

Emissions Related Congestion Charge
Transport for London
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Consultation on the Variation Order introducing Emissions Related Congestion Charging

Campaign for Better Transport (formerly Transport 2000) was a strong supporter of the introduction of the Congestion Charge in 2003. We also strongly support the proposal to relate the congestion charge to levels of CO₂ emissions.

We do not at this stage wish to suggest any departure from the details of the proposed changes; however we would make the following comments on various aspects.

Impact on CO₂ emissions

TfL estimates that the proposals, in the short term at least, would achieve only a small overall reduction in total London-wide CO₂ emissions (somewhere between 0.3% and 2.0%). This limited impact may be seized upon by critics. Campaign for Better Transport believes the changes will have a greater impact in the longer term. We also note that the reduction will be in total, London-wide emissions of which emissions from the congestion charge zone are only a small part. Moreover the £25 charge is intended to influence vehicle choice, send a strong signal and be consistent with other measures such as VED banding and differential parking charges. TfL will no doubt make these points in defence of the charge.

100% discount for VED bands A and B

Better Transport agrees that, for the time being at least, vehicles in Bands A and B should be entitled to a 100% discount. At the moment this would only affect 1% of cars in the congestion charging zone. This proportion is likely to increase and the discount should be kept under review to avoid the erosion of previous traffic and congestion reduction benefits. We agree therefore with the proposal to review these arrangements quite soon after their introduction. In our view the 120 gm/km threshold is also correct as this is in line with the EU voluntary agreement with car manufacturers.

The £25 charge for Band G and extended-cab dual purpose pickups

We support the introduction of a more expensive charge for high CO₂ emitting vehicles, the withdrawal of the residents' discount from owners of such vehicles and the proposed level of charge. All of these changes send the right message. We also agree that it is right to include extended-cab dual purpose pickups in Band G when they meet the other qualifications.

Possible impact on congestion

There has been some concern in the Campaign for Better Transport that the Emissions Related Congestion Charge will have an adverse impact on traffic levels and therefore on congestion because the number of vehicles in Bands A and B will increase and outweigh any reduction in Band G vehicles in the Congestion Charging zone.

Impact on air quality

We are concerned that the proposals are not expected, and indeed are not designed, to have any impact on emissions of NO_x and PM₁₀s and that they may encourage the use of diesel-engined cars. We agree that the impact on emissions of other pollutants than CO₂ must be carefully monitored.

Review of Emissions Related Congestion Charging

For the reasons mentioned above, Campaign for Better Transport supports the proposal to have an early review of the effects of the emissions related charge. Matters which we would wish to see as the subject of particular scrutiny include: traffic levels and the growth in use of vehicles in Bands A & B; air quality and emissions of NO_x and PM₁₀; the effectiveness of the charge level in deterring use of high carbon vehicles in central London; and of course progress in reducing CO₂ emissions.

We hope these comments are helpful and would be pleased to discuss them if you feel that would be useful.



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