

GMB PROFESSIONAL DRIVERS BRANCH

# ULEZ RESPONSE

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LONDONS LOW EMISSION ZONE



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## **GMB Professional Driver's Branch**

Our membership is made up of both private hire, Hackney drivers as well as delivery, ambulance drivers and those who drive professionally for a living. We also have a number of small private hire operators within our membership.

We have a close working relationship with TFL and have been responsible for working to help create and work on the legislation in place today from work on sight and diabetes for drivers to the Red Route Stickers that available for Private hire vehicles in London to avoid PCN's.

Our membership is substantial and growing and is made up of Both Taxi and Private Hire drivers.

We have links with many safety groups and other trade bodies.

Our branch maintains cordial relations with many licencing authorities.

We meet with both enforcement and ground transportation officials on a frequent basis at TFL.

The GMB has had recent contact with most assembly members and the Mayor in relation to the needs of both Passengers and drivers in London and its environs and this submission is a further clarification of our concerns and suggestions.

## **GMB and ULEZ**

The GMB Professional Drivers Branch (GMB) has attended all of the ULEZ Meetings with other groups over the past year and our views and feelings are summarised within this response as well as the issues as we see them.

We agree that emissions in London are far too high and needs to be lowered as a matter of urgency.

It seems to the GMB that those who make a living as drivers have been made scapegoats.

According to TFLs own emission figures, Private Hire are currently at about 4% whilst buses are at over five times higher at 27%.

## **Licensed Taxi**

The Licensed Taxi trade emission level is slightly lower than buses but with ongoing replacement this drops on an ongoing basis.

The GMB notes, from its members that Taxi drivers are only allowed to drive vehicles, designated, as fit for purpose by TFL itself, so in effect, TfL have created an emissions issue within the Licensed Taxi trade, and have the audacity to blame the Taxi trade for TFL's own blunders.

The Licensed Taxi trade has been screaming out for alternative vehicles for almost twenty years, these calls, have fallen on deaf ears, until the Mercedes Vito, which now retails at £13000 more than its TX4 rival.

The TX4 has been proven to be more polluting than the vehicles that are being scrapped, through the Mayor of London's ill-conceived emissions policy, which again, is at the drivers own cost.

The cost of hybrid and plug in vehicles are much higher than the equivalent vehicles in operation.

The Licensed Taxi trade has not been allowed access to hybrid vehicles.

Testing of the Metrocab started only very recently so buying a hybrid would be a massive leap of faith.

There are Two Hybrid Metrocab's currently undergoing evaluation however we understand these are not exhaustive tests and will not be representative of the stresses these vehicles would customarily reach under normal usage.

Currently there are no real viable plug in vehicles that reach the requirements TfL suggest.

The upper end of the Private Hire trade already runs the available hybrids and in the future the rest of the trade will follow as second hand vehicles filter down.

Hoping, Wishing and Assumption is no way to plan for emission reduction.

## **Electric Vehicles**

The GMB feel that all electric vehicles plans for the profession in 2020 need to be dropped as at present the infrastructure required is nowhere near ready.

Currently electric charging points in London are very limited especially since many don't work and that we already have monopolising where individuals who work in office environments, plug in the vehicle, go into their office and do not leave the plug in point until the end of their working day.

The east side of Berkley Square is a very good example of this.

A further issue is disrepair of many charging stations With no uplink or failures to be able to disconnect cables after use there are multiple issues.

Additionally lack of enforcement means regular vehicles often park blocking the bays from legitimate users.

As we will elaborate further using a conventional 13AMP Station for a car such as a Nissan Leaf takes 12 Hours to complete a full charge.

This is hardly practical or pragmatic.

Most of the plug-ins are not quick chargers but in any event it is a known fact that quick charges shorten the life span of the battery.

The plugs in points in London are dominated by a French company and at present there is no structure of future pricing or caps on the cost of charging of plug in the future.

Should companies, Authorities or individuals choose they could charge any price point they desire for electricity resulting in higher costs for consumers.

*Steve Garelick GMB Professional Drivers Branch Secretary — How can we be sure that electricity rates will be not become exorbitant due to lack of choice?*

GMB Professional Drivers Branch feel we could have a scenario that the charging points here are used to subsidise the French as already happens with a French state owned utility company.

