



To:
All members of the
Environment and Sustainability
Committee

Please reply to:
Contact: Karen Wyeth
Service: Committee Services
Direct line: 01784 446341
E-mail: k.wyeth@spelthorne.gov.uk
Date: 29 June 2022

Supplementary Agenda

Environment and Sustainability Committee - Tuesday, 5 July 2022

Dear Councillor

I enclose the following items which were marked 'to follow' on the agenda for the Environment and Sustainability Committee meeting to be held on Tuesday, 5 July 2022:

- | | | |
|-----------|---|----------------|
| 6. | Ultra-low Emissions Zone for London | 3 - 22 |
| | The Committee is asked to approve the recommendations outlined in the report. | |
| 7. | Grant Funding Arrangements for Purchase of Electric Taxis | 23 - 32 |
| | The Committee are asked to approve the recommendations as outlined in the report. | |

Yours sincerely

Karen Wyeth
Corporate Governance

To the members of the Environment and Sustainability Committee

Councillors:

M. Beecher (Chairman) S. Buttar V.J. Leighton
Spelthorne Borough Council, Council Offices, Knowle Green

Staines-upon-Thames TW18 1XB

www.spelthorne.gov.uk customer.services@spelthorne.gov.uk telephone 01784 451499

R.J. Noble (Vice-Chairman)
J. Button
I.J. Beardsmore
A. Brar

R. Chandler
T. Fidler
N.J. Gething
K.M. Grant

S.C. Mooney
L. E. Nichols
O. Rybinski
J.R. Sexton

Substitute Members:

Councillors: M.M. Attewell, J.R. Boughtflower, J.T.F. Doran,
R.D. Dunn, M. Gibson, H. Harvey, I.T.E. Harvey, N. Islam and
T. Lagden

Environment and Sustainability Committee



Date of meeting - 05 July 2022

Title	Spelthorne's Response to Transport for London's consultation on London's expansion of its Ultra Low Emission Zone to align with the Greater London Authority boundary
Purpose of the report	To make a decision
Report Author	<i>Tracey Willmott-French (Senior Environmental Health Manager)</i> <i>Authors of Spelthorne's response: -</i> <ul style="list-style-type: none"> - <i>Dr Claire Lucas (Principal Pollution Control Officer)</i> - <i>Timothy Snook (Sustainability Officer)</i> - <i>Tracey Carter (Senior Economic Development Officer)</i> - <i>Craig Hatton (Senior Planning Officer)</i> - <i>Jackie Taylor (Group Head Neighbourhood Services)</i>
Ward(s) Affected	All Wards
Exempt	No
Exemption Reason	NA
Corporate Priority	Community Recovery Environment
Recommendations	Committee is asked to <ul style="list-style-type: none"> • Note the contents of this report and its Appendices. • Approve the submission of Spelthorne Borough Council's response to Transport for London's consultation on the expansion of the London Ultra-Low Emission Zone. • Approve options 1 and 3, which are for the submission of Spelthorne's response to the Transport for London Ultra-Low Emission Zone consultation team, and the lobbying options outlined. • Permission be granted to the Deputy Chief Executive to make minor amendments to Spelthorne Borough Council's response to the consultation if the need arises.
Reason for Recommendation	Spelthorne residents and businesses may be impacted in a negative and significant manner by the expansion of the London Ultra-Low Emission Zone. Spelthorne's air quality may also be impacted both positively with fleet improvements, and negatively should traffic flows increase at the edge of the charging zone. Provision of information to support Transport for London's decision making for the expansion has not been shared, nor have Spelthorne Council's opinions been sought until now. As such the Council has not had early opportunity to help influence and

	<p>shape the decision, regardless of the potential impacts on Spelthorne.</p> <p>Without sight of the documents/assessments the significance of the impacts cannot be fully determined, and neither can appropriate mitigation be sought and implemented in a timely manner (if required).</p>
--	--

1. Summary of the report

- 1.1 Nearly all the Greater London area is classified as a 'low emission zone' (LEZ). It is proposed that London's 'ultra low emission zone' (ULEZ) be expanded to cover the existing LEZ from 29 August 2023. A map of the extended ULEZ is given in **Appendix A**. Spelthorne's response to the ULEZ expansion consultation is attached at **Appendix B**.
- 1.2 If approved, vehicles not meeting ULEZ minimum exhaust emission standards will pay a £12.50 daily charge to enter the Greater London ULEZ zone. A penalty charge of £180 will apply for non-payment. The minimum emission standards are Euro 4 for petrol vehicles (i.e. registered from 1 January 2006), and Euro 6/VI for diesel vehicles (i.e. registered from September 2015).
- 1.3 Certain vehicles will have a grace period to achieve compliance. These include vehicles in the 'disabled' and 'disabled' passenger tax class, wheelchair accessible private hire vehicles would need to comply by 24 October 2027, and community transport minibuses by 26 October 2025.
- 1.4 The purpose of expanding the ULEZ is to improve air quality in outer London by encouraging frequent users of the ULEZ zone who have non-compliant vehicles to switch to sustainable travel modes or change to emissions compliant vehicles.
- 1.5 The expansion of the London ULEZ will bring about improved air quality and health benefits for the Greater London area. However, the expansion of the ULEZ may have negative social and economic impacts for the residents and businesses of Spelthorne, and in some areas of Spelthorne may cause a deterioration of air quality.
- 1.6 The expansion of the London ULEZ is proposed as a temporary measure prior to the introduction of future road pricing whereby drivers would be charged on a per mile travelled basis rather than for entering a zone. This is in line with emerging national¹ and county level² consideration of road pricing (also referred to as eco-levy or pay as you go/drive). No proposed dates are given for the introduction of future road pricing and Transport for London (TfL), are requesting early-stage feedback on how that may work as part of the consultation exercise.
- 1.7 The TfL consultation on the expansion of the ULEZ closes on 29th July 2022. Members of the public can submit responses directly to TfL via a dedicated website at: <https://haveyoursay.tfl.gov.uk/cleanair?cid=clean-air> . The

¹ UK Parliament Transport Committee Road Pricing. February 2022. Available at: <https://publications.parliament.uk/pa/cm5802/cmselect/cmtrans/789/report.html>

² Surrey County Council LTP4, Policy Areas Demand Management for Cars. Available at: <https://s3-eu-west-2.amazonaws.com/commonplace-customer-assets/surreyltp4/Policy%20Area%20Table.pdf>

Communications team have been asked to circulate the consultation details on the Councils social media channels.

2. Key issues

Economic & Social Impacts

- 2.1 Many businesses in Spelthorne have a large customer base within the West London area and rely economically on this revenue. The expansion of the ULEZ zone will force such businesses to either move their business base or replace their vehicles. Both options will put a large financial strain on small businesses, and many may be forced to close.
- 2.2 Public transport throughout Spelthorne is not up to an appropriate standard to enable Spelthorne's residents living outside of its major urban centres to access Greater London in a reasonable, timely, or affordable manner. This makes it difficult, even impractical for Spelthorne residents who have a ULEZ non-compliant vehicle to travel by public transport to work in the Greater London area (including at Heathrow airport).
- 2.3 Consequently, to travel to work each day such residents will need to either pay the £12.50 charge daily, or purchase a ULEZ compliant vehicle, or change their employment. The first of these options will put a large financial strain on Spelthorne's residents, and many if not most of those affected in this way will be Spelthorne's more vulnerable and more economically disadvantaged residents.
- 2.4 No information has been given in the consultation documents as to whether a vehicle scrappage scheme proposed for residents living in the extended London ULEZ zone would be available to impacted residents living outside of Greater London (e.g. non-London residents who work in the extended ULEZ zone).

