

GMB PROFESSIONAL DRIVERS BRANCH

# ULEZ RESPONSE II

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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 bus lane signs available for Private hire vehicles in London.

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) have attended ULEZ Meetings with many other groups our response to the revised proposals is below

There is no opposition to the proposal to improve conditions in relation to emissions in London However caveats exist and it is our firm belief that the proposals due for 2020 are being forced upon the trades early for the wrong reasons when there are clearly offenders that are not facing the same draconian penalties.

## **Licensed Taxi**

***As set out in our original consultation, do you support the proposal to introduce a requirement that vehicles licensed for the first time as taxis from January 2018 must be ZEC?  
(Unchanged proposal)***

***Do you think the timing of our proposal to introduce a ZEC requirement for vehicles licensed for the first time as taxis from January 2018 is: Right / Can Be / Cant Be Achieved?***

Whilst the proposal is broadly accepted we feel the possibility of such vehicles being available to the trade in the presumed numbers and on time is impossible in 28 months and would propose that this measure is considered for the following year.

The increased costs are offset by a more generous scheme than was available but works on the presumption that all grants will be obtainable and that funds will not run out given that other authorities such as Dundee have a green proposal on the table.

***Do you support our current preferred approach – both a voluntary decommissioning scheme for taxis over ten years old and purchase grants for ZEC taxis? (New proposal)***

In our opinion the 12 year period is more pragmatic given the fact that sufficient numbers of vehicles will not be available at the outset combined with the extra ordinary costs Taxi drivers face plus the increased competition that increased expense cannot be entertained at this point.

### **Private Hire Vehicles**

***As set out in our original consultation, do you support the proposal to introduce a requirement that new vehicles licensed for the first time as PHVs must be zero emission capable from January 2018? (Unchanged proposal)***

We do not support this proposal whatsoever.

This is an imposition on a trade which consistently demonstrated green credentials and a willingness to reduce emissions without the need for legislation.

Given the age of the fleet and the pre-existing low emissions this is nothing short of draconian.

A delay until 2019 is more than acceptable given the <4% composition of the entire fleet base in London and the fact that not all vehicles will be within the proposed zone.

***Do you think that our proposal to introduce a ZEC requirement for all vehicles under 18 months that are newly licensed PHVs from January 2018 is: About right / can be introduced prior or Post 2018?***

Whilst there are several vehicles that are ZEC capable one size does not fit all.

We would remind all parties that there is still a strata of drivers who cannot afford to put such vehicles on the road due to poor income and rates offered by operators.

Additionally in many cases due to past financial hardship these same drivers find it difficult to obtain finance and those using the rental market are gouged on price by those offering such facilities.

We propose a 26 month limit.

***We are proposing a two year sunset period exemption to this requirement until January 2020 for PHVs licensed to carry six or more passengers. Do you support this proposal? (New proposal)***

Firstly we feel that some vehicles classed as SUV / MPV are only capable of carrying 5 Passengers so any proposal should encompass this point.

Clearly any vehicle which carries more than a standard vehicle of four Passengers should be within this class.

Some vehicles may be capable of larger passenger capacity e.g. the Tesla but in reality the seats will not be practical for most grown adults or teenagers.

It is agreed that at present no automotive manufacturer has viable Five, Six, Seven or Eight seated vehicles which many operators and drivers run.

We accept that as there is no option then provided a choice of no less than Six options exist then this is an acceptable proposal.

***As set out in our earlier consultation , do you support the proposal to introduce a requirement that used vehicles (older than 18 months) licensed for the first time as PHVs must meet a minimum Euro 4 petrol or Euro 6 diesel standard from January 2018? (Unchanged proposal)***

In short no.

Once again we would remind all parties that there is still a strata of drivers who cannot afford to put such vehicles on the road due to poor income and rates offered by operators.

This group is NOT a fleet buyer and is made up of individuals who face many more financial challenges than operators purchasing on fleet basis.

