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Please reply to: Cllr Rick Jewell

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Phone:

Date: 27 July 2022

Dear Sir/Madam

## London-wide ULEZ Expansion

Enfield is committed to reducing the exposure of people in the Borough to poor air quality in order to improve health. Air pollution is associated with a number of adverse health impacts and is recognised as a contributing factor in the onset of heart disease and cancer.

Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equality issues, because areas with poor air quality are also often the less affluent areas.


Enfield Council has declared the whole borough to be an Air Quality Management Area and is updating its Air Quality Action Plan (AQAP), outlining the steps it will take to improve air quality in the borough, which can be broadly grouped into five themes:

- **Reducing Emissions from Transport:** despite emissions from transport reducing, it is the main source of air pollution in Enfield and hence will be a priority for measures within this Action Plan;
- **Emissions from developments and buildings:** emissions from buildings account for about 15% of the NOX emissions across London so are important in affecting NO2 concentrations;
- **Raising awareness:** increasing awareness can drive behavioural change to lower emissions
- **Lobbying and partnership working:** As a local authority, we cannot tackle the problem of air pollution alone and are not responsible for many of the contributing sources. As such, more effective actions will come about through collaboration; and
- **Monitoring:** air quality monitoring will be utilised to not only assess compliance with Government set objectives, but importantly to support and evaluate our policies and projects

Enfield has also declared a climate emergency and has developed an action plan setting out how we will become a carbon neutral organisation by 2030, and a carbon neutral borough by 2040. Again, reducing emissions from road transport plays a critical role meeting these objectives.

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Enfield Council is committed to help meet the Mayor of London’s target that 80% of trips in London (75% in outer London) should be made either by foot, cycle or public transport by 2041. We are therefore delivering an ambitious programme of active travel schemes to encourage and support people use private cars less frequently, particularly for short journeys.

The triple challenges relating to air pollution, climate change and traffic congestion are therefore key issues for the Council and it is recognised that the ULEZ supports each of these challenges to a greater or lesser extent.

Reviewing the information provided as part of the consultation material it is clear that the scheme is forecast to improve air quality across the borough, albeit mainly for NOx rather than particulates. Some of the forecast impacts of the scheme for Enfield are summarised in the table below and compared with the rest of outer London.

	Enfield	Outer LDN
Change in road transport NOx emissions 2023 with scheme vs without	-5.3%	-6.9%
Change in road transport PM10 emissions 2023 with scheme vs without (incl. exhaust & non-exhaust emissions)	-1.1%	-1.4%
Change in road transport PM2.5 emissions 2023 with scheme vs without (incl. exhaust & non-exhaust emissions)	-1.6%	-2.0%
Change in road transport CO2 emissions 2023 with scheme vs without	-0.5%	-0.8%
Potential loss of retail spend from outside London - 2023	£100-£200k	N/A
Potential loss of jobs due to loss of retail spend from outside London - 2023	1-2	N/A
Car commuter trips from Herts. to Enfield 2023 with scheme vs without	-1.6%	N/A

The current vehicle compliance rates are already relatively high in outer London, hence the forecast reduction in emissions is relatively modest. Nevertheless, this reduction is important when it is considered that the greatest number of deaths related to air pollution will be in outer London, mainly due to the higher proportion of older people who are more vulnerable to the impact of air pollution

However, in outer London boroughs like Enfield, cars continue to play an important role for many people, particularly for orbital trips. It is essential that TfL therefore invests in active travel as well as rail and bus enhancements in outer London to ensure that people have an attractive alternative to private transport.

Whilst I am supportive in principle of the ULEZ extension, I have some concerns about aspects of the scheme relating to the uncertainty regarding the scrappage scheme; the short lead-in time; and the absence of sufficient information about the cost of the scheme.

### **Scrappage Scheme**

Whilst noting that compliance rates are already relatively high in outer London (c. 82%), there are still many people, likely to be the poorest of our communities, that may depend on a car or van but cannot afford to trade up to a newer vehicle. The consultation documents suggest that a scrappage scheme may be put in place, similar to that introduced when the ULEZ was extended to the North and South Circular roads. A large-scale and targeted scrappage scheme aimed at people on low incomes, disabled people, charities and

businesses would help to mitigate many of the issues raised in the Integrated Impact Assessment. However, no details have been provided and this seems to be only something that the Mayor is 'considering' at this stage.

To my mind, the details of a scrappage scheme go to the heart of the acceptability of the proposals and I cannot fully support the Mayor's proposals without understanding exactly how the scrappage scheme is intend to work, who exactly will be eligible, how much will be available etc.

### **Lead-in Time**

If the scheme were to go ahead in August 2023, there would be less than a year for people to save for a new vehicle or make other arrangements. I'm very conscious that these additional costs occur at a time when many of our residents will be struggling financially due to high energy costs and wider inflationary pressures on household incomes. Whilst I recognise that there is an urgent need to improve London's air quality, I do think that there would be merit in delaying the extension of the ULEZ to give people longer to replace non-compliant vehicles or make alternative arrangements or to put in place greater support for those most challenged.