Environmental Impacts

- 2.5 TfL have assessed the air quality impacts beyond Greater London as neutral in 2023.
- 2.6 The expansion of London's ULEZ means air pollution at some locations in Spelthorne is likely to improve due to a reduction in background levels and a potential increase in ULEZ compliant vehicles. However, at other locations it is likely to deteriorate due to vehicles that are not ULEZ compliant being pushed to use outside the ULEZ zone, and drivers of non-compliant vehicles making detours around Spelthorne's roads to avoid ULEZ charges. TfL have not provided any assessment of this.
- 2.7 The ULEZ expansion is predicted to reduce carbon dioxide emissions and forms part of the Mayor of London's actions to meet a target of net zero carbon emissions by 2030 which would require a 27% reduction in private car journeys in London. An increase in ULEZ compliant vehicle mileage in Spelthorne as opposed to that of non-compliant vehicles could contribute to reductions in carbon dioxide exhaust emissions however TfL have not provided any detailed assessment of this.
- 2.8 If the ULEZ goes ahead, mitigation measures will need to be put in place to try and off-set the negative impacts outlined above. Some examples are provided within the options in section 3 below.

2.9 Without further information and clarity it is not possible with provide with reasonable certainty a prediction of the impacts or quantify them. Further information would be needed to assess the necessity and viability of mitigation measures needed.

3. Possible Mitigation Measures

3.1 Surrey County Council (SCC) is the transport authority for Surrey, they are also the Highways authority for most of Spelthorne's roads. SCC have been contacted and asked for their response to the ULEZ consultation and what potential plans they may have to mitigate against the negative impacts where they have the powers to do so. At the time of writing SCC were due to schedule a meeting with the Spelthorne Principal Pollution Control Officer to discuss the County's approach to the ULEZ expansion consultation. A verbal update will be given at the Committee meeting.

3.2 Lobby TfL for responses to our consultation response, particularly those requesting further information and clarification. This will inform the value and viability of mitigation as outlined below.

3.3 Potential mitigation measures would include: -

- Writing to TfL to lobby for an extension to the Oyster zone for the Spelthorne area. This would make rail transport more affordable and encourage rail travel over car travel. MP Kwasi Kwarteng has campaigned for this for many years.
- Writing to SCC and TfL to lobby for improved bus services throughout Spelthorne and links into West London and Heathrow areas.
- Writing to SCC and TfL to request that consideration is given to altering Spelthorne's roads/flow directions, especially residential roads, to minimise the impacts of non-compliant vehicles using them as routes to avoid the ULEZ charges.
- Writing to SCC and TfL to lobby for the scrappage scheme to include Spelthorne's residents who work in the expanded ULEZ zone. Potentially a joint approach could be taken by County Councils as Transport Authorities to this which is a suggestion that Spelthorne will make to SCC.

4. Options analysis and proposal

4.1 Option 1 – to approve Spelthorne's consultation response for submission (recommended)

4.2 Option 2 – to amend Spelthorne's consultation response to be submitted

4.3 Option 3 – to approve the lobbying options outlined in section 3.3 above (recommended)

4.4 Option 4 – to amend the lobbying options outlined in section 3.3

4.5 Option 5 – do not approve the submission of Spelthorne's consultation response or the lobbying options outlined in section 3.3 above

5. Financial implications

5.1 There may be financial implications but at this time these cannot be quantified.

6. Risk considerations

6.1 Waiting on comments from Audit team

7. Legal considerations

7.1 Waiting on comments from Legal team

8. Other considerations

8.1 Due to the short time available to produce the Spelthorne's consultation response, some service areas such as Legal and Audit did not have the opportunity to offer comments on the consultation response prior to its submission for Environment and Sustainability Committee.

8.2 Permission is therefore sought for the Deputy Chief Executive to make minor amendments to Spelthorne Borough Council's response should the need arise.

9. Equality and Diversity

9.1 Expansion of the London ULEZ may cause potential inequalities to people of Spelthorne who are vulnerable and/or economically disadvantaged.

10. Sustainability/Climate Change Implications

10.1 These are the subject of discussion in this report

11. Timetable for implementation

11.1 TfL ULEZ expansion consultation opened – 20 May 2022

11.2 TfL ULEZ expansion consultation closes - 29 July 2022

11.3 London-wide expansion of the ULEZ – from 29 August 2023

12. Contact

12.1 Due to several service areas being involved in this subject area, please direct queries to Tracey Willmott-French (t.willmott-french@spelthorne.gov.uk), who will send them on to the correct service area for a response.

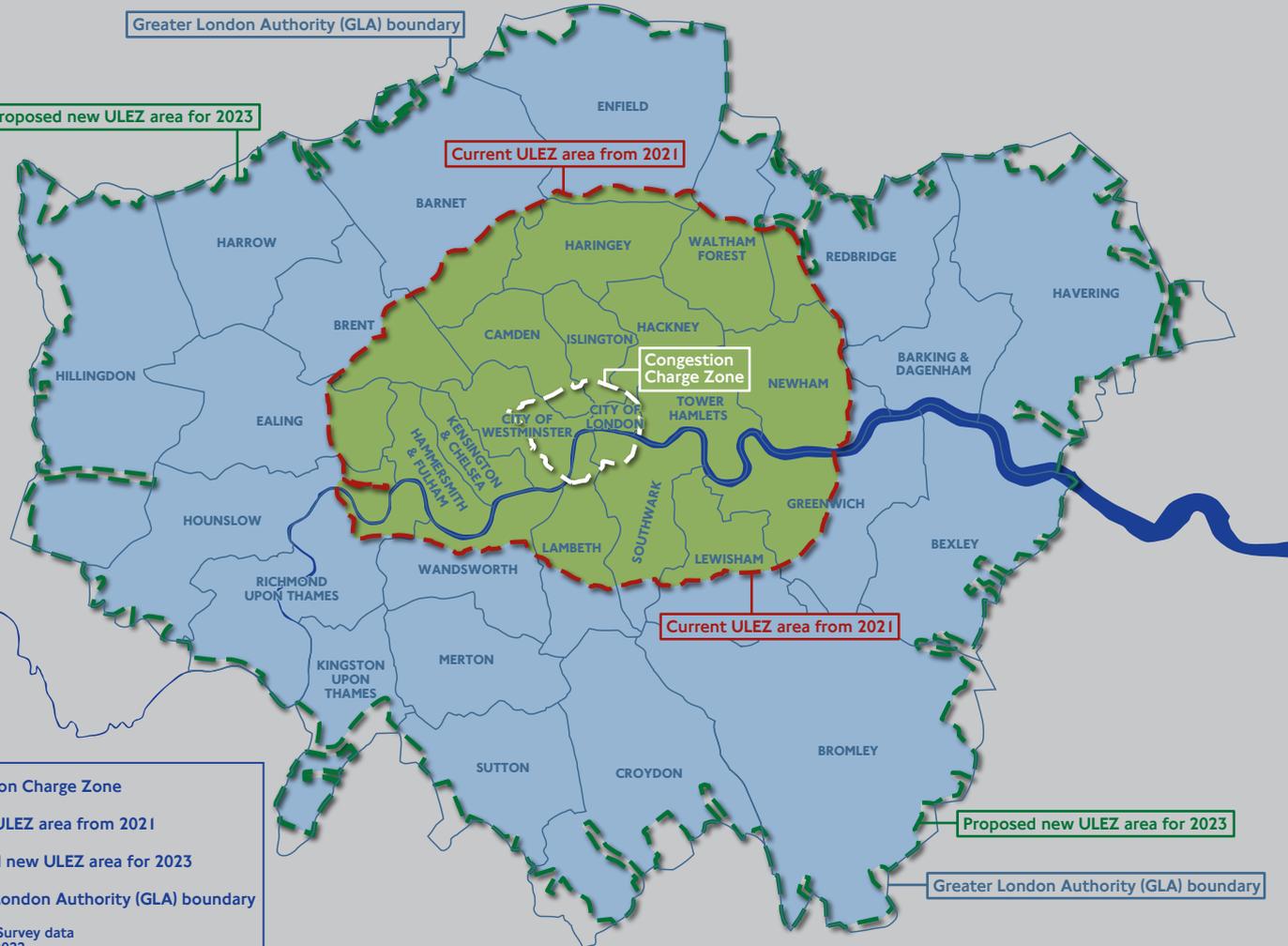
Background papers: There are none.

