GMB London & Southern Region

2017 STRATEGY RESPONSE

MAYORS DRAFT TRANSPORT STRATEGY 2017



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**GMB Union**

**GMB is a campaigning trade union focused on protecting GMB members in their workplaces and growing the number of GMB members in order to strengthen the Union's power. This website reflects GMB member's aims and values, and shows what GMB Workplace Organisers do every day for GMB members.**

GMB is a general union - which means that anyone can join us. GMB has almost 639,000 members working in every part of the economy.

GMB has members in every part of the UK economy doing every type of job imaginable. GMB members are men and women, young and old or even retired, working full and part time, and are made up of a wide and diverse cross section of Britain's society.

Every day of the year GMB offers protection at work and solves problems for GMB members. GMB provide back up, representation and advice on every issue related to members life at work.

This system of support can be provided in a number of ways, often through one of our 25,000 Workplace Organisers: GMB trained individuals who give their time voluntarily to help their workmates.

Backing up the reps are full time GMB Organisers.

GMB employ a team of experts on a range of issues including legal specialists, health experts, [pension](http://www.gmb.org.uk/) specialists, human resource management staff and experts on terms and conditions. In fact, if you need advice and support about anything to do with work GMB can help its membership.

GMB's fundamental approach is that together we can achieve more than we can do on our own.

Whether you're looking for better pay, improved childcare, realistic work-life balance, a change to long working hours, the elimination of poor health and safety or simply a desire for respect from your employer; together our voices are much more powerful than one voice alone.

GMB has been in existence for over 12 decades and has grown to be one of Britain's most powerful and forward-looking forces for change. It is made up of a number of unions who have merged over the last 120 years to become GMB - Britain's General Union.

Through peace and war, with and without help from Government, GMB has been winning for our members and protecting people at work.

Our membership in transport based trades includes: Taxi and Private Hire Drivers including chauffeurs, Cycle and Motorbike couriers, parts delivery drivers, as well as refuse collection & street cleaning operatives to those who deliver inflight meals to the aircraft door.

**GMB Transport Perspective**

The GMB is keen to engage on a sustainable and ecological vision for London’s and Londoners future.

Our perspective is clear that strategy must not give way to job loss and inconvenience for commerce as this defeats the principles of worker protection.

**1). London faces a number of growing challenges to the sustainability of its transport system. To re-examine the way people move about the city in the context of these challenges, it is important that they have been correctly identified.**

**Please provide your views on the challenges outlined in the strategy, and describe any others you think should be considered.**

The GMB endorses many aspects of this draft proposal but feels that certain plans may be too presumptuous using computer modelling.

Upon investigation of government road usage statistics from 2016 there is clear increase in vehicle ownership UK wide and it remains the case that over one third per one Thousand Londoners have vehicle ownership.

Furthermore, regionally London is sixth in the table of ownership.

Diesel cars and van ownership is marginally higher than petrol vehicle ownership with average age limits being around 8 years and showing higher age variations on Bus, Coach and most markedly motorcycle which nears a 13-year average.

Strategies of major motor manufacturers and market disruptors such as ride share companies may change ownership and usage patterns and we are keen to highlight this.

We note the over emphasis on cycling and do not see a change of habit in the short to medium term as this is more likely to follow from immediate change.

There is no mention in the strategy for use of canals as portals given this existing infrastructure is available it is surprising to see this omission.

The major challenge of this proposal is make change without Londoners feeling they are being given the stigma of not being socially responsible and that those who need personal transport that is powered are not made to feel they are pariahs.

 We do feel some of the phraseology used in documentation is patronising and sometimes illogical.

Examples include use of Kilometres instead of miles creating the impression of more movements based on shorter kilometre to mile ratios, Enjoyment of streets – Whilst a good environment is important, use of phrases such as this are patronising.

Further thought should be given in the future in rather than appealing to a percentile who feel this is inclusive to just being direct in presentation.

**2). The Mayor’s vision is to create a future London that is not only home to more people, but is a better place for all of those people to live and work in. The aim is that, by 2041, 80% of Londoners’ trips will be made on foot, by cycle or using public transport.**

**To what extent do you support or oppose this proposed vision and its central aim?**

Whilst we do not oppose this aim we do not believe that such a change can be accomplished in such a timescale based not only of major changes in infrastructure but also the fiscal expenditure required to do so.

**3). To support this vision, the strategy proposes to pursue the following further aims:**

**To what extent do you agree or disagree with the aims set out in this chapter?**

**By 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day**

We do not oppose this proposal; however, this can only be treated as an advisory as individuals must be free to determine their own paths from an activity level.

**For no one to be killed in, or by, a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from our streets by 2041**

Whilst this is an agreeable proposal we feel that unless technology preventing collision is in place this is impossible to be attained in 13 years by bus as the fleet age and materials used in bus manufacture as well as street layouts make this eventuality unattainable.

In view that many vehicles by 2041 will have improved safeguards this hypothesis is possible however the facility for complete eradication is probably not possible given road structure, older vehicles as well as overseas vehicles without

**For all buses to be zero emission by 2037, for all new road vehicles driven in London to be zero emission by 2040, and for London’s entire transport system to be zero emission by 2050**

Given the level of speed that technology is moving we suggest that buses & coaches are Zero emission by 2033 and that the aim of Zero emission is met by 2040 with dispensation for classic vehicles and specialist vehicles.

**By 2041, to reduce traffic volumes by about 6 million vehicle kilometres per day, including reductions in freight traffic at peak times, to help keep streets operating efficiently for essential business and the public**

To solve the peak time issue, we recommend a 7 am to 7Pm ban on HGV traffic.

The aspects mentioned about hubs for streets are laudable but without damage to what are already populated zones we see this as unattainable.

Furthermore, the level of street furniture that causes impairment of vision by road users and pedestrians alike must be considered.

Increased need for power cabinets and trailing cables for vehicle charging will add to this issue and must be carefully considered when looking at street provisions.

We also recommend specific consideration is given to LED lighting both at curb level as indicators and in its use for lighting areas.

Studies showing interference with sleep based on lux levels are available and should be considered when re-planning street space.

**To open Crossrail 2 by 2033**

We do not disagree with this proposal.

**To create a London suburban metro by the late 2020s, with suburban rail services being devolved to the Mayor**

We do not disagree with this proposal.

To improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared to the full network

We do not disagree with this proposal.

Step free access as well as audible advisories for blind or partially sighted individuals should be the norm.

This should include Buses on the travel network.

To apply the principles of good growth

We do not disagree with this proposal.

Please let us know if you have any comments you would like to make on the aims of the strategy.

Changing HGV operation times will allow improved access to London and its environs will 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.

We also suggest a special fee for those using HGV’s and Vans to deliver in to or travel through London during peak periods.

Commercial companies of Local or Government contracts should not be exempt including private ambulances from any company as they are working for profit not as Local or national government vehicles.

4). Policy 1 and proposals 1-8 set out the Mayor’s draft plans for improving walking and cycling environments

To what extent do you agree or disagree that these plans would achieve an improved environment for walking and cycling?

Proposal 1

The Mayor, through TfL and the boroughs, will improve and manage London’s streets to create a high-quality public realm that encourages walking and cycling by all Londoners by: a) Creating ‘Liveable Neighbourhoods’ to improve the public’s experience of walking, cycling and using public transport and to increase opportunities to use streets as public spaces and for play, and to encourage fewer trips by car. b) Providing ‘Healthy Routes’ to create attractive, safe and accessible walking routes to schools and other local destinations, such as shops, health services and parks, with a particular focus on improving conditions for children, older people and disabled people. c) Providing more cycle parking, particularly in residential areas, town centres, public transport interchanges and at key destinations. d) Improving the accessibility of streets for older and disabled Improvements to the street environment to encourage walking and cycling are illustrated in Focus on: Walking and Cycling and the Healthy Streets Approach. Londoners through measures including removing obstacles, widening pavements for wheelchair access, introducing tactile paving, raising sections of roadway to make crossing easier, providing seating and, where possible, ensuring on street cycling facilities cater for the wide range of cycles used by disabled people. e) Ensuring any scheme being undertaken on London’s streets for any reason improves conditions for walking and cycling.

Streets are created as routes for individuals and groups to reach alternative locations the idea of creating playzones is dangerous and illogical.

Cycle parking is desirable but in large retail environments the level of cycles needs to be considered.

Reduction of road space has already been shown to increase congestion and delays increasing pavement space is not necessary as most pedestrians are able to negotiate their way around another this includes those with disability.

Adding seating surely adds further street furniture to already crowded locations.

Perhaps integrated designs are required?

We propose that all-purpose built cycle lanes that are in place become mandatory to reduce collision risk.

Proposal 2

The Mayor, through TfL, will work with the central London boroughs to transform the experience of the walking and cycling environment in central London by reducing the dominance of vehicular traffic, including by transforming Oxford Street and looking urgently at changes to Parliament Square.

