



TRANSPORTEAST

ULEZ consultation
Transport for London
By email

Esme Yuill
Transport East
Suffolk County Council
Endeavour House
8 Russell Road
Ipswich
IP1 2BX

2 August 2022

Dear ULEZ consultation team,

Thank you for the opportunity to comment on the consultation on the London Mayor's proposal to extend the ultra-low emissions zone (ULEZ) to effectively cover the whole of Greater London by adopting the current HGV LEZ boundary from 29 August 2023.

Transport East is the Sub-national Transport Body for Norfolk, Suffolk, Essex, Southend-on-Sea and Thurrock. The partnership provides a single voice for our councils, business leaders and partners on our region's transport strategy and strategic transport investment priorities, working in close collaboration with the government and the rest of the UK. Our region borders the Greater London Authority boundary to the north-east.

We have developed a regional Transport Strategy and Investment and Delivery Programme. These documents set out a vision for the future of transport in the East and a set of strategic priorities to deliver that vision.

Our vision and priorities

We seek a thriving Eastern region with safe, efficient and net-zero transport networks advancing a future of inclusive and sustainable growth for decades to come.

To deliver the transport network to support this, the draft Strategy identifies four core priorities for the region. Setting out a pathway of activities to address challenges and improve transport provision.

- Decarbonisation to net zero – Transport creates 42% of carbon emissions across the region, more than any other source. We aim to achieve net zero carbon emissions from transport by 2040. Our decarbonisation pathway underpins the other three pathways in the Strategy.
- Connecting growing towns and cities - With 75 towns and cities, the East has a strong economy, but our growing places are spread out and our towns are congested. We want enhanced links between our fastest growing places and business clusters.
- Energising rural and coastal communities – Much of our population lives in rural areas or on the coast. Transport links in these areas are historically poor and this is exacerbated by poor digital connections. We want everyone in rural and coastal areas to be able to do more, more easily and more sustainably.

- Unlocking international gateways – With 13 ports and 3 international airports, we are the UK’s gateway to the world for trade. The new Freeport at Felixstowe/Harwich will increase the role of logistics and distribution within the region. We want better connected ports and airports to help UK businesses thrive.

ULEZ boundary expansion specific comments

In principle **we understand the need for further action to reduce transport induced air pollutants and the rationale for the proposed changes to the ULEZ.** Evidence from the implementation of original LEZ and ULEZ indicates the expansion would see some level of improvements to air quality beyond the GLA boundary into the TE region.

However, we believe **the details presented in the scheme are under-developed and the impacts and potential mitigations require further discussion,** particularly with the Local Transport Authorities of Essex and Thurrock, and the relevant district councils of Epping Forest and Brentwood which bound the proposed new ULEZ.

Administrative boundaries are arbitrary for people and businesses day-to-day. This is particularly true for boundary communities, such as Loughton & Chigwell/ Woodford & Hainault, and larger conurbations very close to the boundary including Brentwood and Purfleet. People in these communities, and those further afield, cross the proposed ULEZ boundary into outer London regularly for employment, business, essential services, health, education and leisure.

Public transport and active travel networks between outer London and beyond London are not as dense as in the current ULEZ, with cross-boundary bus connections having been scaled back in recent years. The opportunity to choose an alternative mode for any given journey is much reduced.

There are some specific low-income communities within these boundary areas, who are likely to be most impacted by the expansion of the ULEZ as they are least able to afford a compliant vehicle (despite lower costs due to increased age of compliant vehicles) or opt to use public transport.

The impact on local economies outside London has not been well assessed. Thurrock is a centre for logistics and distribution, including LGVs and the wider Essex area has a strong small trader, construction and support services economy, many of whom use LGVs or cars. This consultation is being held just one year before the proposed start date for the expanded ULEZ, **by the time a final decision is made, this gives little preparation time for businesses to ensure their vehicles are compliant.**

Eligibility for any scrappage schemes, or other financial mitigations must include those regularly travelling into Outer London from outside the ULEZ boundary, including businesses. We recognise this is likely to require central government support and are willing to work with TfL and other boundary stakeholders to make the case for such support.

