

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

- Age UK
- Air Quality Brentford
- Alliance of British Drivers
- Association of Vehicle Recovery Operators
- Autogas
- Baker Street Quarter Partnership
- Balfour Beatty
- Better Bankside
- Better Streets for Enfield
- Big Bus Tours
- Bloomsbury Association
- Brewery Logistics Group
- British Heart Foundation
- British Lung Foundation
- Calor Gas
- Campaign for Better Transport
- Campaign for Better Transport (London)
- Caroline Russell AM
- CEMEX
- Chartered Institute of Environmental Health
- Chartered Institute of Logistics and Transport
- City of London Corporation
- Clean Air in London
- Clean Air Merton
- ClientEarth
- Climate Change Centre Reading
- Confederation of British Industry London
- Cross River Partnership
- Ealing Friends of the Earth
- Enfield Cycling Campaign
- Enterprise Rent-A-Car
- Environmental Industries Commission
- Environmental Protection UK
- Environmental Services Association
- European Network of Child Friendly Cities
- Euston Air Quality and Trees Group
- Federation of British Historic Vehicle Clubs
- Federation of Small Businesses
- FirstGroup
- Fitzrovia Neighbourhood Association
- Fitzrovia West Neighbourhood Forum
- Freight Transport Association
- Friends of the Earth
- GMB Pro Drivers Union
- Green Flag
- Greenpeace
- Hackney and Tower Hamlets Friends of the Earth
- Harrow Community Transport
- John Lewis Partnership
- Kate Osamor MP
- Kennington and Walworth Neighbourhood Action Group
- Kew Residents Association
- Lambeth for a Cool Planet
- Lambeth Green Party
- Licensed Private Hire Car Association
- Licensed Taxi Drivers' Association
- Living Streets
- London Ambulance Service
- London Assembly Environment Committee
- London Assembly Environment Committee – Conservative Group
- London Assembly Environment Committee – UKIP Group
- London Association of Directors of Public Health and the London Environment Directors' Network (joint response)
- London Borough of Brent
- London Borough of Camden
- London Borough of Croydon
- London Borough of Hackney

- London Borough of Hammersmith & Fulham
- London Borough of Haringey
- London Borough of Harrow
- London Borough of Hounslow
- London Borough of Islington
- London Borough of Merton
- London Borough of Newham
- London Borough of Southwark
- London Borough of Sutton and Royal Borough of Kingston upon Thames
- London Borough of Tower Hamlets
- London Borough of Waltham Forest
- London Borough of Wandsworth
- London Councils
- London Cycling Campaign
- London Fire Brigade
- London First
- London Forum of Civic and Amenity Societies
- London Sustainability Exchange
- London Tourist Coach Operators' Association
- Medact
- Metropolitan Police Service
- Mineral Products Association
- Motorcycle Action Group
- Muswell Hill Sustainability Group
- National Association of Wedding Car Professionals
- Northbank BID
- Our Vauxhall
- RAC Foundation
- Road Danger Reduction Forum
- Road Haulage Association
- Royal Borough of Greenwich
- Royal Borough of Kensington and Chelsea
- Royal Mail
- St Marylebone Society
- Sustrans
- The Entertainment Agents' Association
- The Original London Sightseeing Tour
- Routemaster Association
- Tower Hamlets Wheelers
- Toyota
- Travis Perkins
- Uber
- UK Power Networks
- Unite
- UPS
- Veolia
- Victoria BID
- Wandsworth Community Transport
- Westminster BIDS
- Westminster City Council

Appendix B: List of stakeholders invited to respond

- AA
- Abellio
- Abellio West London Ltd
- Access in London
- ACFO
- Addison Lee
- Afternoon Tea
- Age UK
- Airport Bus Express
- Air Quality Consultants
- Alliance of British Drivers
- All-Party Parliamentary Group
- Alzheimer's Society
- Andrew Boff AM
- Andrew Dismore AM
- Andy Slaughter MP
- Angel BID
- Argyall BID
- Arriva London
- Arriva the Shires
- Association of British Drivers
- Asthma UK
- AVRO
- Baker Street Quarter Partnership
- Barnet Community Transport
- Barry Gardiner MP
- BD Auto
- Beddington BID
- Better Bankside
- Bexley Community Transport Scheme
- Bexleyheath BID
- Big Bus
- Boris Johnson MP
- Brent Community Transport
- Brimsdown Freight Quality Partnership
- British Lung Foundation
- British Motorcyclists Federation
- British Property Federation
- Brixton BID
- Bromley BID
- Brookline
- Broxbourne Borough Council
- Buckinghamshire County Council
- Build UK
- Buzzlines
- BVRLA
- BYD
- Camden Town BID
- Campaign for Better Transport
- Campaign for Clean Air in London
- Canary Wharf Group
- Capita
- Carbon Trust
- Caroline Russell AM
- Caroline Pidgeon AM
- Car2go
- Carplus
- Catherine West MP
- CECA
- CEMEX
- Centaur
- Centerpoint
- Central London Freight Quality Partnerships
- Chalkwell
- Chauffeur & Executive Association
- Cheapside
- Chuka Umunna MP
- City of London Corporation
- ClientEarth
- City Car Club
- Clapham BID
- Clarkes
- Clive Efford MP
- Community Transport Association
- Community Transport Waltham Forest
- Confederation of British Industry
- Confederation of Passenger Transport
- Connect
- Considerate Constructors Scheme
- Construction Clients' Group

- Croydon Accessible Transport
- Croydon BID
- CT Plus
- DAF Trucks
- Daimler/Mercedes-Benz UK
- David Kurten AM
- Rt Hon David Lammy MP
- Dennis Eagle
- Department for Environment, Food & Rural Affairs
- DHL
- Diane Abbott MP
- Disablement Association of Barking and Dagenham
- Disability Rights UK
- DisabledGo
- Disabled Motoring UK
- DriveNow
- Duck Tours
- E11 BID
- Ealing Community Transport
- East Community Transport
- East Ealing BID
- easyBus
- E-Car Club
- EEF
- Elmbridge Borough Council
- Emily Thornberry MP
- Emissions Analytics
- Enfield Community Transport
- Environment Agency
- Environmental Protection UK
- Epsom & Ewell Borough Council
- Essex County Council
- Euston Town BID
- Farringdon BID
- Federation of British Historic Vehicle Clubs
- Federation of Small Businesses
- First 702
- Fiona Twycross AM
- Fitzrovia BID
- FM Conway
- Florence Eshalomi AM
- Ford
- Frazer-Nash
- Freight Transport Association
- Friends of Capital Transport
- Friends of the Earth
- Gareth Bacon AM
- Gareth Thomas MP
- Garratt Business Park
- Gavin Barwell MP
- Ghost Bus
- GMB
- Go-Ahead London
- Go Ultra Low
- Golden Tours
- Greater London Forum for Older People
- Rt Hon Greg Hands MP
- Green Alliance
- Greenpeace UK
- Green Line
- Guide Dogs
- Hackney Community Transport
- Hammersmith BID
- Hampstead BID
- Rt Hon Harriet Harman MP
- Harrow Town Centre BID
- Hatton Garden BID
- Harrow Community Transport
- Havering Community Transport
- Heart of London BID
- Helen Hayes MP
- Hertsmere Borough Council
- Hertz on Demand
- Hillingdon Community Transport
- Hitachi Capital
- Hounslow Community Transport
- Rt Hon Iain Duncan Smith MP
- Ilford BID
- Impact
- Independent Disability Advisory Group
- Inmidtown BID
- Institute for Public Policy Research
- Institution of Civil Engineers
- Institute of Couriers
- Iveco
- James Berry MP
- Jane Ellison MP
- Jennette Arnold AM

- Rt Hon Jeremy Corbyn MP
- Jim Dowd MP
- Jim Fitzpatrick MP
- Joanne McCartney AM
- Rt Hon Joan Ryan MP
- John McDonnell MP
- Kate Hoey MP
- Kate Osamor MP
- Karen Buck MP
- Keith Prince AM
- Kent County Council
- Sir Kier Starmer MP
- King's College Hospital
- King's College London
- Karsan
- Kemi Badenoch AM
- Kings Ferry
- Kingstonfirst BID
- KIPPA BID
- Len Duvall AM
- Leonard Cheshire Disability
- Leonie Cooper AM
- Lewisham Community Transport Scheme
- London Cab Drivers Club
- Licensed Private Hire Car Association (LPHCA)
- Licensed Taxi Drivers' Association
- Living Streets
- London Borough of Barnet
- London Borough of Brent
- London Borough of Barking and Dagenham
- London Borough of Bexley
- London Borough of Brent
- London Borough of Bromley
- 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 Harrow
- London Borough of Havering
- London Borough of Hounslow
- London Borough of Hillingdon
- London Borough of Islington
- 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
- London Chamber of Commerce and Industry
- London City Airport
- London City Tour
- London Clinical Senate
- London Cycling Campaign
- London First
- London General
- London Private Hire Board
- London Riverside BID
- London Sovereign
- London Sustainability Exchange
- London Taxi Company (LTC)
- London TravelWatch
- London Tourist Coach Operators' Association
- London United
- Love Wimbledon BID
- Low Carbon Vehicle Partnership
- Lyn Brown MP
- MAN Truck & Bus UK
- Marble Arch BID
- Rt Hon Dame Margaret Hodge
- Marshalls
- Matthew Pennycook MP
- Megabus London
- Meg Hillier MP
- Mercedes-Benz UK
- Merton Community Transport
- Metrobus Ltd
- Metroline
- Mike Freer MP

- Mike Gapes MP
- Motorcycle Action Group
- National Association of Wedding Car Professionals
- National Council for Voluntary Organisations
- Natural England
- National Express Ltd
- Navin Shah AM
- Next Green Car and Ecolane Consultancy
- Nick Hurd MP
- Nicky Gavron AM
- Nissan
- New West End Company
- Northbank BID
- OLSST
- Onkar Sahota AM
- Orpington 1st
- Oxford Tube
- Paddington BID
- Paul Scully MP
- Penzo
- Peter Whittle AM
- Piccadilly & St James BID
- Policy Exchange
- Premium Tours
- Purley BID
- Putney BID
- Quality Line
- RAC Foundation
- Rail Freight Group
- Redwing North Kent
- Renault Trucks UK
- Retail Motor Industry Federation
- Richmond and Kingston Accessible Transport
- Road Haulage Association
- Rosena Allin-Khan MP
- Royal Borough of Greenwich
- Royal Borough of Kensington and Chelsea
- Royal Borough of Kingston upon Thames
- Royal National Institute of Blind People
- Runnymede Borough Council
- Dr Rupa Huq MP
- Scania GB
- Scope
- SECBE
- See London By Night
- Shaun Bailey AM
- Sian Berry AM
- Siobhain McDonagh MP
- Skanska
- Slough Borough Council
- SMMT
- South Bucks District Council
- South London Freight Quality Partnerships
- Spelthorne Borough Council
- Stagecoach
- Stansted Citylink
- Stella Creasy MP
- Stephen Hammond MP
- Stephen Pound MP
- Stephen Timms MP
- Steve O'Connell AM
- Stratford Original BID
- Streatham BID
- Successful Sutton
- Sullivan Buses
- Sustrans
- Sutton Community Transport
- Dr Tania Mathias MP
- Team London Bridge
- Teresa Pearce MP
- Theresa Villiers MP
- Terravision
- TEVVA
- TGM
- The Chartered Institute of Logistics and Transport
- Three Rivers District Council
- Thurrock Borough Council
- Rt Hon Tom Brake MP
- Tom Copley AM
- Tony Arbour AM
- Tony Devenish AM
- Tower Hamlets Community Transport
- Transport & Environment
- Transport for All
- Tulip Siddiq MP

- Unmesh Desai AM
- Unite the Union
- Uno
- UPS
- Vauxhall One
- Vicky Foxcroft MP
- Lady Victoria Borwick MP
- Virendra Sharma MP
- Volvo Group
- Victoria BID
- Wandsworth Community Transport
- Waterfall Garage Services Ltd
- Waterloo Quarter
- We Ride London
- Welwyn Hatfield Borough Council
- Wes Streeting MP
- West Ealing BID
- Westminster City Council
- Westway Community Transport
- Whizz-Kidz
- Willow Lane BID
- X90
- Zac Goldsmith MP
- Zipcar

Appendix C: Summary of stakeholder responses

C1. Political representatives

Caroline Russell AM (Green Party member of London Assembly)

- C1.1 Ms Russell strongly supports the principle of the Ultra Low Emission Zone (ULEZ), bringing forward its implementation to April 2019, and introducing a particulate matter (PM) standard for diesel vehicles within the ULEZ standard.
- C1.2 She does not support a sunset period for residents. She supports a sunset period for disabled tax class vehicles and suggests the Mayor should offer financial assistance to help this vulnerable group since converting vehicles can be expensive.
- C1.3 She says a Londonwide ULEZ for all vehicles is needed to comply with air pollution limits by 2020 at the latest and the Mayor should consult on this as soon as possible. She also suggests integrating the ULEZ with a road pricing scheme.
- C1.4 She favours ULEZ standards being based on real world driving emissions tests verified by the 'cleaner vehicle check' scheme. Penalising non-compliant vehicles would send a clear signal to the motor trade. She also wants all new diesel vehicles to display 'cigarette packet' warnings on nitrogen dioxide (NO₂) and particulate matter (PM_{2.5}) as well as driving emissions test results so consumers are fully informed.
- C1.5 She comments that the best way to clean up the air is to have less traffic. Measures are needed to reduce car use and enable a rapid transition for more journeys being made on foot, by bike and by public transport especially in outer London.

Kate Osamor MP

- C1.6 Kate Osamor MP raised concerns that nearly 40 million people in Britain live in areas with illegal levels of air pollution, and that poor air quality contributes to around 40,000 premature deaths every year. She states that it is vital that urgent action is taken to clean up our air.
- C1.7 She states that she would like to see a coherent network of Clean Air Zones across the UK to effectively tackle the chronic problem of air pollution as well as a national diesel scrappage scheme.

Lambeth Green Party

- C1.8 Lambeth Green Party supports the principle of ULEZ and the introduction of ULEZ in central London from April 2019.
- C1.9 Suggests that ULEZ should go further and include the whole of Greater London. Suggests that the Mayor should do more to address air quality and

review other planned schemes such as City Airport expansion and the Silvertown Tunnel.

London Assembly Environment Committee

- C1.10 The London Assembly Environment Committee urges wide and early implementation of the ULEZ. It welcomes the firming-up of a 2019 date for the central zone rather than 2020. Ideally, it would support introduction as early as January 2019. It also supports extending ULEZ Londonwide for heavy vehicles and to the North and South Circular Roads for light vehicles, but suggests that this should be implemented from 2019 rather than from 2020. Furthermore, the committee suggests that the boundary for light vehicles should be extended further to include more of London.
- C1.11 It continues to support the Mayor's calls for the national government to take tougher action on air pollution, including a nationally-funded diesel scrappage scheme. It also supports measures to reduce traffic and encourage modal shift to walking and cycling.
- C1.12 The Greater London Authority (GLA) Conservatives note an opposing view. They support original plans but do not support the early introduction of ULEZ in central London or expansion of the zone, stating that they believe that there would not be significant benefits that outweigh the impact to residents and businesses. The UKIP GLA also does not support proposals and suggests that a ULEZ be introduced in Heathrow.

