



Proposed changes to the Ultra low emission zone and Low emission zone

British Lung Foundation response

The British Lung Foundation is pleased to submit a response to this consultation. Air pollution can have a devastating impact on all our lung health - it can cause lung cancer, it can worsen existing lung conditions and stunt the growth of children's lungs. In 2010, London's air pollution was associated with approximately 2,300 respiratory hospital admissions. The economic cost of these health impacts in London is estimated as being up to £3.7 billion a year.¹

Air pollution on many of London's roads is at illegal and harmful concentrations. The largest share of nitrogen oxides (NO_x) and PM₁₀ emissions come from road transport, with 48% of these NO_x emissions coming from: diesel cars (24%), petrol cars (14%) and vans (14%).^{2 3} To clean up London's air, we need to radically reduce the number of polluting vehicles on our roads. That's why we strongly support the Ultra low emission zone (ULEZ) and think that it should be implemented as widely and quickly as possible.

Our response outlines our view that:

- The ULEZ should be expanded across a London-wide area to cover all London boroughs - this will ensure the largest number of vulnerable people are protected.
- The ULEZ should be drawn up to include as many schools, care homes and hospitals as possible, with a focus on areas with high rates of inequality and lung disease.
- People who have blue badges and live with long-term health conditions should be supported to change to cleaner vehicles and given more time to meet the ULEZ standards.

We need a London-wide Ultra low emission zone that protects the most vulnerable

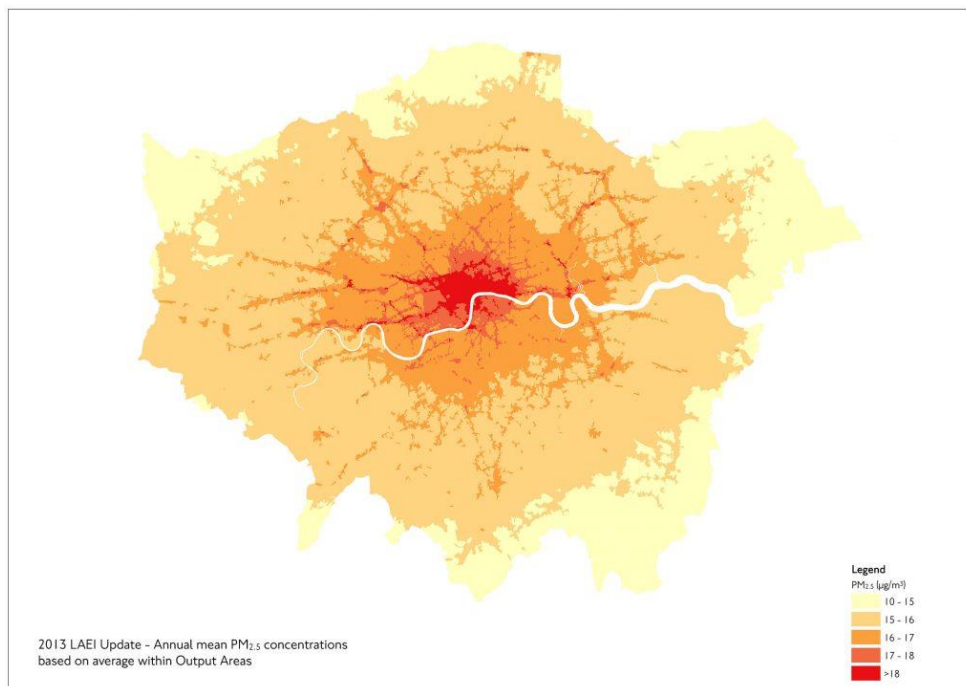
The ULEZ should be extended to cover a London-wide area. Given the extensive and widespread health impacts attributed to air pollution across Central and Greater London, all options for an extended ULEZ should be modelled. At a minimum the ULEZ should cover the area between the north and south circular. Even then, this zone would still exclude many polluted areas of London. Transport for London's research on PM_{2.5} exposure across London shows that every Londoner is breathing in

¹ Kings College London (2015) Understanding the Health Impacts of Air Pollution in London - https://www.london.gov.uk/sites/default/files/hia_in_london_kingsreport_14072015_final.pdf

² Transport for London (2016) New proposals to improve air quality, consultation and information document.

³ Department for Transport, Vehicle Certification Agency. Cars and fuel options (webpage: last checked May 2015).

unsafe levels of PM2.5.⁴ The map below clearly illustrates that action is required in many areas beyond the boundaries of the north and south circular.