### **Cost of Scheme**

The consultation material makes no reference to the cost vs benefits of the scheme. This makes is difficult for people to gauge, for instance, whether the money could be better invested in alternative measures, such as public transport improvements or additional active travel measures. I note that various figures have been reported, including an FoI response from TfL earlier in the month indicating that the cost of expanding the ULEZ could be in the region of £200m. It is also reported that the extension could generate an operating surplus of around £200m (+/- 50%) in the first year of operation, quickly reducing over time as compliance rates increase.

I take the point that the scheme is about improving air quality and health and any surplus revenue is ringfenced for investment to help deliver the Mayor's transport strategy. However, I remain concerned that this financial information was not available to all during the consultation period to help people make a well informed decision.

### **Operational Issues**

The consultation seeks views on a number of more operation matters that I have briefly responded to below:

Removal of £10 auto top-up fee	This is supported as it will encourage more people to use this facility and thereby reduce the risk of a penalty charge notices being issued.
Increase PCN for non-compliance from £160-£180	Any PCN charge needs to be reviewed from time to time to ensure that it remains an effective deterrent. Taking into account the effect of inflation, the proposed level of increase is reasonable.
Update to MTS Proposal 24	The original Proposal 24 in the MTS needs to be updated as further action to address poor air quality in outer London is necessary. However, Proposal 24.1 goes beyond the need to extend the ULEZ to the whole of London, referring more generally to road

	<p>user charging schemes. Whilst the concept of road user charging offers many benefits, further work and engagement with outer London (in particular) is required to ensure that London is not placed at a competitive disadvantage compared to locations beyond the London boundaries.</p> <p>This concern is echoed in the IIA, which states:</p> <p><i>“The assessment identifies that the Proposed MTS Revision and Alternative A would result in negative impacts on employers in outer London due to the potential loss of individuals from outside Greater London who are willing to work in outer London. Businesses that operate outside standard working hours and in locations less accessible by public transport will be the most impacted especially those in the transport and distribution sectors and a range of building support services.</i></p> <p>To address this concern Proposal 24.1 should be reworded to say something along the following lines:</p> <p><i>The Mayor, through TfL, and the boroughs, will seek to address the triple challenges of toxic air pollution, the climate emergency and traffic congestion through road user charging schemes developed in conjunction with the boroughs, including by expanding the Ultra Low Emission Zone London-wide.</i></p>
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## Future Road Charging

It is right that we should review options for future charging schemes, particularly as technology develops and smarter tools become available. In addition, the need for the current ULEZ is going to reduce in a relatively short space of time. We do therefore need to investigate other ways of managing traffic levels if we are going to achieve a switch to 75% of trips in outer London being made by public transport and active travel modes by 2041.

Enfield would be keen to get involved in these conversations to ensure that any scheme that comes forward fully takes into account the implications for outer London and, in particular, to ensure that neither residents nor business in the Borough are at a disadvantage compared to those outside London.

Your consultation pro-forma sets out a number of challenges and, in my view, they are all important and inextricably linked.

The criteria that might be used to shape a future charging system are increasing as technology improves, opening-up new options for a much more sophisticated and dynamic charging system. However, as well as technical considerations relating to charging by length of journey and /or time of day etc., it is critical that any system is easily understood by the public and accepted as fair.

Whilst London has led the way of road charging, this is a much bigger issue and we also need to reflect what is happening nationally.

It is estimated that fuel duty and vehicle excise duty raise some £35 billion a year. Around a fifth this revenue goes on maintaining and developing roads (although London does not get its share of the receipt based on the amount paid in Londoners). However, the transition to electric vehicles is going to severely impact this tax revenue as they currently pay neither fuel tax nor vehicle excise duty. Without change, policies to deliver net zero emissions will also result in zero revenue for the Government from motoring taxation. The UK Government will therefore need to put in place an alternative motoring tax, such as road user charging, if it wants to maintain investment in road maintenance and other public services. It is therefore essential that a possible road user charging regime in London takes into account the wider national position.

## **Conclusion**

The Council is committed to improve air quality in the Borough and recognises that extending the ULEZ can play a part in achieving this objective. My concerns are therefore not about the principle of the Mayor's proposals, but about the timing of the scheme and the lack of clarity about the scrappage arrangements.

In the longer term, I recognise that changing technology makes road user pricing an increasingly viable policy lever to help us effectively manage road space and influence travel choices. However, there remains a number of important questions about how such a scheme would work in practice and its impact on residents and businesses in outer London. I therefore welcome the opportunity to continue the dialogue with TfL in the coming months.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rick Jewell', with a stylized flourish at the end.

**Cllr Rick Jewell**  
**Cabinet Member for Environment**