

By email to: cleanairyourview@tfl.gov.uk

29th July 2022

Dear TfL,

Thank you for the opportunity to respond to the London-wide Ultra Low Emission Zone (ULEZ) expansion consultation. This response is submitted on behalf of the Board of *Greater North Kent* and is without prejudice to any responses submitted individually by partner authorities.

About Greater North Kent

Greater North Kent is an alliance of local authorities – the Kent boroughs of Dartford, Gravesham, Maidstone and Swale, plus Medway Council (unitary authority) and Kent County Council – providing a collective voice for local government in North Kent. As an organization we use our collective voice on behalf of our residents and businesses to promote the quality of life and life chances that North Kent offers. Our Board comprises the Leaders of each of the councils, and we draw upon a long history of collaboration between local authorities in North Kent, including through the former Thames Gateway Kent Partnership.

Introductory comments

We recognise the adverse effects that poor air quality has on human health and the environment, and the contribution that pollution from road traffic makes towards this. **In principle, therefore, we support the objectives underpinning the proposed expansion of the ULEZ to reduce pollution and pollution-related impacts on human health and to incentivise a shift towards more sustainable modes of travel.** Over time there would be a natural decline in more polluting (non-Euro 4/6 compliant) vehicles as older vehicles are taken off the road: but the environmental and human health consequences of poor air quality call for a more urgent response in areas with high concentrations of road traffic. The introduction of an expanded ULEZ could help to accelerate change and we recognise that this could also deliver air quality and human health benefits outside Greater London if the quantum of non-compliant vehicles is reduced. But we have reservations about the implementation of the proposals and transitional arrangements for those most impacted by the changes, as outline below.

Impact on communities

North Kent has a symbiotic relationship with Greater London and, in the case of Dartford, immediately abuts the Greater London boundary and the London borough of Bexley. The GLA/Kent boundary slices through certain communities in ways that mean the introduction of a road charging regime on one side of that boundary could create severance issues and distort travel behaviours with perverse consequences. **It will therefore be important to consult closely with both the London boroughs and neighbouring authorities (in Kent and the other Home Counties) on refining the proposals to minimise negative or perverse impacts on local communities.** This would include sharing much more detail about the proposed boundary of the expanded ULEZ than the indicative map included in the consultation.

Extent of North Kent residents and businesses affected

The consultation acknowledges that there are significant vehicle movements between areas outside Greater London and Outer London, the area that would be covered by the expanded ULEZ. These are for

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a variety of purposes: work, education, shopping, access to healthcare as well as leisure trips and other purposes. The proposal would therefore have significant impacts for residents and businesses based in North Kent travelling into Outer London.

There are no authoritative estimates of the numbers that might be affected, but some idea of scale can be derived using a number of assumptions:

- Kent County Council (KCC) analysis of the 2011 Census:

This showed that 61.3% of travel to work from Kent to Outer London was from North Kent, notably from Dartford, Medway and Gravesham. Across all travel to work by Kent residents, almost 60% of trips were by drivers of cars and vans.

- Integrated Impact Assessment (Jacobs, May 2022) commissioned by TfL to accompany the ULEZ consultation:

Table 4.2 of the suggests that 599,000 daily private car trips would be made from outside Greater London into Outer London of which 56,000 (9.3%) would be in non-compliant vehicles.

Further, Tables 4.3, 4.4, 7.3 and 7.4 indicate that under the proposed scheme 57,200 private cars would be travelling from Kent into Bexley and Bromley for commuting, business, shopping and other trips – equivalent to 9.5% of all trips from outside Greater London into Outer London. Although not all these are work-related, if we use the assumption that 61.3% of these Kent journeys were from North Kent that would total around 3,300 non-compliant private cars travelling from North Kent into Outer London.

Table 4.5 suggests that 158,00 Light Goods Vehicle (LGV) trips would be made from outside Greater London into Outer London, of which 28,000 (17.7%) would be non-compliant. Assuming a similar proportion of LGVs as private cars are from North Kent, this suggests around 1,600 non-compliant LGVs would be travelling from North Kent into Outer London.