We are concerned that Oxford Street plans may actually be problematic for traffic flow and the surrounding streets and residents this has been provided in a separate response.

In relation to Parliament Square changes that have already occurred now create further access issues to local Hotels, business and stations further meddling with this location will lead to further delays and environmental damage.

We believe that modeling and decisions that are made based on skewed surveys cause further issues in the long term.

Proposal 3

The Mayor, through TfL and the boroughs, will deliver a London wide network of cycle routes, with new routes and improved infrastructure to tackle barriers to cycling. The Mayor’s aim is for 70 per cent of Londoners to live within 400 meters of a high-quality, safe cycle route by 2041.

We would refer to our earlier points on road space.

Proposal 4

The Mayor, through TfL and the boroughs, and working with other stakeholders, will protect, improve and promote the Walk London network and create new leisure walking routes.

We have no opinion on this point.

Proposal 5

The Mayor, through TfL and the boroughs, will make it easier for people to walk and cycle in London by:

a) Maintaining, expanding and improving ‘Legible London’ pedestrian wayfinding maps and ensuring that on-street cycle network signage is clear and consistent.

We have no opinion on this point.

b) Using new data to develop and improve online journey planning and navigation tools that will make walking and cycling trips the most easy (easiest) journeys to plan.

Before such a plan is enacted we would want to be sure how data is acquired.

Proposal 6

The Mayor, through TfL, will seek to increase the use of TfL’s Cycle Hire scheme, as well as future models of cycle hire, reinforcing the role of cycle hire as an integral part of London’s cycling infrastructure and public transport network.

We are concerned that the existing scheme has been run at a loss.

Proposal 7

The Mayor, through TfL and the boroughs, will work with schools, employers and community and user groups to promote walking and cycling, whether for the whole journey or as part of a longer journey.

We have no opinion on this point beyond keeping costs of promotion within a set budget.

Proposal 8

The Mayor, through TfL and the boroughs, will work with local communities and cultural organisations to promote one-off, regular and trial closures of streets

to some or all motorised traffic so that Londoners can see their streets differently.

We feel that streets are built for traffic and closures that lead to accessibility issues for residents

**5). Policy 2 and proposals 9-11 set out the Mayor’s draft plans to reduce road danger and improve personal safety and security (see pages 62 to 67).**

**To what extent do you agree or disagree that these plans would reduce road danger and improve personal safety and security?**

Policy 2

The Mayor, through TfL, the boroughs, police and enforcement authorities, will adopt Vision Zero for road danger in London. The Mayor’s aim is for no one to be killed in or by a London bus by 2030, and for all deaths and serious injuries from road collisions to be eliminated from London’s streets by 2041.

GMB have answered this policy earlier in this document:

Whilst this is an agreeable proposal we feel that unless technology preventing collision is in place this is impossible to be attained in 13 years by bus as the fleet age and materials used in bus manufacture as well as street layouts make this eventuality unattainable.

Proposal 9

The Mayor, through TfL, the boroughs and policing and enforcement partners, will seek to reduce danger posed by vehicles by:

a) Introducing lower speed limits and by improving compliance with speed limits through enforcement, information and appropriate training.

b) Introducing road danger reduction measures at locations that pose the highest risk to vulnerable road users.

c) Working to ensure that vehicles driven on London’s streets adhere to the highest safety standards, starting with a new Direct Vision Standard for

HGVs. TfL will develop a newBus Safety Standard which will be introduced across the city’s entire bus fleet featuring design and technological measures to

protect passengers and other road users.

d) Launching a programme of training, education and (working with the police) enforcement activities to improve the safety of vulnerable road users, including

the development of a new London Standard for motorcycle training.

Whilst we broadly agree with the proposal.

We would recommend variable limits late evening to early morning.

Our contributors saw no comments about how cyclists are going to be managed in future to obey the Road Traffic Acts and indeed utilise the segregated space when provided for them.

If a key aim is to massively increase cycling participation then the authorities must also ensure provision is made to “police” their activities.

A Reduction in speed limits is very laudable where there is likely conflict with other users (such as schools, hospitals, shopping centres, etc) but surely blanket reductions for whole neighborhood’s is not appropriate and can only lead to material rises in pollution levels with idling vehicles.

Proposal 10 The Mayor, through TfL and the boroughs, will set out a programme to achieve the Vision Zero aim of reducing the number of people killed or injured on

London’s streets to zero. A joint police/TfL report will provide annual updates on progress

We broadly agree with the proposal however as elucidated earlier Zero deaths or injuries is contingent on other factors.

Proposal 11 The Mayor, through TfL, the boroughs, police and stakeholders, will seek to improve motorcycle safety by: a) Improving the safety of street design by following the guidance set out in TfL’s Urban Motorcycle Design Handbook. b) Improving the quality of motorcycle safety training by delivering a ‘London Standard’ for motorcycle training that goes beyond the minimum required by law. The ‘London Standard’ of motorcycle training will involve: • improving the standard of motorcycle training in London by encouraging training providers to become accredited through the Motorcycle Industry Association (MCIA) • improving rider skills (particularly those of young riders) by promoting a suite of voluntary training courses including BikeSafe-London, ScooterSafe-London, 121 Motorcycle Skills and through the introduction of a pre-Compulsory Basic Training theory app • raising the safety standards of motorcycle courier businesses through training and accreditation c) Calling on all boroughs to allow motorcycle access to their bus lanes, to end the inconsistency between highway authorities that causes unnecessary confusion and risk to motorcyclists. d) Educating other road users on the shared responsibility for safer motorcycle journeys, through the promotion of driver and cyclist skills training and communications. e) Supporting the police in targeting illegal and non-compliant behavior that puts motorcyclists at risk, using data to focus on the streets with a higher risk of motorcyclist collisions.

We broadly agree with the proposal.

**6). Policy 3 and proposals 12-14 set out the Mayor’s draft plans to ensure that crime and the fear of crime remain low on London’s streets and transport system (see pages 68 to 69).**

**To what extent do you agree or disagree that these plans would ensure that crime and the fear of crime remain low on London’s streets and transport system?**

**Policy 3 The Mayor, through TfL and the police, will seek to ensure that crime and the fear of crime remain low on London’s streets and transport system through designing secure environments and by providing dedicated specialist and integrated policing for London’s transport system.**

We broadly agree with the proposal.

Proposal 12

The Mayor, through TfL and working with other transport providers, police, local authorities and other partners, will:

a) Prioritise the tackling of ‘highharm’ crimes, such as sexual offences and hate crime, on London’s streets and public transport system in order to

protect and offer reassurance to those who feel most vulnerable when travelling in London.

b) Improve the safeguarding response to protect vulnerable adults and children using the transport network in London.

This includes building on the work already underway to tackle rough sleeping on the transport network, linking in to the appropriate support services.

We agree with the proposal.

Furthermore we are keen to highlight the issues faced by private hire and taxi drivers who face nonpayment, verbal and physical assault on a daily basis and request the police and authorities act against perpetrators as well as educate that this behavior is socially unacceptable.

Proposal 13 The Mayor, working with the police and local authorities, will take action to reverse the rise in motorcycle theft and motorcycle-enabled crime, especially that carried out using mopeds. Measures could include improving security by designing out crime, such as through the provision of secure parking both on street and in developments; targeted crime prevention messaging; and working with manufacturers to reduce the risk of theft. The police will maintain their focus on disrupting the criminal gangs involved in motorcycle theft and enabled crime.

We agree with the proposal. Perhaps it would be of value to ask motorcycle dealers and service agents to offer tracking facilities to assist in apprehension of those who commit this crime.

Manufacturers have failed to add sufficient measures for crime and theft prevention they should be contacted to take greater responsibility of designing such features.

Proposal 14 The Mayor, through TfL, will seek to work with Government, law enforcement and security agencies, transport providers and other relevant organisations to respond to, and counter, current and future terrorist threats to the London transport system.

We agree with the proposal.

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included**.**

The need to make sure that police hold open events and work with program makers using all media to send the message of what to look for when preventing crime.

**7). Policy 4 and proposals 15-17 set out the Mayor’s draft plans to prioritise space-efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic, including freight (see pages 70 to 78).**

**To what extent do you agree or disagree that these plans would tackle congestion and improve the efficiency of streets?**

**Policy 4 The Mayor, through TfL and the boroughs, will prioritise space efficient modes of transport to tackle congestion and improve the efficiency of streets for essential traffic.**

Proposal 15

The Mayor, through TfL and the boroughs, will work with business and the freight industry to improve the efficiency and safety of freight and servicing in London by:

a) Developing tailored and targeted approaches to address the unique challenges faced by the individual sectors such as food and construction deliveries.

We agree with the proposal.

b) Planning a strategic consolidation and distribution network, including a review of funding requirements, and protecting industrial land through the London Plan.

We agree with the proposal.

c) Encouraging London’s businesses, starting with Business Improvement Districts, to work together to use their procurement power to reduce or re-time their deliveries

and servicing trips to avoid traffic congestion.