GMB estimate that 80% of private and public hire vehicle owners will not in the future be able to have a plug in system at home.

Issues over exiting street furniture blight which not only cause pedestrian issues but line of sight issues for motorists would be increased greatly.

With parking at a premium in most London locations installation of points that would see a regular rotation of vehicles is not only impractical it is impossible.

Costs of destruction and replacement of pavement alone would run in to millions of pounds.

The majority of Professional Drivers do not have a garage or even a driveway and rely on street parking or shared ownership car parks outside their homes.

Currently, as the law stands through safety regulation you can only have an outside home charging point if at the very least you have your own drive.

You cannot simply run a trail of cables to a vehicle from a residence or office as again this naturally impractical its also dangerous and illegal and of course nonsensical.

Even if the future allowed for street plugins on every residential street there will not be the space to cater for all residents requirements.

The Institute of Professional drivers do have a Toilet and Charging System which would assist matters especially in view of the lack of facilities required and mandatory for drivers under HSE guidelines.

This would allow charging points and offer much needed toilet facilities.

However one of the major issues is where to site these and the willingness of Local authorities to assist Professional Drivers.

This situation would be even worse in apartment blocks which are often built without allowing ample parking let alone space for charging points.

To put this infrastructure in place will cost millions, money that government and local councils do not have let alone private residents.

Focusing on hybrid vehicles again presents problems as of today no manufacturer has come up with viable six or seven seated vehicles which many operators and drivers run and are a required option for many travellers.

The expense to the average driver or operator will not be cost effective as current subsidies that appear to be on offer will not make up the shortfall.

The expected cost of low emissions vehicles is Generally Five Thousand Pounds more than the standard range of the same vehicle type.

With a Pie of only Thirty Million Pounds to be shared nationally with no facility for disabled in accessible vehicles this means the Private hire trade in London will be ignored and marginalised despite having to replace its fleet with no discernible financial benefit to those who often are earning below the minimum sustainable income.

*Simon Rush GMB Professional Drivers Branch President — How will the average driver fund an extra £5000 cost when they can barely cover their other expenses?*

As we have said previously, the licensed taxi trade at the moment do not have a hybrid vehicle and again in the future what subsidies will there be on offer to cater for the increased cost.

What has been mooted is only available short term and does not take in to account those who are prepared to go low emission but normally buy second hand to keep costs low or due to credit issues caused often by low earnings described earlier.

The higher level of fuel economy suggested by manufactures compared to Diesel does not actually happen in the real world of everyday working when you consider the increased cost of purchasing/leasing or renting these vehicles.

In fact the Nissan Taxi has been dropped & the Mercedes 300 hybrid option will not continue beyond October 2015 and as of yet no effective replacement has been forthcoming.

Most diesel vehicles from January 2015 will be Euro 6 as required by TFL for 2018 which in effect as already stated here will already be in use by the larger operators who can afford to update fleets and some licensed private hire drivers operating in certain niche markets.

There will be natural transition by drivers and operators who change vehicles every three or four years.

### **Low Income**

However the hardest hit will be the poorer drivers who drive older cars especially when we reach 2018 the Euro 6 vehicles will only be three years old and therefore too expensive for many to acquire.

These not viable for use as these drivers also tend to earn the least unless a mandatory minimum fare is put in place to help private hire drivers absorb these costs.

Private hire & taxi fares have not kept pace with real consumer costs over the last ten years.

Many factors contribute to these issues including and not withstanding inflation and the current downward trend of price cutting by many operators.

Additionally the ever increasing private hire driver numbers this is not sustainable unless some form of legislation is in place for a minimum fare across the board to help cushion the added expenses in implementation of Euro 6 capable vehicles along with more energy and Emission efficient vehicles.

### **Battery technology**

Perhaps a cap on numbers entering the profession per annum may be a way of increasing rates.

Li-ion batteries which are used in the Tesla car are at present 4/5 times more expensive than nickel metal hydrides which were the industry norm.

What happens as the motor industry moves more to these forms of battery power where the generally accepted lifespan is currently about 100,000 miles.

We agree that the cost of the modern battery will decrease but the lifespan of the battery probably won't due to the use of mainly charging via rapid charging which decreases the life of the battery as most drivers and operators will need to charge their vehicles this way due to the mileage they cover on a daily basis.