Appendices:

Appendix A - A map of the extended ULEZ

Appendix B - Spelthorne's response to the ULEZ expansion consultation

This page is intentionally left blank



Greater London Authority (GLA) boundary

Proposed new ULEZ area for 2023

Current ULEZ area from 2021

Congestion Charge Zone

Current ULEZ area from 2021

Proposed new ULEZ area for 2023

Greater London Authority (GLA) boundary

-  Congestion Charge Zone
-  Current ULEZ area from 2021
-  Proposed new ULEZ area for 2023
-  Greater London Authority (GLA) boundary

This page is intentionally left blank



SPELTHORNE BOROUGH COUNCIL

Spelthorne Borough Council's response to Transport for London's consultation on the expansion of London's Ultra Low Emission Zone.

1.0 Economic & Social Impacts

- 1.1 Public transport throughout Spelthorne is not up to London's standards for those who do not live in Spelthorne's major urban centres. Spelthorne residents who work in the Greater London area (including at Heathrow airport) who have a ULEZ non-compliant vehicle must pay the £12.50 charge daily for travelling to work each day.
- 1.2 In creating demand for new vehicles that will be ULEZ compliant, additional pressure will be placed on the new car market to meet this demand, driving up prices and increasing the demand for new car shortages, affecting local businesses and individuals as they may be forced to purchase at high costs or continue paying ULEZ charges.
- 1.3 The second-hand car market has already priced many small businesses and individuals out of replacing aging ULEZ non-compliant vehicles, so the proposed changes will likely exacerbate this further.
- 1.4 Many businesses in Spelthorne have a large customer base within the West London area and rely economically on this revenue. The expansion of the ULEZ zone will force many businesses to either replace their business base or replace their vehicles. Both options will put a large financial strain on small businesses, and many will be forced to close.
- 1.5 The second-hand vehicle market has seen a huge increase in prices as there is a global shortage in micro chips which has reduced the capacity of the vehicle manufacturers to meet customer demand. Second hand vehicles in some instances are now selling for more than they were purchased two to three years ago. This together with the increase of fuel and energy costs with the shortage of staff will put a huge strain on businesses in Spelthorne.
- 1.6 Companies that are situated at Sunbury Cross who are accessed by the A316 will face the very specific issue that all customers who visit their stores will have to drive into the ULEZ zone to exit the store which may destroy their trade and put their existence in Spelthorne under threat.
- 1.7 Additionally, many Spelthorne residents commute to West London for work. For example, there is a large reliance on the low skilled, low paid roles within Heathrow Airport for many residents in the North of Spelthorne. Access to Heathrow by public transport is very poor, especially for shift workers and they rely on driving to access their work. Again this will put a huge strain on the workforce and the businesses that rely on this workforce as the cost of buying

a new car will be unobtainable. This is likely to have a negative impact on Greater London employers due to employees outside of the ULEZ zone leaving their jobs for new ones outside of the ULEZ zone, this is particularly pertinent for those businesses relying on low-paid staff, such as businesses at Heathrow, and in the hospitality and retail industries.

- 1.8 Those who need to travel for care/essential reasons with a car into and out of London ULEZ zone will be negatively impacted by the charge. Potentially separating communities.
- 1.9 Potential for negative respiratory health problems within Spelthorne due to overspill of emissions for M25/M3 or those attempting to avoid ULEZ charge by increasing traffic flow through Spelthorne. This potential impact does not appear to have been assessed and clarity is sought from TfL as to whether an appropriate dispersion-based air quality assessment has been carried out.

2.0 Sustainable Environment, Pollution, and Air Quality Impacts Modelling

- 2.1 There remains a potential for the local environment of Spelthorne to be adversely affected. Although the impact assessment suggests reduced emissions, there remains a possibility of overspill of now non-compliant vehicles from greater London to Spelthorne and Surrey in attempts to avoid the ULEZ zone.
- 2.2 There has been little consideration as to the impact of potential increased demand on new ULEZ compliant vehicles may have on climate given the potential influx in demand for new cars to be manufactured.

Comments on the document entitled Our proposals to help improve air quality, tackle the climate emergency, and reduce congestion by expanding ULEZ London wide and other measures

- 2.3 The consultation document gave the conclusion that 0% of the population of Spelthorne will be living in areas where nitrogen dioxide concentrations are exceeding of $30 \mu\text{g}/\text{m}^3$ in 2023. This does not concur with the most recent annual monitoring dataset for 2021 or any of the preceding years which show that annual mean concentrations higher than $30 \mu\text{g}/\text{m}^3$ are encountered in Spelthorne.
- 2.4 If best practice assessment is followed, which requires consideration of 2019 data that was not affected by the pandemic to be used as a baseline; the annual average concentration of nitrogen dioxide at the roadside at Sunbury Cross was $51.1 \mu\text{g}/\text{m}^3$. This means it is likely there will be an exceedance of $30 \mu\text{g}/\text{m}^3$ at some of the neighbouring residences in 2023 if traffic flows return to pre pandemic levels.
- 2.5 The annual mean $\text{PM}_{2.5}$ concentration at the Sunbury Cross continuous analyser which is situated at a background location in 2019 was $9.9 \mu\text{g}/\text{m}^3$, and at Haslett Road in Shepperton the annual mean concentration was $12.9 \mu\text{g}/\text{m}^3$. Even during the pandemic the 2020 annual mean concentration at Haslett Road was above $10 \mu\text{g}/\text{m}^3$. These locations are near to the M3 and A316, the backgrounds used in TfL's assessment may not be conservative enough given what the localised monitoring shows.
- 2.6 Has dispersion modelling been carried out to review the impact the ULEZ will have on Sunbury Cross and Crooked Billet junctions? If so, what verification procedures have been applied to the data?