We agree with the proposal.

d) Ensuring that all London is within a 30-minute drive of a construction consolidation centre and encouraging their use through Construction Logistics Plans and

the planning process.

Construction vehicles should not be working at peak periods or using central areas as a convenient route to avoid longer distances. 360 Cameras to be fitted to all construction vehicles.

e) Encouraging businesses in central London to ban personal deliveries, and extending the network of collection points in order to reduce the overall number of work place personal deliveries.

We agree with the proposal. Collection points must be safe and secure to avoid these becoming magnets for opportunist criminality.

f) Working with Business Improvement Districts to promote waste and recycling consolidation, using the waste consolidation toolkit.

We think an ethical register of waste and recycling contractors who pay the London Living Wage and have a code of conduct is important and that should be a badge of honor.

Shared contractors should also reduce costs.

Our preference is of course to Local Authority collections.

g) Developing a ‘London lorry standard’ to simplify the regulatory environment for HGVs operating in London.

We agree with this proposal.

Proposal 16 The Mayor, through TfL, will work with Network Rail and the Port of London Authority to move, where practicable, freight off London’s streets and on to the rail network and the river Thames.

We agree with this proposal. However, we note no consideration has been given to Canal opportunities in London.

The facility to use these facilities especially in the Western Corridor of London would remove HGV traffic from central districts.

Proposal 17 The Mayor, through TfL and the boroughs, will support the provision of car clubs for residents when paired with a reduction in the availability of private parking, to enable more Londoners to give up their cars while allowing for infrequent car travel in inner and outer London.

We feel that for profit car clubs that can run a potential monopoly must be regulated within London’s framework of licensing.

Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.

We reserve the right to respond further in any forthcoming amended document.

**8). Proposals 18 and 19 set out the Mayor’s proposed approach to road user charging (see pages 81 to 83).**

**Proposal 18 The Mayor, through TfL, will keep existing and planned road user charging schemes, including the Congestion Charge, Low Emission Zone, Ultra Low Emission Zone and the Silvertown Tunnel schemes, under review to ensure they prove effective in furthering or delivering the policies and proposals of this strategy.**

PHV movements have increased more than 50 per cent in the charge zone during Friday charging hours, to justify congestion charging remaining under review.

This appears a sledgehammer to crack a nut to have a review that considers imposing congestion charge on PHVs, for five days a week, when the finding is concerned with only one day in the week.

Proposal 19 The Mayor will give consideration to the development of the next generation of road user charging systems. These could replace schemes such as the Congestion Charge, Low Emission Zone and Ultra Low Emission Zone. More sophisticated road user charging and/or workplace parking levy schemes could be used to contribute to the achievement of the policies and proposals in this strategy, including mode share, road danger reduction and environmental objectives, and to help reduce congestion on the road network and support efficient traffic movement. In doing so, the Mayor will consider the appropriate technology for any future schemes, and the potential for a future scheme that reflects distance, time, emissions, road danger and other factors in an integrated way.

Unless there is a caveat of public consultation we cannot endorse this proposal as any successive mayor may choose to act without further democratic response.

**9). Proposals 20 and 21 set out the Mayor’s proposed approach to localised traffic reduction strategies (see page 83).**

**To what extent do you agree or disagree with this approach?**

Proposal 20 The Mayor, through TfL, will support borough traffic-reduction strategies, including through the Local Implementation Plan funding process, where they are consistent with the policies and proposals set out in this strategy.

We accept this proposal.

**10). Policies 5 and 6 and proposals 22-40 set out the Mayor’s draft plans to reduce emissions from road and rail transport, and other sources, to help London become a zero carbon city (see pages 86 to 103).**

**Policy 5 The Mayor, through TfL and working with the boroughs, will take action to reduce emissions – in particular diesel emissions – from vehicles on London’s streets, to improve air quality and support London reaching compliance with UK and EU legal limits as soon as possible. Measures will include retrofitting vehicles with equipment to reduce emissions, promoting electrification, road charging, the imposition of parking charges/ levies, responsible procurement, the making of traffic restrictions/ regulations and local actions.**

We are concerned that those who cannot afford to change their vehicle or are on low incomes who are reliant on their vehicle such as careers will be impacted by road charging and increased parking charges.

Any policy will require clear thought as to how those in precarious work, Low incomes are disabled will be affected by such proposals.

**Proposal 22 The Mayor, through TfL, will seek to introduce the central London Ultra Low Emission Zone standards and charges in 2019; the zone would be expanded London-wide for heavy vehicles by 2020 and to inner London for all other vehicles (except taxis) by 2021.**

We are concerned that those who cannot afford to change their vehicle or are on low incomes who are reliant on their vehicle such as careers will be impacted by increased charges.

Any policy will require clear thought as to how those in precarious work, Low incomes are disabled will be affected by such proposals.

PHV owners are again ignored despite the fact may invested in diesel on the basis of government recommendation. Given the fact that Euro 5 Vehicles were purchased in good faith we feel a further tax on professional drivers is unwarranted.

**Proposal 23 The Mayor, through TfL, will ensure all TfL buses meet the Euro VI diesel standards for NOx and particulate matter by 2020 by accelerating the uptake of new vehicles, installing proven retrofit technology and creating priority Low Emission Bus Zones.**

We accept this proposal.

**Proposal 24 The Mayor, through TfL and the boroughs, will create a comprehensive alert system to inform Londoners about air pollution episodes and, where appropriate, will implement additional emergency measures to reduce or restrict vehicle use when forecast or actual periods of very high air pollution risk have the potential to cause immediate adverse health effects.**

We accept this proposal.

**Proposal 25 The Mayor, through TfL and the boroughs, will tackle pollution in local air quality hotspots and at sensitive locations (such as around schools) including through the Mayor’s Air Quality Fund and other funding.**

We accept this proposal and feel that all public facilities require such provision.

**Proposal 26 The Mayor proposes that Government amends fiscal incentives, including vehicle excise duty, so that only the cleanest vehicles are incentivised for purchase; and implements a national diesel vehicle scrappage fund to enable cities to take the most polluting vehicles off their streets.**

We accept this proposal.

**Policy 6 The Mayor, through TfL and the boroughs, and working with other transport providers, will seek to make London’s transport network zero carbon by 2050, which will also deliver further improvements in air quality, by transforming London’s streets and transport infrastructure so as to enable zero emission operation, and by supporting and accelerating the uptake of ultra-low and zero emission technologies.**

We accept this proposal.

**Proposal 27 The Mayor, through TfL, will seek to ensure that, from 2018, all new double-deck buses will be hybrid, electric or hydrogen. In central London, all double-deck buses will be hybrid by 2019 and all new single-deck buses will emit zero exhaust emissions by 2020. The aim is for the whole TfL bus fleet to emit zero exhaust emissions by 2037 at the latest.**

We accept this proposal.

**Proposal 28 The Mayor, through TfL, will work with stakeholders to produce and implement a comprehensive plan to encourage and accelerate the transition from diesel-powered to Zero Emission Capable taxis by providing financial incentives and necessary infrastructure and by regulation (including maintaining a taxi age limit, currently set at 15 years) with the objective of achieving a minimum of 9,000 such vehicles in the fleet by 2020.**

We cannot accept this proposal based on the costs and the levels claimed for the fleet of 9000. The probability of achieving over one third of the fleet in under three years is impossible and improbable based on current ownership statistics and vehicle turnover levels.

**Proposal 29 The Mayor, through TfL, will require all newly licensed private hire vehicles to meet continually improving minimum emission standards. Currently, there is a ten-year age limit for PHVs, all new private hire vehicles younger than 18 months need to be Zero Emission Capable (ZEC) from 2020, and private hire vehicles older than 18 months at time of first registration will have to be ZEC from 2023.**

We accept this proposal.

**Proposal 30 The Mayor will seek to ensure that the GLA and its functional bodies lead by example in the use of ULEVs in their own vehicle fleets and will also encourage the boroughs to adopt the use of ULEVs**

We accept this proposal.

**Proposal 31 The Mayor, through TfL and the boroughs, will introduce regulatory and pricing incentives to support the transition to the usage of ULEVs in London.**

We accept & agree this proposal.

**Proposal 32 The Mayor, through TfL, and the boroughs will work with Government and stakeholders across London to ensure that sufficient and appropriate charging and refueling infrastructure is put in place to support the transition from diesel and petrol-powered vehicles to ULEVs, including ensuring that London’s energy-generating and supply system can accommodate and manage the increased demand associated with this transition.**

We accept & agree this proposal. However, we are concerned that cap on pricing of electricity are in place and that particular consideration is given to renewable energy and disposal of vehicles.

Furthermore, we are concerned on past performance that the targets can be reached in the timescales claimed.

**Proposal 33 The Mayor, through TfL and the boroughs, and working with Government, will seek to implement zero emission zones in town centres and aim to deliver a zero emission zone in central London from 2025, as well as broader congestion reduction measures to facilitate the implementation of larger zero emission zones in inner London by 2040 and London-wide by 2050 at the latest.**

We accept & agree this proposal.