C2. Boroughs

City of London Corporation

- C2.1 The corporation is very supportive of ULEZ and of a PM standard in the ULEZ to bring it into line with national plans for a Clean Air Zone framework and a Euro VI retrofit certification scheme.
- C2.2 It supports a start date of April 2019, provided that a certified retrofit system is available to allow heavy vehicles to be fitted/tested. It is also in support of a September 2019 start, subject to an approved retrofit system being available in good time. If this should not be the case, consideration should be given to an exemption of the daily charge until heavy vehicles can be retrofit.
- C2.3 It also supports the proposal to maintain the residents' sunset period at three years, which would be April 2022. It advises providing sufficient incentive to residents to use less polluting vehicles. It supports the proposal for a longer sunset period for disabled tax class vehicles.

London Borough of Brent

- C2.4 London Borough of Brent supports the principle of ULEZ but suggests that more should be done to address air quality across London. It acknowledges that a further consultation will be carried out in late 2017 which will cover ULEZ expansion, it also raises concerns that there are a number of town centres outside of the North/South Circular boundary which already suffer from poor air quality, and suggests that expansion to these roads would only worsen current conditions.
- C2.5 Suggests that more needs to be done to tackle poor air quality outside of central London where there is a greater reliance on private car travel. Suggests that there should be more investment in alternatives including public transport, walking and cycling.
- C2.6 The council notes that the bus fleets operating in central London will improve, but suggests that older and more polluting vehicles will operate in outer London, thus worsening air quality.
- C2.7 Brent does not support keeping a three-year sunset period for residents in central London, but suggests a phased approach to target the most polluting vehicles first.
- C2.8 Notes that private hire vehicles need to comply with ULEZ, suggests that more should be done to ensure compliance as it may be cheaper for these vehicles to pay the daily charge.

London Borough of Camden

- C2.9 The London Borough of Camden supports the principle of ULEZ and the early introduction of the scheme in central London citing that it will be more effective and will act as a lever to encourage a shift away from older and more polluting vehicles.
- C2.10 Suggests that a 90 per cent discount of the Emissions Surcharge (ES) will not do enough to discourage residents from driving diesel cars and supports London Councils' suggestion that any discount or sunset period be introduced with a sliding scale over the whole duration, increasing towards the end of the sunset period. Camden strongly believes that any funds raised by the schemes should be ring-fenced for projects related to air quality and sustainable transport.
- C2.11 Supports the proposals for a sunset period for disabled tax class vehicles and a new PM standard for diesel vehicles. Furthermore, the council strongly supports widening the zone to include more of London. Suggests that exemptions are kept to an absolute minimum and supports London Councils' position in opposing the exemptions and/or 100 per cent discount for the following vehicle types: two-wheeled motorbikes (and sidecars) and mopeds, specialist off-road vehicles, commercial vehicles constructed before 1973, Ministry of Defence (MOD) vehicles, showmen's vehicles and breakdown vehicles.

London Borough of Croydon

- C2.12 Supports measures to improve air quality in the borough, supports the early introduction of ULEZ in central London and supports the move to improve air quality across London. It also supports a Londonwide ULEZ for HGVs, buses and coaches.
- C2.13 The council would like a Low Emission Bus Zone in London Road and in central Croydon and more investment in car alternatives including Tramlink extension.
- C2.14 It believes that the residents' sunset period is excessive and does not support a general exemption for disabled tax class vehicles and suggests that a requirement be placed on the owners of such vehicles to apply for a temporary exemption for a specific time period.

London Borough of Hackney

- C2.15 The council supports early introduction of the ULEZ in 2019 but stresses the importance of engaging with businesses and private car owners to raise awareness of the proposed changes. A clear roadmap is needed to ensure operators and vehicle owners know the standards they need to comply with. Future changes must also be clearly communicated well in advance. It understands the need for some resident discounts but believes some exemptions are too lenient and will reduce the effectiveness of influencing drivers against using more polluting vehicles.
- C2.16 It supports including particulate matter in ULEZ emission standards, but it would like clarity on the new standards – especially since many vehicles do not perform in real world conditions as well as advertised under their Euro standards.
- C2.17 It notes that road pricing is essential to achieve the required air quality levels across the Capital. It would also like more information on how ULEZ integrates with other measures to improve air quality.
- C2.18 The council supports a Londonwide extension to the ULEZ, since a North/South Circular Road boundary will have a serious impact, in terms of traffic displacement and increased air pollution, on several boroughs bisected by this proposal.

London Borough of Hammersmith & Fulham

- C2.19 The council strongly supports both the principle of ULEZ and bringing forward its introduction to April 2019. It also strongly supports introducing a PM standard for diesel vehicles within the ULEZ standard.
- C2.20 It didn't express an opinion on keeping the three-year residents' sunset period from 2019-2022, but strongly supports keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C2.21 The council comments that it would be disproportionate if an extension of the ULEZ zone to the North and South Circular Roads meant that borough

residents were subject to the full ULEZ charge, while residents of the central charging zone were still in a sunset period and therefore not paying the charge.

- C2.22 To maintain fairness while ensuring maximum benefits of the ULEZ, it suggests any sunset period for the central charging ULEZ should end when the ULEZ is expanded. This might shorten the sunset period to two years, but given the scheme is currently under discussion these residents are still getting nearly four years' notice of the change.
- C2.23 It did not support further exemptions other than for disabled vehicles, as this would compromise benefits from the ULEZ. It also notes that targeting non-tailpipe particulate matter sources such as tyre, brake, clutch wear and resuspension should be part of the ULEZ plans.

London Borough of Haringey

- C2.24 The council strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C2.25 It strongly supports keeping a three-year residents' sunset period from 2019-2022 and keeping the closing date of the sunset period for disabled tax class vehicles as September 2023.
- C2.26 Overall the council welcomes an early introduction of the ULEZ in central London and strengthening standards to include PM emissions from diesel vehicles. This is not likely to significantly impact on Haringey's air quality immediately, but proposals to expand the ULEZ up to the North and South Circular will have a big impact and potentially lead to significant reductions in concentrations.
- C2.27 Since the Economic and Business Impact Assessment showed minor adverse impact on small and medium-sized enterprises (SMEs), Haringey would like clear information regarding the costs and benefits and impact on local businesses and residents in the further consultation and early engagement with businesses. More than 90 per cent of businesses in the borough are micro-businesses employing fewer than 10 staff. Raising awareness of the changes and the options for businesses to upgrade to compliant vehicles well in advance of the start of the ULEZ will be critical.
- C2.28 It also believes that the Mayor should prioritise a reduction in bus emissions across London, given that TfL buses are responsible for 10 per cent of all NO_x emissions.

London Borough of Harrow

- C2.29 The London Borough of Harrow supports the earlier introduction of the ULEZ as part of the Mayor's Clean Air Action Plan.

London Borough of Hounslow

- C2.30 Supports ULEZ and proposals to introduce ULEZ early in central London. Suggests that ULEZ should be widened to the North and South Circular Roads and also be introduced in 2019. Supports measures that incentivise cleaner, greener and hybrid vehicles, vehicle scrappage schemes and Travelcards. It strongly opposes dispensations, exceptions and high rate of discount for residents proposed at 90 per cent, which should be reduced on a sliding scale over a period of two to three years, unless there are extenuating circumstances or financial hardship.

London Borough of Islington

- C2.31 The London Borough of Islington strongly supports the principle of the ULEZ, its early introduction and the introduction of PM standards as a way to improve air quality in London; it supports bringing forward ULEZ implementation in central London between 8 April 2019 and 7 September 2020. However, it does not support the inclusion of diesel vehicles as part of the ULEZ.
- C2.32 The council asks to review the decision to allow diesel vehicles as part of the ULEZ and move towards a diesel free London. According to data from the Emissions Analytics labs, the majority of diesel vehicles emit much more in real world driving than their Euro classification would indicate.
- C2.33 Accelerating the process of setting out plans for a diesel free London, would include initiatives like increasing alternative fuel infrastructures and alternatively fuelled vehicles, increasing cycling and walking and public transport, increasing freight consolidation as well as delivery via cargo bikes.
- C2.34 The council does not support the residents' sunset period until 2022. It would however support a scaling approach where the discount residents receive decreases over time.
- C2.35 It would also support scrappage schemes that will help residents who need it to update their vehicles. It agrees that disabled tax class vehicles require extra support. It also believes that a reduction in the number of exemptions should apply.

London Borough of Merton

- C2.36 Merton welcomes proposals to bring forward the introduction of ULEZ by 17 months to 8 April 2019. It supports the retention of a sunset period for residents and for disabled tax class vehicles to September 2023.
- C2.37 The council also notes that TfL is developing a Direct Vision Standard for HGVs and suggests that the two schemes are merged so that operators can undergo a single procurement process for new vehicles.
- C2.38 Also requests to see detailed plans for ULEZ expansion as soon as possible to allow businesses enough time to plan for the future.

London Borough of Newham

- C2.39 The council supports the principle of the ULEZ, bringing forward its implementation to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C2.40 It also supports keeping a three-year residents' sunset period from 2019-2022 and keeping the date of the sunset period for disabled tax class vehicles from April 2019 to September 2023.
- C2.41 It supports the Mayor of London in taking decisive action to improve air quality and an earlier introduction of the ULEZ, but it also welcomes protections for residents and other individuals so they have time to prepare. The council asks if the same protections will apply in an expanded ULEZ and whether people in these areas will get adequate time to prepare for changes? It notes that the scheme must be fair in relation to future expansion. Newham is not directly impacted by expanded boundaries, but it is important to ensure that people who are, are not unfairly penalised.

London Borough of Southwark

- C2.42 Southwark Council supports the principle of ULEZ and the London Councils' suggestion that vehicles currently exempted under the approved scheme (eg classic cars) are treated the same as any other vehicle and that a scheme of temporary exemption, based on a fixed time period be introduced. It also supports the early introduction of ULEZ and exemption for disabled tax class vehicles but questions whether a T-Charge resident discount level of 90 per cent throughout the sunset period is appropriate and suggests that a sliding scale, increasing in cost towards the end would be more appropriate.
- C2.43 States that if the national retrofit certification scheme is not implemented by the Government by 8 April 2019, there is no indication regarding how retrofitted vehicles will be certified and demonstrate compliance.
- C2.44 Lastly, raises concerns about the areas around the boundaries and requests to see fair measures to deal with communities living either side of the boundary.

London Borough of Sutton and Royal Borough of Kingston upon Thames

- C2.45 These councils strongly support both ULEZ and the introduction of a PM standard. They support keeping the present end date of the sunset period for disabled tax class vehicles from 8 April 2019 to 11 September 2023. However, they do not support keeping a three-year residents' sunset period (8 April 2019 to 11 April 2022), and believe that the sunset period for residents should be shorter. They would recommend that the sunset period be shortened for residents to 11 April 2021 at the latest. This would provide a fair balance between recognising the financial costs on those affected and the benefits to public health from bringing the date forward.

- C2.46 They also take the opportunity to request that the boundaries of the existing Low Emission Zone are also reviewed to ensure that they cover the entirety of both boroughs.

London Borough of Tower Hamlets

- C2.47 London Borough of Tower Hamlets states that 40 per cent of residents and 48 schools in the borough are in areas of unacceptable levels of poor air quality and therefore strongly supports proposals to introduce ULEZ early in central London. Also supports retaining a three-year sunset period for residents and the existing sunset period for disabled tax class vehicles and introducing a PM standard for diesel vehicles.

London Borough of Waltham Forest

- C2.48 The London Borough of Waltham Forest supports the early implementation of ULEZ in central London as well as an emission standard for PM. Also requests that more could be done to encourage public transport, walking and cycling.
- C2.49 Suggests that the exemptions for ULEZ are too broad and that two-wheeled motorbikes (and sidecars) and mopeds, specialist off-road vehicles, for example tractors and mobile cranes, commercial vehicles constructed before 1973, MOD vehicles, accredited breakdown vehicles, roadside recovery vehicles, black cabs and private hire vehicles should not be exempt.

London Borough of Wandsworth

- C2.50 London Borough of Wandsworth states that while ULEZ is welcomed, more should be done to shift towards zero emitting travel choices namely walking and cycling. Requests more detailed information about benefits and impacts specific to the borough.
- C2.51 Supports the early introduction of ULEZ in central London in principle, however requests that support is provided to groups that will find the transition difficult. Furthermore, requests that the benefits of impacts of bringing forward the implementation date by a further five months to April 2019 are published.
- C2.52 Suggests that the residents' sunset period and 90 per cent ES discount could potentially impact on the benefits of the scheme and suggests that there should be a sliding scale of charges to encourage people to upgrade their vehicles. Supports longer sunset period for disabled tax class vehicles.
- C2.53 States that the exemptions are likely to limit the overall air quality benefits and suggests that rather than offer exemptions, vehicles could apply for a specific exemption, for example, to participate in a parade or show.

- C2.54 Agrees with the principle of introducing a PM standard for diesel vehicles as it will bring it in line with the Government's proposed Clean Air Zone framework and the national Euro VI retrofit certification standard for HGVs.

Royal Borough of Greenwich

- C2.55 The council strongly supports the principle of the ULEZ. It also supports bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C2.56 It supports keeping a three-year residents' sunset period from April 2019 to April 2022 and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C2.57 The council notes that extending the ULEZ to the South Circular Road would cause issues for the borough. Residents using non-compliant vehicles living 'inside' the boundary will be charged and those 'outside' will need to pay for journeys within the borough. Non-compliant vehicles diverting to avoid ULEZ charges will have an impact on congestion and air quality across the borough.
- C2.58 It is also concerned about the impact of accelerating implementation on SMEs – both their ability to pay the charge and their ability to replace vehicles in time. Currently there is no 'scrappage' scheme, or exemption proposed to help SMEs address this financial burden.
- C2.59 The council would also urge TfL to consider an exemption for emergency vehicles to the original/current dates for the central London ULEZ, since it may not be possible to update all fleets in time.

Royal Borough of Kensington and Chelsea

- C2.60 The Royal Borough of Kensington and Chelsea supports the earlier introduction of the ULEZ and the introduction of a PM standard. Supports the bringing forward of the residents' sunset period noting that this still provides a four-year notice period for residents within central London to update their vehicles.
- C2.61 States that it is unfortunate that the consultation for both central London and expanding the zone did not happen in tandem as both elements impact residents within the borough. It notes that a sunset period involving a 100 per cent residents' discount applied to an expanded zone would reduce quite substantially the forecast air quality benefits of the scheme. It requests that a situation in which residents of the central London ULEZ continue to benefit from a 100 per cent discount on the ULEZ charge *after* the point at which some Royal Borough residents would be required to pay the ULEZ charge to drive in their own local streets is avoided. Suggests that if a sunset period is to be offered to residents living within the central London ULEZ, this should be set to end no later than the expansion of the ULEZ.

