



**Councillor Katherine Dunne
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Ref: ULEZ Expansion 2023

Date: 29th July 2022

Dear Mayor Khan,

Re: London-wide expansion of the Ultra Low Emission Zone

I am writing on behalf of the London Borough of Hounslow to offer feedback on the latest ULEZ consultation, which sets out plans to expand the existing zone to the London boundary. As an outer London Borough, Hounslow stretches from Zone 2 to the Home Counties, and whilst predominantly outside of the current ULEZ boundaries, the proposals to include Hounslow into the zone next summer will have implications on the Council and the residents we serve.

We welcome this consultation on the proposed expansion and have witnessed first-hand the benefits of the previous ULEZ expansion in October 2021 to cover the areas of the borough inside the North Circular including Chiswick. In the six months following the introduction of the expanded Ultra Low Emission Zone in Chiswick, there has been a 9% reduction in nitrogen dioxide (NO₂) compared to the previous six-month period in 2020-21. While it is difficult to distinguish whether localised impacts stem from the pandemic or ULEZ, the data suggests that NO₂ concentrations in Hounslow have decreased in recent years, and the expansion of the ULEZ has likely had a positive impact on pollution level.

Therefore, the consultation is timely. We want to ensure that Hounslow is cleaner and greener than before. However, considering the cost of living crisis, we need to ensure any expansion of the ULEZ has no further detrimental impact on our communities. Therefore, there are key issues that we would like to raise concerning Hounslow's current compliance level and the mitigations that will be required to address this gap ahead of any further expansion. I have set out our position below.

Climate and Air Quality

Along with the Greater London Authority (GLA), Hounslow declared a Climate Emergency in 2019. Our commitment to addressing the climate emergency is reflected in our newly refreshed corporate plan. One of the core pillars of our corporate plan is to create a greener Hounslow, through tackling air quality and driving the adoption of environmentally conscious



transport options. Both of these ambitions reflect our broad support for the principles behind a ULEZ expansion, and we look forward to continuing coordinated effort from all boroughs to fulfil our collective climate action commitments.

Given Hounslow's proximity to Heathrow Airport and the presence of key arterial routes on the Transport for London Road Network (A30, A4), as well as other strategic routes such as the M4, A205/A406 and A312, air quality is an extremely important issue for us. Long-term exposure to air pollution has been associated with cardiovascular disease and lung cancer, and recent evidence suggests that air pollution is associated with type 2 diabetes and dementia. While air pollution impacts everyone who lives, works, or visits Hounslow, it disproportionately impacts children, the elderly, those who are pregnant, have pre-existing health conditions, or are living in more deprived areas. The Office for Health Improvement and Disparities (OHID) attributed 6.8% of deaths in Hounslow in 2020 to particulate air pollution (PM2.5), higher than the England average of 5.6%. Therefore, we are committed to improving air quality and reducing carbon emissions within the borough.

We are ahead of our 2021 interim target for the percentage of trips by active or public transport, hitting 60% of all trips in 2020 against a target of 59% and we remain committed to meeting our 2041 target of 71%. We are already working to encourage the reduction in car use and renewal of our own vehicle fleet. Where this is not possible, we are supporting the uptake of electric vehicles and have set out our ambition in an Electric Vehicle Strategy, which aims to deliver 2,000 new charge points across the borough by 2025. However, you will appreciate that the energy capacity in West London is challenging, and we have concerns about the extent to which this will hamper our ability to deliver the energy infrastructure required to support our ambitions.

Employment and Transport Accessibility

Hounslow is home to key employment sites, including many associated with Heathrow, which recruit employees from outside the Greater London area. Hounslow also has the third highest proportion of unskilled workers of all London Boroughs and much of this work is done in shift patterns where the ability to travel to work is a necessity. Health and social care workers also need to travel to work, both to conduct visits in the community and visit patients at home. Their ability to use public transport is often limited either due to geographic area or their non-standard work hours.

The outer areas of the Borough have poor public transport accessibility (with PTAL as low as 0 in places), where a car may be the only practical option. Where public transport services run, these are mainly radial and there is a lack of existing orbital services connecting communities to key centres of employment, education, and leisure. This is concerning for our residents and staff who live in the outer areas of the Borough and may have little choice but to use a car.