Additionally, some of the most vulnerable Londoners will still be exposed to toxic air under these proposed boundaries. For instance, some of the boroughs with the highest rates of COPD in London are excluded - Havering (85% more likely to have COPD compared to the London average), Barking and Dagenham (71% more likely to have COPD compared to the London average) and Sutton (48% more likely to have COPD compared to the London average). Around 36,000 people living with COPD live in London boroughs that are excluded from these proposed boundaries, this number is likely to be even higher when you include boroughs that are only partially included.⁵

Highest rates of COPD by London borough (Top 10):

CCG name	Incidence	Prevalence	Included in proposed ULEZ?
NHS BEXLEY CCG	4,407	1.85	Partly included
NHS HAVERING CCG	4,695	1.71	Not included
NHS BARKING AND DAGENHAM CCG	3,574	1.61	Not included
NHS ISLINGTON CCG	3,843	1.56	Included
NHS GREENWICH CCG	4,216	1.48	Partly included
NHS SUTTON CCG	2,839	1.48	Not included
NHS SOUTHWARK CCG	4,415	1.37	Partly included
NHS BROMLEY CCG	4,636	1.34	Not included
NHS CAMDEN CCG	3,547	1.33	Included
NHS LEWISHAM CCG	4,203	1.30	Partly included

Source: NHS digital (2016-2017), cross-referenced with consultation document

Measures to tackle air quality should not disproportionately impact people who live with long-term health conditions

We are very supportive of the Mayor’s plans to improve the air we all breathe. However, we are concerned that people registered with a blue badge in London are likely to be disproportionately

⁴ Transport for London (2017) PM2.5 concentrations and exposure in London https://files.datapress.com/london/dataset/pm2-5-map-and-exposure-data/2017-10-25T12:29:22.42/PM2.5%20summary%20FINAL_v2.pdf

⁵ NHS digital QOF 2016-17: Prevalence, achievements and exceptions at CCG level [2.38MB] <http://digital.nhs.uk/catalogue/PUB30124>

impacted. Currently blue badge holders are not included in the “sunset” exemption policy for the ULEZ. There are 239,000 people registered with a blue badge in London - these people are likely to be over 65, live with co-morbidities and rely on their vehicles to get around London because of their health conditions. They are also likely to be from lower-income backgrounds so less able to upgrade their vehicles. We think these people should be included in the sunset exemption policy and given more time to upgrade their vehicles. We recognise that policies to tackle pollution need to be as ambitious as possible, but urge the Mayor to support the people who need it most to move to a cleaner vehicle or mode of transport.

Answers to consultation questions

1. Do you support tougher vehicle emissions standards in the London-wide Low Emission Zone so that heavy vehicles must meet the Euro VI emissions standards London-wide?

Strongly support

2. Do you support the proposed implementation date of 26 October 2020 for the introduction of tougher Euro VI standards for heavy vehicles driving in the London-wide Low Emission Zone?

Oppose (should be sooner)

3. Do you support the proposed daily charges to be paid by owners of heavy vehicles that do not meet the required emissions standards at: • £300 for those that do not meet Euro IV PM standards and; • £100 for those that do not meet Euro VI NOx and PM standards?

Support

4. Do you support the principle of expanding the area where ULEZ emissions standards apply to light vehicles beyond central London?

Strongly support

5. We are proposing that the ULEZ emissions standards would apply to the inner London area, roughly up to but not including the North and South Circulars roads. Do you support this proposed boundary?

Support an expansion but area should be larger

6. Do you support the proposed implementation date of 25 October 2021 for the expansion of ULEZ to include light vehicles in inner London?

Support

7. Do you support the proposed ULEZ daily charge to be paid by non-compliant owners of light vehicles of £12.50?

Support

8. Do you support bringing forward the end of the sunset period for residents in the Central London Congestion Charging zone from 7 April 2022 to 24 October 2021 so that all residents of inner London, including the Congestion Charging zone, pay the daily charge for non-compliant vehicles from 25 October 2021?

Strongly support

However, people who are registered with blue badges or have long-term health conditions should be eligible for a longer sunset period.

9. Do you support increasing the penalty charge (PCN) level for non-payment of the ULEZ daily charge by owners of non-compliant light vehicles from £130 to £160?

Strongly support

About the British Lung Foundation

The BLF is the only UK charity looking after the nation's lungs. We offer hope, help and a voice. Our research finds new treatments and cures. We help people who struggle to breathe to take control of their lives. And together, we're campaigning for better lung health. With your support, we'll make sure that one day everyone breathes clean air with healthy lungs.

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