**Proposal 34 The Mayor, through TfL, and working with Government, manufacturers and other relevant organisations will support and accelerate the development and uptake of technologies to tackle tyre and brake wear.**

We accept & agree this proposal.

**Proposal 35 The Mayor, through TfL, will seek to ensure that the energy impact of increased provision of transport services in London is minimised.**

We accept & agree this proposal.

**Proposal 36 The Mayor, through TfL, will contribute to London’s overall emissions reductions by (a) continuing to monitor, report and reduce operational CO2 and other air pollutant emissions from all of TfL’s assets and infrastructure, including stations, buildings and street lighting, and (b) seeking to work with stakeholders such as Network Rail to undertake measures to ensure that CO2 and other air pollutant emissions from the construction and operation of transport infrastructure are minimised.**

We accept & agree this proposal.

**Proposal 37 The Mayor, through TfL, will work with the Port of London Authority to publish an emissions strategy for the River Thames to reduce air pollutant and CO2 emissions from all river vessels and urges Government to introduce new legislation to ensure that emissions from vessels can be effectively reduced.**

We accept & agree this proposal. Additionally we hope that alternative power sources can be made available to further improve emissions.

**Proposal 38 The Mayor, through TfL, will seek to deliver a package of measures both to increase the level of low-carbon energy generation on TfL’s land and for supply to its assets.**

We accept & agree this proposal.

**Proposal 39 The Mayor, through TfL, will meet or exceed the emissions standards set out by the NRMM Low Emission Zone for TLRN construction and maintenance activities and urges Government to introduce new legislation to ensure that all emissions from NRMM can be effectively reduced.**

We accept & agree this proposal.

**Proposal 40 The Mayor, through TfL, will conduct further research into the health risks of particulate matter on the London Underground network and take appropriate measures to mitigate the adverse effects of any risks found where practicable.**

We accept this proposal.

**11). Policies 7 and 8 and proposals 41-47 set out the Mayor’s draft plans to protect the natural and built environment, to ensure transport resilience to climate change, and to minimise transport-related noise and vibration (see pages 104 to 111).**

**Policy 7 The Mayor, through TfL and working with the boroughs, will:**

**a) Ensure that transport schemes in London protect existing and provide new green infrastructure wherever practicable to deliver a net positive impact on biodiversity. This will be achieved through the requirement for specific commitments to be made under the relevant planning or development consent regime, including Habitat Regulation Assessment and other environment protection undertakings. Designated spaces such as Sites of Importance for Nature Conservation shall be protected where practicable.**

We accept this proposal.

 **b) Maximise opportunities to protect, promote and enhance London’s built heritage and sites of cultural importance.**

We accept this proposal.

**Proposal 41 The Mayor, through TfL and the boroughs, will retain existing trees and plant new ones on the Transport for London Road Network (TLRN) and borough roads to protect tree canopy cover. Street tree numbers on the TLRN will be increased by 1 per cent every year between 2016 and 2025; and the Mayor will encourage boroughs to increase the numbers of trees along their streets.**

We accept this proposal with the past caveat of street furniture and obstructed views which can cause injury or death.

**Proposal 42 The Mayor, through TfL and the boroughs, working with Highways England, will implement sustainable drainage infrastructure to enable the removal of 50,000m 2 of impermeable highway surface per year in London. Other nonroad transport projects should be designed to achieve appropriate greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible (in accordance with the drainage hierarchy set out in the London Plan). In all cases, drainage should be designed and implemented in ways that deliver other Mayoral priorities, including improvements to the water quality, biodiversity and amenity of the highway network.**

We accept this proposal.

**Proposal 43 The Mayor, through TfL, will support London’s transition to a circular economy by encouraging transport providers to follow GLA Group Responsible Procurement Policy guidance.**

We agree with this proposal.

**Policy 8 The Mayor, through TfL and the boroughs, and working with other transport and infrastructure providers, will seek to ensure that London’s transport is resilient to the impacts of severe weather and climate change, so that services can respond effectively to extreme weather events while continuing to operate safely, reliably and with a good level of passenger comfort.**

We are keen to see this policy implemented as soon as possible.

**Proposal 44 The Mayor, through TfL, will work with transport and other infrastructure providers in London to undertake a dedicated programme of research to understand and prioritise the risk of severe weather and climate change adversely affecting the operation of London’s transport network and to minimise any such impacts on the most vulnerable user groups.**

We are keen to see this policy implemented as soon as possible.

**Proposal 45 The Mayor, through TfL, will seek to undertake and implement an evidence-based programme of measures to adapt existing and to design and build new transport infrastructure to make it resilient to severe weather conditions and climate change.**

We agree with this proposal.

**Proposal 46 The Mayor, through TfL and working with the boroughs, will reduce the number of Londoners exposed to excessive noise and vibration levels from road transport in London by: a) Reducing traffic volumes by encouraging mode shift from travelling by car to walking, cycling and using public transport. b) Minimising the noise impacts of vehicular traffic on streets by encouraging the use of quieter vehicles, reducing vehicle speeds and discouraging poor driver behaviours such as rapid acceleration and braking. c) Developing quieter road infrastructure including low-noise road surfacing, and minimising the noise impacts from road and street works. d) Monitoring noise levels close to major road corridors to measure the adverse impacts of road transport on affected communities. e) Seeking to reduce the noise impacts of servicing and deliveries through appropriate design and management of delivery areas, promoting responsible behaviours, adopting best practice and encouraging the use of quieter vehicles and equipment. f) Working with the Department for Transport to investigate ways of reducing noise from the loudest vehicles such as some types of motorcycle and supercars.**

One of the issues in relation to vehicle noise is based not on vehicle speeds but the noise and acoustics caused by standing engines. This has been caused in part by reduction of roadspace.

It is clear that this will only be an issue for the short to medium term as in time the majority of vehicles that are Hybrid or electric have little or no engine noise.

In terms of Sports cars, conversions, Vehicle customisations and Motorcycles this is clearly an issue that needs to be addressed.

However, the glaring omission from this report is noise from in vehicle entertainment systems. Bye laws should be considered where audio levels are beyond a set level. Clearly in the case of convertible vehicles this is a common issue.

**Proposal 47 The Mayor, through TfL, will seek to work with Network Rail and train operating companies to mitigate the effects of noise and vibration caused by rail services in London where reasonably practicable, and thereby minimise their adverse impact on the health and quality of life of Londoners. Key measures will include: a) Addressing noise issues as part of all planned railway works and taking steps to minimise their impact on neighbours. b) Specifying and procuring quieter trains. c) Ensuring new rail infrastructure incorporates technology that is effective in reducing noise and vibration such as shock-absorbent track fastenings. d) Investigating complaints of noise and vibration disturbance from railway construction and/or operations and endeavouring to eliminate the disturbance at source or otherwise mitigate its adverse effects. e) Maintaining open communication with residents before and during construction works, where levels of noise may be above what is normally expected and/or heard at unusual times. f) Continuing to reduce the impact of night services by reducing noise and vibration at their source and taking a robust approach to responding to complaints. The policy on aircraft noise is set out in the London Plan. See also Focus on The Unacceptable Impacts of Expanding Heathrow.**

We agree with this proposal in part but defer to our sister unions proposals on these points.

**12). Policy 9 and proposal 48 set out the Mayor’s draft plans to provide an attractive whole-journey experience that will encourage greater use of public transport, walking and cycling. (see pages 118 to 119).**

**To what extent do you agree or disagree that these plans would provide an attractive whole-journey experience?**

**Policy 9 The Mayor, through TfL and the boroughs, will use the Healthy Streets Approach to direct complementary public transport and street improvements to provide an attractive whole journey experience that will facilitate mode shift away from the car.**

We agree with the points made however a one size fits all approach does not work in all situations.

**Proposal 48 The Mayor, through TfL and the boroughs, will make improvements measured against the Healthy Streets Indicators to transform the design and layout of street space and transport facilities around bus, rail, Underground, London Overground, DLR and other stations, as far as practicable, to create safe, secure, accessible, welcoming, well-designed gateways to and from public transport.**

We would caution against wholesale implementation in all instances unless real time testing of the impacts takes place in these locations to see real not computer modeled impacts.

For clarity any plan for access allows for convenient access for PHV / Taxi to drop / pick up passengers – There is no point in encouraging people to use public transport if they cannot easily get to the transport hubs.

It is noteworthy that we did not see anywhere a clear statement that PHV / Taxi must form part of the central policy of delivering increased use of public transport – If our industry is efficient (and green) it can deliver passengers to transport hubs but only if the authorities support it.

**13). Policies 10 and 11 and proposals 49 and 50 set out the Mayor’s draft plans to ensure public transport is affordable and to improve customer service (see pages 121 to 125).**

**To what extent do you agree or disagree that these plans would improve customer service and affordability of public transport?**

**Policy 10 The Mayor will ensure public transport fare levels are set to enable access to affordable travel for all Londoners.**

We agree.