The lack of data about the nature and likely compliance of vehicles regularly crossing the boundary (origin/ destination, age/ type of vehicle) makes it difficult to identify the scale of impact for communities outside the proposed ULEZ boundary. While the Integrated Impact Assessment indicates there could be some marginal air quality improvements for communities just beyond the proposed ULEZ boundary, the limited geographical assessment area, and the lack of data on air quality, social and economic impacts on communities outside London makes it hard for TE to reach a

fully informed view on the proposals. **Further analysis should be undertaken on the economic, social and environmental impacts for boundary authorities outside London.**

We are particularly keen to ensure air quality beyond the GLA boundary is not made worse by the expansion of the ULEZ and the limited modelling undertaken does not allow for this assessment to be made. Exposure to air pollution has numerous health effects, which come about at every stage of life, from the first weeks in the womb all the way through to old age. The health effects of air pollution are complex, and range in severity of impact. In some cases, damage can be gradual and may not become apparent for many years.

Groups that are more affected by air pollution include:

- older people
- children
- individuals with existing Chronic Vascular Disease or respiratory disease such as Asthma
- pregnant women
- communities in areas of higher pollution, such as close to busy roads
- low-income communities (who are often the same as those in areas of higher pollution)

Improvements in air quality in the places these people live will reduce the risk of comorbidities and lead to long term health and social improvements, with significant cost-savings. Equally, if air quality worsens, even if only in specific locations, the impacts on particular groups can be notable.

Further assessment should also be made of the impacts on boundary roads and modelling shared with neighbouring LTAs. The proposed ULEZ expansion boundary is the current LEZ HGV boundary. The route patterns of HGVs differ from smaller vehicles, tending to stick to the Strategic and Major Road Networks. Expanding the emissions restrictions for all vehicles to the same boundary may have greater impacts on boundary roads and junctions on the local road network, which could create localised impacts. We ask for this local modelling to be shared with relevant boundary authorities and any hot spots identified for potential mitigation, with a fund created to implement any necessary changes. **If this modelling has not been undertaken, we ask it is done rapidly to inform future discussions and for the launch date for expansion to be delayed until mitigations can be put in place, if required.**

While meeting air quality targets requires robust action, we also ask **further consideration to be given to the timing of the expansion**, given the current inflationary pressures for people and businesses. This is to ensure the equity of the proposed expansion.

We understand additional mitigation measures, both financial and operational, would require joint action from both the Mayor of London and national government, in partnership with boundary local authorities. We are happy to support or facilitate additional conversations to progress this.

Finally, **there must be a widespread publicity campaign prior to introducing this change to the ULEZ zone, including beyond the GLA boundaries.** Additionally, there should be **very clear highway signing on all routes into the ULEZ and clear signage to appropriate alternate routes**, which have been agreed in advance with boundary authorities.

Comments on other changes to ULEZ scheme

Removal of the £10 registration for auto-pay is a positive step to minimise the risk of unnecessary penalty charges. It also would encourage those travelling into the zone infrequently in non-compliant vehicles to register.

The changes to PCN fines also appear acceptable. However, it is important occasional users of the zone are not disproportionately affected.

Details of both the auto-pay system and PCN levels should be part of any wide-spread pre-implementation advertising campaign.

Comments regarding the future of road user charging

There is a growing consensus around the need for a new approach to charging for road use that better reflects the wider societal costs of vehicle use, and which off-sets the reduction in government revenue from diminishing VED and fuel duty.

However, more work is needed at both national and regional levels to understand the detailed impacts of any specific scheme. Our Transport Strategy identifies this as an area for future work and we would welcome working with TfL and other STBs to understand how to progress the evidence around road user charging, to understand the benefits and impacts further.

There is a particular risk to those living in more isolated communities, of which there are several relatively close to the London boundary, who have little or no alternative to driving. Our work on 'transport deserts' within the East, identifies areas with poor public transport provision which shows several areas in Epping, Brentwood, Basildon and Thurrock where residents and businesses are reliant on private transport.

Should the Mayor of London progress a road user charging scheme in advance of any national proposals, TfL would need to prepare an extensive evidence base (including for places beyond the London boundary) and test a range of difference pricing options, so the benefits and impacts could be readily understood, and adverse impacts addressed in partnership with all authorities and central government.

We would welcome and be happy to facilitate early engagement with authorities and communities across the East once TfL has more clarity about options for any future road user charging proposals. Equally we are happy to share any emerging evidence from our work which may inform TfL's thinking in this area.

Yours Sincerely

Esme Yuill

Communications Lead, Transport East