



# ***Changes to the central London Ultra Low Emission Zone***

## **About Living Streets**

We are Living Streets, the UK charity for everyday walking. We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone. Our ambition is to enable people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking.

## **About London Living Streets**

London Living Streets has been set up to be a voice for people on foot in London and is formed from a number of local Living Streets groups across the capital.

### **1. Do you support the principle of the Ultra Low Emission Zone to improve air quality in London?**

Living Streets strongly supports the principle of the Ultra Low Emission Zone (ULEZ).

Road traffic contributes to the majority of air pollution in London. Londoners who chose the most sustainable modes of transport, such as walking and cycling, are unfairly exposed to the air pollution generated by the most polluting vehicles. The ULEZ will reduce the use of the most polluting vehicles and incentivise the use of cleaner vehicles.

The principle of the ULEZ will only be effective if it is quickly expanded from the existing Central London Congestion Charge Zone boundary to the North/South Circular roads and then the existing Low Emission Zone boundary.

The effectiveness of the zone will depend on the emission standard selected and the real world performance of that standard. Currently produced Euro 6 diesel cars “exceed the NOx limit 4-5 times (400%) on average in real driving conditions compared to laboratory testing”.<sup>1</sup> We therefore expect to see a tightening of emission standards for the zone beyond Euro 6.

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<sup>1</sup> [http://europa.eu/rapid/press-release\\_IP-15-5945\\_en.htm](http://europa.eu/rapid/press-release_IP-15-5945_en.htm)

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

Living Streets strongly supports the bringing forward the implementation of the ULEZ in central London from 7 September 2020 to 8 April 2019. Levels of air pollution in London are already at illegal levels and there should be no delay in implementation. We are therefore disappointed to see the timetable for expansion of the scheme to Inner London slipping from 2020 to 2021.<sup>2</sup> Levels of air pollution in Inner London are comparable to those in Central London in particular near to busy roads. We therefore would expect to see the scheme expanded to the North/South Circular roads at the earliest opportunity.

## **3. Do you support keeping a 3 year resident's sunset period so it is from 8 April 2019 to 11 April 2022?**

We would expect to see action to reduce air pollution as quickly as possible. We therefore do not support sunset periods for the most polluting vehicles. Residents in the Central London Congestion Charge Zone have access to high quality walking and cycling infrastructure as well as the highest levels of public transport access. We are also concerned that sunset periods for Central London would set a bad precedent for when the ULEZ is expanded to the rest of London and could significantly reduce its effectiveness.

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<sup>2</sup> <https://www.london.gov.uk/press-releases/mayoral/mayor-unveils-action-plan-to-battle-toxic-air>

#### **4. 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?**

We would expect to see action to reduce air pollution as quickly as possible. We therefore do not support sunset periods for the most polluting vehicles. We are also concerned that sunset periods for Central London would set a bad precedent for when the ULEZ is expanded to the rest of London and could significantly reduce its effectiveness.

#### **5. To what extent do you support introducing a Particulate Matter (PM) standard for diesel vehicles within the ULEZ standard?**

Living Streets strongly supports the introduction of a Particulate Matter (PM) standard for diesel vehicles within the ULEZ standard. Any exposure to air pollution can be harmful. The World Health Organisation (WHO) says that there is no safe level of exposure to the pollutant PM2.5 and the WHO guidelines aim to achieve the lowest levels of PM possible.<sup>3</sup> We would therefore expect to see a PM standard within the ULEZ standard.

#### **6. Further comments about the proposals**

London has the worst toxic air pollution in the country and it is good to see the most ambitious interventions planned in the capital.

However, the timetable for expanding the ULEZ from the existing Central London Congestion Charge Zone boundary to the North/South Circular roads and then the existing Low Emission Zone boundary must be brought forward. Illegal levels of air pollution are not restricted to central or Inner London.

In addition to charging the most polluting vehicles, we would expect to see policy to encourage and support mode shift to walking and cycling.<sup>4</sup> This should include policies to achieve in London the national aim to increase the number children aged 5 to 10 that usually walk to school to 55% in 2025.<sup>5</sup>

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<sup>3</sup> [http://www.euro.who.int/\\_data/assets/pdf\\_file/0005/78638/E90038.pdf](http://www.euro.who.int/_data/assets/pdf_file/0005/78638/E90038.pdf)

<sup>4</sup> <https://www.livingstreets.org.uk/media/2527/blueprint-for-change.pdf>

<sup>5</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/603527/cycling-walking-investment-strategy.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/603527/cycling-walking-investment-strategy.pdf)