'sunset period' to comply	1
Support discount for taxis	1
Theme: Emissions standards	468
Concern that central government has promoted diesel vehicles in recent years, and is now penalising them	208
Concern regarding enforcement of standards eg MOT/manufacturers claims	130
ULEZ needs greater emphasis on reducing particulates and NO _x emissions	22
Ensure foreign vehicles comply	18
Ensure taxis and buses are tested thoroughly	13
Oppose using Euro standards as they do not reflect real-world conditions	10
Pollution created by electricity generation means EVs are not clean technology	10
Need more information on the effects of NO ₂	9
Concern that Euro 5 has been skipped and Euro 6 implemented instead	8
Make the cut-off date for old vehicles earlier than 2005	7
Ensure MOTs check emissions	5
Make the cut-off date for old vehicles later than 2005	5
Concern over the lack of Euro 6 vans available to buy	4
Ensure diesel vehicles are a minimum Euro 6 standard	4
All vehicles should be a minimum Euro 5 standard	3
Ensure petrol vehicles are a minimum Euro 4 standard	3
Diesel vehicles should reach the same emissions standard as petrol vehicles	2
Public transport should be compliant with more stringent restrictions than other vehicles	2
Should charge per emissions per passenger, not by vehicle type	2
Include tyre pressure tests in MOT to increase miles per gallon	1
Lower the diesel emission standard from Euro 6 to Euro 5 for the inner zone (up to the North/South Circular Roads)	1
Test diesel vehicles every six months	1
Theme: Comment on consultation	241
Criticism of consultation	108
Confusingly worded	81
Criticism of data used	52
Theme: Comment about the Congestion Charge	203

Code	Count
Support an increase in the Congestion Charge	55
Support an extension to the Congestion Charge zone	41
Oppose the Congestion Charge	29
PHVs should pay the Congestion Charge	25
Support a western extension of the Congestion Charge	15
Make the Congestion Charge 24/7	13
Oppose exemptions to the Congestion Charge	12
Oppose an extension to the Congestion Charge zone	7
Congestion Charge should target congestion levels not emissions	2
Combine the Congestion Charge and the ES so you only have to pay once	1
Drivers should have 48 hours to pay the Congestion Charge	1
Oppose the Congestion Charge exemption for motorcycles	1
Support an exemption for EVs	1
Not answered/Not relevant/Not providing an answer to a question	5,547
Duplicate response	26

Appendix H: Further analysis of campaign responses

(see following pages)

Summary of campaign responses

1. Transport for London (TfL) ran a public consultation from October – December 2016 regarding proposals for the Ultra Low Emissions Zone in London. Steer Davies Gleave analysed individual responses received to this consultation. In addition to the individual responses, TfL received two campaign responses via email. These campaigns were led by:
 - Healthy Air (955 responses)
 - Friends of the Earth (13,594 responses)
2. This memo summarises the responses received in each campaign.

Method

3. Each campaign had a standard response which the majority of respondents submitted. However, respondents had the opportunity to edit their response. Many responses were therefore very similar to the standard response, with some edits or additions; while a further group of responses were completely different from the standard response.
4. This memo shows the standard response for each campaign before providing a codeframe which summarises the points made in edited or additional responses. The same codeframe developed to analyse open responses received to the main consultation was used; additional codes were added if needed.

Healthy Air campaign

5. The Healthy Air campaign included a slightly adapted version of the closed questions from TfL's consultation. It included a new question at the start asking respondents if they suffer from a respiratory illness or condition, and it excluded questions four – six (regarding exemptions of certain vehicles). The following tables show the responses to these questions from the Healthy Air campaign¹:

Do you suffer from any sort of respiratory illness or condition?	Count	%
Yes	265	28%
No	690	72%
Total	955	100%

