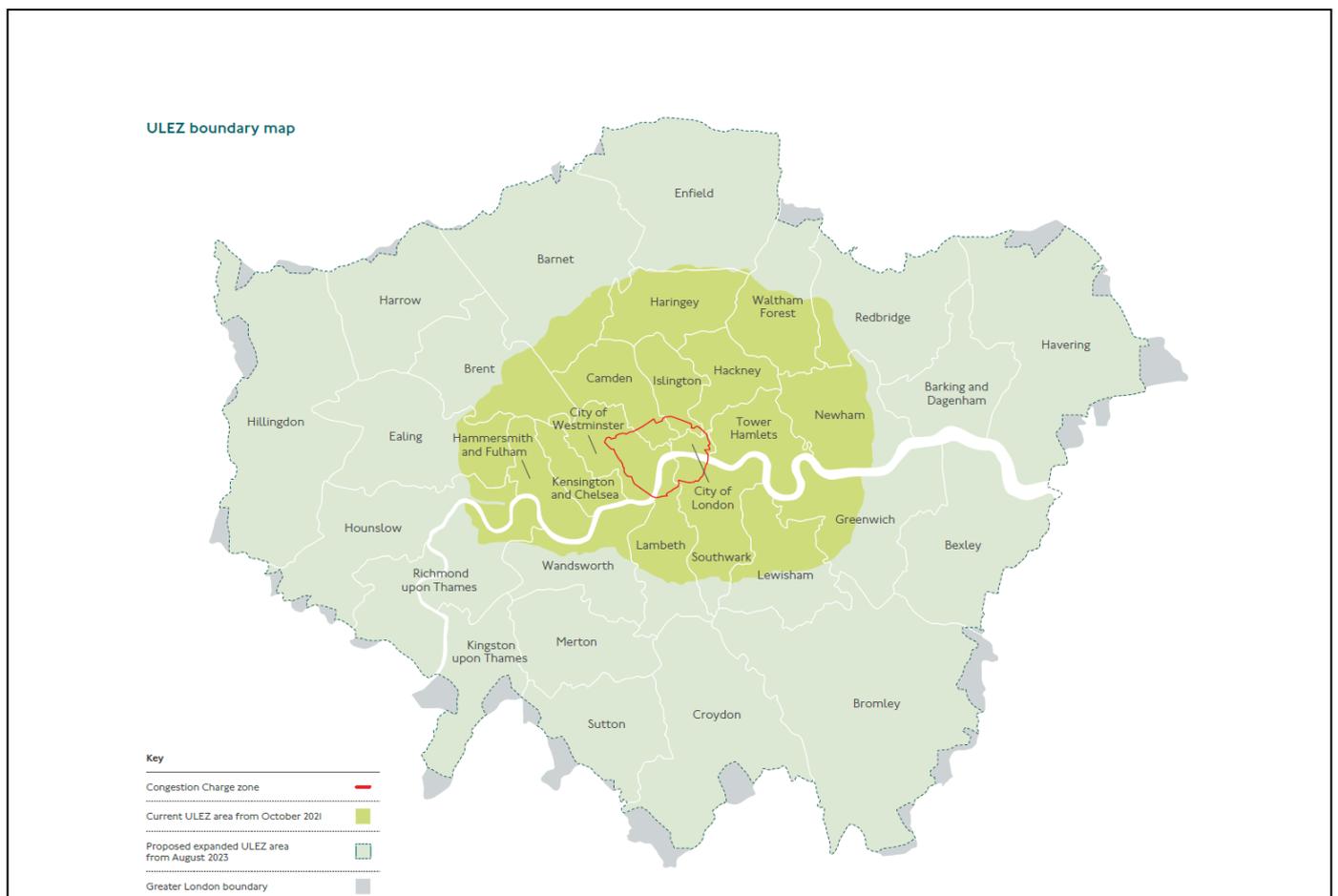


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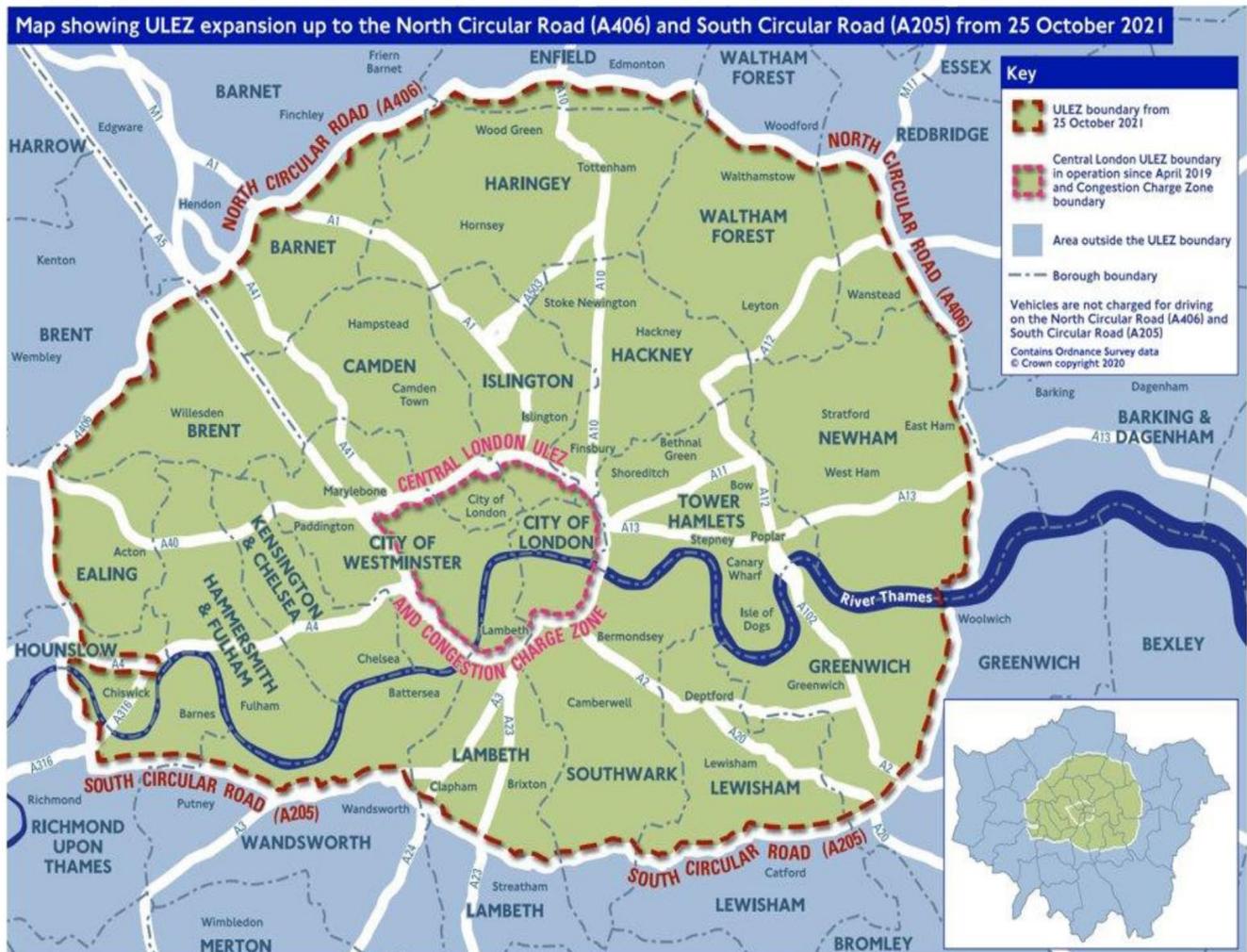


LONDON BOROUGH OF HILLINGDON RESPONSE TO THE MAYOR OF LONDON'S PROPOSAL TO EXTEND THE ULTRA LOW EMISSION ZONE TO THE GLA BOUNDARY

1. INTRODUCTION

1.1. The Mayor of London announced, during a visit to Lewisham in East London on Friday March 4th 2022¹ that it was his intention to expand the **Ultra-Low Emission Zone (ULEZ)** to cover the entire GLA area – in other words, to the furthest extremities of Outer London (see title page). The original central London zone was first introduced in 2019 and as recently as October 2021 had been extended to reach as far as the North and South Circular Roads, as shown in Figure 1.

Figure 01: Existing extent of ULEZ - as previously expanded in October 2021



Source: https://www.london.gov.uk/sites/default/files/ulez_evaluation_report_2020-v8_finalfinal.pdf

1.2. The Mayor stated that he wishes to extend the reach of the ULEZ purely with the objective of improving air quality (and his case has been bolstered by a number of allied stakeholders and academics), this needs to be carefully considered in the context of the reality behind the rhetoric and the financial situation at TfL. The extension of the ULEZ boundaries will unquestionably increase the revenue that the Mayor receives, whether through user payments or on the back of enforcement, but the question should reasonable be asked of where this revenue would be targeted.

¹ <https://www.london.gov.uk/press-releases/mayoral/mayor-sets-out-london-wide-ulez-plans>