Westminster City Council

- C2.62 Westminster City Council supports the principle of ULEZ and bringing forward the implementation date on the basis that a 'phased sunset period' could be provided for any orders for essential service vehicles such as waste collection vehicles and ambulances to allow for fleet renewal.
- C2.63 It supports the principle of providing a sunset period for residents and support the proposed sunset period for disabled tax class vehicles, but suggest that the timeframe is lengthened for these specific types of vehicles.

C3. Government organisations

London Ambulance Service

- C3.1 London Ambulance Service (LAS) is committed to reducing its vehicle emissions, has ambitions for an ultra low emission fleet, and will explore all options to comply in full with the ULEZ early introduction.
- C3.2 The LAS replacement programme has been curtailed in recent years and is behind schedule which has significant financial and potentially political implications if it does not comply.
- C3.3 The LAS is looking to exploit all avenues to ensure compliance with the ULEZ and will be looking for support from the Mayor's Office, TfL, Office for Low Emission Vehicles (OLEV) and any other body that can help to achieve these ambitions.

London Councils

- C3.4 London Councils supports the work that the Mayor has done to highlight the issue of air pollution and suggests that a long-term roadmap is developed showing how we will improve air quality in London well beyond the implementation of the ULEZ. It stresses that London should aim for the safe levels of air pollution as set by the European Union (EU) as a minimum, but have a long-term view to reaching the levels set out by the World Health Organization (WHO), which are more stringent for PM.
- C3.5 London Councils supports the early introduction of ULEZ in central London, but suggests that consideration should be given to organisations that had already put measures in place to update their fleets by September 2019 to reduce any cost impacts. London Councils would also like clarification on what would happen if the national retrofit standard is not implemented by 8 April 2019.
- C3.6 Supports the proposed length of the sunset period for residents, but suggests that the discounted rate for the ES charge during this period would not provide enough of a disincentive for drivers of more polluting vehicles. Suggests that sunset periods need to be coordinated with future expansion plans, and consistency needs to be applied to any final proposals. London Councils feels that any plans for exemptions and sunset

periods should be developed with greater input from the central boroughs concerned.

- C3.7 London Councils does not support the exemptions to ULEZ and suggests that these exemptions are counterintuitive to the scheme. Further suggests that the Mayor should look to work with boroughs to identify some of the groups who might face a minor adverse impact due to the early introduction of the ULEZ, and look to provide some form of mitigation support to help insulate them from these impacts.

London Fire Brigade

- C3.8 The majority of London Fire and Emergency Planning Authority (LFEPA) members voted to support the introduction of the expanded ULEZ in 2019, but have requested that officers work with TfL to identify precisely how the authority will comply with the earlier implementation.
- C3.9 The current estimated additional cost of compliance with the earlier date is £1.6m and the intention is to identify a solution which reduces this cost and minimises the impact on the authority's budget while aiming to comply with the requirements of the zone once they are finalised.

Metropolitan Police Service

- C3.10 Metropolitan Police Service supports the introduction of the ULEZ and has requested that officers work with TfL to identify precisely how it will comply with the earlier implementation. The intention is to identify a solution which reduces the cost of implementation and minimises the impact of this on the Mayor's Office for Policing and Crime/Metropolitan Police Service budget while aiming to comply with the requirements of the zone once they are finalised.

C4. Business organisations/Business Improvement Districts (BIDS)

Baker Street Quarter Partnership

- C4.1 The partnership strongly supports the principle of the ULEZ. It also supports bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C4.2 It supports keeping a three-year residents' sunset period from April 2019 to April 2022 and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C4.3 The partnership says that while the ULEZ may add to members' costs in the short term (increased delivery and supply charges), improvements in air quality are more important as they bring benefits to wellbeing and health, and support staff recruitment and retention.

C4.4 It would like the ULEZ to be extended to include the Marylebone Road, consistently ranked as one of the most polluted roads in Europe, which impacts on the reputation of the area and member businesses.

Better Bankside

C4.5 Better Bankside fully supports of the principle of the ULEZ, bringing forward the implementation date to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.

C4.6 It strongly supports expanding the ULEZ to cover as much of London as possible. If a Londonwide zone is not practical, the North/South Circular would be a sensible compromise. It also supports all double-decker buses in central London being hybrid by September 2019 (as opposed to September 2020, as originally proposed).

C4.7 It notes that the ULEZ will only work if there are incentives to change. As well as a diesel scrappage scheme, it urges TfL to work with local boroughs and Business Improvement Districts to accelerate installing electric vehicle charging points. It stresses the importance of communications to engage not only businesses with a fleet of vehicles but also those who receive deliveries and services.

C4.8 Better Bankside is also keen to see further funding committed to tackle reducing emissions at source, such as:

- A Londonwide anti-idling ban (borough and TRLN)
- Creation of zero emission taxi ranks in high pollution areas (eg London Bridge)
- Advice to businesses on reducing delivery and servicing
- Creation of 'low exposure' walking routes, such as the Low Line
- Air quality measurement programmes

Brewery Logistics Group

C4.9 The group supports the principle of the ULEZ but strongly opposes bringing forward its implementation in central London to April 2019.

C4.10 It does not support a sunset period for residents or for disabled tax class vehicles.

C4.11 It supports introducing a PM standard for diesel vehicles within the ULEZ standard.

C4.12 The group says that if air pollution is as serious an issue as claimed there should be no sunset periods or discount schemes. It notes that cycle lanes don't help air pollution since fewer traffic lanes lead to greater congestion. It suggests that increasing freight vehicle numbers and the current state of roads in London will lead to slower vehicle speeds and higher emissions. Electric vehicles will reduce emissions, but care is needed when setting up charge points to ensure kerb space is not lost for freight deliveries.

- C4.13 The group says that if sunset periods are being considered for emergency services not compliant until 2020, freight vehicles should receive the same benefits since they are equally important to London's day-to-day functioning. It comments that the differential in proposed charges for non-compliant vehicles unfairly penalises HGVs. Low emission requirements should apply, but equally to all forms of transport.

Environmental Industries Commission

- C4.14 The Environmental Industries Commission supports the early introduction of ULEZ in central London but suggests that the retrofit standard needs to be clarified before this. States that the fitting of retrofit systems is a highly specialised job that can only be completed by its experienced teams, or third parties trained or led by its engineers, there will therefore be limits to fitting capacity. It supports the introduction of a PM standard for diesel vehicles.

Confederation of British Industry

- C4.15 The Confederation of British Industry (CBI) raises concern about giving adequate time to businesses, especially SMEs, to adjust to an earlier timescale (April 2019 rather than in 2020). Additionally, it points out the fact that there is not an adequate manufacturing supply to meet the spike in demand for Euro 6 compliant vehicles by 2019.
- C4.16 It stresses that GLA, TfL and local authorities should ensure clear communication with businesses, for example, the exemption of black cabs from the current proposals, to help ensure a united approach on the policy as it is implemented.
- C4.17 It also calls for consistency across the UK in the run-up to the introduction of the ULEZ. CBI members who conduct intercity trips are concerned their vehicles could incur a double charge at differing rates between London and other cities which have clean air policies. Furthermore, future clean air schemes developed in devolved cities across the country will need to be aligned with the Government's policies.
- C4.18 It also calls for certainty to avoid businesses having to upgrade, for example, their fleets twice in a short space of time – incurring significant costs. With the decision to leave the EU and the next phase of emissions standards due to be introduced in 2020-21, there is a lack of clarity on what future of emissions standards could look like in the UK, and therefore within London's ULEZ. If forced to modernise their fleet stock under this uncertainty, businesses could see them rendered non-compliant after a few years. Additionally, with a range of alternative fuels available, businesses need a long-term trajectory to allow them to confidently invest in new technology.

Federation of Small Businesses

- C4.19 The Federation of Small Businesses supports environmental protection measures, but stresses that bringing forward the implementation of ULEZ in central London will not allow enough time for businesses to upgrade their fleets without significant cost hardship. It is also concerned that this may result in job losses and loss of business owners' homes if secured for lending purposes.
- C4.20 Would like to see a ULEZ sunset period 90 per cent discount for ES extended to small businesses as a means of support in a challenging economic climate.
- C4.21 States that many businesses have been working towards a 2020 implementation date and would like to have seen these efforts reflected in revised proposals.
- C4.22 Calls on the Mayor and government to introduce a diesel scrappage scheme and requests a full cost benefit analysis on a new demand-managed system that would remove a number of road charging schemes including Congestion Charging, LEZ, ULEZ, ES and bridge charging.

London First

- C4.23 London First recognises that improving London's air merits timely action but raises concerns about bringing forward previously agreed timescales. Particularly around the shorter time periods for businesses to plan for their fleets and costs associated with fleet renewal and leasing arrangements that have already been put in place.
- C4.24 Supports the introduction of a PM standard and suggests that TfL concentrates on improving air quality in geographic areas and specific routes where emissions are highest.
- C4.25 London First welcomes plans to upgrade the bus and taxi fleet and states that it would work with TfL and businesses to assist with the delivery of the rapid charging network.
- C4.26 Suggests that TfL and the GLA look beyond ULEZ and fossil fuelled vehicles to develop infrastructure for electric vehicles including freight.
- C4.27 Requests that further consideration is given to congestion in London as well as air quality and welcomes the commitment in the Mayor's Transport Strategy to consider the next generation of road user charging systems.

Mineral Products Association

- C4.28 Mineral Products Association (MPA) recognises the implications of poor air quality and supports the policy intention to improve air quality in London. However, it notes the importance of imported aggregates for London's construction industry.
- C4.29 MPA notes proposed exemptions for road building and construction machinery but requests that these exemptions are not extended to volumetric concrete mixers. Volumetrics were originally designed to meet

the market for small loads of concrete but are now a mainstream part of the market. States that volumetrics are officially defined as engineering plant rather than large goods vehicles and are therefore not subject to HGV regulations, including drivers' hours and working time rules, weight limits and the need for operators to hold operator licences.

- C4.30 MPA has no objection to the use of volumetrics but believes that they should be subject to normal HGV regulations (as they are to all practical purposes HGVs).

The Chartered Institute of Logistics and Transport

- C4.31 The institute strongly supports the principle of the ULEZ. It supports bringing forward implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard. It supports the three-year residents' sunset period from April 2019 to April 2022 and keeping the current sunset period end date for disabled tax class vehicles (September 2023).

Northbank BID

- C4.32 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C4.33 It does not support a three-year residents' sunset period from April 2019 to April 2022 – believing it should be longer. It supports keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C4.34 The organisation says it supports all measures to improve air quality and the ULEZ is a good step towards it. It supports ways to prioritise the central London zone in particular for the Strand and Aldwych which have large numbers of polluting vehicles and high numbers of pedestrians living, visiting and working in the area.
- C4.35 It comments that traffic in the Northbank area is often very congested and the ULEZ should be aligned with projects to relieve congestion and promote active modes of transport such as walking and cycling.

Victoria BID

- C4.36 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C4.37 It supports keeping a three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.

C4.38 It comments that not all MOD vehicles should be exempt from the ULEZ charges. For example, a diesel staff car driving around London should not be exempt.

Westminster BIDS

C4.39 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.

C4.40 It does not support a three-year residents' sunset period from April 2019 to April 2022 – believing it should be longer. It supports keeping the sunset period end date for disabled tax class vehicles as September 2023. It says a sunset period for residents should depend on the introduction of a diesel scrappage scheme.

C4.41 It comments that the ULEZ objectives must be to reduce NOx emissions and PM in central London since pollution is highest in this area. If the ULEZ is expanded beyond the CCZ, residents in this wider area should not get exemptions – as this would undermine the air quality improvements in central London. It suggests that without a diesel scrappage scheme, it may be better to:

- Postpone ULEZ expansion for light vehicles until 2023 and implement it wholesale, with no sunset period for residents in the area outside the CCZ
- Alternatively, create an outer London ULEZ, which would not entitle residents living there to drive into the central ULEZ or CCZ area without paying full charges

C5. Businesses

Autogas

C5.1 The organisation supports the principle of the ULEZ and bringing forward its implementation in central London to April 2019.

C5.2 It strongly supports introducing a PM standard for diesel vehicles within the ULEZ standard.

C5.3 It did not provide an answer regarding the three-year residents' sunset period from April 2019 to April 2022, or the sunset period end date for disabled tax class vehicles (September 2023).

C5.4 The organisation says that liquid petroleum gas (LPG) can play a vital role in cost effectively and quickly reducing harmful transport emissions across the Capital. The technology has been successfully trialled for use in taxis and has applications for other classes of vehicle.

- C5.5 It asks for clarity on emissions standards as soon as possible and mitigation of the financial impact on business, fleet operators and black cab drivers, perhaps via scrappage schemes.

Balfour Beatty

- C5.6 Balfour Beatty states that sustainability and environmental protection are at the heart of its business approach and as such has invested in its fleet to include the most sustainable technologies and modern plant.
- C5.7 It states that the majority of its existing fleet is diesel and to replace it will take time and money. Requests that any incentives offered by the Government to phase out diesel must also apply to commercial fleets.
- C5.8 Balfour Beatty states that any additional cost to the company and the wider construction industry is likely to have a knock-on effect with other Mayoral initiatives including addressing the housing problem in London.

Calor Gas

- C5.9 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C5.10 It supports the three-year residents' sunset period from April 2019 to April 2022, but does not support the current sunset period end date for disabled tax class vehicles (September 2023) – believing this should be shorter.
- C5.11 The organisation says the GLA should put pragmatic measures in place to aid fleet operators, taxi drivers and businesses operating within the ULEZ. This includes providing certainty on retrofit standards and ensuring that there is a range of acceptable solutions to meeting the emissions standards, rather than pushing for an electric solution for all.
- C5.12 It notes that extending the ULEZ will lead to increased costs for many people, and the GLA needs to consider assistance for car and van owners – such as a scrappage scheme.
- C5.13 It comments that ULEZ should be technology neutral. Electric vehicles are not suitable for all applications and other technologies like LPG also provide reductions in emissions of particulate matter, NO_x and CO₂. It notes this technology has been successfully trialled for taxis and is approved by TfL. BioLPG will be introduced into the UK later this year – offering a low carbon as well as a low emission alternative fuel.

CEMEX

- C5.14 States that it believes it will be in a position to upgrade its fleets to comply with the introduction of ULEZ in 2019. However, it raises concerns about the ability of smaller operators to do the same.
- C5.15 It requests that large goods vehicle (LGV) cycle safety requirements and emission standards are viewed together. States that both require

investment and require working with vehicle manufacturers on vehicle specification.