¹ Some percentages may not total 100%, due to rounding

How strongly do you support or oppose the introduction of a new £10 Emissions Surcharge on the Congestion Charge to discourage the use of older, more polluting vehicles in central London to improve air quality and health?	Count	%
Strongly support	890	93%
Support	48	5%
Neither support nor oppose	8	1%
Oppose	3	0%
Strongly oppose	3	0%
Don't Know	3	0%
Total	955	100%

The Mayor is proposing that the Emissions Surcharge will start on 23 October 2017 as the earliest possible operational date for implementing the scheme. Do you agree with this implementation date?	Count	%
Yes	928	97%
I do not think the emission surcharge should be introduced at all	6	1%
No – People need more time to comply	15	2%
Don't Know	6	1%
Total	955	100%

Following the start of ULEZ in central London, to what extent do you support or oppose residents continuing to be liable for the Emission Surcharge, at the discounted rate of £1, during the ULEZ sunset period (for the first 3 years, while residents do not pay the ULEZ charge)?	Count	%
Strongly support	863	90%
Support	39	4%
Neither support nor oppose	23	2%
Oppose	13	1%
Strongly oppose	6	1%
Don't Know	11	1%
Total	955	100%

Do you support or oppose including 9+ seater vehicles, such as coaches, buses and minibuses?	Count	%
Support the inclusion of all 9+ seater vehicles	897	94%
Support the inclusion of coaches and buses only	17	2%
Support the inclusion of minibuses only	4	0%
Oppose the inclusion of all 9+ seater vehicles	11	1%
Oppose the inclusion of coaches and buses	6	1%
Oppose the inclusion of minibuses	2	0%
Neither support nor oppose	5	1%
Don't know	13	1%
Total	955	100%

Do you support or oppose the idea of bringing forward the introduction of the central London ULEZ to 2019 to improve air quality and health?	Count	%
Strongly support	930	97%
Support	16	2%
Neither support nor oppose	2	0%
Oppose	1	0%
Strongly oppose	3	0%
Don't Know	3	0%
Total	955	100%

Do you support the overall principle of expanding ULEZ (up to but not including) the North and South Circular roads for all vehicles?	Count	%
Yes	921	96%
No	11	1%
Don't Know	23	2%
Total	955	100%

When do you think the expansion of ULEZ (up to but not including) the North and South Circular roads for all vehicles should be introduced? Please choose the year you think would be most appropriate	Count	%
2019	916	96%
2020	11	1%
2021	5	1%
Later than 2021	2	0%
I do not support the expansion of ULEZ	14	1%
Don't Know	7	1%
Total	955	100%

An expanded ULEZ will affect many more cars, vans and motorcycles. Do you think the daily charge for the ULEZ in inner London (between the Congestion Charge zone and the North and South Circular roads) should be the same or different to the current charge for the ULEZ in central London?	Count	%
The daily charge should be the same for light vehicles at £12.50	847	89%
The daily charge should be lower than £12.50 for light vehicles	90	9%
I do not support the expansion of ULEZ	18	2%
Total	955	100%

To what extent do you support or oppose the overall principle of expanding ULEZ London-wide for heavy vehicles?	Count	%
Strongly support	928	97%
Support	15	2%
Neither support nor oppose	2	0%
Oppose	7	1%
Strongly oppose	1	0%
Don't know	2	0%
Total	955	100%

When do you think the expansion of ULEZ London-wide for heavy vehicles should be introduced? Please choose the year that you think would be the most appropriate.	Count	%
2019	938	98%
2020	8	1%
2021	2	0%
Later than 2021	0	0%
I do not support the expansion of ULEZ	5	1%
Don't know	2	0%
Total	955	100%

Healthy Air standard response

6. The standard response from the Healthy Air campaign is shown in Box 1. 829 of the 955 total Healthy Air responses submitted this verbatim:

Box 1: Healthy Air standard response (829 responses)

“Dear Sadiq Khan

You have taken another big step in the right direction with this announcement. Thank you.

By focusing on road transport and in particular diesel vehicles, you are demonstrating that you understand the urgency of addressing this public health crisis. However, you need to go further and faster to meet your legal and moral obligations to protect the people of London from harmful air pollution.

