

The Greater London ULEZ Expansion Scheme

Advice Received from WSCC Highway Authority / CBC Sustainability Team

Summary Briefing

Background

The London Ultra Low Emission Zone was introduced to Central London in April 2019, was expanded to inner London in October 2021, and from 29 August 2023 this year Transport for London's intention is to extend it to the entire Greater London Authority area.

Non-compliant vehicles will be subject to a daily charge of £12.50, which will apply to all pre-Euro 4 standards petrol vehicles registered before January 2006, and all pre-Euro 6 diesel vehicles registered before September 2015. Specific grace periods are planned to support disabled people, making them exempt from paying the ULEZ charge until October 2027.

West Sussex County Highways Advice - Summary:

The County Council supports the TfL ambition to improve air quality, however they will be writing to TfL because they have concerns about the impact of ULEZ on people outside Greater London:

- No assessment produced by TfL on the volume of people outside of Greater London expected to be impacted by the ULEZ expansion and general lack of information.
- People outside Greater London won't benefit from the mitigation package, including no access to the diesel scrappage scheme for those on low incomes.
- Potential disproportionate impact on residents on lower incomes who need to travel into Greater London, made more acute due to cost-of-living crisis. Adverse impact also expected for organisations and businesses travelling into Greater London.
- People making trips in and out of London before and after midnight will be penalised by having to pay the ULEZ charge twice (£12.50 x 2). A lack of explanation by TfL as to why this double charge cannot be avoided. No solutions offered.
- TfL have not produced modelling information to evidence the anticipated scheme impacts on traffic flows / emissions/ pollution levels outside Greater London.
- Concerns that the ULEZ expansion will push congestion and pollution outside of the ULEZ zone / making air quality worse in surrounding areas. No detailed modelling.

Sustainability Team Advice - Summary:

- ULEZ primary purpose is to improve air quality, reduce pollution and improve health.
- Road traffic is the biggest contributor to air quality related diseases and death which disproportionately affects low income communities, children, the elderly, individuals with existing cardiovascular or respiratory diseases and pregnant women.
- Annual mortality of human-made air pollution in the UK is on average between 28,000 and 36,000 deaths every year.
- Between 2017 and 2025 the total cost to the NHS and social care system of air pollutants is likely to be £1.6 billion.¹
- Levels of NO₂ pollution in the Greater London Urban Area exceed legal limits and are 5 times over the WHO recommended safe limit. In the South-East outside London it is 3.9 times over the safe limit.
- Crawley has good public transport links to London, getting around London by tube or bus very convenient. Unlimited bus / tube / tram travel for an hour is £1.75, free for under 16s and half price to age 19. ULEZ revenues invested in public transport.

The numbers of people in Crawley negatively affected by the ULEZ are far fewer than might have been thought:

- Just 6% of Crawley residents travel more than 30km to work and the expanded ULEZ boundary will be 27km away from Crawley's boundary.
- TFL observes that nine out of ten vehicles in outer London expansion zone meet the ULEZ standard so the proportion of Crawley residents choosing to drive into the expanded ULEZ zone with a ULEZ non-compliant vehicle will be a fraction of the above 6% figure.
- Most petrol cars registered since January 2006 and most diesel cars registered since Sept 2015 (and some diesel's dating back to 2012) will be compliant
- New diesel vans sold from September 2016 and new petrol vans registered with the DVLA from January 2006 should be compliant.

Advice from CBC Air Quality Officer – Summary:

- It is likely that some local businesses who travel into London regularly will need to upgrade their fleet to be ULEZ compliant*. Whilst locally there may be negative economic impacts from this, there will also be beneficial outcomes in terms of improved air quality.
- From a policy perspective, it would be difficult to oppose ULEZ on air quality grounds, but then require something similar in terms of emissions limits within the Gatwick northern runway DCO (construction vehicles, on-airport emissions etc)
- A number of non-compliant vehicles within the London ULEZ are likely to be dispersed outside of Greater London as people sell those vehicles on to others outside of the ULEZ zone. There is therefore potential for older more polluting vehicles, that are being scrapped by residents and businesses in London, making their way into the second-hand market in Crawley and surrounding districts.
- The ULEZ may speed up the transition of Crawley's Taxi fleet to cleaner vehicles without the need to introduce stringent policy changes, as most Taxi and PHVs (private hire vehicles) will need to be ULEZ compliant.

Conclusion (Air Quality Officer):

- On balance, the overall impact will not be significant in terms of air quality (either positive or negative) in our authority, and there is insufficient data/evidence to support an opposition to the ULEZ expansion on air quality grounds.

ⁱ <https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>