



Mobility • Safety • Economy • Environment

RAC Foundation's Response to Transport for London Consultation - Proposed changes to the ULEZ (start date and emissions standards).

June 2017

The RAC Foundation is an independent transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and motoring. The Foundation carries out independent and authoritative research with which it promotes informed debate and advocates policy in the interests of responsible road users.

The Foundation is supportive of the development of electric vehicles (EV) and other alternatively fuelled vehicles that help improve air quality and reduce greenhouse gas emissions.

We have only sought to offer views on questions where we think we have something to add.

Consultation response

The RAC Foundation has been supportive of the introduction of the ULEZ in Central London and, in particular, of the provision of a sensible lead-in time to the introduction of the scheme, which allowed approximately 5 years between finalising a plan for the ULEZ and its implementation. This offered the public and businesses affected by its introduction a reasonably sensible period of time in which to plan and make changes prior to the introduction of the ULEZ in September 2020.

The September 2020 introduction date also aligned the ULEZ with the national government's timeline for introducing Clean Air Zones elsewhere in the country.

It follows that we have a number of concerns about the proposed acceleration of the London scheme.

Perhaps the most significant issue is for the operators of heavy vehicles, where the lead times for production of new vehicles is long, given their bespoke nature, and where lease periods would also tend to run for several years. Leases are costly to amend or withdraw from, withdrawal generally triggering financial penalties.

London is dependent on many specialised vehicles (e.g. refuse collection trucks, vehicle recovery trucks etc.) where bespoke bodywork is fitted to a standard chassis/engine/drivetrain. The questions here are not just over the standard lead times for new orders, but whether the capacity exists in the industry, both for new vehicles and for those installing retrofit equipment, to allow operators to achieve compliance with the new

standards. This picture is complicated still further by the mismatch of timing over the new Direct Vision Standards consultation.

Although the consultation document estimates the number of vehicles that will not be compliant with the ULEZ for an April 2019 introduction date, it is unclear whether the estimates have taken accurate account of the lead-times involved, industry capacity and the interaction with DVS.

We would therefore urge that more consideration be given to the practical realities of commercial operators being able to order and/or retrofit vehicles to achieve compliance – which must be the objective. Otherwise accelerating the scheme and implementing the £100 per day charge will simply be loading unavoidable costs on businesses which ultimately make their way through to consumers.

Were the decision to be to proceed with acceleration, we would encourage consideration to be given to the level of the charge, moving, perhaps, to a graduated approach over a number of years – say £20 in year 1, £50 in year 2, rising to £100 from year 4, such that the appropriate financial signal is being sent but recognition given to the practical realities of achieving compliance and the broader risks to a well-functioning London if, say, the operators of heavy recovery vehicles find the day 1 ULEZ charge rates uneconomic to swallow for their business.

Similar – though perhaps less extreme - issues arise for businesses operating vans.

In respect of private cars and powered two-wheelers, we would observe that it is often lower income households that are reliant on older vehicles to access work, retail or other services. We note the Mayor's desire to improve London's public transport offering, and his wish that there be some form of national scrappage scheme, but starting from where we are, and in the absence of any evident central government support for scrappage, accelerating the London ULEZ could hurt those households harder and faster without giving them any real room for manoeuvre.

Our other concerns are about the interaction between the London ULEZ and the proposed CAZs elsewhere, in particular about the potential for confusion to abound should road users be faced with different schemes with different rules in different places. Tackling the air quality challenge is important in London, but it's also an important challenge nationally, and it warrants national co-ordination.

In relation to Proposal 2 from this consultation, the RAC Foundation is supportive of including a PM standard for the ULEZ to ensure consistency with the CAZ standards. It is regrettable that the real-world performance from motor vehicles has departed so far from the lab test results on which emissions standards have been based, but it is also salutary to note that an over-focus on one problem – historically the attention given to CO₂ which drove the search for higher mpg performance and hence the apparent attractiveness of the diesel – can result in unintended consequences (we have in mind the emerging evidence on the particulate performance of gasoline direct injection engines). It is important to look at

25 June 2017

all these issues in the round, meantime, the addition of real-world testing to the emissions standard (RDE) can't come too soon.

RAC Foundation

25 June 2017