**Proposal 49 While a Government decision on further devolution of rail to London has not been forthcoming, the Mayor will press the Government to match TfL’s fares freeze in London until 2020, and to prioritise affordability beyond then.**

GMB Endorse this position.

**Policy 11 The Mayor, through TfL and working with other transport operators, will seek to make the public transport network easier and more pleasant to use, enabling customers to enjoy comfortable, confident, safe and secure, informed and stress-free travel.**

GMB agree with this philosophy. It must be noted that workers carrying out service must be safe and secure too in their work environment.

**Proposal 50 The Mayor, through TfL and the boroughs, and working with other transport operators, will improve customer service across the transport system with a focus on: a) improved staff training, including the training of bus drivers b) providing a more consistent level of service across all transport modes (including rail services where devolved from the DfT) c) making the most of new technology and innovations in customer service, including provision of mobile phone access underground.**

All those involved should receive training including upper management who should try different roles within the network to understand and engage with staff rather than at arms length.

**14). Policy 12 and proposals 51 and 52 set out the Mayor’s draft plans to improve the accessibility of the transport system, including an Accessibility Implementation Plan (see pages 127 to 129).**

**Policy 12 The Mayor, through TfL and the boroughs, will seek to enhance London’s streets and public transport network so as to enable all Londoners, including disabled and older people, to travel spontaneously and independently, making the transport system navigable and accessible to all.**

This is desirable but changes should not be made for changes sake whilst there will be an increase in age range only with real time testing can the correct facilities be deployed.

**Proposal 51 The Mayor, through TfL, will continue to provide improved accessibility training to all bus drivers, and will ensure that new buses provide better accessibility for all users, including more onboard space for wheelchair users, improved boarding ramps and induction loops.**

We agree with this proposal.

**Proposal 52 The Mayor, through TfL and working with Network Rail and other stakeholders, will improve the overall accessibility of the transport network by: a) Improving journey planning tools, ensuring advances in technology make the tools more accessible and easier to use, and also better guide people to the most accessible journey options.** **b) Using Inclusive Design, for example for station and train layout and facilities, including signing, information and seating. c) Providing step-free access at selected rail and Underground stations and on all new** **infrastructure, to halve the additional journey time required by those using the step-free network only, so that journey times on the step-free network become comparable to those on the wider public transport network. d) Providing staff, and facilities to board trains, creating a ‘turn-up-and-go’ service for wheelchair users. e) Improving the accessibility of taxi ranks, river piers and services, and Victoria Coach Station. f) Providing travel mentoring and other opportunities to help Londoners gain confidence to use public transport.**

We agree with this proposal with the caveat below.

**Please let us know if you have any comments you would like to make on these plans and please also describe any other measures you think should be included.**

When the strategy touches on social-needs transport.  It forgets the fact that PHVs spend a large portion of their time delivering a reliable, friendly service for older and disabled Londoners who require door-to-door lifts to hospital, clinic, their GP and pharmacy.  Transporting special-needs Children and adults to school, college or get-togethers is another vital role undertaken by PHVs.

**15). Policy 13 and proposals 53 and 54 set out the Mayor’s draft plans to transform the bus network; to ensure it offers faster, more reliable, comfortable and convenient travel where it is needed (see pages 133 to 137).**

**To what extent do you agree or disagree that these plans would achieve this?**

**Policy 13 The Mayor, through TfL and the boroughs, will transform the quality of bus services so that they offer faster, more reliable, accessible, comfortable and convenient travel by public transport, while being integrated with, and complementing, the rail and Tube networks.**

We question this aspect based on congestion in London leading to longer journey times.

**Proposal 53 The Mayor, through TfL, will adjust bus service volumes to support measures to reduce car use in conjunction with improvements to rail, walking and cycling modes.**

We are concerned that there are periods where buses are under utilised causing congestion chaos.

Smaller vehicles and or extended routes should be considered for off peak periods especially in central environs where congestion and delays are rife.

It is logical to be sure that buses can also be linked to signals to be sure they do not block intersections as occurs frequently causing further issues for all travellers including pedestrians.

**Proposal 54 The Mayor, through TfL and the boroughs, will seek to improve bus journey times and reliability by: a) Reviewing and, where necessary, extending the operating times of bus lanes to improve their contribution to a reliable service for customers. b) Making greater provision for bus priority lanes, junctions and signals to prioritise buses over other vehicular traffic. c) Delivering new bus priority corridors and protecting existing bus priority in central London. d) Improving bus priority on key radial routes from inner to central London, targeting those routes with high patronage to the benefit of bus users. e) Continuing with an improved approach to coordinating road works and reducing the number of times streets have to be dug up to limit disruption to bus services.**

TfL extending the hours of all bus-lane operation to cover off-peak times as well as weekends, without hard evidence to support such a proposal.  In Central London, bus lanes could operate 24 hours a day and certain roads converted into bus-only corridors, again without supporting evidence to justify the proposal.

This hampers traffic flow and causes congestion unnecessarily.

Furthermore, Taxi is then prohibited from the bus only corridors increasing meter rates to an already beleaguered trade.

**16). Policy 14 and proposals 55 to 67 set out the Mayor’s draft plans to improve rail services by improving journey times and tackling crowding (see pages 140 to 166).**

**Policy 14 The Mayor, through TfL and working with Network Rail and train operating companies, will seek to transform London’s rail-based services to provide safer, modern, reliable, integrated, accessible and user-friendly services, with improved journey times and an increase in capacity of at least 80 per cent by 2041 to tackle crowding and facilitate mode shift to rail.**

GMB recommend working with our sister Unions on these policies.

**Proposal 55 The Mayor, through TfL, will seek to consistently deliver real-time data, information and visualisations for the Tube, rail, buses and streets via multiple customer channels. TfL will develop real-time tools for operational staff to improve the communication of overcrowding and congestion information to customers**

GMB recommend working with our sister Unions on these policies.

**Proposal 56 The Mayor, through TfL, will work with Government and stakeholders to finalise the Crossrail 2 route alignment and stations, ensuring the project progresses through the detailed design phase to gain powers to enable construction to start in the early 2020s, with the line opening by 2033 in time for the opening of Phase 2b of High Speed Two.**

GMB accept this proposal.

**Proposal 57 The Mayor, through TfL, will work with the DfT to open the Elizabeth line in 2019, with services initially providing 24 trains per hour through central London and increasing in frequency during the 2020s as demand requires.**

GMB looks forward to this exciting development.

**Proposal 58 The Mayor, through TfL, will invest in the Tube network to improve the capacity and reliability of its train services.**

GMB recommend working with our sister Unions on these policies and with the GMB where applicable.

**Proposal 59 The Mayor, through TfL, will work to encourage the DfT to increase the capacity of the national rail network in London to manage crowding on both local and longer distance services.**

GMB accept this proposal.

**Proposal 60 The Mayor, through TfL, will work with Network Rail, train operating companies and stakeholders to seek the modification of the planning of local train services from Moorgate, Victoria and London Bridge to create a London suburban metro, offering improved frequencies, journey times and interchange opportunities by the late 2020s.**

GMB accept this proposal.

**Proposal 61 The Mayor, through TfL, will continue to seek the devolution from DfT to the Mayor/TfL of the responsibility for local stopping rail services in London in the interest of providing improved customer services more efficiently and more quickly, and to enable better integration with London’s wider transport system.**

GMB accept this proposal if it ensures jobs are safeguarded.

**Proposal 62 The Mayor, through TfL, will work to encourage the development and integration of inner and outer London rail services and multi-modal interchange hubs to create ‘mini-radial’ public transport links to town centres and to provide improved ‘orbital’ public transport connectivity.**

GMB accept this proposal.

**Proposal 63 The Mayor, through TfL, will work with the DfT to continue to increase capacity on the London Overground network, with the aim of a 45 per cent increase in capacity by 2030.**

GMB accept this proposal.

**Proposal 64 The Mayor, through TfL, will work to encourage the DfT to upgrade rail freight routes outside London so that non-London freight can be taken around London, thereby freeing up rail paths through the capital for additional passenger services.**

The proposed scheme is a pragmatic solution. We hope it can be married to other hub options to allow multifaceted transfer of freight for road legs an example would be drop and load allowing less dead mileage where freight is off loaded to road transport.

**Proposal 65 The Mayor, through TfL, will upgrade the Docklands Light Railway (DLR) with the introduction of a new higher-capacity train fleet, improved frequencies (towards 30 trains per hour across more of the network) and greater station capacity at major development sites and transport interchanges. The Mayor’s aim is to increase capacity on existing DLR lines by 120 per cent by 2040.**

GMB accept this proposal.

**Proposal 67 The Mayor, through TfL and working with Network Rail and the boroughs, will deliver a programme of station capacity improvements to complement line capacity enhancements and to improve the overall public transport journey experience in London.**

GMB accept this proposal.