Enterprise Rent-A-Car

C5.16 Enterprise Rent-A-Car supports the principle of ULEZ as well as the early implementation of ULEZ in central London. It states that as a company committed to the promotion of low emission vehicles and car sharing, it welcomes proposals that incentivise sustainable transport solutions.

C5.17 It suggests that more can be done to reduce emissions of NO₂ and other pollutants such as increasing the share of low emission vehicles on our roads and promoting alternative, more environmentally friendly modes of transportation, such as public transport (city buses, Underground and trains), car rental and car clubs.

Green Flag

C5.18 Supports measures to reduce emissions in London, but requests that an exemption, discount or funding to upgrade vehicles is offered to breakdown services as part of ULEZ. If this is not possible, Green Flag opposes the early introduction of ULEZ in central London.

John Lewis Partnership

C5.19 John Lewis Partnership does not support the early implementation of ULEZ in central London because of the long timescales and costs involved in procuring and renewing fleets.

C5.20 Suggests that a discount should be offered to the partnership to provide enough time to comply with the scheme. Furthermore, it welcomes a vehicle scrappage scheme to aid fleet renewal.

C5.21 The partnership further suggests that both ULEZ and Direct Vision Standard need to be better integrated to help business with purchasing decisions moving forward. More detailed information must be made available.

Royal Mail

C5.22 Royal Mail states that it operates approximately 48,000 vehicles nationally, 9,000 of which are based in London. This is one of the largest commercial fleets in the UK. It states that renewing its fleet to be ULEZ compliant will have significant cost impacts to the business and therefore requests that implementation of ULEZ in central London remains at 2020 as previously announced. It also requests a sunset period similar to the clause offered to residents in the zone as Royal Mail is required to drive to all parts of London to operate the Universal Service under the Postal Services Act 2011.

- C5.23 It requests that the Mayor of London works with the Department for Environment, Food & Rural Affairs (Defra) and other local authorities to provide an integrated policy framework with minimal complexity for national fleet operators. It furthermore requests that the Government sets clear retrofitting guidelines to enable fleet operators to achieve compliance.
- C5.24 Seeks information on how long a Euro 6 standard is likely to be in place to help plan for fleet investment.

Toyota

- C5.25 Toyota states that it is committed to tackling poor air quality through the widespread adoption of low emission, fuel-efficient vehicles, most notably through the application of hybrid technology.
- C5.26 Suggests that the relevant public authorities are best placed to decide on implementation timescales for air quality initiatives and welcomes TfL's technology neutral approach in setting emission standards for ULEZ.

Travis Perkins

- C5.27 Travis Perkins supports the principle of ULEZ but opposes the early introduction of ULEZ in central London. It states that a number of vehicles in its fleet would need to be replaced to be ULEZ compliant. Requests that businesses are offered the same incentives as car users in London to replace old vehicles.

Uber

- C5.28 Uber supports the introduction of the ULEZ in central London. However, it is concerned that early introduction will have a serious impact on private hire drivers – significantly increasing the cost of replacing a non-compliant existing vehicle.
- C5.29 It notes the number of affordable ultra low emission vehicles (ULEVs) available is limited, particularly ones suitable for private hire.
- C5.30 It suggests accelerating TfL's programme to install a comprehensive rapid charging network to support uptake of private hire ULEVs. A diesel scrappage scheme could also play a role in reducing financial impact for drivers.
- C5.31 Uber also notes that early implementation could impact on the numbers of wheelchair-accessible private hire vehicles available in London and suggests that the sunset period for disabled tax class vehicles be extended to cover this group of vehicles.

UK Power Networks

- C5.32 The organisation strongly supports the principle of the ULEZ, but opposes bringing forward its implementation in central London to April 2019.

- C5.33 It didn't offer an opinion on whether it supported a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C5.34 It strongly supports introducing a PM standard for diesel vehicles within the ULEZ standard.
- C5.35 The organisation notes that bringing forward implementation will have a major and negative financial impact on its operations since it had made plans to change its van fleet in London by the 2020 deadline. Each van is customised to perform a highly specialised service and cannot be bought 'off the shelf'. It will require a significant amount of capital funding.

UPS

- C5.36 UPS supports the principle of the ULEZ and gives a 'qualified welcome' to bringing forward its introduction to 2019 instead of 2020.
- C5.37 It wants clarity on how the methodology for PM emission standards will operate alongside existing regulatory requirements and detail on vehicles affected by this change. It notes that Euro 6 is an accepted standard for diesel emissions and TfL should make clear how this change will be policed to ensure operators are compliant.
- C5.38 UPS comments that there are barriers that need addressing to support improved air quality in London, for example grid constraint restrictions. UPS paid for third party infrastructure in its Kentish Town depot to allow charging of multiple trucks. Lack of capacity may prevent take-up of electric (and range-extended electric) vehicles by the private sector, which is crucial to improving air quality in London.

Veolia

- C5.39 Veolia support the principle of the ULEZ but raise significant concerns around proposals to bring forward the date of implementation.
- C5.40 They state that the proposals will increase the costs of waste collection for local authorities and interfere with procurement cycles. They state that authorities which have delayed purchase of vehicles to choose lower emission options are being penalised for taking these decisions
- C5.41 They state that shifting the start date forward means that authorities will be more likely to stick with Euro VI diesel vehicles for a longer period at the cost of investment in lower emission CNG and electric alternatives.
- C5.42 They also state that there will be insufficient supply of new refuse collection vehicles if the decision is taken to expand the ULEZ.
- C5.43 As a result they request a phased implementation for Refuse Collection Vehicles.

C6. Coach and bus operators

Big Bus Tours

- C6.1 The organisation supports the principle of the ULEZ, but strongly opposes bringing forward its implementation in central London to April 2019.
- C6.2 It does not support a three-year residents' sunset period from April 2019 to April 2022, nor the current sunset period end date for disabled tax class vehicles in September 2023 – believing both should be longer.
- C6.3 It strongly opposes introducing a PM standard for diesel vehicles within the ULEZ standard.
- C6.4 The organisation says the new timeline is too short for businesses to adapt vehicles and subsidies to assist with vehicle conversion must be made available. It comments that coach companies bringing tourists into London will not be able to sustain the additional costs and the impact on London tourism could be huge, but this is not addressed in the current proposals. It says that September 2020 is a more reasonable timeline for implementation.

FirstGroup

- C6.5 The organisation supports the principle of the ULEZ, but neither supports nor opposes bringing forward its implementation in central London to April 2019.
- C6.6 It does not support a three-year residents' sunset period from April 2019 to April 2022 – believing it should be shorter. It did not give an answer regarding its support (or not) for keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C6.7 It supports introducing a PM standard for diesel vehicles within the ULEZ standard.
- C6.8 FirstGroup seeks assurances that if its usual route for Green Line services is not available and it has to use the ULEZ, it would not be subject to the charge. It comments that any proposal to extend the ULEZ will need to take into account its impact on local bus services not provided under contract to TfL, particularly at the edges of the Greater London area.

Harrow Community Transport

- C6.9 Harrow Community Transport opposes the principle of ULEZ and the introduction of ULEZ in central London from April 2019.
- C6.10 Suggests that ULEZ will adversely affect charities that operate accessible minibuses. States that many operators will not be able to update fleets in time and therefore be forced to pass on any charges to service users who are often the most disadvantaged in society.

The Original London Sightseeing Tour

- C6.11 Raised concerns that bringing the introduction of ULEZ in early in central London will have significant impact on the open top bus market and that most vehicles will need to be replaced. Suggests that two years is not enough time to allow for this as the technology is either unavailable or prohibitively expensive. Also suggests that the resale value of non-complaint coaches will be lowered due to an oversupply in the market place.
- C6.12 Suggests that proposals would have a significant impact on the tourist and commuter coach industry and would negatively impact London's economy. It therefore suggests that implementation for coaches is delayed or staggered to allow a realistic time for compliance.

Wandsworth Community Transport

- C6.13 Wandsworth Community Transport opposes the principle of ULEZ and the introduction of ULEZ in central London from April 2019.
- C6.14 It states that more time should be provided to allow for people to adjust and update vehicles.
- C6.15 It questions whether London Dial-a-Ride fleets will be given an exemption and suggests that other community transport providers should benefit from similar exemptions.

C7. Environmental groups

Air Quality Brentford

- C7.1 The group strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.2 It supports the three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C7.3 The group would like to see Brentford and the whole of Greater London included the ULEZ at the earliest possible date. Brentford, in particular, is a pollution hotspot with the M4 and A4 arterial roads running through residential areas and levels of NO₂ and PM₁₀ regularly exceed that which is legal.

Clean Air Merton

- C7.4 The group strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.

C7.5 It does not support a sunset period for residents or for disabled tax class vehicles.

C7.6 The group would like to see the ULEZ extended to include the whole of Merton since the council's data shows that that NO₂ levels are generally over the legal limits.

Clean Air in London

C7.7 The group strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.

C7.8 It did not support a residents' sunset period and felt the sunset period end date for disabled tax class vehicles should be shorter.

ClientEarth

C7.9 ClientEarth states that an ambitious ULEZ should be the cornerstone of a comprehensive strategy aimed at delivering legal compliance as soon as possible and establishing London as a world leader in clean air and sustainable urban transport. Suggests that the Mayor should link up the urgent need to tackle illegal levels of air pollution with the longer-term zero emission objective and ensure that proposals for improving ULEZ help to accelerate both objectives.

C7.10 It supports the principle of ULEZ, but stresses that TfL needs to demonstrate the scheme is based on the best available evidence and robust modelling of all options, including area covered, standards set, restrictions applied and implementation date(s), to help London meet legal limits in the shortest time possible. Suggests that there needs to be increased investment in public transport including walking and cycling, particularly in outer London boroughs.

C7.11 ClientEarth strongly supports the early implementation of the ULEZ in central London in 2019 so that the health benefits are felt as soon as possible. Suggests that an expanded ULEZ to include more of London should also be introduced in 2019. Also supports the introduction of a PM standard for diesel vehicles, but suggests that legal limits are better aligned with the World Health Organization's guidelines.

C7.12 Suggests that exemptions should only be considered for individuals who have a genuine need to drive in the zone due to health and mobility issues.

Climate Change Centre Reading

C7.13 The centre supports the principle of the ULEZ and bringing forward its implementation in central London to April 2019.

C7.14 It strongly opposes introducing a PM standard for diesel vehicles within the ULEZ standard.

- C7.15 It does not support a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023 – believing both should be shorter.
- C7.16 It suggests that the ULEZ should be introduced as soon as possible as a Net Zero Emission Zone (NZEZ) with a two-year amnesty on vehicle standards. It notes that TfL could use existing traffic regulation powers to prohibit idling and suggests a monthly car-free day on a working day (as suggested for Reading).

Ealing Friends of the Earth

- C7.17 The group strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.18 It did not express an opinion on whether or not it supported a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C7.19 The group says there should be a ULEZ covering all London as soon as possible. It notes there is serious air pollution in Ealing. It is concerned that so much attention has been given to this (very limited) ULEZ compared to other aspects of air pollution, since ULEZ is just one element of the measures needed to make London's air fit to breathe.

Environmental Protection UK

- C7.20 Environmental Protection UK (EPUK) strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.21 It says sunset periods should be shorter – for residents and for disabled tax class vehicles.
- C7.22 EPUK would like as few exemptions as possible as they undermine the effectiveness of the ULEZ, but notes that many disabled people and Blue Badge holders are under financial pressure due to austerity measures. These vulnerable users should get additional government assistance to improve their vehicles. EPUK supports shorter sunset periods for both residents and Blue Badge holders but would accept the three-year period, especially for cases of hardship.
- C7.23 It comments that particulate matter is a key concern. The health evidence suggests very strongly that there is no safe concentration for particles and more attention needs to be paid to ultrafine particles as there is growing evidence of their involvement in several medical conditions including cardiovascular conditions and dementia.

- C7.24 EPUK argues stringent emission criteria and enforcement are necessary for the ULEZ to be effective. It would welcome use of robust real world emission data for cars and vans, such as that found in the EQUA Index (www.equaindex.com).

Environmental Services Association

- C7.25 Environmental Services Association (ESA) supports the principle of the ULEZ, but opposes bringing forward implementation to April 2019.
- C7.26 It didn't offer an opinion on keeping a three-year residents' sunset period, or on keeping the end date for the disabled tax class vehicles as September 2023. It neither supports nor opposes introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.27 The ESA notes that bringing the ULEZ implementation forward could have a serious impact on waste management. Investing in new compliant vehicles is a significant capital cost. Those who do not update will get ULEZ charges. Both alternatives will have an impact on London's recycling rates and service delivery. It also risks a surge in demand for compliant vehicles without a sufficient supply.
- C7.28 It notes a lack of infrastructure to support compressed natural gas (CNG) vehicles, which are better environmentally than diesel Euro 6 vehicles. A 2019 deadline is too early for greater uptake of CNG, and could delay the transition. ESA proposes a transition phase for refuse collection vehicles (RCVs), given the vital services they provide, taking into account procurement cycles and development timescales of alternative fuels such as CNG. TfL should also consider the use of financial incentives to accelerate the transition.

Euston Air Quality and Trees Group

- C7.29 Euston Air Quality and Trees Group supports the principle of ULEZ and the introduction of ULEZ in central London from April 2019.
- C7.30 States that there are too many minicabs operating in central London and that they should be made to pay Congestion Charges.
- C7.31 Suggests that diesel engines should be banned during the day in the Congestion Charge zone.

Friends of the Earth

- C7.32 Friends of the Earth (FotE) strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.33 It did not express an opinion on keeping the three-year sunset period for residents from 2019-2022, or on keeping the closing date of the sunset period for disabled tax class vehicles as September 2023.

- C7.34 FotE says stronger measures are needed to bring pollution levels down sooner and an enlarged and strengthened ULEZ should be in place by the end of 2018. It proposes the ULEZ should be extended Londonwide, for all types of vehicles including cars – and that the Mayor should consult again on this immediately. This would:
- Ensure that infrastructure investment is focused at the most appropriate boundary
 - Avoid traffic problems at the North/South Circular boundary
 - Avoid splitting local authorities into being in or out of the ULEZ
- C7.35 The group comments that all measures possible must be pursued to bring down levels of air pollution and reduce long-term exposure to NO₂ – associated with higher mortality, hospital admissions and respiratory symptoms.
- C7.36 FotE strongly supports the inclusion of PM pollution in the ULEZ, since research from the WHO says that small particulate pollution has health impacts even at very low concentrations. It supports a new Clean Air Act to move the UK to WHO standards.

