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Dear Transport for London

Cross River Partnership response to proposed changes to Low Emission Zone and Ultra Low Emission Zone

Introduction

Cross River Partnership (CRP) is a public-private partnership that has been delivering economic, social and environmental generation projects across central London for the last 24 years. We count amongst our membership 8 boroughs, 19 Business Improvement Districts (BIDs), Network Rail and London & Partners as well as the Greater London Authority and Transport for London (TfL).

We have been working with our partners for a number of years to deliver on TfL and Mayoral aspirations to improve London's air quality. This includes the MAQF-funded Clean Air Better Business programme, the Central London Sub Regional Transport Partnership, development and delivery of BID-led air quality and freight programmes and co-ordination of EU electric freight vehicle programmes.

We welcome the Mayor's action to improve London's toxic air quality, which contributes to thousands of premature deaths each year and negatively effects the economy. With half of London's NOx emissions coming from road transport, the Mayor's recent actions to clean up London's bus, black cab and private hire fleets and developing charging infrastructure, Low Emission Neighbourhoods, and public transport capacity, are pleasing.

CRP have previously submitted in support of Mayoral proposals for the Emissions Surcharge (T-charge) and earlier Ultra Low Emission Zone (ULEZ) start date. These proposals, since confirmed, have signalled the beginning of the step-change required.

We have also called for the ULEZ programme to go further, faster to provide clarity and reassurance to industry and residents when purchasing vehicles and to reduce emissions faster. It is therefore pleasing that the Mayor is now consulting on proposals for the medium-term

Tougher Emission Standards for the London-wide Low Emission Zone

CRP support the Mayor's proposals for tougher emission standards for the London-wide Low Emission Zone (LEZ), which would require heavy vehicles to meet Euro IV emission standards London-wide. We support the proposed implementation date of 26 October 2020 and the proposed level of daily charges.

These amendments will make the LEZ much more effective in reducing emissions and in improving health and wellbeing outcomes for Londoners and London businesses.

Expansion of the Ultra Low Emission Zone

CRP support the Mayor's proposals to expand the Ultra Low Emission Zone (ULEZ) for light vehicles to the North and South Circular roads. We support the proposed implementation date of 25 October 2021 and the proposed level of daily charges.

These amendments will make the ULEZ much more effective in reducing emissions and in improving health and wellbeing outcomes for Londoners and London businesses.

We recognise that proposals will add costs to residents and businesses, but the cost of air pollution (£3.7 billion a year in London) cannot be ignored. Earlier Mayoral decisions on the T-Charge and ULEZ have indicated the direction of travel, and the proposed changes give appropriate time for residents and businesses to adapt.

Next steps

To maximise the impact of the proposed charges, the Mayor should apply the revenue collected to support residents and businesses to reduce emissions from their travel and transport. Within this, priority should be given to reducing demand for motorised modes as shifting to low emission modes will not alone improve air quality enough. Even zero tailpipe emission vehicles produce PM from tyre and brake wear and tear. Nor too will cleaner vehicles address congestion or deliver healthy streets.

Improving the efficiency of travel and transport systems will help reduce or limit congestion, which will further reduce tailpipe emissions from those vehicles that are on the road.

A focus area for improving efficiencies should be deliveries and servicing, with efforts made to upscale successful, proven interventions undertaken through programmes such as delivery and servicing planning (e.g. www.deliverBEST.london), preferred supplier schemes (e.g. www.westendbuyersclub.london), and in making active transport modes such as walking more desirable. TfL should consider delivery of these programmes via CRP, who has strong and existing relationships with businesses throughout central London and experience in delivering air quality, freight, urban realm and behaviour change interventions with businesses (e.g. Click. Collect. Clean Air. www.clickcollect.london and the online Clean Air Route Finder www.cleanairroutes.london).

CRP continue to support the Mayor's call for Government support for a diesel scrappage scheme to help small to medium sized businesses switch to ULEZ-compliant vehicles, and much better incentives need to be in place at the national level to support businesses and residents in making the switch to zero emission vehicles.

Once again, thank you for the opportunity to comment on the proposed improvements to the LEZ and ULEZ. We look forward to continuing to work with TfL and all of our partners to deliver the Mayor's priorities for London.

Yours faithfully,



Susannah Wilks
Director

Director **Susannah Wilks**

Cross River Partnership is an alliance of Angel London, Baker Street Quarter Partnership, Better Bankside, Camden Town Unlimited, Cheapside Business Alliance, City of London Corporation, City of Westminster, Euston Town BID, Greater London Authority, Groundwork London, Hammersmith London BID, Hatton Garden BID, Heart of London Business Alliance, London and Partners, London Borough of Camden, London Borough of Islington, London Borough of Lambeth, London Borough of Lewisham, London Borough of Southwark, Marble Arch BID, Network Rail, New West End Company, Northbank BID, Paddington Now, Royal Borough of Kensington and Chelsea, South Bank BID, Team London Bridge, The Fitzrovia Partnership, Transport for London, Vauxhall One, Victoria BID and WeAreWaterloo.