**17). Policies 15 to 18 and proposals 68 to 74 set out the Mayor’s draft plans to ensure river services, regional and national rail connections, coaches, and taxi and private hire contribute to the delivery of a fully-inclusive and well-connected public transport system. The Mayor’s policy to support the growing night-time economy is also set out in this section (see pages 176 to 187).**

**Policy 15 The Mayor, through TfL and working with the Port of London Authority and river services operators, will seek the use of the full potential of the Thames to carry passengers, to integrate river services with the public transport system, walking and cycling networks, and to enable the transfer of freight from road to river in the interests of reducing traffic levels and the creation of Healthy Streets.**

We look forward to this proposal.

**Proposal 68 The Mayor, through TfL, will work with the Port of London Authority to produce a London Passenger Pier Strategy which will promote new piers and additional capacity at strategic piers. TfL will also investigate the feasibility of new cross-river ferry services, including services between the Isle of Dogs and North Greenwich to enhance resilience in the busy Jubilee line corridor.**

We feel that improved access is fundamental and an improvement to a service that is under considerable stress. A consideration of vessels that are more conducive to foul whether would be welcomed.

**Proposal 69 The Mayor, through TfL, will work with host boroughs and river service operators to investigate the potential for an extension of river transport services to Barking Riverside by the early 2020s to connect key growth areas with Canary Wharf and other new developments in east London.**

We look forward to this proposal.

**Policy 16 The Mayor, through TfL, will support improvements to public transport to enhance travel between London and the rest of the UK, and require regional and national public transport schemes to be integrated into London’s public transport system wherever practical.**

This is a pragmatic proposal but we must be mindful that regional authorities must feel that they are not being given consideration to their needs rather than facing demands for integration.

**Proposal 70 The Mayor, through the GLA and TfL, will work with relevant stakeholders to seek to ensure that transport investment on corridors in the Wider South East supports the realisation of any associated economic and housing growth potential.**

We look forward to this proposal. However, those building homes must be involved in funding transport investment should they desire connectivity to London and its environs.

**Proposal 71 The Mayor, through TfL, will work to encourage the DfT to ensure the delivery of High Speed Two is complemented by Crossrail 2, new gateway stations at Euston and Old Oak Common and other improvements to London’s transport system so that people are able to reach their final destination efficiently and in a timely manner by public transport, cycling or walking.**

This proposal is of concern due to the damage and impact on local communities, traffic and environment.

In view of the major changes in the vicinity of Euston not only to Tottenham Court Road but access to Covent Garden we foresee major traffic and environmental impact these cannot be relegated when working on such developments.

We are certainly concerned that due to the A40 West cross route aging that if structural deficiencies are found the impact to any work in and around Acton and the vicinity the impacts will be grave for not only the environment but businesses and workers as well as local residents.

Great care must be taken with any such project.

We also feel that where possible freight trains must be used for removal of debris and bringing materials to any site.

**Proposal 72 The Mayor, through TfL and the boroughs and other stakeholders, will ensure new coach facilities are well connected with London’s public transport system while, at the same time, seeking to reduce coach kilometres travelled in central London. This will include: a) Working with stakeholders to identify and deliver replacement facilities for Victoria Coach Station through the provision of one or more hubs. b) Continuing to work with the coach industry to enable the provision of adequate on-street and off-street coach infrastructure in appropriate locations across London for commuter and tourist coach services.**

A more dynamic approach may be required such as separate stations for quadrants of London or perhaps an Underground facility that can be created on a cut and shut basis.

The current locations and infrastructure are far from perfect and facilities need to be improved to make such facilities more welcoming to the travelling public and London’s visitors.

**Policy 17 The Mayor, through TfL and the boroughs, Network Rail and train operating companies, will seek the development of London’s public transport services to support the growth of the night-time economy.**

We look forward to this proposal.

**Policy 18 The Mayor, through TfL, will seek to ensure London has a safe, secure, accessible, world-class taxi and private hire service with opportunity for all providers to flourish.**

Firstly, we wish to point out the omission that nowhere within the draft is there the verdict, established by Ken Livingstone when Mayor of London, that PHVs are part of the public transport family.

We agree with Policy 18 that taxi and PHV are safe, accessible and secure for the travelling community.

Safety levels are higher than any other form of public transport.

Following GMB recent Tribunal hearings which in effect is giving workers rights to drivers of PHV, TFL powers should include regulatory power in a minimum fare for all whoever and wherever the operator is.

This will add to quality of life and increase rates allowing Taxi and Private hire to stop the race to the bottom rather than the subsidised rates seen that damage the marketplace.

We reiterate our earlier point that we are keen to highlight the issues faced by private hire and taxi drivers who face non-payment, verbal and physical assault on a daily basis and request the police and authorities act against perpetrators as well as educate that this behaviour is socially unacceptable.

Using TfL's Journey planner to show the availability of taxi is a good thing but surely a comparable price should also be shown for private hire as a fairness to competition.

We are concerned about tracking technology and feel showing when drivers are off duty and their whereabouts is a step too far.

To keep taxi world class as it is today is not to water down the knowledge otherwise this damages the process and mindset that has created this standard over generations.

Clearly, we are aware of navigational systems but to take away aspects of driver knowledge may damage the world class reputation.

We have to ensure that with the Fully electric taxi arriving in 2018 that the roll out of charging points is speeded up as 150 or so sole use points is clearly not enough to cater for the trade with the majority of drivers living in flats or terrace homes without a driver.

Moreover, drivers of taxis cannot wait whilst they charge on ranks instant accessibility is paramount.

Many drivers live in the home counties and assurances will need to be given that they can still work a full shift pattern without having extended down time for finding an available charging point and then physically using.

We are aware of new technology that is becoming available which will allow enough charge for approx. 80 miles to be completed in 5 minutes.

Will these charging points be rolled out?

There is a further concern in relation to the electromagnetic effects of being in such close proximity to batteries and charging stations and we believe more research is required on this aspect.

TfL's current move on the high increase in Operator fees will damage the trade possibly creating the loss of small and medium enterprises. This in turn will restrict choice for passenger and driver hardly innovative in this day and age.

We have to be careful that TFL don't price Drivers of both trades out the market with ever increasing costs when in reality it will achieve little.

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.

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.

**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 instillation 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 resident’s requirements.

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.

The expected cost of Zec vehicles is Generally Five Thousand Pounds to Ten Thousand Pounds more than the standard range of the same vehicle type.

With a fund 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.

**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 ZEC vehicles along with more energy and Emission efficient vehicles.

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.

**Proposal 73 The Mayor, through TfL, will seek: a) Powers to limit the overall number of private hire vehicles licensed for use in London so as to manage their contribution to overall congestion, particularly in central London. b) Powers to introduce a requirement to ensure that taxi and private hire journeys by TfL-licensed drivers must either start or end in the Greater London area.**

A)

We find it interesting that in central London that with 70k active PHV according to a TFL FOI that in central London they take up 10% of road space while Taxi with 23k Licences take up 17% in the same central space this seems at odds with current commentary.

Indeed, within the report, PHVs are recognised for playing a role in moving people around but denigrates PHVs alone for increasing congestion.

Using the same prognosis this would mean Taxis as well as buses, HGV and many more delivery vehicles also increase congestion.

However, GMB agree wholeheartedly that TFL should have more regulatory power to cap private hire numbers when required by a rolling system.

B)

Perhaps firstly National Minimum Standards and a more level playing field in the costs of licensing would assist.

This issue can be addressed via technology and again With National Standards a Compliance officer from any authority can question a driver from any licensed area.

Bringing powers to ensure that taxi and private hire journeys must start or end in the licences area is a folly.

Firstly, it will damage the top end of the PHV market with many chauffeurs often spending days with clients starting one day in London with the following day starting in Birmingham and the completion of the job that day at Manchester airport.

Often standard drivers can collect a pre-booked fare at Stansted Airport with a journey to Gatwick or Biggin Hill.

We however agree that a driver with a licence with TFL cannot spend the majority of their working time in say Manchester.

It would be simple for unscrupulous operators to show a journey starting in London for 1p based on a London driver starting in TFL’s licensing vicinity but then charging the rest of the fare from the real location to avoid enforcement.

A more practical approach is required to allow those with prebooked journeys outside TFLs jurisdiction to undertake these if parameters set by licensing authorities and trade groups is set down.

This works perfectly where the client or company booking such a service is doing so for temporary work in a district such as a Conference or Chauffeured services.

A further alternative may be to create a Chauffeur / Executive band for private hire to create more clarity.

Another 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.

With a fund of only Thirty Million Pounds to shared nationally with no facility for WAV 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.

**Proposal 74 The Mayor, through TfL, will raise the safety standards for all customers travelling by taxi and private hire vehicles through effective and transparent regulation and enforcement.**

Safety standards in PHV and taxi are already at a very high level with taxi drivers in a specialised vehicle and most PHV vehicles under 10 years old are already equipped with all modern safety equipment.

