

County Council – 13 October 2023

Item 11(a) - Notice of Motion on impact of the London Ultra-Low Emission Zone on West Sussex from Cllr Burrett

Briefing Note

Scope of ULEZ expansion

The London Ultra Low Emission Zone (ULEZ) was introduced to Central London in April 2019, expanded to inner London in October 2021 and expanded to include the Greater London from the end of August 2023. The expansion to Greater London follows consultation during summer 2022.

Vehicle compliance levels, charges and exemptions

Non-compliant vehicles will be subject to a daily charge of £12.50, which will apply to all pre-Euro 4 standards petrol vehicles registered before January 2006, and all pre-Euro 6 diesel vehicles registered before September 2015. Specific grace periods are planned to support disabled people, including those on disability benefits and those with wheelchair accessible vehicles until October 2027.

Forecast impacts on air quality

- The expansion is forecast to reduce nitrogen oxides (NO_x) emissions from cars and vans in outer London by 10 and 7 percent respectively, and reducing PM_{2.5} car exhaust emissions in outer London by nearly 16 per cent ([House of Commons Library Briefing, PDF, 453KB](#)).
- The reductions in concentrations mean there is relatively little change in the number of people living in areas exceeding the current NO₂ limit value of 40µg/m³ (about 2,500 fewer people which is less than 0.5 per cent of the population) because this is largely unaffected in areas where it is exceeded in central and inner London (where ULEZ already operates).
- It is estimated that over 20,000 additional London residents could live in areas meeting the World Health Organisation (WHO) interim target 2 of 30µg/m³ NO₂ due to the scheme, while over 300,000 additional residents could live in areas that meet the tighter WHO interim target 3 of 20µg/m³.

Scrappage scheme eligibility

A £110m scrappage scheme started in January 2023 for low income and disabled Londoners (£1k for a motorbike, £2k for a car, £5k for a wheelchair accessible vehicle or partial bus and tram pass payment). Eligible charities (e.g. community transport) and micro-businesses can receive grants for scrapping vehicles (£5 for a van, £7k for a minibus) or retrofitting to ULEZ standards. This scheme only applies in Greater London.

Impact assessment – vehicle compliance, impacts on low-incomes, non-London communities, daily charge periods, and dispersal impacts

Transport for London (TfL) have forecast that 95% of cars, and 91% of vans are expected to be compliant by the end of 2023 [[Link to Mayoral decision - Appendix 2 – see response to ref B1](#)].

TfL state that, by August 2023, compliant petrol vehicles will have been available for 18 years, and that, given the age of vehicles and size of the market, they expect compliant vehicle options to be available at a relatively low cost. [[Link to Mayoral decision – Appendix 2 \(PDF, 2.2MB\) – see response to ref B2](#)]

The consultation raised concerns about the charging period from midnight to midnight, meaning that someone would need to pay £25 for a trip into London before midnight, if they leave after midnight. TfL confirm this as correct but state that another £12.50 is not payable if they were to enter London again later that day. [[Link to Mayoral decision – Appendix 2 \(PDF, 2.2MB\) – see response to ref A20](#)].

Impact beyond London

TfL identified amongst the scheme impacts: “Short-to-medium term minor negative community severance impacts for people living in communities adjacent to the London-wide ULEZ boundary who are required to travel into outer London by non-compliant vehicle to access employment, services and facilities”. [[Link to Mayoral decision – see 4.2.1](#)]

Consultation comments have highlighted concerns that the ULEZ expansion will push congestion and pollution outside the zone and make surrounding areas worse. TfL have responded that they have modelled the pollution and transport impacts of the proposals on the non-Greater London area within the M25. They expect pollutant levels to also fall in this area, and they expect negligible changes in traffic flows outside the proposed expanded ULEZ. They have also stated that they did not previously observe increased pollution on boundary roads following the introduction of the Central London ULEZ in 2019, or its expansion in inner London in 2021. [[Link to Mayoral decision – Appendix 2 \(PDF, 2.2MB\) – see response to ref B10](#)].

Scrappage scheme eligibility

Adjacent authorities including Surrey County Council have requested that residents outside Greater London be included in the scrappage scheme. TfL have responded that they have called for a national scrappage scheme, to those outside of London, and state that government funding has been provided covering other cities including Birmingham, Manchester and Portsmouth. They also note that, with a finite amount of funding available, the scrappage scheme will be most effective when funds are targeted at those who will be disproportionately impacted and less able to avoid the charge without mitigation or appropriate support. [[Link to Mayoral decision – Appendix 2 \(PDF, 2.2MB\) – see response to ref E7 and section 5.6.5](#)]

Judicial review

A challenge to the proposals brought forward by four London boroughs (Bexley, Bromley, Harrow and Hillingdon) and Surrey County Council failed on all three grounds ([Hillingdon -v- Mayor of London judgment \(PDF, 295KB\)](#)).

Issues concerning scheme implementation

- There has been no published assessment of the impacts on residents and businesses outside Greater London in terms of the volume or types of people likely to be impacted.

- There appears to be no specific explanation or detailed assessment provided by TfL of options for a 'buffer zone' approach to scrappage scheme for those affected in adjacent areas outside Greater London.
- There is no explanation by TfL as to why a charging period cannot apply over a movable 24-hour period to avoid a double charge for travel in/out of London before and after midnight.
- No detailed modelling information appears to have been published to support the summary response claiming negligible changes in traffic flows and emission reductions in areas outside the expanded ULEZ area.

Response to Consultation

West Sussex County Council did not formally respond to the consultation that TfL undertook in 2022. However, the Cabinet Member for Highways and Transport wrote to the Mayor of London in July 2023 setting out the issues stated above.

Lee Harris

Director of Place Services