- 2.7 Sunbury Cross is a location that will be particularly vulnerable to rerouting traffic as the proposed ULEZ will start on the London side of the junction of the M3 and A316 where the current LEZ applies. It is hard to understand how an improvement is predicted without further information on the methodology or the screening process that has determined the study area. Is the improvement based upon fleet change? And has potential rerouting been considered? The consultation materials provided do not give a high enough resolution of information to understand if this is the case for the non GLA areas.
- 2.8 The predicted improvement is encouraging borough wide, but more information is needed to understand where those improvements are occurring and whether there is any increase in exposure in key areas of existing poorer quality as this information is not given in the table. It seems unrealistic that a blanket reduction would apply, unless the resolution of modelling and the assumptions made within the model (such as utilising a single background concentration for the entirety of the model domain) do not pick up the subtleties of different junctions especially with the strategic road network and local dispersion. Page 96 of the consultation only describes approaches in London using London datasets, what data and approaches have been used elsewhere where the LAEI only partially covers the Borough as stated in Table 37?
- 2.9 It is a very simplified approach to use one background concentration for such a geographically wide area, and the approach used gives less resolution than Defra's background models provide so why has that broad brush approach been used rather than following well-established air quality assessment guidance on backgrounds and dispersion modelling including the Design Manual for Roads and Bridges and Defra guidance such as TG-16, which do apply to the non-GLA boroughs?
- 2.10 There is a concern over fleet and background assumptions in relation to the LAEI up to and including the M25 may not be conservative for Spelthorne especially concerning buses, as not all buses are low emission in the non GLA Boroughs that have been assessed.
- 2.11 The method presented only considers the LAEI Major Roads network – what is this within Spelthorne? can a diagram be provided? No technical details are given for the CMAQ Clean Air Fund study or model, or how this accounts for backgrounds in non GLA Boroughs. All crucial technical information needs to be properly referenced so that we can understand exactly what has been modelled.
- 2.12 Table 20 surely is evidence as to why measures to reduce car usage and especially those supporting public transport should extend beyond Greater London. Table 20 indicates that over half the quantity of Transport NO_x is emitted from the non GLA areas compared with the GLA areas on an annual basis. Extending mitigation to the non GLA boroughs is going to have a better impact on London.
- 2.13 Spelthorne requests an extension of the Oyster zone to make rail transport more affordable and encourage rail travel over car travel. The MP Kwasi Kwarteng has campaigned for this for many years.
- 2.14 Table 22 and 23 (page 105/106) break down the change in road transport-based NO_x and PM but no Borough specific data for Spelthorne is presented,

why is it only giving info for GLA borough when others have been modelled. Where is the data for non GLA Boroughs?

- 2.15 Giving figures for all Non GLA boroughs collectively is not satisfactory for impact assessment, we need to understand the impacts locally that could be vastly different to those for example to the north or east of London, this is too much generalisation especially considering the impacts that are predicted on Heathrow which sits just over the border of Spelthorne with Hillingdon.
- 2.16 Page 77 states that minor negative impacts are expected on reduced retail spend from people living outside of London; increased van operating costs for a significant proportion of tradespeople, street markets, delivery companies and similar; and on localised labour markets, particularly Heathrow Airport. No air quality or transport data is presented in relation to this negative impact which is an oversight as there will be an impact on air quality which we need to understand as the borough neighbouring the airport.
- 2.17 No information is presented about impacts on traffic flows on the M25 or of the impact upon designated habitats. Whilst the consultation documents indicate that Natural England were consulted about changes to the Mayor's transport strategy, it is not clear whether any data was presented to them or to National Highways about the impact the ULEZ may have on traffic flows on the M25. This is not explained by the consultation materials and is of concern to Spelthorne both in terms of local air quality impacts upon residents and for the ecological impacts on Staines Moor, which is a designated habitat immediately adjacent to the M25 where nitrogen deposition rates may change if traffic flows change on the M25. Has the assessment considered this?
- 2.18 The consultation documents state that moderate disproportionate negative financial impact is expected on disabled people who make journeys using non-compliant vehicles and do not qualify for Motability scheme and disabled vehicle tax class grace period. These disabled people, alongside people on low incomes and older people, are expected to experience moderate differential impacts on health (stress and anxiety and isolation). It is expected there will be disproportionate moderate negative impacts on care workers (particularly Black, Asian and minority ethnic people and women) using a non-compliant vehicle where employers do not reimburse staff. Differential moderate negative impacts are expected on people who receive domiciliary care, mobile healthcare services, and/or informal care in outer London, particularly disabled people, older people, pregnant or maternal women, and people with underlying health conditions. And that moderate negative impacts are expected on those reliant on non-compliant vehicles including people on low incomes accessing employment (particularly in night-time economy) or opportunities in outer London; people with restricted mobility including pregnant and maternal women; and tradespeople, likely to be disproportionately experienced by men and members of the Gypsy and Traveller community, working in outer London. What mitigation will be provided to reduce the impact on the communities identified as being subject to negative impacts?
- 2.19 A query has been raised with TfL as to whether the measures that will be in place in London to help mitigate the impacts economically of the extension which are listed in the consultation documents as applying to Londoners will or will not apply to non-GLA areas within the M25?

Comments on the document entitled Jacobs London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA)

- 2.20 The policy context section of the executive summary only considers policy of relevance to London and not policy of non-GLA areas that are going to be impacted by the proposal.
- 2.21 Forecast impact of the proposed scheme on travel patterns only refers to London Boroughs so those that are non GLA cannot effectively review the assessment.
- 2.22 Table 1: Predicted impacts, committed and potential mitigation and enhancement measures air pollutant rows refers only to Greater London, it is not clear if this covers impacts non GLA boroughs? References are made to Outer London; however, no definition is given as to whether that refers to the non GLA boroughs or not.

2.23 Ricardo Air quality health impact assessment (AQHIA)

- 2.24 The introduction states that modelled concentrations of various pollutants for a 2023 Do-Minimum scenario (i.e. without scheme) and with Proposed Scheme scenario were provided by TfL. Where is that assessment data? It does not seem to have been presented in the consultation documentation and it is key to understanding local air quality impacts for each Borough including those beyond the GLA.
- 2.25 'These modelled concentrations at 20m resolution were averaged to Output Area (OA) level1. OAs were assigned to boroughs and Central, Inner and Outer London regions by Ricardo. Where OAs straddle across more than one borough or region they were assigned to the area containing the greatest proportion of the OA by area.' Once again no definition is given to enable the reader to understand if the non GLA boroughs were included in the assessment and how.
- 2.26 Table 6 provides no data from non GLA boroughs, and it is not clear if the health impacts for non GLA boroughs have been assessed.

Appendix B - Air Quality Assessment methodologies (Jacobs)

- 2.27 This Appendix refers again to modelling undertaken by TfL "The impact of the Proposed Scheme on exposure to air pollution has been assessed using modelled 2023 annual mean NO₂ and PM_{2.5} concentrations provided by TfL, both 'with the Proposed Scheme' and 'without the Proposed Scheme'". Where is the data and methodology by which it was derived provided?
- 2.28 The Appendix states that "Changes in road traffic emissions and exposure to pollution has been assessed at the Greater London level, as well as across central, inner' and outer London, and within each London borough, respectively, and within 'non-Greater London' areas covered by the LAEI."

This indicates the non GLA boroughs have been assessed but elsewhere it states the proposal to help improve air quality, tackle the climate emergency, and reduce congestion by expanding ULEZ London wide and other measures (Table 37 and 39) it is indicated that the LAEI only partially covers Spelthorne. What technical approach has been taken and what areas were assessed within Spelthorne?

This needs to be clarified as the assumptions and limitation section presented on page 136 state ... "Given the geographical scope of the assessment is

limited to the area covered by the LAEI, no assessment of potential changes in emissions or concentrations of air pollutants because of the proposed scheme has been undertaken outside of this area. While changes in emissions and concentrations of air pollutants are likely to occur outside of the study area considered, it is assumed that any such changes would primarily be either negligible or positive in nature (e.g. because of reductions in traffic flows or improvements to the vehicle fleet)”

The conclusion given for non GLA boroughs is neutral impacts regarding air quality, please clarify if that is based on the above assumption or an actual assessment with modelling?