On the basis of these assumptions, around 4,900 drivers of non-compliant cars and vans from North Kent could be impacted by expansion of the ULEZ.

Transitional arrangements and mitigations

The previous section indicates that the introduction of the ULEZ expansion could affect a substantial number of North Kent residents and businesses. We presume that the exemptions and transitional arrangements identified in the consultation document (e.g. for disabled passenger tax class vehicles and historic vehicles) would apply equally to those from outside Greater London as within Greater London and **would welcome confirmation that this would be the case.**

A standard charging regime is in effect a regressive tax that disproportionately impacts those on lower incomes, and smaller businesses, who are least able to afford the charge or the cost of replacing or upgrading vehicles. We therefore welcome the Mayor's commitment in the consultation document to introduce a scrappage scheme, particularly targeted on lower income households and on micro-businesses to replace or upgrade non-compliant vehicles. However, the consultation document only mentions this being available to Londoners. Given the direct impact of ULEZ expansion on residents and

businesses outside Greater London who work, provide services, or have to access services in Outer London, in the interests of fairness **we request that any scrappage scheme should extend to communities outside Greater London that are affected by the scheme.**

For many of those from North Kent who are affected there is limited or no scope to find alternative routes to travel, alternative locations to travel to, or alternative means of travel (particularly given the far lower density of public transport across the boundary in south east London compared to the rest of the GLA area) in order to avoid the proposed ULEZ if they cannot afford to replace their vehicle or pay the charge. For some people whose work requires multi-site journeys across the GLA/Kent boundary, for example care workers carrying out home visits, there are no feasible alternatives to car usage; and many such jobs are in lower income brackets. Unless their vehicles are already ULEZ-compliant, such people could be disproportionately affected by the expansion of the ULEZ.

Whilst we cannot put a number on how many North Kent residents who travel into Outer London are on low incomes, the 2019 Indices of Multiple Deprivation estimated that around 121,500 North Kent residents (71,500 of working age) lived in the 20% most deprived Lower Super Output Areas according to Income. This is around 15% of the North Kent population. It is therefore a reasonable assumption that a proportion of North Kent residents travelling into Outer London are income-deprived, and that these are more likely to be using non-compliant vehicles that they are less able to afford to replace or upgrade.

We would therefore ask:

That TfL should share evidence of the Equalities Impact Assessment conducted that considers protected groups and others affected by the extension both within the extended charging zone and that travel into the zone from outside it, including from North Kent; and

That the Mayor of London should work with central Government to ensure funding support is provided to enable access to a fair and equitable scrappage scheme for those residents based outside the proposed ULEZ zone, but who need frequently to travel into the zone for work or for unavoidable private trips, and for businesses and tradesmen outside Greater London whose sales and customer base are reliant on access to the Outer London market.

Implementation

Introduction of an expanded ULEZ only 13 months after the close of this consultation, and with much detail on implementation and mitigations to be worked out in consultation with relevant stakeholders, actually gives residents and businesses limited time to plan for how they will deal with the change. **It is therefore crucial that the ULEZ expansion should not proceed until the full set of mitigations are established, which must include a scrappage scheme eligible for those outside of London, along with their planned implementation and eligibility criteria. TfL should also ensure that advance publicity about the introduction of an expanded ULEZ is communicated widely outside London.**

Road user charging

There is insufficient information in this consultation to comment on longer-term proposals such as replacing the existing congestion and ULEZ charges with a system of road user charging. We would be interested to see and comment on any proposals if they are developed in future. As a general

observation, though, we would suggest that the case for road user charging might be better explored at a national level as part of wider package of reforms that also include vehicle taxation and fuel duties.

Concluding remarks

We look forward to seeing the response to the issues we have raised and urge TfL and the Mayor of London to work closely with Greater North Kent partner authorities to ensure that mitigations for non-Londoners are secured and implemented fairly.

Yours faithfully

[signed]

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