

Response ID ANON-8PZR-SABQ-U

Submitted to **Have your say on changes to the Ultra Low Emission Zone and Low Emission Zone**

Submitted on **2018-02-28 15:42:56**

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

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

Strongly support

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

Support

3 Do you support the proposed daily charges to be paid by owners of heavy vehicles that do not meet the required emissions standards at: • £300 for those that do not meet Euro IV PM standards and; • £100 for those that do not meet Euro VI NOx and PM standards?

Support

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

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

Strongly support

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

Support

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

Oppose (should be sooner)

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

Support

Part 3: Proposals for residents

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

Strongly support

Part 4: Proposals for penalty charges

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

Strongly support

Part 5: Other comments

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

Comments:

Collectively, we represent each of the Business Improvement Districts (BIDs) in the City of Westminster through our seven constituent organisations:

- Baker Street Quarter Partnership
- Heart of London Business Alliance
- Marble Arch Partnership
- New West End Company
- The Northbank

- PaddingtonNow
- Victoria BID

Our BID areas cover a significant proportion of London's Central Activities Zone and make a larger contribution to the UK economy than Wales. They encompass a huge range of sectors and attract millions of visitors. Our organisations represent both businesses and property owners in Westminster, all of whom share a common interest in the capital's future and prosperity.

On behalf of our members, we are making a joint response to Transport for London's consultation on changes to the Ultra-Low Emission Zone and Low Emission Zone.

The BIDs in the City of Westminster thank you for the opportunity to comment on this consultation. The Westminster BIDs have previously responded collectively to Ultra-Low Emission Zone (ULEZ) consultations in December 2016 and June 2017. Since then, the Mayor has introduced the T-Charge in central London, bought forward the start date of the ULEZ for central London to 8 April 2019 and announced a series of measures relating to London's bus fleet. The proposals now being consulted on are:

- Introducing tougher emissions standards for the Low Emission Zone from 2020, so that they affect heavy vehicles London wide
- Expanding the ULEZ from central London up to, but not including, the North and South Circulars in 2021 for light vehicles (excluding taxis), so that all vehicles in this inner London area are subject to emissions standards

The Westminster BIDs are supportive of the extension of the proposed extension of the Ultra-Low Emission Zone (ULEZ) and the introduction of tougher emissions standards in central London. We consider this to be a positive step towards tackling poor air quality. Collectively we have been working in central London to support business-led action to improve air quality, and believe if everyone takes steps to address the problem of air pollution, a significant, lasting change will be realised.

Our aim as BIDs is to help to deliver cleaner air for visitors, residents and workers in our respective areas. Only when businesses take ownership of their share of the issue and play a key role in reducing emissions will this change enable significant improvements to air quality.

Other comments:

- The primary sources of air pollution in Westminster are road traffic and gas combustion from local energy-generating boilers. To tackle the first contributor, the Westminster BIDs have been leading the way on the introduction of waste consolidation schemes, to significantly reduce the number of waste collection vehicles in the streets, as well as to consolidate deliveries to occupiers in the district. Consideration should be given to utilising these examples, particularly how they can help reduce business operating costs while contributing to reductions in air pollution, to build support for business-led action in other areas of the ULEZ.
- Whilst welcoming the package of measures outlined in the consultation, it should be noted that small businesses are likely to be disproportionately affected by the proposed changes, as they may not have sufficient funds to upgrade business vehicles. We would therefore support any initiatives to encourage the retrofitting of existing vehicles, or the exchange of existing business vehicles, so they are compliant with the standards required within the ULEZ.
- The vast majority of licensed taxis are old polluting diesel vehicles, making them a significant contributor to poor air quality in central London. We welcome TfL's introduction of a new licensing requirement, so that from 2018 all newly licensed taxis are zero emission capable. However we remain concerned that taxis are currently exempt from the ULEZ, significantly reducing the effectiveness of the policy in central London.
- There is also concern about the capacity of charging infrastructure and the financial cost of upgrading vehicles for drivers. With only 90 fast charging points dedicated to taxis proposed for installation this year, only a small proportion of taxis will be able to take advantage and we would encourage TfL to continue to work closely with local authorities to roll out more charging points at a range of locations, such as under-used car parks in central London.
- As the central London ULEZ will be enforced using existing congestion charge infrastructure, it is unclear how an expansion outside central London will be enforced. We would welcome some more detail on how the expansion will work in practice.

Part 6: About you

11 What is your name?

Name:

The Westminster Business Improvement Districts

12 What is your email address?

Email:

westminsterbids@fourcommunications.com

13 Please provide us with your postcode (of your home or business)?

Postcode:

14 In what capacity are you responding to this consultation?

Other (please specify)

Other (please specify):

As the collective Westminster Business Improvement Districts

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

Not Answered

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

Organisation:

The Westminster Business Improvement Districts

17 How did you find out about this consultation?

Not Answered

Other:

18 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.)?

Not Answered

Do you have any further comments?:

Part 7: Travelling in London

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

Other (please specify):

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

Not Answered

21 Do you drive in the area within the North and South Circular Roads, if so, how often?

Not Answered

Part 8: Equality and Inclusion

22 What is your gender?

Not Answered

23 Ethnic Group:

Not Answered

24 What is your age group?

Not Answered

25 Sexual Orientation:

Not Answered

26 Faith:

Not Answered

27 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)

Not Answered