Furthermore, Safety in PHV can be achieved through new drivers coming into the trade having to complete accredited driving courses with drivers in the trade needing to complete if they have points or a record of own fault accidents.

A further improvement may be to allow drivers who elect to choose to have on board video equipment to film forwards and rearwards with sound, thus protecting both parties.

Pedi cabs need to be licensed as do the drivers in a similar way to our trade with full DBS and safety of the pedi cabs themselves.

We should start by removing all motorised pedicabs with pedicabs providers having an operator in being fit and proper along the lines of the PHV industry.

We have all seen the congestion pedicabs cause in the west end especially at the weekends, perhaps a cap, on their number and with powers given to compliance officers to move un-booked pedicabs on if they are causing a nuisance or a danger to vehicular or pedestrian traffic.

**Policy 19 The Mayor, through TfL and the boroughs, will ensure that new homes and jobs in London are delivered in line with the transport principles of ‘good growth’ for current and future Londoners by using transport to: a) create high-density, mixed-use places, and b) unlock growth potential in underdeveloped parts of the city.**

GMB accept this proposal but are concerned that high density housing can create social issues and must be planned with full local community input.

Those seeking to develop should be funding transport infrastructure fully or partially.

**Proposal 76 The Mayor, through TfL and the boroughs, will: a) Impose high expectations on developers to deliver transport solutions that will promote sustainable mode shift, reduce road congestion, improve air quality and assist in the development of attractive, healthy and active places.**

 **b) Restrict car parking provision within new developments, with those locations more accessible to public transport expected to be car free. New developments should contain high levels of cycle parking and storage, and contribute to the provision of on-street cycle parking in town centres and other places of high demand.**

A) We agree with this sentiment.

B) GMB feel that ignoring the need for those who use vehicles for their trade or work must not be unreasonably restricted by choice of habitat due to lack of parking this is discriminatory.

There is no disagreement that that Cycle parking and storage are laudable but we must be careful to make this not become an imposition on personal freedoms.

**Proposal 77 The Mayor, through TfL and the boroughs, will seek to ensure that delivery and servicing plans facilitate off-peak deliveries using quiet technology, and the use of more sustainable modes of delivery, including cargo bikes and electric vehicles where practicable. Largescale developments and areawide plans should include a local consolidation strategy (consisting of measures such as shared procurement for consumables, coordinated waste and recycling collection, timetabled deliveries, ‘click and collect’ for residents and flexible loading bays). TfL will work with boroughs and other stakeholders to pilot ambitious plans in Opportunity Areas and around major developments such as High Speed Two (HS2) to reduce the impact of construction and freight related trips.**

Whilst some aspects of this proposal are sensible it is clear developers such as HS2 limited have a different mindset.

Vehicle flow in Camden and Ickenham and Ruislip areas for HS2 is a major part of the planning with vehicle working from as early as 5.30 AM to be in place for a 12-hour day that will no doubt extend beyond 7.00 PM due to overruns.

In the vicinity of Ruislip and the A40 the plan features over 700 Grab vehicles a day alone excluding other vehicles servicing the district with multiple road closures causing extended congestion for 7 years.

The more expensive tunnel was ignored at residents and local commercial interests expense.

We note in all districts HS2 will be operating no thought has been given to assisting the local communities with improved facilities as a ‘Thank you’.

This makes us sceptical that other developments across the capital will not see anything more than major upheaval with little thought for the surrounding communities.

**Proposal 78 The Mayor, through TfL and the boroughs, will support growth through transport investment and planning in the Central Activities Zone, in and around town centres and Opportunity Areas. The Mayor expects planning frameworks in these areas to set mode share targets that are significantly more ambitious than elsewhere in London and will require boroughs and other stakeholders to demonstrate how development plans will contribute to mode shift away from car use towards walking, cycling and public transport.**

Whilst opportunity areas seem a superb idea we are concerned that these suit planners pipe dreams rather than what average Londoners really seek.

We are open to persuasion on this provision.

Again, without real communal involvement we caution against planners deciding what they presume those who will live in the areas will really require.

**Proposal 79 The Mayor, through TfL and the boroughs, will seek to ensure that full advantage is taken of the opportunity presented by Crossrail 2 to maximise housing delivery and the creation of healthy new places that are fully integrated with their surroundings.**

We are sorry but this proposal is not only a poorly worded cliché but is somewhat patronising.

Greater housing availability with good local facilities is a must however there needs to be upkeep and a contract to be sure this is maintained with no drop in the quality to the ‘healthy new places that are integrated with their surroundings’

**Proposal 80 The Mayor, through TfL and the relevant boroughs, will seek to encourage Network Rail to proceed with enhancements to the West Anglia Main Line to enable and serve sustainable development of the Upper Lea Valley.**

We look forward to seeing Network rail agreeing this request.

**Proposal 81 The Mayor, through TfL, the relevant boroughs and Network Rail, will seek to extend the Bakerloo line to Lewisham and beyond in order to improve public transport connectivity in this part of London and support the provision of new homes and jobs. The extension will be designed to enable the creation of an attractive, dense area in inner London, with sustainable travel behaviours and a mix of uses.**

GMB look forward to this extension as a way of improving South London’s links and an improvement to commerce and work availability that is desperately needed in this area.

**Proposal 82 The Mayor, through TfL and relevant boroughs, will support a Government-led extension of the Elizabeth line eastwards from Abbey Wood to provide up to 12 trains per hour, facilitating the sustainable development of the Thames Gateway corridor within and beyond London.**

This is a desirable proposal.

However, we are keen to point out that with many choosing Coach travel as commute from Kent districts using this corridor traffic can only be decreased if train fares are not excessive.

**Proposal 83 The Mayor, through TfL and relevant boroughs, will examine the feasibility of delivering a new London Overground rail link between Hounslow and Old Oak and assess options for an extension towards Cricklewood.**

GMB Welcome this proposal.

Again, we are concerned that Cricklewood suffers from traffic issues due to its proximity to the A41, M1 and A 406.

The perfect storm of traffic and construction do not mix well.

**Proposal 84 The Mayor, through TfL and the boroughs, will make the most of the transport network in London by identifying opportunities for new rail stations that will unlock the potential for significant numbers of homes and jobs to be created.**

GMB Welcome this proposal.

**Proposal 85 The Mayor, through TfL and working with the boroughs, will complement major transport infrastructure investment with improvements to local bus services, bus priority and bus infrastructure in order to enable high-density development over a larger area and thus spread the benefits of the infrastructure investment further.**

GMB Welcome this proposal.

**Proposal 86 The Mayor, through TfL and the boroughs, will pilot bus transit networks in outer London Opportunity Areas with the aim of bringing forward development, either ahead of rail investment or to support growth in places without planned rail access.**

GMB accept this proposal.

**Proposal 87 The Mayor, through TfL and the boroughs, will explore the role for demand-responsive bus services to enable further sustainable housing development, particularly in otherwise difficult to serve areas of outer London.**

GMB accept this proposal.

Some districts outside the borough use a similar scheme to dial a ride that may be a good fit to this proposal.

**Proposal 88 The Mayor, through TfL, will continue to support the construction and operation of the Silvertown Tunnel, together with the introduction of user charges on the Blackwall and Silvertown tunnels (once the latter** **is opened), to address the problems of traffic congestion and associated air pollution, frequent closures and consequential delays, and the lack of network resilience and reliability at the Blackwall Crossing.**

GMB accept this proposal.

User charges once costs are recovered must be continued not only for upkeep but for use on other projects.

**Proposal 89 The Mayor, through TfL, will promote new walking, cycling and public transport river crossings where such infrastructure would accord with the policies and proposals of this strategy.**

GMB accept this proposal subject to mandatory cycle lanes.

 **Proposal 90 Following the delivery of the Silvertown Tunnel, the Government’s Lower Thames Crossing and the Docklands Light Railway (DLR) extension to Thamesmead, the Mayor will give consideration to the case for further road crossings of the river in east London where the following criteria are met: a) The proposal is shown to meet a growth and development need that cannot be met through the provision of a public transportonly crossing. b) The proposal has been developed through engagement with all affected boroughs, and its location and utility are determined by reference to demand and growth modelling. c) The proposal is consistent with the Mayor’s overall vision for a healthy city, and includes provision for a mechanism to ensure that any negative impacts of the likely volume of traffic carried can be managed within relevant environmental limits. d) In conjunction with the Silvertown Tunnel, the Government’s Lower Thames Crossing and the DLR to Thamesmead, the proposal would support future sustainable development and reduce barriers to trade and employment between east and south east London. e) The proposal includes appropriate provision for pedestrians, cyclists and public transport services (unless there is already alternative provision for these users nearby). f) Legal limits for air quality are met, and there would be no significant adverse air quality impacts at sensitive receptors, including schools. g) The use of the river for the movement of freight will be maintained and protected.**

GMB accept this proposal.

