



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.