We also share a boundary with Surrey and there are many trips between the communities of Ashford, Sunbury, Stanwell (plus other locations in Surrey) and Hounslow that could be impacted by the ULEZ expansion. Aside from the main routes of the A30 and A316; Clockhouse Lane, Chertsey Road, Ashford Road and Groveley Road all carry several



thousands of vehicles per day. Yet, currently, workers who reside outside the GLA boundary will not be eligible for any grants but will be impacted by the ULEZ expansion.

The ULEZ may result in a reduction in trips into Hounslow which may impact employment and businesses within the Borough. In these locations public transport provision is limited and not as frequent. Additionally, the night tube network within Hounslow is limited, only operating on the Piccadilly Line. Noting the service is still closed and due to restart later this year on a weekend only.

The timescale to change a car in just over 13 months is challenging especially when viewed against the wider economic picture and makes a strong case for the need for significant improvements to the current public transport network.

Therefore, we request the following:

- Improvements to public transport services to support this change, especially in areas with low PTAL. Enhancement and expansion of the bus network will be essential to ensure people have a viable alternative way to travel with newer and cleaner buses introduced on routes within the borough. Also, increasing the number of rail and tube stations with step free access will make public transport more accessible. We ask TFL to review night bus routes in Outer London, review the night tube service and provide funding for car clubs and car sharing schemes to ensure communities are not further isolated.
- Funding for more active travel infrastructure, to ensure residents and other stakeholders have a safe and attractive alternative to using a car especially for short trips. We also request that funding is made available for complementary measures to help our communities gain skills, including cycle training delivered at community hubs, opportunities to fund cheaper bicycle purchase, and cycle parking facilities.
- Support provided to those who commute into Hounslow from outside of the GLA boundary, to avoid negatively impacting the labour market within Hounslow.
- Expand the NHS ULEZ reimbursement scheme to increase the eligibility criteria and help increase awareness of the schemes.
- Consult and engage with health and care workers, including informal carers to understand how the impacts of the ULEZ expansion can be further mitigated.

Compliance and Scrappage Scheme

The consultation webpages state that 82% of drivers in outer London are driving compliant vehicles; however further analysis of TfL's own integrated impact assessment identifies that Hounslow has the lowest compliance of any London Borough at 58%-67%. This means there are approximately 33,000 to 42,000 non-compliant vehicles registered within Hounslow. This indicates that Hounslow's residents, businesses, and other stakeholders are



likely to be some of the most impacted in London. We will therefore need the most support adapting to a ULEZ expansion.

From February 2019 to November 2021, you provided £61m of funding in various stages for a vehicle scrappage scheme targeted at small businesses, charities, Londoners on low incomes and disabled Londoners, to help them adapt to the ULEZ. This resulted in the removal of approx. 15,000 non-ULEZ standards compliant vehicles from London's roads.

Where public transport and active travel is less accessible in outer London, those on low incomes unable to afford a compliant car may find it more difficult to change their mode of travel to adapt, or may be forced to reduce the number of trips they make, affecting their ability to travel to or find work.

Furthermore, in creating demand for new ULEZ compliant vehicles, additional pressure will be placed on the new car market, increasing demand and potentially causing challenges with supply in the timeframes before the introduction of the expanded ULEZ. This will affect both local businesses and individuals.

Therefore, we request the following:

- Funding from TfL made available in order to deliver electric vehicle charge point expansion faster and at more locations.
- The scrappage scheme for the latest expansion must go beyond the traditional offering for new vehicles, especially as the dominant proportion of road transport emissions are now non-exhaust emissions (e.g., tyre and brake wear). It should encourage the uptake of cycling or micro-mobility through grants on bikes, e-bikes, and cargo bikes (modal shift).
- Other considerations could include mobility credits or travel free days. These need to be supported with commitment and funding for the delivery of dedicated active travel infrastructure including the completion of C9 to Hounslow Town Centre.

Council Fleet and Operations

We manage our own vehicle fleet. Our fleet consists of 400 vehicles in total and we have around 70 vehicles that are currently non-compliant. We have already invested in their replacement, yet supply chain challenges mean the earliest likely date for vehicle delivery is 2023/24. If there any further delays in the market and supply, there will be insufficient time to make the fleet compliant before the proposed August 2023 rollout of the ULEZ expansion.