**Proposal 91 The Mayor, through TfL, will consider, when surplus transport land becomes available, its accessibility to the transport network and its potential for the development of sustainable, affordable housing. Any capital receipts generated from the sale of TfL surplus land shall be allocated to TfL’s transport investment programme.**

GMB accept this proposal. Affordable housing is the key to making London a place for all not just the few who can afford to live in the vicinity.

 **Proposal 92 The Mayor, through TfL, will pursue opportunities for mixed use development and redevelopment in and around operational sites such as rail or bus stations to deliver much-needed housing and regeneration, while continuing to protect, and enhance where practicably possible, transport operations.**

GMB accept this proposal subject to emissions, operation times and noise levels being considered.

**Proposal 93 The Mayor, through TfL and working with the relevant boroughs, will examine the feasibility of decking over the A13 at Barking and assess the case for its potential to provide sustainable housing, jobs, and to improve the character of the surrounding environment for the benefit of existing communities.**

GMB accept this proposal.

**Proposal 94 The Mayor, through TfL, the boroughs, planning authorities beyond London and other delivery agencies, will: a) Develop mechanisms for coordinating planning and investment along transport growth corridors, building on approaches such as the London Stansted Cambridge Corridor and Old Kent Road.**

GMB accept this proposal but caution again in relation to construction traffic and its effects.

**b) Develop Opportunity Area Planning Frameworks with ambitious mode shares for walking, cycling and public transport, maximising the use of investment in transport infrastructure and services.**

GMB accept this proposal however caution against being over ambitions in this proposal.

 **c) Use public sector funding to deliver smaller-scale transport schemes that help to unlock** **directly the potential for the creation of new homes and jobs, and leverage funding for such purposes from other sources. TfL’s Growth Fund is currently funding 15 schemes that will support 50,000 new homes and 30,000 new jobs by 2024.**

GMB look forward to the results of these schemes.

 **d) Embed ‘good growth’ principles in TfL assessment of development proposals and Transport Assessment requirements, and then use and apply them.**

GMB do not understand why this should be part of a proposal when it should already be adopted in any event?

**e) Update TfL’s Travel Plan guidance to encourage sustainable travel, reflect the aims of the Healthy Streets Approach and ensure developers take account of the need to deliver carbon-free transport in London by 2050.**

GMB would expect this as a matter of course and would have expected this to be adopted already.

 **Proposal 95 The Mayor will promote the improvement of surface links to London’s airports, with airport operators contributing a fair share of the funding required.**

GMB accept that there is logic to this but are concerned that airports do not then request a monopoly on resultant routes.

We would add that airports that call themselves London Airports should not be charging London Private hire or Taxi fees for dropping off passengers.

**Policy 20 The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result and the benefits of future regulatory and technology improvements would be fairly shared with affected communities. Any such expansion must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional demand alongside background growth.**

GMB understand Heathrow already have a ULEZ proposal of their own.

Airport equipment such as tugs, tenders and catering support vehicles must become ZEC in short order.

We also feel an off-airport parking area for those not using public transport, Taxi and PHV and of course ancillary service vehicles would reduce emissions a LEV or pod based shuttle would be employed to serve airport terminals and office / engineering facilities.

**Proposal 96 The Mayor will seek a commitment from Government to fund and deliver within an appropriate timescale the extensive transport measures required to support the expansion of Heathrow.**

GMB agree with this proposal.

 **Proposal 97 The Mayor, through TfL, will work to ensure its provision of information and payments platforms take account of technological advances and evolve and remain fit for purpose.**

GMB agree with this proposal.

Furthermore, we would caution against imposition such platforms on Private hire and taxi unless all the benefits of accessibility are granted to both trades.

**Policy 21 The Mayor, through TfL, will manage new transport services in London so that they support the Healthy Streets Approach, guided by the following principles:**

**a) Supporting mode shift away from car travel: new transport services should not encourage more car journeys, especially where there are good walking, cycling or public transport options.**

GMB agree with this proposal. We do with to point out this proposal denies being anti-car then proceeds to provide policies to achieve the opposite, effectively defaming private motorists as sinners who need restraining.

Please be sure to keep a balanced approach when considering motorists.

**b) Complementing the public transport system: new services should help more people who would otherwise complete their journey by car to access the public transport network, while not reducing walking and cycling to and from stops and stations. They should also provide a means of travel in areas where public transport connectivity is currently poor (especially in outer London).**

GMB agree with this proposal but would remind those framing future plans that those in with poor connectivity are not relegated to no connectivity by omission or cost consideration.

 **c) Opening travel to all: new services should be accessible to all Londoners and should not contribute to the creation of social, economic or digital divides in which some Londoners would have better travel options than others.**

GMB agree with this proposal.

**d) Cleaning London’s air: new services should prioritise ultra-low and zero emission vehicles to reduce emissions of carbon dioxide, nitrogen oxides and particulate matter in London and enable faster switching to cleaner technologies.**

GMB agree with this proposal

 **e) Creating a safe, attractive environment on our streets: new services and technology should help create a safer, quieter and more pleasant environment on London’s streets, where it is more attractive to walk or cycle, and should not lead to existing active trips being made by nonactive modes. There must always be an emphasis on the safety of passengers, pedestrians, cyclists and other road users.**

GMB agree with this proposal but are unsure what the last section relates to all and is superfluous.

 **f) Using space efficiently: new services must make efficient use of road and kerb space, be appropriate for the area of London in which they operate, and share data where possible to enable improved monitoring, operating and planning of the transport network.**

GMB accept this proposal but caution over data collection. This must be discussed in greater depth and accepted by those providing such services.

Expense levied on Taxi and Private hire will only cost drivers and again creates a concern towards onerous additions to existing obligations.

**Proposal 98 The Mayor, through TfL, will explore and monitor the relationship between access to kerb space and the level of demand for all forms of car travel to inform assessment of how demand management measures should evolve over time.**

We refer to our earlier point on monitoring.

**Proposal 99 The Mayor, through TfL, will explore and trial demand-responsive bus services as a possible complement to ‘conventional’ public transport services in London.** **Proposal 100 The Mayor, through TfL, will take part in trials of new vehicle technology, adopting a safetyfirst approach, and will consider the application of new vehicle technology in support of the Healthy Streets Approach. Proposal 101 The Mayor, through TfL and working with the DfT and other stakeholders, will adopt an appropriate mix of policy and regulation to ensure connected and autonomous vehicles develop and are used in a way consistent with the policies and proposals of this strategy.**

GMB accept this and refer back to our point of a dial a ride type facility or perhaps staggered services based on usage data.

**Policy 22 The Mayor will seek to ensure that London’s transport system is adequately and fairly funded to deliver the aims of the Transport Strategy. Additional powers should be devolved to the Mayor, the GLA or TfL to enable the Mayor and his agencies to respond effectively to economic, social and environmental change. This includes financial, regulatory and other powers to enable London’s challenges to be met, and emerging opportunities to be optimised.**

GMB accept this proposal but caveat that a secondary council oversees TFL’s decision process.

**Proposal 102 The Mayor, though TfL and working with Government, will fund the delivery of the strategy by:**

**a) Maximising any available efficiencies, subsidising services at appropriate levels and ensuring that value for money is otherwise achieved from the existing and planned transport network.**

GMB accept this aspect but caution against using working practices or contractors who will ignore fair working practice.

**b) Seeking to ensure a sustained level of funding from fares, Business Rate Retention and other existing sources of income.**

GMB accept this.

**c) Seeking additional taxes, powers or other similar mechanisms, including Vehicle Excise Duty in London, to create a fairer way of funding the delivery of transport schemes and services, to better capture and conserve the benefits they create and to enable the delivery of the transport and community benefits that the pursuit of this strategy will bring to London, the Wider South East and the UK as a whole.**

GMB accept this with the proviso that neither Taxi or private hire are subjected to increased costs.

We would add commercial services such as private ambulance, Waste collection, Private Meals on wheels as example see no exemptions as the services are being run for profit not for social good.

**Policy 23 The boroughs shall prepare and implement Local Implementation Plans (LIPs) containing proposals for the implementation of the Mayor’s Transport Strategy in their area. Each LIP should also contain a delivery plan and a performance monitoring plan.**

GMB accept this policy.

 **Policy 24 The Mayor, through TfL and the boroughs, will review their delivery plans should monitoring show that the expected transport outcomes of this strategy are unlikely to be achieved.**

GMB accept this policy of ongoing improvement.

**Proposal 103 The Mayor, through TfL, will offer support and guidance to ensure that local transport schemes and initiatives as set out in Local Implementation Plans are supported by monitoring plans that demonstrate delivery against the policies, proposals and expected outcomes of this strategy.**

GMB acclaim this proposal.

**GMB Union further points.**

Further points of consideration are set down below.

**Battery technology**

What can be expected as the motor industry moves more to 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.

**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 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.

There is no reason the GLA cannot create this standard.

**Alternative Power Sources**

Cotton batteries are currently being developed in Japan these organic batteries are now under test 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.

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.

**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.

GMB look forward to further input to the final proposals.

Questions in relation to our response can be directed to:

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