

Response of the Road Haulage Association to the London Mayors consultation on proposed changes to the Ultra Low Emission Zone in central London

23 June 2017
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Background to the proposal

1. In March 2015, the previous Mayor of London confirmed the introduction of an Ultra Low Emission Zone (ULEZ) to start in September 2020. This ULEZ will cover the same area as the existing London Congestion Charging Zone, it will apply all day every day and will require all vehicles that do not meet a NOx emission standard to pay a daily charge to drive within the zone.
2. The current Mayor is now proposing to introduce the ULEZ early on 8 April 2019. This is 17 months earlier than the currently approved date of 7 September 2020. The charge for entering the zone with a non-Euro VI HGV will be £100 per day.

Responses to the Questions

The Consultation required a response to an online survey with limited responses allowed to most questions. The RHA responded to the survey. This paper shares our response. Questions 1 to 5 only allowed responders to tick boxes and provided no space for comment or explanation. Questions 7 to 13 are general questions about us as responders and are not reported here.

Question 1. Do you support the principle of the ULEZ to improve air quality in London?

RHA Response:- Neither support nor oppose.

Question 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?

RHA Response:- Strongly oppose (we explain more in response to question 6).

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

RHA Response:- Don't know.

Question 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?

RHA Response:- Don't know..

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

RHA Response:- Neither support nor oppose.

Question 6. If you have any further comments about the proposals, please write these in the box below.

3. The RHA opposes the early application of the ULEZ to Heavy Goods Vehicles (HGVs) in central London. The RHA's opposition is based on the limited impact this measure will have on improving health and local air quality in the central London area, and the high costs that will be incurred. The RHA does not believe that the early adoption of the ULEZ as proposed is fair and reasonable for the HGV sector.
4. The excessive cost occurs as a result of the early restriction that will be placed on non- Euro VI HGVs. In early 2019 the LEZ compliant fleet of HGVs (Euro classes IV, V and VI) in Great Britain is expected to be Euro IV – 15%, Euro V – 33%, and Euro VI – 52%.
5. The time between now and the introduction of the advanced restriction is not sufficient for a wholesale shift to Euro VI as is proposed. (We felt the original plan gave insufficient time too – this is far worse). It is important TfL understands the impacts that will occur and the cost of transition that the early introduction will have - especially after businesses have already made purchasing plans based on the previous Mayors plan.
6. Further massive uncertainty for the sector has been created by the plans for the introduction of new Direct Vision Standards. The current working assumption of TfL is to ban more than half of the HGVs over 12 tonnes from entering London in 2020. Given that TfL have not been able to advise which new Euro VI vehicles will be allowed and which will be banned, and that TfL have confirmed that the consultation process is just about how to apply the ban rather than if the ban will take place, TfL have placed the industry in an almost impossible position to start adapting to the ULEZ proposals.

7. The RHA does recognise that there is a need to deal with local air quality issues that impact on people's health. The move to Ultra Low Emission Euro VI vehicles is supported by the industry. The RHA membership concerns only relate to excessive costs associated with the wasteful and inappropriate early retirement of relatively new vehicles.
8. Euro V vehicles were the standard vehicle type supplied until 2014. At the time of the introduction of the new advanced ULEZ the Euro V vehicles will be between 6 and 10 years old. Replacing the volume of young and intensively used vehicles will not be possible. Many will still have to be used and pay the charges – the extra air quality benefits will not be obtained from these vehicles while costing the businesses and consumers dearly. We do not believe the assessment on page 55 of the consultation document that 97% of the HGVs will be compliant with the new April 2019 start date of the ULEZ is realistic. There is simply not time for that adjustment to be made.
9. The Mayor needs to be aware that the wider demands of clean air zones elsewhere in the UK will impact on the ability to supply replacement Euro VI vehicles – in particular specialist vehicles. At the TfL sponsored stakeholder event on the 16th June the supply of replacement vehicles was raised by a London council and others as a major problem. The requirement for early replacement of HGVs will, in particular, unfairly target small haulage businesses who have no way of redeploying fleets around a network, some SME businesses will be placed in financial peril.
10. According to your own data, in 2013 49% of NOx emissions came from non -road transport sources such as domestic and commercial gas heating, rail and aviation. The contribution to NOx from types of road transport identified was:
 - HGVs - 10%, Buses and coaches - 13%, Diesel cars, vans & minibuses – 18.5%, Domestic and Commercial property alone accounted for 22%, of NOx emissions.The 2013 data is now old and is based on data prior to the introduction of HGV Euro VI engines and is therefore not a true reflection of the current position.
11. Euro VI has been the emission standard for HGVs since the beginning of 2014, Euro V started in 2009. The life of the most intensively used HGVs is about 10 years. For specialist vehicles the life span of the lorry can be much longer, but these are often less intensively used.

