

## **Air Quality Consultation (phase 2)**

*New proposals to improve Air Quality - Have your say on the introduction of a new Emissions Surcharge and ideas for improving Ultra Low Emission Zone*

The Natural Gas Vehicle Network (NGV Network) is an established trade body which represents a diverse range of businesses involved in the production of gas-derived fuels and gas-powered vehicles, particularly heavy goods vehicles. Given that air pollution, and related preventable deaths, are at unacceptably high levels, the work of our members is vital in developing the next generation of cleaner transport fuels and vehicles. The NGV Network is one of the six divisions of the Energy and Utilities Alliance (EUA).

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

We support the introduction of an Emissions Surcharge as this will be vital to begin reducing levels of harmful pollutants in central London as early as possible. It will also give road users a strong indication of the requirements that will come into force with the ULEZ.

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

We agree that the implementation of the Emissions Surcharge should occur as early as possible. Given that minimal additional physical infrastructure will be required, there will be no need for a delay in its introduction. Restrictions on vehicles within central London will not be overbearing and will give road users a clearly enforced set of standards to comply with in time for the implementation of the ULEZ.

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

We have no comment to make.

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

We have no comment to make.

5. To what extent do you support or oppose the exemption of Showmans vehicles?

We have no comment to make.

6. Do you support or oppose including L-Category vehicles (e.g. three wheeled vehicles and quadricycles) that currently pay the congestion charge?

We have no comment to make.

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

We support the inclusion of vehicles with nine or more seats as many of these types of vehicles are amongst the most polluting and should therefore be prioritised when action to improve air quality is considered. Companies and public bodies operating coaches and buses will need to adapt their fleets in time for the implementation of the wider ULEZ and so inclusion within the Emissions Surcharge will provide a strong incentive to do so as soon as possible.

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

The ULEZ should be introduced a year earlier than originally planned as this will begin the process of improving air quality in London sooner which will be of huge benefit to residents and road users. Furthermore, the ULEZ represents the most ambitious action taken to sharply reduce harmful transport-related emissions in the UK to date. This will give a clear and positive example to other local authorities developing Clean Air Zones; therefore, the sooner it is operational the sooner air quality can be improved across the country.

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

We believe that the initial proposals from the previous Mayor of London to restrict the ULEZ to only the area currently covered by the Congestion Charge would be a mistake. We therefore welcome the latest proposals to expand it to a far larger area beyond central London. Many areas of inner London, and even some in outer London, suffer from the same unacceptably high levels of air pollution as the city centre. This is particularly true for main arterial roads which pass through several boroughs and carry heavy traffic, not only from cars but also from HGVs and buses which are almost exclusively diesel. Any zone set up that does not cover a much wider area than the current Congestion Charge area will simply not be ambitious enough to make a meaningful difference to air pollution for the majority of Londoners.

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

We believe that, for the reasons stated previously, the ULEZ should cover the expanded area between the North and South Circular roads as soon as it formally comes into force. The Emissions Surcharge will be an important starting point, but it should be expanded as soon as is practically possible to ensure robust action is taken across a wide area of London.

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

We believe that the ULEZ charges should be the same between central London and the North and South Circular roads for two reasons. Firstly, it will be important for the terms of the ULEZ to be as simple for road users to understand as possible, particularly considering the parallel operation of the London-wide LEZ and Congestion Charge. Secondly, the effect of poor air quality is the same whether it is in central London or in other areas of the city; to operate two different charges would give the impression that there are two tiers of air pollution in London.

12. To what extent do you support or oppose the overall principle of expanding ULEZ London-wide for heavy vehicles?

We strongly support this proposal. Emissions from diesel HGV engines are disproportionately high and they therefore should be treated differently to lighter vehicles. The London-wide LEZ is already well established and a known quantity for the drivers and fleet operators it affects. A London-wide ULEZ would therefore only represent a tightening of existing LEZ regulations as opposed to the relatively substantial change for light vehicles under the ULEZ.

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

Fleet operators may need additional time to comply with a ULEZ covering the whole of Greater London. We believe that a four year timescale would be sufficient and therefore an implementation target of 2021 would be achievable.