2.29 Page 136 states that ... ‘Modelled annual mean concentrations of NO_x, NO₂, PM₁₀ and PM_{2.5} across Greater London and within ‘non-Greater London’ areas covered by the LAEI, for the assessment year (2023), both with and without the proposed changes in the following format: -

- At 20m grid resolution
- As average concentrations at ‘Output Area’ and ‘Lower Super Output Area Level’
- As population weighted concentrations across central, inner, outer and Greater London and within each London borough, respectively and within ‘non-Greater London’ areas covered by the LAEI
- Population data across Greater London and within ‘non-Greater London’ areas covered by the LAEI at Output Area level for the assessment year (2023).
- Locations of hospitals, schools, and care homes in Greater London and within ‘non-Greater London’ areas covered by the LAEI
- Boundary data for Output Areas, Lower Super Output Areas, London boroughs, central, inner, outer and Greater London’

Spelthorne would like to review the borough specific data and assessment method for the data referenced above.

2.30 The following statement does not indicate a verification method for the performance of the model ... ”The assessment is based on traffic modelling, emissions estimates and dispersion modelling, all of which are subject to uncertainty, to a greater or lesser extent, particularly when forecasting into the future. It is therefore assumed that all model outputs are suitably robust for the purposes of this assessment.”

2.31 How were the models verified? And has local air quality monitoring data been incorporated for the non GLA areas?

2.32 In previous communications between Spelthorne and TfL, TfL had indicated that the local air quality monitoring data provided by Spelthorne’s officers was being sent to Jacobs for consideration. If TfL undertook the modelling was the Spelthorne provided data used in any verification process?

Appendix C - Stakeholder Workshops

2.33 Appendix C does not include Spelthorne in the Table as Spelthorne Borough Council was not invited to any of the Stakeholder Workshops. Nor were the workshop materials shared with Spelthorne Borough Council when the material was requested. Further to this, National Highways do not appear to have been included either.

- 2.34 The 2022 stakeholder consultation was very poor indeed. Presumably TfL have consulted with the neighbouring Transport Authorities, but those details are not presented. Did TfL consult with Surrey County Council?

Appendix D - Air Quality & Carbon Results, London Borough/Local Authority

- 2.35 Page 170, tables 9-5, provided an estimate for 2023 of population weighted NO₂ and PM_{2.5} concentrations within London Boroughs and relevant non-Greater London local authorities. The data appears to be based on a regional emissions type assessment method that only gives emissions rather than a local air quality assessment that provides a concentration at a receptor.

Other parts of the documentation reference TfL providing a 20m grid resolution prediction presumably of pollutant concentrations. Equivalent data has not been presented for Spelthorne.

- 2.36 Tables 9-1 to 9-5 are of concern due to lack of clarity and explanation of the data contained within them, for example the 'all vehicles' column cannot be a sum of the other vehicle type columns as they do not add up, however, no explanation is given of the meaning of this column or what the difference is. The tables provide a source that is "Based on spatial extents of relevant local authority areas covered by the LAEI, which is in some cases limited". This is of concern because it refers to non GLA boroughs including Spelthorne, and hints at a data gap but does not explaining how the gap has been accounted for in the assessment work. Further, DfT data and Defra background data covering non GLA areas where the LAEI coverage is poor does not get a mention anywhere which is also of concern.

Appendix E - Impacts on Protected Characteristic Groups

- 2.37 Minor positive health benefits are predicted for the following groups on account of air quality.
- Differential and disproportionately greater health benefits because of air quality improvements for older people living in outer London.
 - Differential and disproportionately greater health benefits because of air quality improvements for children living in outer London.

The definition of outer London is not given so it is not clear whether the non GLA Boroughs have been included in the impact's ratings.

General

- 2.38 Spelthorne are supportive of the goal of the proposal to extend the ULEZ from an environmental perspective, however, there are some concerns that the resolution of the impact assessment is not suitable to fully characterise the environmental impacts of Spelthorne's local air quality.
- 2.39 The increase in compliant vehicles, especially vans, would likely be beneficial for Spelthorne as these may travel through the Borough to access London. However, this potential benefit is not coming across in the assessment materials presented. The data on predicted improvements is focussed on 2023 so is not capturing potential benefits of enhanced fleet improvement over time. Like London, Spelthorne has issues with diesel vehicles contributing to poor air quality. It is the view of Spelthorne Borough Council that better reductions in emissions could have been achieved regionally,

including within Greater London, if the mitigation measures such as a scrappage scheme were to apply to non GLA boroughs accelerating the potential for greater fleet changes.

- 2.40 Overall the air quality impacts in Spelthorne are predicted to be neutral but with some reduction in exposure which is positive provided the assessment method is robust. More detail on the air quality modelling methodology and traffic data applied within the model associated with the non GLA boroughs would have been appreciated as it is not clear if this is just an assumption (based on page 136 of Appendix B of the Jacobs London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA) based on fleet change emissions calculations without air quality dispersion modelling).
- 2.41 The data presented is predominantly for 2023, the 'opening year'. Spelthorne would like to understand the predictions for future years; however, this is not possible as the tabulated air quality data in the Jacobs London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA) for Spelthorne just refers to 2023.
- 2.42 There are positive statements within the assessment regarding neighbouring London boroughs which could help contribute to better air quality in Spelthorne. For example, where fleet changes predict some of those vehicles will be travelling through Spelthorne on their way to neighbouring London boroughs would become compliant over time.
- 2.43 Based on the information provided it has not been possible to ascertain the predicted impacts on local air quality which is particularly concerning given the strategic road junctions in Spelthorne that could be impacted by displaced or rerouting traffic. No assessment has been presented for consultation by TfL in that regard, and no definition of how the partial LAEI coverage referenced in the consultation documentation has been addressed in producing the published conclusions regarding air quality in non GLA boroughs.
- 2.44 Retaining inclusion of Heathrow within the zone and the Southern Perimeter Road reduces the risk of Spelthorne becoming a back-route to the airport by vehicles avoiding the ULEZ charge and from an air-quality perspective, that is positive.
- 2.45 No detailed information has been given on the impacts on vehicle flows on the M25, or the associated impacts on local air quality because of the proposed scheme. This is a key concern for Spelthorne.
- 2.46 No information is given on the strategy for camera placement or enforcement.
- Will this be tailored towards A-roads?
 - How will the APNR camera placement impact upon traffic flows?
- The intention of assessing these impacts is not given. This is of concern because drivers travelling short distances who would ordinarily travel through the outer London boroughs to reach bordering non GLA boroughs, may under the ULEZ re-route to more minor roads to avoid ULEZ charges and enforcement, which would cause changes to local air quality and congestion. TfL are not providing enough information for boroughs to be able to understand what the impacts will be on a local level. Further to this, what is the enforcement strategy regarding Heathrow Airport?
- 2.47 Page 3 states that the IIA process is a tool for identifying key impacts associated with the Proposed Scheme, including how negative impacts could

be avoided or mitigated where possible, and how positive impacts could be enhanced. However, no measures are identified that mitigate impacts for non GLA Boroughs.