12. Between the introduction of Euro VI in 2014 and the end of 2016, the RHA estimates that the NOx emissions across Great Britain from HGVs reduced by about a third. This improvement will continue over coming years.
13. Emission standards for HGVs and buses should not be confused with the Euro 6 standards used in car and van emission testing. Euro VI engines fitted to HGVs (and buses) have been tested and shown to perform to standard in real-world operation – in contrast to Euro 6 diesel engines fitted to cars and vans.
14. How compliance with the ULEZ will be managed effectively for non-UK vehicles is unclear, in particular there does not appear to have been any thought given as to how to identify clearly which non-UK vehicles are what Euro class. This needs to be clarified.
15. Considering the effectiveness of Euro VI vehicles, the limited benefits of early scrapping of older HGVs, and the opportunity that exists with various other measures, the RHA makes the following recommendations to TfL for this consultation:

RHA Recommendations

16. The RHA believes the ULEZ proposals need to focus on areas of greatest public health risk. As has been demonstrated by TfL, these are often clearly defined areas where buses and taxis are subjected to high levels of congestion.
17. The RHA suggests that TfL:-
 - a. Should focus on vehicles creating the most pollution in pollution “hot spots”, in particular the worst performing buses and taxis – (an example of a positive approach is the London “low emission bus zones” focusing Euro VI buses on pollution “hot spots” in London).
 - b. Should reduce congestion in key areas of high pollution through better traffic management, smarter vehicle routing and improved roadworks management.
 - c. Should encourage use of the road network outside peak periods (including pushing for immediate reform of the London Lorry Control Scheme).
18. Having assessed the impacts the RHA is suggesting that we continue with the previous Mayors plans for HGVs. We do not agree with any advancement of the ULEZ from the original date in late 2020 for any HGVs – however, if the Mayor is

determined to advance the ULEZ into 2019 we ask him to consider a phased approach that only advances the ULEZ date for higher polluting Euro IV vehicles. This may help many make the transition.

19. Such a phasing of restrictions in the ULEZ would focus on the Euro IV vehicles with highest emissions, if done this way the phasing would be;
 - a. Euro IV HGVs have the ULEZ applied from April 2019,
 - b. Euro V HGVs have the ULEZ applied from September 2020.
20. We also suggest that ULEZ considers exemptions for certain specialist vehicle activities. Examples could include gritting, snow ploughing, emergency vehicles and recovery vehicles – these are limited activities where vehicle replacement costs are very high and the air quality impact is negligible.
21. 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 where it is needed.

Questions 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.)? (Do you have any further comments?)

22. Very Poor.
23. The consultation supporting documentation was not clearly focused on the subject matter of the consultation – ULEZ in Central London. Much of the information related to the whole of London, with details out of scope of the consultation topic.
24. The documentation, while large in size is not always totally clear.
25. This is the case where the consultation document deals with the claimed benefits of the proposed early introduction of the ULEZ. An example is table 15 on page 56 which is unclear because there is no description of the totals before and after – it claims a saving in tonnes but the percentage claim cannot be checked. In the related text the percentage improvement seems to relate to a “further” reduction, not a reduction in the total emissions. Given that the 97% compliance expectation for HGVs is not credible in our view for 2019, we feel the widely reported “additional 20%” reduction in road transport emissions is probably misleading.



The Road Haulage Association

26. All questions in the online survey should invite responders to make comments or provide explanations.

Background about the RHA

27. The Road Haulage Association is the leading trade association representing road haulage and distribution companies who commercially operate HGVs. Our 7,000 members operate near to 100,000 HGVs nationally and internationally. Companies range in size from those working with a single truck to those with thousands of vehicles.

28. Largely taken for granted, these companies provide an essential service on which the people and businesses of the UK depend. The food we eat, the clothes we wear, the houses we live in and the places where we work all depend upon road haulage working to get goods to where they need to be.

29. We proactively encourage a spirit of entrepreneurship, compliance, profitability, safety and social responsibility. We do so through a range of advice, representation and services, and training.

30. We would like to thank The Mayor of London for the consultation and the opportunity to comment on the issues raised.

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