I welcome your proposal to introduce an expanded Ultra Low Emission Zone in 2019. However, I would like to see other options on the table, such as expanding the zone to the whole of greater London and restricting access to central London to zero emission vehicles.

You should extend the T-charge (for the most polluting vehicles) to all diesel cars. You should also consider including all diesel vehicles if an analysis shows this would meet compliance with legal air pollution limits in the shortest time possible.

I urge you to seize this opportunity to put London on the path towards a cleaner, healthier and more sustainable future.

Thank you.”

Healthy Air additional responses

7. A further 126 responses either edited or added to the standard response, or comprised completely different text. The following table summarises these themes, more details of the codes within each theme are shown in the appended spreadsheet: Healthy Air codeframe.

Theme	Standard response	Edited or additional response	Total
Principle of a ULEZ	1,658	182	1,840
Ban vehicles	829	107	936
Boundary	829	97	926
Charging levels	829	90	919
Suggested supporting policy	-	48	48
Discounts and exemptions	-	20	20
Alternative policy suggestion	-	10	10
Financial assistance	-	9	9
Timescales	-	8	8
Taxi and PHV	-	5	5
Impact of proposals	-	3	3
Comment about congestion charge	-	4	4
Comment on consultation	-	2	2
Emission standards	-	2	2

Friends of the Earth campaign

8. The Friends of the Earth campaign only included a text response to the ULEZ proposals – there were no equivalent closed questions as with the Healthy Air campaign.
9. 12,920 responses were analysed as part of the Friends of the Earth campaign². It seems that Friends of the Earth provided options to respondents as there were several standard responses:
 - 5,130 were standard Friends of the Earth responses, matching verbatim the response in Box 2;
 - 870 had identical content to the standard Friends of the Earth response, although with a subtle change which does not affect the overall argument of the response (e.g. “Dear Mr Khan” or “Yours sincerely” added, or a change in punctuation). They were treated the same as the standard response.
 - A further 3,237 responses matched the standard Friends of the Earth response, but had a subtle change in emphasis that the ULEZ should apply to heavy goods vehicles, but not specifically at a Greater London scale. It is likely that Friends of the Earth may have altered the standard text at some point during the consultation, which would account for this. Box 3 highlights this change.
 - 765 responses were another standard response, with different text making slightly different points. This response is shown in Box 4.

² A further 674 responses were received, of which:

- 451 were duplicates – the response was identical and they contained the same contact information at the end of the response, and were hence removed;
- 203 were ‘archived’ – they appeared to contain a draft, incomplete response, often with incomplete contact information, and were hence discarded;
- 20 further responses were not relevant responses to this consultation and were also removed.

Box 2: standard response (5,130 responses plus 870 with minor edits)

"Dear Mayor of London Sadiq Khan,

Like you, I agree that tackling air pollution in London has to be a top priority and I'm glad for the opportunity to take part in your 'Clean up London's toxic air' consultation.

London is one of the worst cities in Europe for air pollution, and we need to change that - otherwise the death toll from air pollution will continue to rise.

I strongly agree with your proposal to introduce a new £10 Emissions Surcharge on the most polluting vehicles. This should be on top of the congestion charge and implemented in October 2017. Likewise I strongly support bringing forward the introduction of the Ultra Low Emission Zone to 2019. I agree with the proposal that it should go further out to the North and South Circular Roads at the very least. Additionally, the new ULEZ should apply to all trucks and lorries across Greater London.

If the most ambitious version is implemented at the earliest opportunity, it could stop the death toll from air pollution rising. We need to act fast to clean up London's toxic air.

Any proposals that are put in place to tackle air pollution need to be coupled with measures to ensure that the city is accessible, walking and cycling are supported, and the quality, cost and emissions of public transport are greatly improved. Where necessary we need to support small businesses with exemptions.

Everyone living and working in London should be helped to play their role in reducing air pollution.

Thank you for all your work so far. I look forward to seeing this plan in action."

