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Dear TfL

**Improving air quality and Londoners' health, tackling climate change and reducing congestion.
Public Consultation**

Thank you for the opportunity to respond to the above consultation and for the efforts being made to clean London's air for all our futures.

The City of Westminster has some of the highest carbon emissions and worst air quality of any national local authority. Being at the heart of London we are determined to play our part to ensure the safest and healthiest environment possible for our residents and the hundreds of thousands who work and visit our streets each day.

This ambition led to our *Declaration of A Climate Emergency*, listening to people's needs and the publication of our *Climate Action Plan*, please refer to <https://www.westminster.gov.uk/tackling-climate-change-westminster/our-climate-action-plan> of which progressive reductions in traffic emissions and congestion are core objectives.

For Greater London to have a shot at creating an environment of cleaner air for all our futures we fully support the proposals set out in the consultation. Especially in respect to:

- A further expansion of the Ultra-Low Emission Zone (ULEZ) to effectively cover the whole of Greater London from 23 August 2023
- The removal of the annual £10.00 registration fee for the Auto Pay function for the current ULEZ, the Central London Congestion Charging scheme and the Low Emission Zone (LEZ) schemes
- To increase the fines for the ULEZ and Central London Congestion Charging schemes from £160.00 to £180.00 (with terms and conditions); and
- To support the Mayor in his proposed amendments to the Mayor's Transport Strategy (MTS). This to enable legislation to introduce the above changes and then open up a conversation on the future means of road user charging across London in the context of creating an even more cleaner environment, to encourage more of us to walk, use public transport and cycle and to return equitable funding to Transport for London (TfL) for re-investment in our public transport network, especially the London Bus Network.

Expansion of the ULEZ to effectively cover the whole of Greater London

It's recalled the original ULEZ of April 2019 was laid over the pre-existing Central London Congestion Charging Scheme of 2003 and spans much of east Westminster. The resultant reductions in harmful vehicle CO2 and NOX emissions as a result of the ULEZ was obvious to us all and thus the City Council fully supported the later expansion it in October 2021, outwards to the new boundary limits of the



Inner and Outer Circle cordons. Of both phases, it is recalled we fully played our part in ensuring that the necessary signs and lines were implemented on affected boundary roads and we are proud that all of Westminster is now within London's ULEZ.

Therefore, building on the above achievements it is confirmed that the City Council fully supports the proposed further expansion of the ULEZ, as consulted, to effectively cover most of Greater London.

This support being subject to:

- It being pegged to the current £12.50 daily tariff, for now
- The continuation/ or re-introduction of the previous 'Scrappage' scheme that was in place to financially assist those on the lowest of incomes and in respect to other needs, eg for the replacement of an essential tradesperson's van; and
- The retention of the current range of 'Discounts and Exemptions' which include disabled drivers and taxi drivers etc. But of the latter, we ask TfL to invest a greater share of any increased income in more concentrated enforcement of the minority of inconsiderate Taxi drivers who idle their engines at various Taxi Ranks across the West End and outside of London's main line stations.

The removal of the annual £10.00 registration fee for the Auto Pay function for the: current ULEZ; Central London Congestion Charging; and Low Emission Zone schemes; and to increase the fines for the ULEZ and Central London Congestion Charging schemes from £160.00 to £180.00

The proposed removal of the annual £10.00 charge for the Auto Pay option across the above two driver charge systems is welcomed as this will potentially encourage more compliance by those who need to pay. And the proposed increase in the fixed fines charged to a non-payer from £160.00 to £180.00 is also supported as this may encourage more drivers to be compliant and pay their dues more on time.

To support the Mayor in his proposed amendments to the Mayor's Transport Strategy (MTS)

As a fellow local authority we understand why the Mayor is seeking public approval to be permitted to make changes to the statutory MTS that will enact the necessary powers to first consult then implement the above changes to the ULEZ and Central London Congestion Charging schemes.

Shaping the future of Road User charging - a debate

Since its inception back in 2003, the Central London Congestion Charging Scheme has seemingly reached its limit in reducing ongoing traffic congestion especially in respect to the exponentially rising number of delivery drivers working for the burgeoning On-line retail and fast-food markets in particular. Of which to cost of any Congestion Charge paid will merely be passed onto the consumer and not lead to any reductions in traffic, in the main.

Likewise, we agree with the notion that the necessity of a driver to adhere to the array of three London charging systems, namely:

- The Central London Congestion Charging scheme, if not exempt or granted a concession
- The ULEZ, for those driving non-compliant vehicles; and even
- The Low Emission Zone, if the driver of a Heavy Goods Vehicles, Bus or Coach

is a cumbersome ask of any regular London driver let alone those from outside of the capital. Also, it must cost TfL much to maintain three separate operating systems and associated on-road CCTV installations, signs and lines; legal services; and the necessary back-office functions. So, its agreed that a combined single charging system would save much on resourcing and any confusion for the driver.



And this coupled to other factors such as:

- Advancements in on-vehicle technology in terms of tracking and recording telematics potential
- The increased use of delivery vehicles serving the On-line market that complete more miles on our local highway networks in comparison to, say, the private car. This additional mileage is of course not accounted for within the current Congestion Charging scheme
- The recent removal of sustained and proportional funding from the Government and The Department for Transport (DfT) towards TfL for the maintenance of London's strategic 'Red Route' roads network. Which could mean that there is now a case for TfL to determine a more equitable 'User Pays' principle when it comes to charging drivers for the number of miles travelled on London's roads; and
- If a London wide system is developed, then this could return more funding investment into the more sustainable London Bus and Underground networks over the years to come.

All mean that a new system of driver charging could well be necessary for a 21st Century London that would:

- Equitably charge the driver for the miles driven
- Encourage more of us to walk, cycle, use the London Bus and other public transport modes; and
- Accelerate our conversion to zero carbon vehicles by 2030 for those vehicles that remain essential to keep London's economic and social growth on track.

I would welcome the opportunity for such discussions to extend to the call for a future Zero Emission Zone in Central London and a proposal called 'Zero Diesel City'.

Therefore, on behalf of the City Council I would welcome further discussion with The Mayor, TfL and fellow stakeholders on how we can develop an equitable road user charging system fit for a 21st Century London and beyond.

Yours sincerely

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