

# Environment and Sustainability Committee



Date of meeting - 05 July 2022

<b>Title</b>	<b>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</b>
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	<i>Tracey Willmott-French (Senior Environmental Health Manager)</i> <i>Authors of Spelthorne's response: -</i> <ul style="list-style-type: none"> <li>- Dr Claire Lucas (Principal Pollution Control Officer)</li> <li>- Timothy Snook (Sustainability Officer)</li> <li>- Tracey Carter (Senior Economic Development Officer)</li> <li>- Craig Hatton (Senior Planning Officer)</li> <li>- Jackie Taylor (Group Head Neighbourhood Services)</li> </ul>
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	NA
<b>Corporate Priority</b>	Community Recovery Environment
<b>Recommendations</b>	Committee is asked to <ul style="list-style-type: none"> <li>• <b>Note the contents of this report and its Appendices.</b></li> <li>• <b>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.</b></li> <li>• <b>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.</b></li> <li>• <b>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.</b></li> </ul>
<b>Reason for Recommendation</b>	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>
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## 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 national<sup>1</sup> and county level<sup>2</sup> 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 29<sup>th</sup> 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

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

<sup>2</sup> 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](mailto: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