Box 3: HGV edit response (3,237 responses)

"Dear Mayor of London Sadiq Khan,

Like you, I agree that tackling air pollution in London has to be a top priority and I'm glad for the opportunity to take part in your 'Clean up London's toxic air' consultation.

London is one of the worst cities in Europe for air pollution, and we need to change that - otherwise the death toll from air pollution will continue to rise.

*I strongly agree with your proposals to introduce a new £10 Emissions Surcharge on the most polluting vehicles. This should be on top of the congestion charge and implemented in October 2017. Likewise I strongly support bringing forward the introduction of the Ultra Low Emission Zone to 2019. **I agree with the proposal that it should go further by including heavy goods vehicles and expanding it out to the the North and South Circular Roads at the very least.***

If the most ambitious version is implemented at the earliest opportunity, it could stop the death toll from air pollution rising. We need to act fast to clean up London's toxic air.

Any proposals that are put in place to tackle air pollution need to be coupled with measures to ensure that the city is accessible, walking and cycling are supported, and the quality, cost and emissions of public transport are greatly improved. Where necessary we need to support small businesses with exemptions.

Everyone living and working in London should be helped to play their role in reducing air pollution.

Thank you for all your work so far. I look forward to seeing this plan in action."

Box 4: second standard response (765 responses)

"Dear Sadiq Khan,

I'm very concerned about air quality in London. I'm pleased you are proposing steps to improve it, but you must take stronger action to deal with our deadly air pollution crisis.

I welcome your proposal to introduce a Toxicity Charge (T-Charge) for the most polluting traffic. But the T-Charge needs to be widened to include all diesel cars, not only the oldest. Diesel vehicles present a severe threat to Londoners' health, and they must be phased out. I know that many people bought diesel cars before the dangers were widely known. So I support your call for a diesel scrappage scheme to help people move to clean vehicles, or take up alternatives to driving.

I also welcome your proposal to extend the Ultra Low Emission Zone (ULEZ), and introduce it earlier. However, extending the ULEZ only to the North and South Circular for all vehicles does not do enough to improve air quality in outer London. A carefully designed ULEZ should cover all types of vehicles across London, and should be combined with a pay-as-you-go driving scheme which differentiates between cleaner and dirtier vehicles.

As well as banishing dirty diesels from London, you must take steps to reduce vehicle numbers altogether, and make sure new infrastructure does not add to the problem. London needs more policies to provide alternatives to driving, including safer cycling and walking infrastructure, and more affordable public transport.

Earlier this month, the government was ordered by the High Court to act faster to clean up the UK's air. Londoners need you to stand up for us and do everything you can to bring down London's air pollution to legal limits as soon as possible.

Thank you so much for taking the time to consider my representations."

10. These standard responses accounted for 10,002 of the total Friends of the Earth responses received. The remaining 2,918 responses either edited or added to one of the standard responses or comprised completely different text. The following table summarises these themes; responses could be coded as multiple codes within each theme. More details of the codes within each theme are shown in the appended spreadsheet: Friends of the Earth codeframe.

Theme	Standard response	Standard_HGV edit	Second standard response	Edited or additional response	Total
Suggested supporting policy	18,000	9,711	3,060	8,011	38,782
Principle of a ULEZ	12,000	6,474	1,530	5,063	25,067
Boundary	12,000	3,237	765	4,536	20,538
Timescales	6,000	3,237	765	2,518	12,520
Impact of proposals	6,000	3,237	-	2,073	11,310
Ban vehicles	-	-	765	676	1,441
Financial assistance	-	-	765	347	1,112
Charging levels	-	-	765	312	1,077
Alternative policy suggestion	-	-	-	216	216
Discounts and exemptions	-	-	-	140	140
Taxi and PHV	-	-	-	88	88
Emission standards	-	-	-	36	36
Comment about Congestion Charge	-	-	-	22	22
Costs	-	-	-	5	5
Comment on consultation	-	-	-	2	2