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By Email to: cleanairyourview@tfl.gov.uk

Sent by email

Date: 16th September

Dear sir/madam,

Proposal to extend the London ULEZ scheme from August 2023

Following your recent consultation on the proposal to extend the London ULEZ scheme, I would welcome the opportunity for a more detailed discussion about the proposal and work that has been undertaken to ensure all impacts on neighbouring authorities outside of London are reduced or managed.

England's Economic Heartland is a sub national transport body representing 13 Local Transport Authorities from Swindon to Cambridgeshire. Our partnership includes Buckinghamshire and Hertfordshire – both areas that border the boundary of the proposed ULEZ extension area.

EEH understands the principles behind the expansion of the ULEZ, recognising its potential contribution to air quality improvement; reduced car dependency; reduced congestion; carbon reduction; and the Government's climate change objectives. However, we are concerned that a decision to extend the zone is being proposed without a full assessment of the potential impact of the scheme on ULEZ boarder areas.

There are a number of businesses on the periphery of London that serve London that will be adversely impacted as well as residents where there is a lack of travel alternatives (they are not served by underground, tram or buses) and they will not be able to access the proposed scrappage scheme. Their alternative is to pay the daily £12.50 charge, which would not be affordable. We are especially concerned of the impact on key workers such as nurses and care workers who are required to make home visits. The same scrappage should be provided for people, businesses and other organisations outside London.



Temporary extensions are welcomed to provide time for compliance, however, there is concern that the time for those exemptions are not long enough to allow for people outside London to comply. Consideration must be given to extending [temporary] exemption to those who would not fall within the exemption categories proposed but who can demonstrate a reasonable case on the basis of hardship.

It is suggested that there is a widespread publicity campaign prior to introducing the change to the ULEZ zone. The effects of the extension (and the alternatives being offered) need to be clear to people both inside and outside Greater London.

Entry into the zone would need to be clearly signed so drivers understand when they are approaching or entering the zone, along with clear advice about appropriate alternatives. However, it should be noted that there are concerns over signage in the more rural areas, due to its urbanising effect, and increased traffic as a result of drivers using inappropriate village and residential roads to avoid the ULEZ.

Greater provision of alternative transport modes should be provided as an alternative to vehicle use. Our Local Authorities would welcome greater coordination in expanding public transport and active travel options between the Greater London ULEZ and neighbouring areas. A proportion of revenue from the extended ULEZ should be hypothecated to support the improvement of public transport and active travel options into and out of London.

EEH would also welcome further explanation about the modelling work that TfL have conducted regarding the impacts of introducing the ULEZ on low-income groups, particularly in light of recent increases in fuel prices, and recent indications from the 2021 census highlighting localised growth in low-income groups on border areas.

In conclusion, while EEH is willing to work with TfL on consideration of this proposition, we would welcome further discussion and collaboration in order to address and minimise its impact.

I look forward to hearing from you soon.

Yours sincerely



Naomi Green
Managing Director
England's Economic Heartland