Greenpeace

- C7.37 Strongly supports the principle of ULEZ and believes that the scheme should be in the centre of the Mayor's efforts to address air pollution. Suggests that the ULEZ should be combined with investment in alternatives to private car travel such as walking and cycling. This would improve air quality and congestion and provide alternatives to those people on lower incomes.
- C7.38 Greenpeace strongly supports bringing forward the implementation of ULEZ in central London to 2019. However, it stresses disappointment that the extension of ULEZ to the North and South Circular Roads has been deferred to 2021, and suggests that the boundary should be widened to include all of Greater London.
- C7.39 It strongly supports the inclusion of a particulate matter standard for ULEZ and requests that Euro 6 diesel cars bought after that date of the ULEZ announcement are also included in the scheme alongside older models. States that the market is already starting to shift away from diesel towards increasingly affordable electric and hybrid alternatives. The ULEZ should reflect and strengthen this trend, promoting London's leadership in the transition towards EVs. In the long term, diesel and petrol vehicles need to be phased out to tackle climate change.

Hackney and Tower Hamlets Friends of the Earth

- C7.40 Hackney and Tower Hamlets FotE strongly support the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.

C7.41 It says residents' sunset period should be shorter, and the proposal should stick with the original three-year period for disabled tax class vehicles – giving an end date of April 2022.

Lambeth for a Cool Planet

C7.42 Lambeth for a Cool Planet strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.

C7.43 It says residents' sunset period should be shorter, but supports keeping the sunset period end date for disabled tax class vehicles as September 2023.

C7.44 It comments that bringing forward the implementation of the ULEZ will bring air quality benefits to all parts of Lambeth. It suggests that any sunset period for residents of the central London ULEZ should end when the area is expanded. Residents in the extended area are unlikely to get a long sunset period (if any) and to expect them to pay ULEZ charges while central London residents are enjoying a sunset period is unfair.

C7.45 It also suggests that any sunset period should apply only to vehicles already owned by eligible residents at the time the ULEZ comes into effect. A resident buying a non-compliant vehicle after that time should not enjoy a sunset period in respect of that vehicle.

London Sustainability Exchange

C7.46 The exchange strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.

C7.47 It would like a longer sunset period for residents and for disabled tax class vehicles.

C7.48 The exchange says Blue Badge holders should be fee exempt. Blue Badges holders are usually over 65 and have mobility restrictions and health issues. Inflicting fees upon them is unfair, especially if they are travelling through the ULEZ for treatment.

C7.49 The exchange strongly supports bringing forward the ULEZ implementation not just because of improvements to air quality and the associated health benefits, but also because it will deter people from bringing private cars into London.

C7.50 It supports extending methods of payment to include an app since it will be more convenient for users and reduce unpaid charges.

C7.51 It also comments that for air pollution levels to markedly reduce the ULEZ area should be extended outside central London.

Muswell Hill Sustainability Group

- C7.52 The group strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.53 It did not support a three-year residents' sunset period from April 2019 to April 2022 – believing this should be shorter. It did support keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C7.54 The group notes that air quality is a major issue locally. It wants to see more charging points for EVs and a scrappage scheme for diesel. It also suggests that the contribution residential wood burning makes to emissions should be evaluated since it produces particulate emissions.

Chartered Institute of Environmental Health

- C7.55 The institute strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C7.56 It supports keeping a three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C7.57 It comments that poor air quality, as the result of lack of control on NOx emissions and PM, has brought us to the edge of a public health emergency. It strongly supports the ULEZ but as part of a wider package to encourage alternative transport arrangements such as walking, cycling and greater use of public transport.

C8. Freight organisations

Freight Transport Association

- C8.1 The Freight Transport Association (FTA) states that it does not support the early implementation of ULEZ in central London unless there is considerable support to the industry to be compliant – especially for small operators. Suggests that only 40 per cent of the HGV fleet and 22 per cent of vans across the UK would be compliant in 2019. There would not be an established second hand market to replace vehicles and the cost to business would be considerable.
- C8.2 Suggests that organisations with operating bases within or close to the zone should also be offered a sunset period.
- C8.3 Requests that proposals for ULEZ and the Direct Vision Standard are better coordinated to allow operators more time to upgrade fleets.

Road Haulage Association

- C8.4 The Road Haulage Association (RHA) neither supports nor opposes the principle of the ULEZ. It strongly opposes bringing forward implementation

in central London to April 2019. It neither supports nor opposes introducing a PM standard for diesel vehicles within the ULEZ standard.

- C8.5 It did not give answers on keeping the three-year residents' sunset period from April 2019 to April 2022, or keeping the current sunset period end date for disabled tax class vehicles (September 2023).
- C8.6 The RHA says early implementation is not fair or reasonable for the HGV sector. Replacing existing vehicles earlier will have a major impact on businesses planning transitions to comply with implementation in 2020.
- C8.7 It notes that the introduction of Clean Air Zones in the UK will also affect the availability of replacement Euro VI vehicles – in particular specialist vehicles. This is a particular risk for SMEs who cannot redeploy fleets around the network.
- C8.8 The RHA believes the ULEZ proposals should focus on reducing congestion in key 'hotspots' through better traffic management, smarter vehicle routing and improved roadwork management. It should also encourage road network use outside peak periods.
- C8.9 It says a phased approach to early implementation will mitigate some of the impact for hauliers. Also, exemptions should be made for some specialist vehicles (gritting, snow ploughing, emergency vehicles and recovery vehicles) where replacement costs are very high and air quality impact is negligible.
- C8.10 The Mayor and his team also need to consider other emission sources. Focusing heavily on goods vehicles without addressing other transport and non-transport sources of pollution will result in no meaningful improvement to air quality.

C9. Health organisations/charities

Age UK London

- C9.1 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C9.2 It supports a three-year residents' sunset period from April 2019 to April 2022. It did not support the sunset period end date for disabled tax class vehicles of September 2023 – believing this should be longer.
- C9.3 Age UK says it would like to see further research on the effects of poor air quality on older Londoners since much current research focuses on children and young people. Its own feedback from older people is that they are very aware of poor air quality having harmful effects on themselves and/or other older people.

C9.4 It would also like a sunset period for vehicles such as minibuses operated by charities and similar organisations providing frontline services to disadvantaged Londoners.

Association of Directors of Public Health for London and London Environment Directors' Network

C9.5 The Association of Directors of Public Health for London and London Environment Directors' Network (ADPH and LEDNet) endorse introducing all proposed changes as early as possible while minimising exemptions and the length of time these exemptions are applicable. Both welcome the inclusion of PM emissions into the standards for diesel vehicles.

C9.6 They note that addressing air pollution improves the health of Londoners and reduces health inequalities. Endorse an approach which creates a city where walking, cycling and the use of public transport are the most accessible and attractive choices.

British Heart Foundation

C9.7 The British Heart Foundation (BHF) believes that there should be no delay in tackling poor air quality, and action should be taken at as quick a pace as possible. It therefore supports bringing forward the introduction of ULEZ in central London.

C9.8 The BHF is pleased to see that the importance of also reducing harmful levels of PM is front and centre in the Mayor's proposals for the ULEZ. This is especially significant given that studies show that globally cardiovascular disease is estimated to account for 80 per cent of all premature deaths from air pollution. Requests that the Mayor goes further to tackle PM in London and sets measures that go beyond EU legal limits and adopt the World Health Organization's PM limits.

British Lung Foundation

C9.9 Supports the principle of ULEZ and the early introduction of ULEZ in central London so that the health benefits generated from having cleaner air are felt as soon as possible. States that these health benefits will benefit the vulnerable people the most. It supports the sunset periods for residents and disabled class tax vehicles but believes that Blue Badge holders should also benefit from a sunset period. It states that Blue Badge holders are required to travel for specialist care and treatment and therefore would be disproportionately impacted.

C9.10 The foundation supports a PM standard for diesels and suggests that health targets should be set for ULEZ and integrated with local health plans.

C9.11 It supports the expansion of ULEZ Londonwide and suggests that the boundary should be set so that it includes areas where vulnerable people frequent such as schools, hospitals and care homes.

C9.12 Building on the pollution alerts, British Lung Foundation suggests that there should be wider public health information on air pollution, with wider monitoring outside schools, care homes and hospitals.

Medact

C9.13 Medact strongly supports the principle of ULEZ and makes the following suggestions:

- Implement the ULEZ as soon as possible
- Expand the area to include the North and South Circular Roads, and beyond into Greater London as soon as possible
- Include a charge on Euro 6 diesel cars in all ULEZ as these cars have clearly been shown to be neither safe nor clean
- Invest in and support alternatives to car travel such as public transport, walking and cycling; and encourage greater car sharing

C9.14 Supports proposals for sunset periods and the introduction of a PM standard for diesel vehicles.

C10. Motoring groups

Association of Vehicle Recovery Operators

C10.1 The Association of Vehicle Recovery Operators states that it can take between 12-18 months to manufacture specialist recovery vehicles and that provision needs to be given to recovery vehicle operators to allow enough time to replace these fleets.

C10.2 It also states that many operators have already invested in fleets that comply with existing emission standards and these will be adversely affected when ULEZ is introduced.

C10.3 Requests an exemption from ULEZ charges.

Federation of British Historic Vehicle Clubs

C10.4 The federation supports the principle of the ULEZ, but neither supports nor opposes bringing forward its implementation to April 2019. It also supports introducing a PM standard for diesel vehicles within the ULEZ standard.

C10.5 It supports keeping the three-year year residents' sunset period from April 2019 to April 2022, but says the sunset period for disabled tax class vehicles should be longer.

National Association of Wedding Car Professionals

C10.6 The National Association of Wedding Car Professionals seeks assurance that the exemption for 'historic vehicles' is also applicable should ULEZ be introduced earlier in central London (from April 2019).

Routemaster Association

C10.7 The association supports the principle of the ULEZ and bringing forward its implementation to April 2019.

C10.8 It supports keeping the three-year residents' sunset period from April 2019 to April 2022, but says the sunset period for disabled tax class vehicles should be shorter.

C10.9 It neither supports nor opposes introducing a PM standard for diesel vehicles within the ULEZ standard.

C10.10 It says all previous exemptions in earlier ULEZ proposals, for example, for vehicles in the historic taxation class as well as those over 30 years of age, should remain in place unchanged.

RAC Foundation

C10.11 The foundation supports the principle of the ULEZ, but opposes bringing forward its implementation in central London to April 2019.

C10.12 It supports introducing a PM standard for diesel vehicles within the ULEZ standard.

C10.13 It supports keeping a three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.

C10.14 The foundation says ULEZ implementation in 2019 will impact businesses, given long lead times for new commercial vehicles (particularly ones with specialised uses) and penalties for ending leasing agreements. Businesses with vans and lower income households, who rely on older private cars or powered two-wheelers to access work also face these issues. In the absence of a scrappage scheme, a 2019 ULEZ will hurt this group.

C10.15 If the ULEZ is introduced in 2019 it suggests a graduated approach to charging over time to find a balance between compliance and the risks to a well-functioning London.

C10.16 The foundation is also concerned that the interaction between the London ULEZ and the proposed Clean Air Zones elsewhere will lead to confusion for road users.

C10.17 It supports adding real-world testing to emissions standards.

C11. Taxi and private hire organisations

GMB (Professional Drivers Branch)

- C11.1 The GMB strongly opposes the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C11.2 It opposes a three-year residents' sunset period from April 2019 to April 2022, but supports keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C11.3 It says the proposals will disproportionately affect poorer motorists living outside the central area who use older vehicles to get to work. People in low paid jobs often work long, unsociable hours. Using public transport can not only be impractical but also creates dangers especially for the vulnerable or lone women. Bringing the timeline forward gives poorer users even less time to plan for the change. A scrappage scheme with guaranteed low finance would help.
- C11.4 It comments that private hire drivers' income will decrease even further as fleet operators pass on the costs of purchasing new vehicles.
- C11.5 It suggests banded Congestion Charging (without resident discounts) and restricting deliveries at peak times to ease the flow of traffic and reduce emissions. It notes that a lack of charging infrastructure especially rapid charging points may be an issue for electric vehicles. It also says that removing traffic lanes to create cycling routes has led to increased congestion and emissions.

Licensed Private Hire Car Association

- C11.6 The association strongly supports the principle of the ULEZ, but strongly opposes bringing forward its implementation in central London to April 2019. It supports introducing a PM standard for diesel vehicles within the ULEZ standard.
- C11.7 It has no opinion on keeping a three-year residents' sunset period from April 2019 to April 2022 and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C11.8 It says that the proposals should not be brought forward because more time is needed to comply and little if anything can be changed in the new timelines.

Licensed Taxi Drivers' Association

- C11.9 The organisation strongly supports the principle of the ULEZ and bringing forward its implementation in central London to April 2019. It supports introducing a PM standard for diesel vehicles within the ULEZ standard.
- C11.10 It supports keeping a three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C11.11 The association supports the proposal that taxis will remain exempt from the ULEZ, as they are already subject to environmental standards through

the licensing system. By January 2018 all new black cabs in London will be zero emissions capable (ZEC).

- C11.12 It notes the disparity between standards for taxis and for PHVs which are not required to be ZEC until 2023. It says this is no longer tenable given the rise in PHVs and undermines TfL's requirements for taxis in London. Therefore, PHVs should have to make a similar transitional commitment to taxis and remain subject to the ULEZ.
- C11.13 It also notes that since taxis are the only 100 per cent wheelchair accessible transport option available in London, they should remain exempt from the ULEZ in order not to restrict access and the independence of wheelchair users.
- C11.14 The association supports a PM standard for diesel vehicles within the emissions standards, but believes taxis should be exempt, recognising the transition to ZEC from 2018.

Unite the Union (Cab Section)

- C11.15 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C11.16 It supports a three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.

C12. Transport campaign groups

Alliance of British Drivers

- C12.1 Alliance of British Drivers states that it objects to the proposals as there is insufficient information available on the cost benefit analysis of the proposals. Suggests that more information should be made available.

Better Streets for Enfield

- C12.2 Better Streets for Enfield strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C12.3 It says residents' sunset period should be shorter, but supports keeping the closing date of the sunset period for disabled tax class vehicles as September 2023.
- C12.4 The group wants to see a ULEZ for the whole of London within the M25, combined with road charging to discourage short car journeys. It also wants

TfL to encourage cycling and walking via protected cycle lanes and safer junctions and protect all residential areas so they are free from through traffic.

- C12.5 It favours the introduction of real world emission tests for diesel vehicles since this would not only identify diesel Euro 6 vehicles that emit high levels of NOx, but also individuals and companies who cheat the system by removing diesel particulate filters and exhaust gas recirculation valves.

Campaign for Better Transport

- C12.6 Strongly supports the proposal to bring forward the introduction of the central London ULEZ to April 2019 from September 2020, and perceives it as a vital step towards meeting clean air compliance and addressing a public health crisis.
- C12.7 Urges the Mayor to use the residents' sunset period to encourage people to use alternative methods of transport including car clubs rather than purchasing a new vehicle. Supports the proposal to provide a longer sunset period for owners of disabled tax class vehicles.
- C12.8 Supports the introduction of a PM standard for diesel vehicles which it perceives as an important first step in addressing PM emissions. Welcomes initiatives which encourage walking and cycling.