- 2.48 The support to low income and disabled Londoners through a scrappage scheme refers to the eligibility of 'Londoners'. It is not clear whether non GLA areas that have been assessed are included within that definition. Spelthorne Borough Council has raised a query about this with TfL 10/06/22 and awaits a response.
- 2.49 There is potential for further mitigation or enhancement measure listed in Table 1 of the 'Jacobs London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA)' to undertake collaborative working between TfL and local authorities adjacent to the GLA. For example, through holding regular meetings until the implementation of the Proposed Scheme and for the first year of implementation to monitor the impacts of the Proposed Scheme is welcome.
- 2.50 However, so far there has been very little collaborative working regarding air quality impacts and the proposed ULEZ extension. Further, monitoring performance only for the first year is inadequate; because based on the assumption that the scheme goes live in August 2023, considering Defra's air quality monitoring calendar and reporting procedure, neighbouring boroughs will not have complete ratified continuous analyser data to undertake bias adjustment of annual air quality monitoring data for 2024 until midway through 2025. Further, impacts on local air quality will not be fully verifiable for 5-years and in line with air quality guidance it is best practice to consider data sets of 5-years duration due to variable meteorological conditions year on year.
- 2.51 It is very disappointing that there are not further measures such as extension of the rail zones qualifying for Oyster fares to attract people onto public transport in non GLA boroughs especially given the beneficial impact this could have had on air quality in outer London and non GLA boroughs through modal shift.
- 2.52 A potential further mitigation or enhancement measure for loss of retail spend by those living outside Greater London is the 'promotion of public transport access to major retail centres in outer London'. The issue is the expense of accessing those centres once the scheme goes live, in the assessment year 2023 household budgets are going to be very tight indeed, and extending Oyster to cover Spelthorne would be a strong mitigation measure making such trips by public transport far more affordable and potentially cheaper than car use once parking costs are factored in.
- 2.53 Small impacts are predicted on taxi and private hire vehicles licensed outside London and mitigation is assessed as not applicable. The ULEZ extension may have a disproportionate impact on Spelthorne taxis and private hire vehicles given the reliance on Heathrow for business.
- 2.54 The measure to *'Liaise with Heathrow Airport and relevant local authorities to explore opportunities outside proposed London-wide ULEZ boundary for park & ride sites catering for airport employees'* may be at risk of displacing polluting vehicles into Spelthorne. This impact does not appear to have been assessed. Better public transport connectivity is important, Heathrow already has staff long stay parking in Hillingdon, there is no desire to have that

displaced into Spelthorne, which has a borough wide Air Quality Management Area.

Future Pay for use strategy

- 2.55 Regarding plans to introduce per km travelled charges in the future, TfL should undertake a full impact assessment and consultation when further details are provided and include neighbouring Boroughs and National Highways from an early stage in the plans.
- 2.56 It would be expected that appropriate air quality dispersion modelling would be undertaken at a high enough spatial resolution to understand the impacts upon air quality in the non GLA boroughs across the affected road network, a comprehensive approach that is lacking in the assessment presented for the ULEZ extension.
- 2.57 The plans that are presented are missing a congestion reduction opportunity that could be achieved by weighting road user charges during the peak traffic periods to help reduce congestion.

3.0 Waste collection services

- 3.1 The extension of the ULEZ zone will require Councils who operate direct services and many vehicles such as refuse collection vehicles to reduce diesel emissions across their entire fleets, as well as require them to adopt new clean technologies. This is not an overnight process and will require a vast amount of funding which local authorities currently do not have, and time to comply. Waste collection authorities in Surrey do not own their waste it is controlled by the disposal authority, Surrey County Council. They have the power to direct us to dispose of waste in any location they have their disposal contracts, if this is in the ULEZ zone the burden of cost will fall to the local authority.

4.0 Local Plan Impacts

- 4.1 The Borough's emerging Local Plan has been published for consultation under Regulation 19 prior to its submission to the Planning Inspectorate for an Examination in Public at some point in the next few months. The Local Plan sets out where the Borough's housing needs are proposed to be met, with the greatest level of focus for these within Staines-upon-Thames and in Sunbury-on-Thames. Both of these towns are located close to major junctions, Staines at J13 of the M25 and Sunbury at J1 of the M3. Whilst the transport modelling undertaken for the Local Plan demonstrates that the allocated sites do not give rise to traffic flows which would meet the threshold of severe, as defined by the National Planning Policy Framework, there are concerns that additional traffic flows generated by vehicles seeking to avoid the ULEZ boundary could exacerbate this.
- 4.2 A further issue to consider which is associated with this is the volume of existing HGV vehicle movements around Stanwell Moor, to the north of Staines, due to the waste and recycling plant located there at Oakleaf Farm. The capacity of this plant is expected to increase to continue to meet increasing waste management and recycling targets. This will likely lead to increased HGV movements and, when coupled with similar movements associated with Heathrow Airport directly to the north of Stanwell Moor, presents significant air quality and noise impacts which negatively affect the north of Spelthorne.

- 4.3 As has already been noted in the Council's response, there are sensitivities at these locations namely the proximity of Sites of Special Scientific Interest (Staines Moor) and the Southwest London Waterbodies Special Protection Area to Staines along with the already high levels of pollution at Sunbury Cross. Given the significance of the Local Plan setting of the Council's approach to meeting development needs over the next 15 years and, the requirement to mitigate any impacts of this as far as possible, it is a concern that there has been a lack of consultation with the Borough. This is particularly concerning given the sensitive sites and the potential impacts of increased traffic flows on these, that there has been such limited, or no, clear consultation with Natural England and National Highways. The Council is developing its Habitats Regulation Assessment to support the Local Plan in conjunction with Natural England to ensure any identified air quality impacts on sensitive sites are fully scoped and mitigated where possible. If external factors are likely to influence this work, such as changing and increased traffic flows because of the ULEZ, then TfL should be liaising with NE and the Council to share modelling and to ensure there is a fully considered assessment and mitigation strategy in place.
- 4.4 There is no justification for pushing air quality impacts out of neighbouring London Boroughs and into Spelthorne, which is already highly vulnerable due to its location. The Council's Local Plan seeks to encourage the uptake of sustainable and active travel measures and to reduce negative contributions on air quality with more environmentally friendly construction and heating methods. Through the draft policies within the Plan, the Council has sought to minimise these impacts as much as possible and to seek to make a positive contribution in improving air quality and protecting designated sites. This approach will be severely affected by the change of traffic flows because of the ULEZ with the likelihood of the most polluted vehicles seeking to avoid crossing the boundary and increasing in volume travelling into and across Spelthorne.
- 4.5 The Local Plan is produced based upon robust and up-to-date evidence to ensure a clear and justified strategy can be adopted which minimises impacts across Spelthorne. It remains unclear as to whether the justification for the ULEZ extension has been subject to the same level of robust evidence gathering and it appears there is a significant lack of work undertaken to fully consider and assess the impacts upon Spelthorne.

This page is intentionally left blank

Environment and Sustainability Committee



Date of meeting - 05 July 2022

Title	<i>Electric Vehicle Taxi Project</i>
Purpose of the report	To make a decision
Report Author	<i>Dr Claire Lucas - Principal Pollution Control Officer</i>
Ward(s) Affected	All Wards
Exempt	No
Exemption Reason	
Corporate Priority	Service delivery
Recommendations	<ol style="list-style-type: none"> 1. Grant approval for an amended project scheme to provide a contribution towards the purchase of Hackney Carriages and private hire vehicles as referred to in this report. 2. Delegate authority to the Group Head for Commissioning and Transformation to complete negotiations with the Department for Environment, Food and Rural Affairs with a view to the amended Council Project being approved. 3. Delegate authority to approve an amended grant agreement with DEFRA to the Monitoring Officer and Group Head for Commissioning and Transformation in consultation with the Chair of the Environment and Sustainability Committee. 4. Authorise the Group Head of Corporate Governance to enter into appropriate agreements with bid partners; and third parties required to deliver the amended project.
Reason for Recommendation	To ensure Grant Funding is spent in accordance with the requirements and timescales of the Grant Funding Agreement.