As previously outlined in many cases due to past financial hardship these same drivers find it difficult to obtain finance and those using the rental market are gouged on price by those offering such facilities.

We propose a 24 month base level.

Additionally we propose implementation from June 2019 unless grants can be made available.

***Do you support the proposal to change the definition of a zero emission capable PHV to align with the eligibility criteria for the Office for Low Emission Vehicle's (OLEV) plug-in vehicle grant? (New proposal)***

We can only accept such a proposal if it can be demonstrated without any such criteria is based on existing proposals even if the grant is withdrawn over the ensuing period.

Further to this we will make clear requests in relation to grants later in this response.

***Further PHV response:***

It is our contention that similar grants should be made available for higher polluting vehicles at the latter end of their availability to the PHV trade and funds similar to those offered to taxi in addition to any grant should be made available.

Additionally should the grants no longer be available then it should be the GLA's responsibility to meet the cost of the grants that are currently in place.

***Do you support TfL's additional initiatives to improve air quality in London? (New proposal)***

***A) Retrofit an additional 400 Euro V buses outside of central London to meet the Euro VI standard***

This proposal must be at the operators expense and not the public's expense or from existing or proposed funds.

Bus operators work on a for profit basis unless they can demonstrate to an independent working party they will face loss as a result of such engineering and that they will not benefit when vehicles are sold on to others at the end of their London working life we see no benefit.

There is a corporate responsibility that operators must embrace just as Taxi drivers did who were forced in to retrofitting their taxis.

***B) A demonstrator fund for bus operators to trial double decker zero emission buses in central London***

Categorically no.

It is a necessity for such technology to be in place Private hire and Taxi do not receive widespread funded trials for vehicles so why should private enterprise?

There is no need for a demonstrator a choice of replacements should be available and providers can choose accordingly.

Why on earth should the public fund such an enterprise?

***C)The creation of a Low Emission Neighbourhood in central London.***

Such a proposal is similar to social engineering and should not be the province of a transport authority or a Mayoral Authority.

**Ulez Proposals**

We reaffirm our position on the matters outlined below.

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.

As previously advised during off peak adding a smaller vehicle to the existing bus fleet would reduce congestion and emissions.

A clear scrappage scheme should be available to private hire as at present this appears to be discriminatory by GLA and TFL>

**FUEL**

On fuel itself we reaffirm the following:

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 past 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.

This has been totally ignored by those looking at this for the GLA and TFL.

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.**

We have brought up carbon cotton batteries as well as Storedot technology and Hydrogen

This seems to have been discounted and ignored by GLA and TFL the question is why?

Surely if alternatives exist the GLA and TFL groups should be beating the drum for this to encourage manufacturers to take on this technology.

Hydrogen power is a strong alternative power source 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 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**

We reaffirm the following proposal.:

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.

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.

We believe this will create more safety for cyclists too.

## **Plug in Points**

At the head of the consultation paper a total self-funded plan for implementation of power points is advised.

The question is at what cost to the consumer?

As previously outlined at meetings how much above the odds will the consumer pay for the benefit of obtaining charging power for their vehicles?

How will bays be policed to allow a through flow of vehicles that need to charge up? Especially those engaged in Hire and Reward work or deliveries.

### **Overseas Vehicles.**

No mention has been made about how this will be implemented or whether it is a consideration we reaffirm that this is a necessity.

At present when entering Low emission zones in Germany an 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.

## **Plant and Equipment.**

A clear immediate campaign to London wide based users of retrofitting of industrial and plant equipment of to meet Euro IV standard introducing this by mid 2017 is a imperative.

Given that 20% of emissions are created by this group alone drastic measures must be taken including substantive fines for those who ignore this.

Enforcement teams will be self-funded from fine income.

## **Final perspective.**

In closing we still feel that those in Taxi and Private hire are feeling the brunt of measures that others are able to afford and in some cases ignore.

The timescales promoted are unfair and unreasonable considering 2020 is the implementation date.

Questions in relation to our response can be directed to:

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