Campaign for Better Transport (London)

- C12.9 Campaign for Better Transport (London) supports the principle of ULEZ and the introduction of ULEZ in central London from April 2019. Suggests that London should be doing more like other international cities, for example Paris and Berlin, to address poor air quality.

Enfield Cycling Campaign

- C12.10 The Enfield Cycling Campaign (ECC) strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C12.11 It does not support residents having a sunset period at all, but supports keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C12.12 The ECC would like to see the ULEZ extended to the M25 as a priority. It is very concerned that poor air quality affects residents' health. It wants to see all Londoners' health protected by a Londonwide ULEZ for all vehicles as soon as possible, and by 2020 at the latest.
- C12.13 It is disappointed to see just a partial extension (to North and South Circular Roads) planned for 2021 and suggests the Mayor should consult on the option of a Londonwide ULEZ for all vehicles. This should be integrated with a road-pricing scheme, with charging based on the time of day, distance travelled and level of vehicle emissions to reduce car use.

- C12.14 It suggests that ULEZ PM standards be based on real world driving emissions tests verified by the 'cleaner vehicle check' scheme. Penalising non-compliant vehicles would send a clear signal to the motor trade.
- C12.15 The ECC also wants all new diesel vehicles to display 'cigarette packet' warnings of exposure to nitrogen dioxide (NO₂) and particulate matter (PM_{2.5}) alongside driving emissions test results so consumers are fully informed.
- C12.16 It notes that the best way to clean up the air is to have less traffic. Measures are needed to reduce car use and enable a rapid transition to more journeys being made on foot, by bike and by public transport especially in outer London.

Living Streets (London)

- C12.17 Living Streets supports the introduction of ULEZ in London but suggests that the Euro VI standard is tightened to reflect real world driving conditions. It supports the introduction of a PM standard for diesel vehicles.
- C12.18 It also supports the early implementation of ULEZ in central London and suggests that the zone is widened up to the North and South Circular Roads at the earliest opportunity to address poor air quality.
- C12.19 Living Streets does not support a sunset period for residents and disabled tax class vehicles and also suggests that this sets a bad precedent for when ULEZ is expanded and feels that this could significantly reduce the scheme's effectiveness.
- C12.20 Lastly, Living Streets suggests that transport policy should be developed to encourage more people to walk and cycle.

London Cycling Campaign

- C12.21 London Cycling Campaign supports the principle of ULEZ and the early introduction of the scheme in central London.
- C12.22 It supports the introduction of a PM standard for diesels but stresses that more needs to be done to improve air quality including ensuring a modal shift to walking and cycling including investing more in these modes. Suggests that the Mayor should incentivise modal shift for deliveries particularly in central London so that businesses use cycles in the future.
- C12.23 Suggests that the Mayor should not pursue policies that encourage car use, congestion and pollution, but should join-up all policies relating to climate change, transport, pollution, public health and quality of life.

London Forum of Civic and Amenity Societies

C12.24 The London Forum of Civic and Amenity Societies states that Euro VI diesel vehicles are still significant polluters and suggests that by allowing these vehicles within the ULEZ emission standard, it encourages people to purchase these vehicle types. Suggests that the Mayor gives a commitment that the ULEZ standards will be reviewed in the future to discourage people from buying these vehicles.

London Tourist Coach Operators' Association

C12.25 The association strongly supports the principle of the ULEZ. It neither supports nor opposes bringing forward its implementation in central London to April 2019. It supports introducing a PM standard for diesel vehicles within the ULEZ standard.

C12.26 It has no opinion on keeping a three-year residents' sunset period from April 2019 to April 2022, but supports keeping the sunset period end date for disabled tax class vehicles as September 2023.

C12.27 The association says bringing forward the ULEZ implementation date to April 2019 will have an impact on costs for members whose fleet replacement plans have been based on the original 2020 timeline. It is concerned that these impacts appear not to have been quantified by TfL and would like to know what calculations have been done to measure them.

C12.28 It comments that a balance needs to be struck between restricting numbers of cars, private hire vehicles and delivery vans, and hitting mass occupancy vehicles which in themselves are part of the solution to cleaning London's air.

Motorcycle Action Group

C12.29 The group neither supports nor opposes the principle of the ULEZ, bringing forward its implementation to April 2019 or introducing a PM standard for diesel vehicles within the ULEZ standard. It supports keeping the three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.

C12.30 The group says that motorcycles should be exempted from the ULEZ charge. Most motorcycles used in London are small engine machines and even older models (a small proportion of the number in use) produce much lower emissions than cars. It suggests that encouraging motorcycle use to replace car and bus use could help TfL achieve emissions targets. Many London riders use motorcycles as a cost-effective means of commuting. If charges are introduced, they are likely to use other means of transport, such as cars or buses which contribute considerably more NOx to air pollution levels.

C12.31 It proposes that motorcycles and electric vehicles should be treated in a similar manner with regard to charging, since both make minimal contributions to emissions. It also suggests that charging would contradict the Mayor's policy statement on motorcycling as a low-emission way of reducing congestion.

Road Danger Reduction Forum

- C12.32 The forum strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C12.33 It does not support a sunset period for residents or for disabled tax class vehicles.
- C12.34 The forum would like to see pay as you go road pricing for all motor vehicles throughout London and the immediate start of a process to create a Londonwide ULEZ for all vehicles – so all Londoners can breathe safe air within EU limits for NO₂ by 2020.
- C12.35 It comments that the diesel ULEZ standard should be based on independent 'real world driving' emission tests – not the manufacturers' ones. World Health Organization guidelines should be used for the diesel ULEZ particulate matter standard. It also comments that cycling provision could be improved, especially in outer London.

Sustrans

- C12.36 Sustrans believes that measures aimed at changing the way people travel, with significantly more walking, cycling and clean public transport in place of car use, must be a critical part the Mayor's Transport Strategy to tackle air pollution in parallel with ULEZ.
- C12.37 Supports the principle of ULEZ and endorses widening the geographical area of the zone to include the whole of Greater London. Suggests that the emission standards are set to reflect real world driving conditions as opposed to laboratory testing.
- C12.38 Supports the early introduction of ULEZ in central London and introduction of a PM standard for diesel vehicles to align the standard with the Government's Clean Air Zone framework.

Tower Hamlets Wheelers (London Cycle Campaign)

- C12.39 The group strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C12.40 It did not express an opinion on keeping a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C12.41 The group notes that Tower Hamlets has some of the most serious air quality problems of any London borough. It asks that the ULEZ be extended beyond the planned zone to include all areas of inner London – including Tower Hamlets. It would also like the ULEZ to be integrated with other policies reducing the need for motor vehicle travel and increasing journeys made by walking and cycling.

C12.42 It says constructing new roads and tunnels in London will only encourage the growth of motor traffic and undermine the Mayor's air quality objectives. The group would like to see the money raised by an extended ULEZ spent directly on enabling non-polluting transport modes such as cycling and walking and advocates moving towards zero emissions standards for all vehicles.

C13. Other

Bloomsbury Association

C13.1 The association strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard

C13.2 It does not support a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023, believing both should be shorter.

C13.3 The association would like to see the ULEZ introduced earlier than 2019 and pedestrians given priority with vehicles banned from central London or banned from certain streets in central London on more days than just New Year's Eve. It wants restrictions on motor vehicles in central London on high pollution days – banning all motor vehicles (except emergency vehicles) entering the central area.

C13.4 It comments that lorries above a certain size (18 tonnes) should be banned from central London entirely and the Lorry Control Scheme should be reviewed. It also notes that many road users do not observe Road Traffic Act regulations on leaving engines running while parked or parking regulations, leading to increased congestion and emissions.

Cross River Partnership

C13.5 The organisation strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.

C13.6 It does not support a three-year residents' sunset period from April 2019 to April 2022 – believing this should be shorter, but it supports the current sunset period end date for disabled tax class vehicles (September 2023).

C13.7 It is pleased to see more stringent regulation and supports extending the current proposals to cover the outer London boroughs where car use (and pollution) is increasing.

C13.8 It notes, however, that the ULEZ alone will not reduce traffic congestion. Delivery and servicing organisations will continue to enter central London, pay the charge, and pass on the charges to customers. It is therefore crucial that ULEZ changes are supported with further work to reduce the number of vehicles operating within the zone, not just emissions.

European Network of Child Friendly Cities

- C13.9 The European Network of Child Friendly Cities supports the principle of ULEZ and the introduction of ULEZ in central London from April 2019.
- C13.10 Requests that there should be a clear plan to reduce air pollution to within legal limits within a defined timeframe. Also suggests that there should be longer-term plans to reduce emissions close to schools and nurseries such as exclusion zones.

Fitzrovia Neighbourhood Association

- C13.11 The association strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019 and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C13.12 It does not support a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023, believing both should be shorter.
- C13.13 The association wants to see restrictions on motor vehicles in central London on high pollution days – a ban on all motor vehicles (except emergency vehicles) entering the central area. This should also extend to residents' motor vehicles.

Fitzrovia West Neighbourhood Forum

- C13.14 Fitzrovia West Neighbourhood Forum supports the principle of ULEZ on the basis that a scrappage scheme is introduced to assist residents with older diesel cars – especially those that are elderly and disabled.
- C13.15 Suggests that TfL should lead by example and introduce zero emission buses and taxis.
- C13.16 Also notes that more needs to be done to reduce emissions from other sources such as tyre wear, home heating etc., and the promotion of walking and cycling as an alternative means of transport.

Kennington and Walworth Neighbourhood Action Group

- C13.17 The group did not express an opinion on its support (or not) for the principle of the ULEZ to improve air quality in London, for bringing forward the implementation date in central London to April 2019, or introducing a PM standard for diesel vehicles within the ULEZ standard.
- C13.18 It did not express an opinion on whether it supported a three-year residents' sunset period from 8 April 2019 to 11 April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C13.19 However, the group believes it is vital to the health and wellbeing of Londoners that levels of pollution are reduced as a matter of urgency. It

says focusing only on the Congestion Charge zone is not the right approach.

- C13.20 It notes there will be significant increases in pollution for areas just outside the ULEZ boundary like Kennington and Walworth. The group would like TfL and the Mayor to make public in an easily accessible form the results of modelling on the impact of the ULEZ on the areas immediately outside it as well as within the zone.
- C13.21 It is concerned that the main driver behind the proposed boundary location is the presence of existing Congestion Charge monitoring equipment. It asks that the Mayor and TfL reconsider this proposal so it improves air quality for all Londoners – particularly those in areas with high levels of dangerous air pollutants.

Kew Residents Association

- C13.22 The association strongly supports the principle of the ULEZ, bringing forward its implementation to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.
- C13.23 It supports keeping a three-year residents' sunset period from April 2019 to April 2022, and keeping the sunset period end date for disabled tax class vehicles as September 2023.
- C13.24 The association supports extending the ULEZ to suburban areas of London, but wants it to cover the whole of the London area as far as the M25.
- C13.25 It notes that air quality in Kew outside the South Circular Road is already poor and likely to deteriorate further if the ULEZ stops here. With major roads passing through the area, non-compliant vehicles will look to avoid charges by using roads outside the ULEZ to reach their destinations – increasing congestion and pollution in these areas.
- C13.26 The association comments that it is essential to clean up the air for the whole of London, not just inner areas. Air pollution in the suburbs is a severe problem. Extending the ULEZ to the M25 would benefit the health and quality of life of millions more Londoners.

Our Vauxhall

- C13.27 Our Vauxhall supports the principle of the ULEZ and bringing forward its implementation to April 2019. It strongly supports a PM standard for diesel vehicles within the ULEZ standard.
- C13.28 It says a residents' sunset period should be shorter, but supports keeping the closing date of the sunset period for disabled tax class vehicles as September 2023.
- C13.29 It comments that the impact of the proposal on the ULEZ boundary zones should be closely monitored. Also, that money should be set aside to mitigate the impact in these areas.

C13.30 Notes there are a number of schools in the Vauxhall Cross area where children are routinely exposed to poor air quality. It is concerned that this proposal, along with the existing plan for Vauxhall gyratory can only make matters worse for them.

St Marylebone Society

C13.31 The society strongly supports the principle of the ULEZ, bringing forward its implementation in central London to April 2019, and introducing a PM standard for diesel vehicles within the ULEZ standard.

C13.32 It does not support a three-year residents' sunset period from April 2019 to April 2022, or keeping the sunset period end date for disabled tax class vehicles as September 2023, believing both should be shorter.

C13.33 The society says that it supports these proposals but the current ULEZ boundary is likely to cause even more pollution in its area. Pollution, from vehicles and also from the diesel trains at Marylebone Station, is the most important issue in the area. It wants to see the ULEZ boundary significantly extended, and more initiatives to tackle the problem.

The Entertainment Agents' Association

C13.34 The group supports the principle of the ULEZ but opposes bringing forward its implementation in central London to April 2019.

C13.35 It would like a longer sunset period for residents and for disabled tax class vehicles.

C13.36 It supports introducing a PM standard for diesel vehicles within the ULEZ standard.

C13.37 The association notes that many performers need to carry props, musical instruments, costumes and technical equipment and must therefore travel by car or van. Since many performers are on a relatively low income they cannot replace non-compliant vehicles without financial hardship. Many of the association's members and the performers they represent live outside London. Even those who live in London mostly live on the outskirts due to economics and travel considerable distances to work.

Appendix D: Consultation questionnaire

1. Part 1 – ULEZ

Q1: Do you support the principle of the Ultra Low Emission Zone to improve air quality in London?

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

Q2: To what extent do you support bringing forward the implementation of the ULEZ in central London from 7 September 2020 to 8 April 2019?

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

Q3: Do you support keeping a three-year residents' sunset period so it is from 8 April 2019 to 11 April 2022?

- Yes
- No – the sunset period for residents should be longer
- No – the sunset period for residents should shorter
- I do not think residents should have a sunset period at all
- Don't know

Q4: Do you support keeping the present end date of the sunset period for disabled tax class vehicles so it is from 8 April 2019 to 11 September 2023?

- Yes
- No – the sunset period for disabled tax class vehicles should be longer
- No – the sunset period for disabled tax class vehicles should shorter
- I do not think disabled tax class vehicles should have a sunset period at all
- Don't know

Q5: To what extent do you support introducing a PM standard for diesel vehicles within the ULEZ standard?

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

2. Part 2: Further comments

Q6: If you have any further comments about the proposals, please write these in the box below.

[Free Text Box]

3. Part 3: About you

7. What is your name?

8. 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)

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

10. 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

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

12. 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

13. How did you hear about this consultation?

- Received an email from TfL
- Received a letter from TfL
- Read about the consultation on the TfL website
- Read about it in the press
- Through social media
- Other (please specify below)

14. 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

4. Part 4: Travelling in London

15. 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

16. 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

5. Part 5: Equality and inclusion

Please tell us a bit about yourself in this section. All information will be kept confidential and used for analysis purposes only. We are asking these questions to ensure our consultations reach all sections of the community and to improve the effectiveness of the way we communicate with our customers. You do not have to provide any personal information if you don't want to.