It is also currently unclear whether the exemptions in place from the previous ULEZ expansion will be extended, and currently fifteen of our school transport vehicles are registered for an exemption which ends 29th October 2023. So despite acting early and investing significantly, if no dispensation is provided, we will be subject to ULEZ penalties, putting further pressure on Council budgets.



Therefore, we request the following:

- Grant Hounslow and other London Borough's additional time to upgrade fleets beyond the time that the ULEZ expansion is implemented, recognising the supply chain and other logistical challenges they face.
- Extend exemptions which are currently in place for school transport vehicles, this is crucial to ensuring we are able to continue carrying out our responsibilities for school transport.

Additional considerations

There are a number of other considerations we would like to bring to your attention and these are set out below.

1. **SME businesses;** there is the potential for negative impacts on small businesses as they are likely to be using light goods vehicles (LGVs) which tend to be in service for longer and are more likely to be non-compliant. We ask that there is specific scrappage support for these small businesses to avoid them incurring significant daily challenges and hampering our SME economy.
2. **Freight;** the West of the Borough is home to internationally important freight and distribution industry servicing Heathrow. There is a risk that these businesses could relocate outside of Hounslow and the London boundary, further damaging our economy that is slowly recovering from the pandemic. Assistance for these businesses will be essential.
3. **Changes to Auto Pay;** the proposal to remove the annual Auto Pay registration fee in January 2023 ahead of expansion is welcome and will help those needing to access the zone with no alternative means. It is requested that any expansion has a soft launch to ensure stakeholders are aware if their vehicle is not eligible and efforts should be made to ensure digital exclusion is not a barrier for individuals to sign up to Auto Pay.
4. **Future of Road User Charging;** except for Chiswick, most of Hounslow's geography sits outside existing road user charging schemes. While a new and more sophisticated approach to streamlining these charges is still some years away, it is vital that any replacement recognises the vastly different contexts across the city and between inner and outer London. We need to be mindful of journeys in and out of London, especially into neighbouring authorities such as Spelthorne, Surrey, etc. and how this would impact trip patterns if these areas were excluded from the proposals. There is potential impact on the M25 especially which needs to be fully assessed and we would ask that TfL engage with the Department for Transport in relation to this topic.
5. **Equalities;** we welcome the proposed grace period extension to 2027 for people with disabilities alongside the extension for minibuses and wheelchair accessible private



hire vehicles. However, there is also the potential that access to primary and secondary health care appointments may be restricted for others who rely on personal vehicles such as pregnant residents and older residents. The Impact Assessment does not reference the impact on these groups, who may not be able to afford a compliant vehicle but may be reliant on a private vehicle due to mobility issues and would then have travel options severely limited.

The integrated impact assessment identifies a moderate negative impact of the proposals on people on low incomes and for people with restricted mobility including pregnant and maternal women with TfL committed to mitigation including the night bus network and return of the night tube. However, it is crucial that bus provision is expanded for the daytime as well. The impact on people in all of the protected characteristics groups must be fully considered and mitigated.

Hounslow Council would welcome targeted support in the form of personalised travel planning from TfL and associated stakeholders to enable residents to understand how they can utilise modes of active travel within their local environment (15min city concept). This could be in the form of a specific digital app, targeted engagement and communications.

- 6. Consultation;** Hounslow welcomes this opportunity to provide a response to the ULEZ consultation however there are opportunities for TfL to further engage with communities and stakeholders. With 29% of the borough population having English as a second language it has been difficult to locate any consultation materials that have been produced in any other language such as Punjabi or Polish for example. We have not seen evidence of how TfL have taken steps to engage with these communities, methods include leafleting and hosting in person consultation events. We wish for TfL to publish and share further details on they propose to address these concerns and further consultation and engagement plans in relation to this.

I look forward to engaging with your further on the issues and in particular how we can work collaboratively to mitigate the challenges we have set out above.

Yours sincerely

A handwritten signature in blue ink that reads "K. Dunne".

Cllr Katherine Dunne

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