Additionally the reduction of availability of rare Earth metals is becoming an issue too.

The recycling of the spent fuel systems is also an issue which needs to be addressed.

Most lithium supply come from lithium deposits concentrated in South America which in the future may present problems of supply as these are areas of instability and could affect the supply and may impact on the battery price and in turn the overall cost of the vehicle.

In the future recycling of Li-ion batteries is expected to be the main source of lithium supply's and unlike oil where volatile price fluctuations increase or decrease the cost of running a vehicle lithium fluctuations will impact on the total cost of manufacturing of the vehicle.

Even with Toyota passing on valuable battery patent technology to other manufacturers this is not a forgone conclusion this will be in place in time.

Should the Storedot Car Battery become a reality then there is a faint possibility this would also create a solution should a 3 Minute charge time be attainable.

GMB Professional Drivers Branch agree that changes are required but we feel that much of this change will focus on the individual been forced into change rather than TfL.

## Bus Usage

As an example by 2020 what are TFL'S projected figures on N02 (Nitrogen dioxide) levels on buses?

We all agree Buses are currently one of the most polluting forms of N02 in London. It has already being alleged that the current route master buses will be exempt from these changes.

Why do many large buses need to run on off peak and low usage routes when smaller busses could be used?

Surely a Mini Version of a Double Deck Bus would be more cost effective use less road space and create fewer emissions.

Whilst the Whiterose paper from 1984 claims that smaller buses do not work, patterns in London are different and have evolved in the intervening period.

Based on this a stale argument that adding a smaller vehicle to the existing bus fleet is not only inaccurate it is baseless without a redeeming argument beyond the need to buy alternative vehicles.

A good example of cost savings using smaller low cost vehicles in Dallas are a case in point.

Benefits include.:

- Reduced road damage
- Lower costs per passenger mile
- Lower Emissions
- Improved Disabled access
- Praise from the travelling public.

If Private Hire vehicles were allowed access to bus lanes when carrying passengers, the emissions of the vehicle would be drastically reduced, as a moving vehicle emits a fraction of the emissions of a stationary vehicle in a traffic queue.

Also the general traffic would flow better as the Private Hire vehicles would not be taking up road space with the general traffic thereby shortening the queues and decreasing the time traffic is stationary emitting less pollution.

### **Fuel Options**

The GMB believe there are other ways of reducing emission levels for example the Fischer Tropsch process which is basically synthetic diesel on a large scale.

This apparently reduces carcinogens emissions by over 90% and Nitrogen oxides by 5 up to 25%.

This Ecopar fuel is used in Sweden and meets tough regulations in the US and other European cities.

At a recent ULEZ meeting we proposed making it mandatory for all Greater London based Fuelling facilities to offer only this type of fuel.

To keep costs low fuel companies would then be keener to make this the standard nationwide to keep parity.

GLA say they cannot force petrol stations to supply this. We beg to differ as bio fuels have been forced and are in use via suppliers.

There is no reason the GLA cannot create this standard.

The mayor has the power for this legislation.

## Alternative Power Sources

Cotton batteries are also not been looked at even though currently in Japan these organic batteries are now under teste and there are proven claims that these batteries will last longer, charging time is less and the cost is much cheaper than conventional battery options.

They are much greener.

Ryden The Japanese Company behind this technology have the benefit of Kaname Takeya who helped develop Toyota battery technology in the Prius and Tesla model S.

Surely this technology must be considered and fostered.

This is known as the Ryden Battery and can be charged 20 times quicker than current lithium battery and is also much safer from fires Is recyclable and can fit in to any space in vehicles creating further distance capacity as well as noise dampening factors.

We feel that TfL are jumping in too quick especially with the Ryden system now been tested.

Who can forget that long ago that we were all encouraged to buy diesel vehicles to reduce C02 emissions in petrol engines and to save costs on distance travel which did achieve its aim.

However the cost to health and the environment have been immeasurable.

We feel that perhaps we should be focusing on cleaner diesel and wait as hybrid vehicles are constantly improving and with the cotton battery scenario are we in a few years going to be told that lithium based technology is no cost effective or safe and that we all need to move to the Ryden System after the industry has spent millions on hybrid and inefficient unworkable electric vehicles.