17. Gender:

- Male
- Female
- Trans female
- Trans male
- Gender neutral
- Prefer not to say

18. Ethnic group:

- Asian or Asian British – Bangladeshi
- Asian or Asian British – Chinese
- Asian or Asian British – Indian
- Asian or Asian British – Other
- Asian or Asian British – Pakistani
- Black or Black British – African
- Black or Black British – Caribbean
- Black or Black British – Other
- Mixed – Other
- Mixed – White and Asian
- Mixed – White and Black African
- Mixed – White and Caribbean
- Other ethnic group
- Other ethnic group – Arab
- Other ethnic group – Kurdish
- Other ethnic group – Latin American
- Other ethnic group – Turkish
- Prefer not to say
- White – British
- White – Irish
- White - Other

19. Age:

- Under 15
- 16-20
- 21-25
- 26-30
- 31-35
- 36-40
- 41-45
- 46-50
- 51-55
- 56-60
- 61-65
- 66-70
- 71+
- Prefer not to say

20. Sexual orientation:

- Bisexual man
- Bisexual woman
- Gay man
- Heterosexual man
- Heterosexual woman
- Lesbian
- Other
- Prefer not to say

21. Faith:

- Buddhist
- Christian
- Hindu
- Muslim
- Sikh
- Jewish
- Other
- None
- Prefer not to say

22. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (Please include problems related to old age)

- Yes, limited a lot
- Yes, limited a little
- No
- Prefer not to say

Appendix E: Stakeholder meetings

Date	Event	Description	Stakeholder(s)
Jul-16			
15-Jul	Campaign for Better Transport meeting	Catch up to discuss current planning issues	Campaign for Better Transport
21-Jul	Confederation of Passenger Transport UK meeting	Regular meeting	Confederation of Passenger Transport
25-Jul	BVRLA		BVRLA
Aug-16			
10-Aug	Central Sub-regional panel	Regular meeting of borough officers and other reps for central London	Boroughs – central region
Sep-16			
01-Sep	SMMT	Meeting with Deputy Mayor	SMMT
01-Sep	London First	Regular catch up	London First
06-Sep	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
08-Sep	West Sub-regional panel		London borough officers
08-Sep	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-Sep	Independent Disability Advisory Group (IDAG)	Presentation to TfL's advisory panel	IDAG

13-Sep	Community Transport briefing	Presentation to regular Community Transport meeting	Community Transport Group representatives
16-Sep	London Travelwatch (LTW)	Meeting to discuss the MTS – air quality added to the agenda	LTW
19-Sep	London City Airport meeting	Meeting to discuss the ULEZ expansion	London City Airport
20-Sep	SMMT Electric Vehicles Group	Plenary to discuss electric vehicles industry	Vehicle manufacturers, charge point manufacturers, operators, academics, government
22-Sep	Bus Network Seminar	Annual borough meeting to discuss bus issues	Borough leaders, officers, cabinet members
22-Sep	South Bank Employers' Group (SBEG)	Presentation at regular event for SBEG members	SBEG members
28-Sep	Recovery vehicles working group	Regular meeting with recovery vehicles industry	Vehicle recovery firms
29-Sep	LPHCA Road Show	Annual roadshow event	PHV operators and PHV trade associations
Oct-16			
18-Oct	Consultation event	Breakfast briefing for launch of the consultation	Representatives from health, environment, business, freight, voluntary, boroughs, and MPs
06-Oct	Central panel	Regular meeting of borough officers and other reps for central London	Boroughs – central region
11-Oct	London Councils engagement group	Meeting to discuss widening/tightening the ULEZ	Boroughs, London Councils
12-Oct	Florence Eshalomi AM and Leonie Cooper AM briefing	Meeting with Labour leads for transport and the	Assembly Members, researchers

		environment to discuss proposals	
12-Oct	Assembly researcher briefings	Meeting with Assembly researchers to discuss proposals	Assembly researchers
25-Oct	BVRLA	Policy discussion about issues affecting the vehicle rental sector	BVRLA
13-Oct	London First	London First meeting	London First
14-Oct	Federation of Small Businesses (FSB)	Air quality meeting	FSB
17-Oct	Greener by Design	Royal Aeronautical Society's annual environmental conference	
21-Oct	Freight Forum	Meeting, hosted by TfL's Commissioner, of around 60–80 stakeholders from across the freight and fleet industry, businesses and the boroughs	Freight industry including FTA, DHL, RHA; business including LCCI, London First, FSB; boroughs and the Department for Transport
Nov-16			
02-Nov	Freight in the City Expo	TfL is the headline sponsor, and we have speakers and exhibition space	Freight and business
05-Nov	Regent Street Motor Show	TfL/Go Ultra Low have a section at the event to explain the ULEZ	Freight stakeholders
09-Nov	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

09-Nov	Transport Association dinner	Presentation on air quality initiatives	Freight operators
10-Nov	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-Nov	Sub-regional mobility forum	Presentation on air quality	Boroughs
24-Nov	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-Nov	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
Dec-16			
01-Dec	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
03-Dec	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
05-Dec	PHV meeting	Air quality meeting with the PHV trade	PHV operators and PHV trade associations
06-Dec	BVRLA roundtable		BVRLA members, car clubs, operators, BT, RAC Foundation, FTA, Royal Mail, John Lewis
Jan-17			
19-Jan	LoCITY Working Group - HGV		Freight and fleet operators
25-Jan	LoCITY Working Group - Policy, Planning, Practice and Procurement		DfT, OLEV, boroughs, LCVP

26-Jan	ULEV Car Club Working Group		Car clubs, BVRLA, London Councils
Feb-17			
22-Feb	Institute of Directors		
28-Feb	SMMT Environment Policy Working Group		
Mar-17			
30-Mar	Greenpeace		
30-Mar	Prof Grigg, Doctors Against Diesel / QMU		
30-Mar	Client Earth		
Apr-17			
03-Apr	Borough cabinet member briefing		Transport and environment cabinet members
May-17			
03-May	GLA Fleet Managers meeting		LAS, Met Police, LFB, BTP
Jun-17			
09-Jun	British Transport Police		
16-Jun	Freight breakfast event		Freight and fleet operators
22-Jun	Borough officer technical briefing		Transport and environment officers
Jul-17			
24-Jul	MTS Freight Forum		Freight and fleet operators, business, boroughs
24-Jul	GMB Drivers Union		

Appendix F: Glossary of terms

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

Auto Pay: 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.

BAME (black, Asian and minority ethnic): Used to refer to members of non-white communities in the UK.

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

CHP (combined heat and power): Local electricity generation that captures the heat that would otherwise be wasted to provide useful thermal energy (such as steam or hot water) that can be used for space heating, cooling, domestic hot water and industrial processes.

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

Congestion Charge (CC), Congestion Charge zone (CCZ): 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.

COPERT (calculation of air pollutant emissions from road transport): A software tool used worldwide to calculate air pollutant and greenhouse gas emissions from road transport. The development of COPERT is coordinated by the European Environment Agency (EEA), in the framework of the activities of the European Topic Centre on Air Pollution and Climate Change Mitigation. The European Commission's Joint Research Centre manages the scientific development of the model. COPERT has been developed for official road transport emission inventory preparation in EEA member countries.

Cost of compliance: The cost to individuals, groups, businesses etc., complying with a scheme by either paying the daily charge or upgrading vehicles to meet the required standard, along with the inconvenience and administration costs associated with the required response.

DVLA (Driver and Vehicle Licensing Agency): The Government agency that maintains the registration and licensing of drivers in Great Britain and the registration and licensing of vehicles, together with the collection and enforcement of Vehicle Excise Duty (VED) in the UK.

Economic and Business Impact Assessment (EBIA): Assessment that identifies and assesses the impacts on London's economy as a result of the proposals, the potential impacts on small and 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 proposals 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.

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

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.

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

Health Impact Assessment (HIA): Assessment that identifies and assesses the impact of the proposals 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 equality issues and thus has some overlap with the EqIA.

HGV (heavy goods vehicle): Type of truck weighing more than 3.5 tonnes.

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 proposal.

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

London Environment Strategy (LES): A statutory strategy containing a general assessment by the Mayor of the environment in Greater London as well as policies and proposals in relation to biodiversity municipal waste management, climate change mitigation and energy, adaptation to climate change, air quality and ambient noise.

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 light commercial vehicle; designed and constructed for the carriage of goods and weighing less than 3.5 tonnes.

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

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

MTS (Mayor's Transport Strategy): A statutory document setting out the Mayor's intentions for London transport.

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 less than 10 microns in diameter): Particulate matter that is harmful to human health and subject to EU limit values.

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

RDE (real driving emissions): Test to measure the pollutants, such as NO_x and PM, emitted by vehicles while being driven on the road. RDE complements lab tests to help ensure that vehicles deliver anticipated emissions under real world driving conditions.

Sensitive locations: Sensitive locations (often called sensitive receptors) include, but are not limited to, hospitals, schools, daycare facilities, housing for the elderly and convalescent facilities. These are places 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 vehicles): A vehicle that is constructed to be capable of operating in zero emissions mode for at least part of its operating cycle. The zero emissions 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: Principle of a ULEZ	3,296
Support introduction of a ULEZ	1,012
Support measures to improve air quality in London	838
Oppose introduction of a ULEZ	622
Support tougher measures on air quality than proposed	359
Concern that ULEZ charging scheme will not be effective in improving air quality	200
Oppose 24/7 ULEZ	129
Oppose ULEZ because emissions from manufacture of new vehicles outweigh emissions saved by low emissions	72
ULEZ proposals are complicated/confusing	56
Support 24/7 ULEZ	2
Pollution is airborne so creating a central London ULEZ will be ineffective	2
Introduce ULEZ instead of the Congestion Charge	1
Theme: Suggested supporting policy	3,156
Improve provision for cyclists, eg more cycle lanes, cycle parking, extension of Santander Cycles scheme	259
Improve public transport	252
Ban idling	229
Improve provision for EVs, eg more EV charging infrastructure	227
Support for low emission buses	214
Penalise manufacturers of polluting vehicles, not motorists	188
Improve pedestrian environment, eg pedestrianisation, wider pavements	162
Address pollution from non-transport sources, eg diesel generators, home energy efficiency	152
Encourage motorcycle use	131
Make public transport cheaper	105
Introduce incentives to use zero emissions vehicles/cycling/public transport as well as charges	91
Publish list of compliant and non-compliant vehicles before introducing ULEZ charge	81
Plant more trees and encourage wildlife	74
Reduce traffic levels in London	53
Strict controls on roads by schools/hospitals etc	52
Stricter controls on construction	47
Improve vehicles available to purchase	46
Support for low emission HGVs	40
Reduce number of buses	38

Code	Count
Introduce on-street vehicle emissions testing	36
Support for electric/low emission trains	33
Improve education about dangers of pollution	31
Invest in alternative fuel research	30
Support measures to discourage single-occupancy vehicles (SOVs), eg car sharing, shared taxi schemes, or higher charge for SOVs	28
Support for trams	27
Introduce charges for noise pollution	26
Reduce planes flying over London	23
Support for low emission delivery vehicles	21
Support for stop/start engine technology	20
Encourage hydrogen vehicles	19
Support consolidation centres for deliveries	17
Introduce more park and ride schemes	17
Make parking more difficult, eg higher charges, fewer spaces, more enforcement	15
Suggest a higher tax on diesel than petrol	15
Utilise river and rail for freight	15
Introduce charge for cruise ships docked in London and stop increase in numbers	14
Introduce local monitoring and displays of pollution levels	14
Promote sharing lifts to school/walking buses	14
Stricter MOT tests	13
Install air filters in existing infrastructure	13
Introduce a ban on wood burners	13
Ban smoking in public spaces	13
Reduce off-peak bus frequency/size to ease congestion	13
Improve bus lanes	12
Concern for personal safety on public transport	11
Introduce other methods of reducing emissions	10
Limit London's economic and population growth	10
Support for low emission coaches	9
Allow EVs to use bus lanes	9
Build more river crossings	8
Offer incentives for businesses to be based outside central London/let employees work from home	8
Cap the number of vehicles a household can own or introduce an extra tax for more vehicles	7
Support funding for innovative businesses helping to lower emissions	6
Suggest allowing motorcycles to use bus lanes	5

Code	Count
Cap the number of times residents can use their car each month	4
Implement Londonwide 20mph zone	4
Oppose Enderby Wharf/Silvertown Tunnel	4
Suggest a first-time cautionary notice for infrequent visitors	4
Support carbon capture	4
Support visitor discount/passes	3
Support use of facemasks for public	3
Introduce more traffic calming measures	3
Cap annual private/individual vehicles trips	3
Ban smoking completely within London (ie in public and in people's homes)	3
Introduce tourism tax	2
Move government out of London	2
Support stricter controls on wayfinding apps which encourage backstreet rat-running	2
Utilise other planning policy to reduce exposure to pollution, eg reduce development on main roads, reduce development on brownfield sites	1
Support strict regulations on diesel refrigerated HGVs	1
Support improved healthcare for people affected by pollution	1
Support for low emission motorcycles	1
Reduce pollution on the Underground	1
Set up a system to pay ULEZ automatically	1
Reduce frequency of bus stops to improve traffic flow	1
Position ULEZ as a fine rather than a charge	1
MPs should walk/cycle more	1
Introduce stricter speed limits	1
Force diesel vehicles into permanent engine management mode	1
Extend HGV defective exhaust reporting system to non-HGVs	1
Cruise terminal at Greenwich must be built with shore power	1
Cap delivery vehicle numbers	1
Ban new registrations of diesel vehicles once ULEZ is introduced	1
Theme: Discounts and exemptions	1,816
Support exemption for motorcycles	461
Oppose exemption for taxis	420
Oppose exemption for buses	134
Oppose exemption for private hire vehicles	75
Support exemption for Blue Badge holders	64
Support exemption for historic vehicles	64
Oppose any exemptions	61
Oppose exemption for HGVs	56
Support exemption for residents of ULEZ zone	49

Code	Count
Support exemption for private/individual vehicles	40
Support exemption for disabled class vehicles	31
Include aircraft in ULEZ	28
Support exemption for petrol vehicles	25
Support discount for historic vehicles	22
Support exemption for emergency service vehicles	22
Support exemption for EVs	22
Oppose exemption for motorcycles	20
Support inclusion of river traffic	20
Oppose exemption for diesel cars	19
Oppose exemption for residents of ULEZ zone	18
Oppose exemption for Blue Badge holders	12
Support exemption for minibuses	11
Support exemption for vehicles less than 10 years old	11
Support exemption for critical workforce eg nurses	10
Concern regarding abuse of exemptions, eg residents, disabled	9
Support discount for residents of ULEZ zone	9
Oppose exemption for Blue Badge holders	8
Oppose exemption for two-stroke vehicles	7
Reduce the age cars have to be to qualify as historic	7
Support exemption for taxis	7
Support discount for residents in close proximity to the ULEZ zone	6
Support exemption for small businesses	4
Oppose exemption for emergency services vehicles	4
Support exemption for camper vans	3
Support exemption for coaches	3
Oppose exemption for disabled class vehicles	3
Support exemption for specialist vehicles	2
Support exemption for LGVs	2
Oppose exemption for EVs	2
Discounts should decrease over time	1
Oppose exemption for coaches	1
Support discount for residents of Greater London	1
Support exemption for all private/individual vehicles bought since 2000	1
Support exemption for building site machinery	1
Support exemption for car sharing vehicles	1
Support exemption for commercial vehicles	1
Support exemption for funeral vehicles	1