1. Summary of the report

- 1.1 The Council acting as lead applicant acting with Guildford Borough Council; Waverley Borough Council; Woking Borough Council, Elmbridge Borough Council, Reigate and Banstead Borough Council and Epsom and Ewell Borough Council have been awarded £256k capital funding from the Air Quality Grant Funding Scheme 2020/21. The funding is to deliver electric vehicles for Hackney carriages and private hire vehicles operating within Surrey to encourage wider uptake of these vehicles.
- 1.2 Owing to a lack of interest from operators to facilitate the short-term lease of vehicles, Officers have restructured the scheme to encourage the purchase of low emission/electric taxis.

- 1.3 Further funding has been made available by Surrey County Council (SCC) to deliver the scheme available depending on degree of uptake of ultra-low emission taxis. As a result of lack of response from Electric Vehicle leasing companies, this report seeks to obtain authorisation to amend the original project proposal and delegated authority to allow officers to deliver a scheme to provide a grant funding contribution to licensed taxi drivers who wish to purchase an electric taxi.

2. Key issues

- 2.1 The Council has committed itself to a vibrant, sustainable economy and an increase in environmentally friendly measures to address the climate emergency. The low emissions taxi project will contribute to both of these priorities by accelerating the move to a low carbon economy through increased uptake of sustainable, low carbon transport technology and, in doing so, by improving air quality and reducing carbon emissions in the city.
- 2.2 The core purpose of this scheme is to support the increased use of electric and other ultra-low emission vehicles (ULEVs). The Purpose of the Air Quality Grant Funding Scheme is to provide support to local authorities in England to develop and all implement measures that deliver air quality benefits within one to two years.
- 2.3 The project is being run by an alliance of seven local authorities from Surrey, and Surrey County Council, through the Surrey Air Alliance (SAA). The SAA has appointed a Project Board to oversee management of the project. The allocated funds need to be spent by the end of this financial year.
- 2.4 The original bid led by Spelthorne Borough Council successfully secured funds to encourage the uptake of electric vehicles (EV's), as taxis within Surrey through the provision of Electric Vehicles for short term hire of 2 to 4 weeks to taxi drivers at a low cost to enable an on-road trial using an EV as a taxi.
- 2.5 At the point where the original grant application was made the trade had been temporarily affected by the pandemic for a period of 6 months. Subsequently the taxi trade in the Boroughs taking part in the project has not recovered to pre pandemic levels of trade, especially where businesses had a reliance on customers from Heathrow Airport and Gatwick Airport or upon large events venues such as horse racing venues. To illustrate the prolonged impact of the pandemic, Spelthorne being an acute example due to its proximity to Heathrow Airport now has approximately 35% fewer licenced drivers than were licenced with the local authority in September 2020, when the original grant proposal was written.
- 2.6 The trade in Spelthorne for many operators is currently being sustained through providing school services via the County Council for pupils who need to travel to specialist educational facilities that meet their needs. This makes adopting an EV an expensive prospect and without measures to encourage uptake, it is unlikely that operators will change their vehicle in the near future unless an EV is a competitive alternative to a second hand hybrid vehicle.
- 2.7 In order to offer information and the chance to try an EV vehicle to drivers who had an interest in short term trials the project was able to offer events in September 2021 with the Energy Savings Trust to educate the drivers and

taxi operators about EV vehicles and their suitability and benefits for taxi use. The drivers taking part were offered the opportunity to take a short test drive in an EV vehicle. 2 events were held, with good attendance.

- 2.8 The project steering board with the support of procurement specialists at Surrey County Council began a procurement process involving suppliers including Enterprise, Toyota, Dynamo, Skyline, G&M Direct, PCO Rent, WeFlex, Otto Ltd and the Crown Commercial Services Framework.
- 2.9 None of the companies or frameworks were able to provide suitable vehicles for either use as taxi's or for short trials. The larger taxi suppliers viewed the number of vehicles as too small to make it worth their while, and the smaller suppliers were not able to provide vehicles with suitable mileage ranges for the mixed motorway and urban driving that a Surrey taxi driver would require. No standard car hire provider was willing to provide vehicles for taxi use due to the restrictions of their commercial insurance.
- 2.10 A potential supplier Otto Ltd, undertook a short benchmarking survey of taxi drivers at a taxi stand in Guildford. Otto is a leading supplier of EV taxis to taxi drivers and operators in London, London being some way ahead of Surrey in terms of uptake of EV vehicles for taxi use. The feedback from drivers was as follows:
 - 2.10.1 The project offering of short trials was likely to obtain some interest, but more as a novelty to try an electric vehicle rather than with the intention of switching their vehicle. The drivers preferred the option of a longer trial of at least 2 months to get used to the car and whether it would work for their business.
 - 2.10.2 Economic factors due to the pandemic are making the switch to electric vehicle unattractive as a second-hand hybrid vehicle presents better value for money given the current circumstances of the trade due to the pandemic and the current taxi licencing policies within Surrey.
 - 2.10.3 It was also found that the drivers tended to have access to driveway parking which could facilitate home charging of an EV but that on street rapid charge facilities would be required to facilitate uptake.
 - 2.10.4 The drivers had a poor understanding of the range in terms of mileage that an EV vehicle could give them and tended to underestimate the range by half of what a modern EV is capable of.
- 2.11 To further explore the feasibility of the reconfigured project the participating Boroughs conducted a survey of 54 taxi/private hire vehicle drivers who are currently licenced drivers in Surrey. The feedback from drivers was as follows:
 - 2.11.1 81.5% of the respondents expressed interest in the project.
 - 2.11.2 72.2% of the respondents had a driveway available to facilitate charging an EV.
 - 2.11.3 70.4% of the drivers surveyed currently plan on buying a second-hand vehicle when they next replace their taxi/private hire vehicle.
 - 2.11.4 74.1% considered the concept of a financial incentive for a period of 1 year supporting the cost of a vehicle via a subsidised Personal Contract Plan rate to be a measure that would encourage them to try an EV vehicle for their business.

- 2.11.5 A driver gave additional feedback that the incentive proposed would be helpful in light of the two years of reduced revenue due to Covid as EVs are expensive. The driver explained that lease companies typically look at two years annual accounts so the reduced revenues due to the pandemic make obtaining lease vehicles more difficult for drivers and operators.
- 2.11.6 A driver gave additional feedback that they were unsure about sourcing a second-hand EV given the expense of battery replacement should a fault be found and that a new vehicle with a long warranty was preferable.
- 2.12 In March 2022 the Mayor of London has announced the intention to extend the London Ultra Low Emission Zone (ULEZ), to cover Greater London in 2023 subject to consultation. This extension would inevitably impact upon taxi and private hire drivers and operators in Surrey who drive into Greater London regularly, especially in the Boroughs adjacent to London Boroughs (Spelthorne, Epsom and Ewell, Elmbridge and Reigate and Banstead). Heathrow Airport is included within the expansion area for the ULEZ, the airport is a regular destination for taxi journeys. Given the short timescale for the expansion proposed by the Mayor of London support for the purchase of EVs as replacement vehicles would be helpful to the trade in Surrey.
- 2.13 After the combination of feedback from taxi drivers and the lack of a supplier who was willing to supply hire vehicles for use as taxis the configuration of the project was revised a more viable alternative to the original project which is now not deliverable.
- 2.14 As a result of a lack of interest from other vehicle providers in the trade, it is likely that Otto Ltd will be awarded a contract to provide EV taxis and leasing arrangements to taxi drivers.
- 2.15 The reconfigured project will allow taxi and private hire drivers and operators to undertake the subsidised use of an EV as their own vehicle for 12 months, with the option to either return the vehicle within the first year, or to continue payments after 12 months independently of the project to purchase that vehicle.
- 2.16 The revised project specification is summarised below:

New Proposal	Original Proposal
Telematics in the subsidised vehicle only.	Telematics in the drivers existing vehicle to give information on range requirements and fuel savings from switching to an EV.
The project would offer a longer subsidised EV experience with the option for drivers to continue payments to the supplier towards ownership of the EV vehicle. Alternatively drivers may return the vehicles to the taxi provider. Conditions related to the return of vehicles will be	Supply of 16 EV vehicles on 2–4-week trials on rotation for a 12 month period. (2-3 vehicles per district/borough)

<p>finalised in due course. Approximately 44 vehicles will be offered at a subsidised price for an initial 12 month period.</p>	
<p>Drivers will be encouraged to undertake subsidised use of an EV for a year with the option to return the vehicle within 12 months, or to continue with their own payments to purchase the EV vehicle. It is anticipated that more EV taxis and private hire vehicles will be operating in Surrey after the end of the project, than with the original proposal.</p>	<p>EV trials offered to drivers for a 2-to-4-week period, with no incentive to own/take up an EV.</p>

- 2.17 In order to reduce officer time and costs associated with managing the amended project, the Council is proposing to appoint Surrey County Council as its agent to administer the scheme.
- 2.18 SCC will ensure that the appointed vehicle provider shall manage EV vehicle purchase and shall be responsible for:
- Communicating with drivers to arrange purchase.
 - Communication with Licensing Authorities to answer any queries.
 - Checking a driver remains a licensed driver with the relevant Licensing Authority and confirm their identity.
 - Communicating with the Licensing Authority in each Borough/District to notify which driver will be purchasing which vehicle, and when for license regulation purposes. Dealing with queries from drivers by email and telephone regarding the vehicle purchase.
 - Informing drivers on how and where to charge a vehicle.
 - Collection of payments from drivers.
 - Fitting a telematic device to vehicles via the ODB port or battery connection.
 - The provision of a spare tyre meeting the vehicle licensing requirements.
 - Ensuring the vehicle is roadworthy as per the UK MOT requirements (including tyre inflation and tread to meet the MOT requirements and the requirements of the Highway Code).
 - Ensuring that the driver/operator has adequate breakdown cover for their vehicle, including emergency charging of vehicles if needed.
 - Ensuring the driver/operator has adequate insurance is in place including public liability insurance and adequate motor insurance to operate the vehicle as a taxi or private hire vehicle.

2.19 The Council’s Legal Services team will ensure appropriate legal arrangements and performance measures are in place to ensure compliance with grant funding terms and conditions

3 Options analysis and proposal

- 3.1 Do nothing – the procurement process to deliver the original proposal has been unsuccessful. A decision not to amend the project will result in the Council being unable to meet its grant funding duties. In this situation, DEFRA would be able to demand a return of all unspent grant funding for the project.
- 3.2 Approve the amended scheme to assist taxi drivers to purchase low emission/electric vehicles as proposed by officers. A table of the anticipated impacts is provided below:

Losses	Benefits	Change to Outcomes
Loss of pre vehicle trial data giving a comparison to the maintenance and fuel costs of the driver’s current vehicle	Less resource will be required from Council Officers to fit and remove telematics	No telematic supplier costs therefore the costs assigned for telematics can be recycled to provide longer subsidised EV vehicle experience leading to the option of ownership and therefore retention of an EV vehicle as an on-road taxi. The telematics within the EV vehicle will still provide data on the mileage of the subsidised EV vehicles which can be used to ascertain utilisation and emission savings.

CO		
Fewer vehicle trials however the subsidised experience will offer a longer period of on road use which is more likely to lead to the driver adopting the vehicle at the end of the project.	The driver gets real world experience of fuel savings over a longer period of time. The driver has more incentive to retain the vehicle as an operational taxi after the experience period by continuing the PCP payments. This is important as uptake of EV vehicles as Taxi's and private hire vehicles will remain low in Surrey unless they are competitively priced and working as functioning taxis as an example to other drivers.	The EV is likely to give a greater per vehicle emission reduction through greater on road use. The legacy of the project will be longer where drivers opt to continue payments to own the vehicle.
Less drivers able to trial an EV taxi, but working with the Energy Savings Trust all drivers have been offered a test drive in an EV	Drivers who participate in the project will have an incentive to continue to own their EV after the first year when the project ends, acting as an advocate longer term for other drivers in Surrey to take up EV taxis and private hire vehicles	It is anticipated that more EV taxis and private hire vehicles will be operating in Surrey after the end of the project than with the original project, acting as an advocate longer term for other drivers to take up EVs in Surrey

4 Financial implications

- 4.1 A summary of the financial proposal is tabled below. Members are advised that there is no additional cost to the Council as a result of the original and revised schemes.

Item	New Proposal	Original Proposal
Defra Air Quality Grant request	£256,686	£256,686
Surrey County Council cash contribution	£40,000 Covering staff costs for Project Management, communications costs and any additional subsidy costs needed.	£40,000

<p>Total (Based on grant funding allocation and matched funding from SCC(all inclusive) per month plus wrapping of 7 EVs). Excludes costs to be borne by taxi driver for instalment payments from Year 2 onwards.</p>	<p>£296,686.00</p> <p>(No additional contribution required from SBC finances)</p>	<p>£296,686.00</p>
--	--	---------------------------

5 Risk considerations

- 5.1 Risk: Lack of familiarity with electric vehicles may result in new technology not being utilised efficiently or effectively

Mitigation: pro active engagement with taxi trade has provided drivers with a limited period introduction to electric vehicles.

Risk: Cost of living crisis will discourage taxi trade from purchasing new vehicles

Mitigation: Fuel savings will likely offset a significant portion of the vehicle purchase costs. Finance packages will be tailored to the individual driver's circumstances.

6 Legal considerations

- 6.1 It is confirmed that there amended project and proposed procurement of a service provider is compliant with the terms of the grant funding.
- 6.2 The proposed service provider is authorised by the Financial Conduct Authority to offer finance packages linked to the purchase of vehicles.
- 6.3 In the event that the recommendations are accepted, Officers will submit the amended project to DEFRA for approval. Implementation of the amended project will be dependent on approval of the amended project.
- 6.3 It is further confirmed that there are no subsidy control and/or EU State Aid concerns related to the amended proposal in its current form.

7 Other considerations

- 7.1 None

8. Equality and Diversity

- 8.1 The Council will ensure that all taxi drivers within their respective boroughs are notified of the scheme and given the opportunity to participate.
- 8.2 Vehicles may be adapted to accommodate the requirements of specially abled passengers.

9. Sustainability/Climate Change Implications

- 9.1 The project is based on grant funding that specifically targets a reduction and an improvement of the air quality for residents.
- 9.2 The choice of low emission/electric vehicle represents a more sustainable mode of transport for taxi journeys.

10. Timetable for implementation

- 10.1 Approval of amended scheme by DEFRA – 18 July 2022
- 10.2 Appointment of SCC as project agent – 31 July 2022
- 10.3 Appointment of service provider – 20 August 2022
- 10.4 Roll out of amended scheme – 01 September 2022
- 10.5 Funds to be spent by the 01 April 2023.
- 10.6 It is anticipated that officers will report on progress to Members once contract terms with SCC and the service provider have been agreed.

11. Contact

- 11.1 Claire Lucas – c.lucas@spelthorne.gov.uk

Background papers: There are none.

This page is intentionally left blank