Hydrogen power is another alternative but mainstream production is some time off due to the costs in creating inverters membranes and the high level of platinum usage.

We believe this is has an excellent future as the Fischer Tropsch method can also create a plentiful supply of the gas however we think viable systems are five to ten years from meaningful fruition.

## **HGV and Delivery**

The Freight Transport Association have been looking at reduced emission targets but we have certain ideas which will fundamentally alter commercial vehicle usage in the Proposed ULEZ and thought London.

Firstly we propose a 7.00 AM to 7.00 PM curfew on certain classes of HGV and Delivery Trucks and Vans not only will this reduce emissions but will free up valuable road space during the day.

This will allow improved access and lower emissions as traffic flow will immediately improve due to junctions not being blocked roads space will not be reduced due to delivery's taking place and traffic control waits will be shorter.

The anecdotal evidence that without HGV's on the road at these times would save cyclists life's is also something to consider.

A Shared payload scheme so that those making deliveries can share costs and reduce the need for additional vehicles.

A higher fee for those using HGV's to deliver in to or travel through London during peak periods.

## **Overseas Vehicles**

At present when entering Low emission zones in Germany a emissions sticker is mandatory and needs to be purchased in advance.

Emissions stickers are available in red, yellow and green according to the particulate emission of the vehicle possessed. Green stickers give full access. This is dependent on emissions other stickers either prohibit access or give partial access.

Vehicles without an emissions sticker are not permitted to drive in any low emission/ environment zone.

It would be mandatory for overseas vehicles to buy a sticker for those without would be subject to a fine including cost of tracing and enforcing in the home country of the vehicle.

It is important to note this is a Motoring offence in Germany and it is endorsable.

There is no reason or excuse why this should not be the case in London as clearly it is the Law in Germany and they enforce on foreign owned vehicles.

In short there is no defence that can be made to not adding this to any statute or plan.

## **Commercial Exempt Vehicles.**

We do not accept that exemptions for vehicles providing private ambulance service, Medical Supply delivery or any commercially owned vehicle should be exempt from any charges for zone usage.

If the individuals or companies are working for commercial gain then they should pay as any other road user would for zone access.

## Motorcycles and Unconventional Vehicles

Motorcycles are often ignored when considering emissions however they have a part to play and in addition to gasses the noise levels also play a part of daily city ambient noise.

We believe that not only is there no need for exemption for these road users but a charge based on noise as well as output would greatly enhance the ULEZ.

Why should Motorcyclists be exempt?

We also would endorse banning Pedicabs of any variety from the zone as the congestion and delays created by them will only add to static and stagnant gas formation.

## Europe

We are concerned that we are paying the price in the UK but many European nations are ignoring this issue and not facing the consequences.

2015 CCPI data shows the UK standing as the third in line worldwide.

Eight European countries are only showing moderate performance this includes Germany.

A further Nine including Greece and the Netherlands is showing poor performance

Why are we footing this bill when our profession is the only one annually seeing a drop in emissions?

## Summing up

The existing proposals are too farfetched to be practical and setting down timescales and vehicle emission targets which cannot met are folly at best.

London itself has the largest population in Europe and is a major working city to the envy of the world.

We conclude that the real improvement would be by working on the HGV ban and reducing bus size and journeys at non-peak periods.

A less rigid approach to implementation is required with Euro 5 Vehicles being phased out only as improved technology is available.

We recommend a buyback Scheme for both Private Hire and Taxi for those who wish to implement a greener option would also hasten improvement.

Additionally tax incentives would be welcome for those implementing.

Low cost finance which allows drivers to buy fuel efficient and environmentally friendly vehicles.

A similar leasing plan to be in place too for those unable to get on the ownership ladder.

Existing hybrids should be allowed an extension to seven years for those who are unable to invest to at least achieve near parity rather than face financial loss as a result of exclusion.

We are concerned that rather than invigorate business and improve conditions these plans will stifle business and create congestion and ecological issues elsewhere as the traffic is pushed outside the ULEZ environs creating further delays and disruption.

Our final concern is that should the law commission recommendations become legislation then licensing will change fundamentally and any decision must take this matter in to consideration.

Questions in relation to our response can be directed to:

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