Code	Count
Support exemption for HGVs	1
Support exemption for hybrid vehicles	1
Theme: Impact of proposals	1,792
Concern regarding disproportionate impact on poorer people	499
Concern regarding impact on small businesses	283
Concern regarding impact on businesses	151
Concern regarding disproportionate impact on private cars	122
Concern regarding disproportionate impact on diesel cars	115
Concern regarding impact on disabled drivers	112
Concern regarding negative impact on second hand car market	98
Concern regarding impact on self-employed who rely on cars or vans	70
Concern regarding impact of ULEZ on commercial/delivery drivers	59
Concern regarding impact on elderly drivers	51
Concern regarding increased pollution in outer London	37
Concern regarding impact on owners of older cars	36
Concern regarding disproportionate impact on night and shift workers	27
Concern regarding impact on residents of ULEZ zone and its boundary area	22
Concern regarding disproportionate impact on motorcycles	16
Concern regarding impact on carers	16
Concern regarding negative impact on London's economy	12
Concern regarding impact on coach operators	12
Concern regarding health impact of electric vehicles	2
Concern regarding privacy intrusions caused by monitoring measures	1
Concern that businesses will move their polluting vehicles to other cities	1
Suggest TfL publish monitoring data showing the benefits of ULEZ	1
Theme: Emission standards	1,754
Concern that central government has promoted diesel vehicles in recent years, and is now penalising them	1,341
Concern regarding enforcement and monitoring of standards	94
Should not be subject to ULEZ: Euro 5 diesel vehicles	41
ULEZ needs greater emphasis on reducing particulate matter	38
Pollution created by electricity generation means EVs are not clean technology	34
Oppose using Euro standards as do not reflect real-world conditions, eg use most recent MOT emissions data	32
Should not be subject to ULEZ: Euro 6 diesel vehicles	18
A partial Euro 6 standard is confusing	18
Support for phased introduction of Euro 6 standards	17
Diesel vehicles only account for 10 per cent of emissions	15

Code	Count
Should be subject to ULEZ: Euro 6 diesel vehicles	15
Ensure foreign vehicles comply	11
All vehicles should be minimum Euro 5	10
Petrol and diesel vehicles should comply to same standards	9
ULEZ needs greater emphasis on reducing NOx emissions	8
Ensure private hire, taxis and buses are tested thoroughly	7
Should not be subject to ULEZ: Euro 4 vehicles	6
Support CO ₂ emission limits as well as particulate and NOx	6
Vehicles modified to be Euro 6 should be considered compliant	4
Should not be subject to ULEZ: Euro 4 petrol vehicles	4
Should not be subject to ULEZ: Euro 3 petrol vehicles	4
Concern zero emissions capable taxis will keep using petrol/diesel engine	4
Should be subject to ULEZ: Euro 4 petrol vehicles	3
Should not be subject to ULEZ: Euro 3 motorcycles	2
Only Euro 6 vehicles with particulate capture systems should be exempt	2
Emission standards should become more stringent over time	2
Diesel vehicles using AdBlue technology should be considered compliant	2
All vehicles should be minimum Euro 6	1
Concern that emissions are affected by driver behaviour/driving style	1
Enforce current laws and regulations more strictly	1
Improved engine maintenance can reduce emissions	1
Older diesel vehicles should be removed before Euro 5 and 6 vehicles	1
Oppose using Euro 6 standards as they might not apply after Brexit	1
ULEZ needs greater emphasis on reducing NOx emissions	1
Theme: Timescales	1,610
Implement ULEZ sooner than April 2019	779
Oppose April 2019 implementation date as need longer transition time for compliance	474
Support implementation date of April 2019	170
Change TfL-owned vehicles to zero emission first	88
Diesel vehicles need longer to comply	50
Standards for commercial vehicles should be implemented sooner	17
Extend ULEZ zone to North/South Circular Roads sooner than planned	16
Extend ULEZ Londonwide sooner than planned	6
Restrictions for diesel vehicles should apply sooner than for petrol vehicles	6
Support later introduction of ULEZ for petrol vehicles	3
Introduce a rolling date for exemption of historic vehicles	1
Theme: Costs	1,401
Concern that ULEZ is a tax/revenue-raising scheme for TfL	867

Code	Count
Concern regarding high cost of frequently buying new vehicles to comply	196
Further increase in costs of living	180
Concern that commercial drivers will pass on costs to consumers	108
ULEZ would make car ownership prohibitively expensive	27
Concern over cost of implementation	15
Costs of ULEZ outweigh the benefits	8
Theme: Financial assistance	958
Support car scrappage scheme	437
Provide financial support for shift to EVs, eg subsidised vehicle purchase, free parking, free charging points etc	257
Support vehicle retrofit fund	94
Revenue raised from charging should be used for projects to improve air quality, eg low emission technologies, tree planting, public transport, cycling	59
Support financial assistance for commercial drivers/haulage companies to replace their vehicles	39
Oppose car scrappage scheme	35
Support financial assistance for disabled residents	23
Revenue raised from charging should be used to improve roads	12
Request to know what revenue generated will be used for	2
Theme: Boundary	868
ULEZ should be Londonwide (to M25)	290
Support expanding ULEZ to North and South Circular Roads	135
Concern about increased traffic and pollution on boundary	105
Support extending ULEZ beyond CC zone (without specifying where)	86
Oppose expanding ULEZ to North and South Circular Roads	74
ULEZ should be UK-wide	33
Unfair to have different rules in London to the rest of the UK	22
Support extending ULEZ to include Heathrow	17
Oppose Londonwide ULEZ	16
Concern about rat-running if North and South Circular Roads included in ULEZ	13
Support extending ULEZ to include Brentford/Ealing	12
Support for extension further south than South Circular Road	8
Support extending ULEZ to include Kensington and Chelsea	4
Oppose inclusion of south London in the ULEZ	3
Support expanding ULEZ to North and South Circular Roads for HGVs only	3
Support Londonwide ULEZ for HGVs	3
Support extending ULEZ to include A501 Marylebone Road	2
Support extending ULEZ to include Hounslow	1

Code	Count
Support extending ULEZ to include Merton	1
Support extending ULEZ to include Victoria Coach Station	1
Support extending ULEZ to include Wembley Park/Stadium given amount of development and visitors	1
ULEZ should not include residential areas	1
Theme: Alternative policy suggestion	844
Improve traffic flow eg increase road space, reduce roadworks, reduce bus lanes, relocate cycle lanes, synchronise traffic lights	395
Oppose investment in cycle lanes as they cause congestion and worsen pollution	240
Introduce incentives for low emission vehicles instead of charging scheme	96
Stricter controls on cyclists eg road fund/licence/compulsory insurance	46
Oppose 20mph speed limits as they cause congestion and pollution	24
Improve car parking facilities and availability	23
Suggest higher tax on fuel instead of ULEZ	8
Suggest higher tax for purchasing polluting vehicles instead of ULEZ	7
Use money intended for ULEZ on health research instead	3
Stricter controls on motorcyclists	1
Stricter controls on pedestrians	1
Theme: Ban vehicles	805
Ban diesel vehicles	168
Ban non-compliant vehicles rather than charge	176
Ban diesel vehicles from central London	30
Ban diesel buses	44
Ban private/individual vehicles from central London	42
Ban deliveries during the day	40
Ban private/individual vehicles	37
Ban HGVs during peak times	35
Ban HGVs during the day	30
Ban HGVs from central London at all times	28
Ban non-EVs from Greater London	28
Ban odd/even number plates on certain days	23
Ban non-EVs from central London	22
Ban private/individual vehicles from central London during peak hours	17
Introduce greater restrictions on HGVs	12
Ban private/individual vehicles from school zones at pick up/drop off periods	9
Ban diesel vehicles on days when pollution is higher	9
Ban all vehicles from ULEZ zone	7
Ban private/individual diesel vehicles	6

Code	Count
Check and ban cars with defective/modified exhausts	4
Ban motorcycles	3
Support for HGV-free zones	3
Ban all vehicles on days when pollution is higher	1
Ban private/individual vehicles during the day	1
Theme: Taxi and private hire vehicles	483
Support for low emission taxis/private hire vehicles	200
Ban polluting taxis	80
Cap private hire vehicle numbers	57
Cap taxi numbers	37
Cap Uber numbers	32
Ban Uber	16
Improve regulation of Uber	15
Introduce a taxi scrappage/retrofit scheme	15
Modernise taxis/allow for more choice in taxi vehicles	9
Improve regulation of private hire vehicles	8
Limit the amount of time taxis can travel empty	6
Ban taxis from bus lanes	5
Improve regulation of taxis	1
Concern regarding impact on taxis	1
Ban Addison Lee	1
Theme: Charging levels	398
ULEZ should be determined by emissions of car not by age or size	96
Charge should only apply to new vehicles produced after ULEZ legislation enacted	61
Oppose daily charge, should be a per mile charge	39
Charge should be means tested	24
Support higher charge for commercial vehicles	22
Support higher charge for diesel vehicles	20
Charge should be determined by age of vehicle	20
Charge vehicles based on size	19
Support higher ULEZ charge	19
Larger businesses should be charged more than smaller businesses	11
Support higher charge for HGVs	10
Support for reduced charge for HGVs travelling at night	7
Support lower ULEZ charge	7
Support lower charge for motorcycles	6
Charge should increase over time	5
Support annual charge for motorcycles	5

Code	Count
Support charge for all diesel vehicles regardless of age	5
Support higher charge for more expensive vehicles	4
Support higher charge for buses	4
Charge to rise when pollution levels are higher (similar to Uber surge pricing)	3
Support higher charge for 4x4s	3
Support higher charges for frequent drivers in ULEZ zone	2
Support higher charge for residents	2
Support higher charge for private/individual vehicles	2
Oppose admin fee for EVs	1
Support higher charge for private hire vehicles	1
Theme: Sunset period	323
Sunset period for residents of ULEZ zone should be longer	53
Oppose sunset period for residents of ULEZ zone	49
Sunset period for residents of ULEZ zone should be shorter	27
Support sunset period for residents of ULEZ zone	23
Sunset period for disabled tax class vehicles should be longer	22
Support sunset period for commercial vehicles	20
Oppose sunset period for disabled tax class vehicles	15
Support sunset period for disabled tax class vehicles	14
Support sunset period for all residents of Greater London	13
Sunset period for Blue Badge holders should be longer	11
Support sunset period for recently bought diesel vehicles	10
Sunset period for disabled tax class vehicles should be shorter	9
Sunset period should apply for residents in close proximity to ULEZ zone	9
Support same sunset period for disabled tax class vehicles and residents	7
Oppose the principle of a sunset period	6
Oppose three-year sunset period for residents of ULEZ zone	6
Oppose sunset period for Blue Badge holders	4
Support phased sunset period	4
Support sunset period for Blue Badge holders	3
Support a means tested sunset period for residents of ULEZ zone	3
Support sunset period for motorcycles	1
Support sunset period for small businesses	1
Theme: Comment on consultation	247
Criticism of consultation	135
Criticism of data used	79
Confusingly worded	33
Theme: Comment about the Congestion Charge	125

Code	Count
Oppose the Congestion Charge	53
Support an extension to the Congestion Charge zone	25
Support increase in Congestion Charge	24
Support a western extension of the Congestion Charge	14
Make the Congestion Charge 24/7	5
Oppose exemptions and discounts to the Congestion Charge	2
Change Congestion Charge times	1
Private hire vehicles should pay the Congestion Charge	1
Not answered/not relevant/not providing an answer to a question	8,000
Duplicate response	34

Appendix H: Further analysis of campaign responses

1. TfL ran a public consultation from April-June 2017 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, we received campaign responses via email, coordinated by Greenpeace. This memo summarises the responses received as part of this campaign.

Method

2. Greenpeace's campaign had a standard response which the majority of respondents submitted – 8,374 respondents (80 per cent). 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.
3. This memo shows the standard response for the Greenpeace campaign before providing a code frame which summarises the points made in edited or additional responses. The same code frame developed to analyse open responses received to the main consultation was used and additional codes were added if needed.

Greenpeace campaign

4. In total, 10,495 Greenpeace campaign responses were received. Of these:
 - A total of 8,374 responses (80 per cent) were identical to the standard response (shown in Box 1)
 - A total of 2,121 responses (20 per cent) were either edited or added to the standard responses or comprised completely different text

Box 1: Greenpeace standard response (8,374 responses)

Dear Mayor of London Sadiq Khan,

Air pollution is a huge problem for London. I have several points I'd like to raise in your London's Air Quality consultation.

I strongly support calls for the Ultra Low Emission Zone (ULEZ) to improve air quality in London. It should be introduced by April 2019 and extend to the North to South Circular.

Cutting pollution including particulate matter from diesel vehicles is essential so they should be regulated under the ULEZ.

Car manufacturers continue to break emissions standards tests and have lobbied to weaken them. Diesel cars will never be a clean or safe option. London's air pollution crisis will continue whilst they remain on our roads. That is why I support Greenpeace's recommendation that Euro 6 diesel cars bought from 2018 onwards should be included in the North to South Circular ULEZ, alongside older diesel vehicles. If you publicly announce this in 2018, drivers buying new vehicles would have advance warning. Will you please consult on this recommendation?

Your plan should help everyone make the transition. The central London ULEZ should not apply to residents till 2022 and disabled tax class vehicles till 2023.

I want London's clean air plan to help both the public and the car industry end the pollution fuelled health crisis.

Sincerely,

[respondent name]"

5. The remaining 2,121 responses were edited and added to the standard response in some way. Edits and additions varied: some made one or two small additions to the standard response; while some respondents submitted a completely different response. **Error! Reference source not found.** summarises these additional themes; responses could be coded as multiple codes within each theme.
6. Table 1: Summary of themes from Greenpeace campaign responses

	Standard response	Edited or additional response	Total
Timescales	16,748	3,993	20,741
Sunset period	16,748	3,816	20,564
Principle of a ULEZ	8,374	2,100	10,474
Boundary	8,374	2,012	10,386
Emission standards	8,374	2,007	10,381
Suggested supporting policy	0	477	477
Ban vehicles	0	59	59
Alternative policy suggestion	0	46	46
Taxi and private hire vehicles	0	42	42
Financial assistance	0	27	27
Discounts and exemptions	0	22	22
Impact of proposals	0	8	8
Charging levels	0	6	6
Costs	0	3	3
Comment on consultation	0	1	1