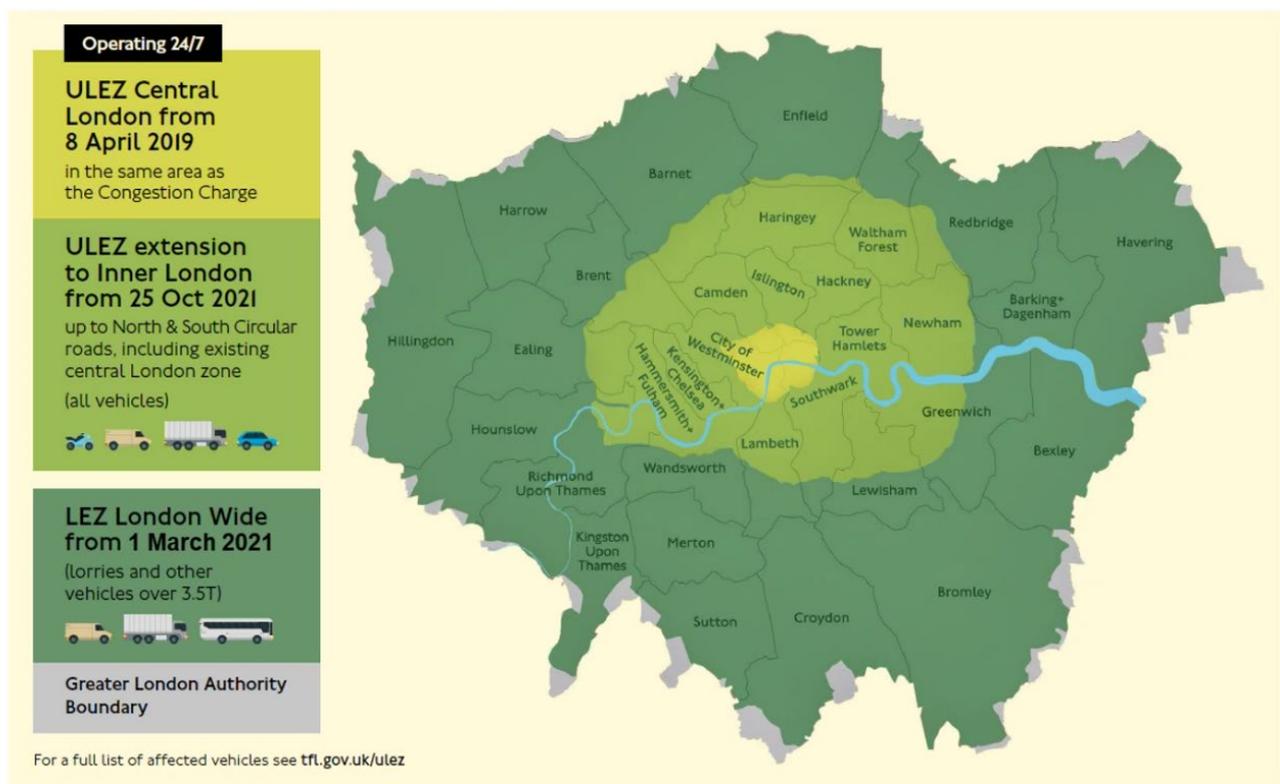
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1.3. In order to take forward such a major step-change in London road network management, the Mayor must engage constructively and effectively with all stakeholders and cannot expect an easy transition; an early action will need to be the full development and outcome of a worthwhile **Equalities Impact Assessment**; whilst an Integrated Impact Assessment (IIA)² has been prepared by consultants and shared by TfL (and is critiqued in this report) the Council has serious concerns not only that the IIA appears not to be fit for purpose, but crucially that important issues may be blithely dismissed or labelled as for future consideration.

1.4. There are many factors to consider in context, such as impacts of these changes for various groups – derived from ages and ethnicity – that should cover not only exposure to air quality but also access to travel. The Mayor has quoted a report from Imperial College which suggests that Air Quality related deaths are higher in ‘outer London’ than elsewhere, due to the age demographic; whilst it is true that there are more older residents in parts of Outer London, there needs to be more granular analysis of where they actually live in relationship to areas of air quality concern, and it could be argued that the introduction of a ULEZ zone in their area will not change the age or indeed any other demographic.

Figure 02: Context of proposal from the Mayor for expanded ULEZ

6 **Emission zones in London**



This document reflects ongoing work and discussions within TfL and is not intended to reflect or represent any formal TfL or GLA views of policy. Proposals cited may be subject to public consultation and Mayoral approval. Its contents are confidential and legally privileged and should not be disclosed to any unauthorised persons EVERY JOURNEY MATTERS

Source: Presentation to Council Officers of March 23rd 2022. The grey areas around the edges represent roads where there has been consideration (under the LEZ) for turning facilities.

“London 94202/53 ULEZ Scheme Integrated Impact Assessment 17 May 2022”

LONDON BOROUGH OF HILLINGDON RESPONSE TO THE MAYOR OF LONDON'S PROPOSAL TO EXTEND THE ULTRA LOW EMISSION ZONE TO THE GLA BOUNDARY

1.5. This report will seek to identify the impacts of the Mayor's ULEZ proposals on Hillingdon.

1.6. Hillingdon Council supports the argument for better air quality in principle and has been working on a variety of tailored programmes to that end, but societal impacts are seldom clear cut and we believe that the Mayor's ULEZ proposals are fundamentally flawed for a variety of reasons, elaborated in this report, with a series of conclusions drawn.

1.7. A key element of the Mayor's proposals is the document prepared for him as an 'Integrated Impact Assessment' (IIA). The Council's report tackles this IIA on several fronts, because clearly many of the arguments within it are relevant to the Council's own arguments, including the air quality and economic aspects; accordingly our response to the IIA may be found both within relevant sections of the main report but also as an appendix which rebuts the validity of the IIA, explain how it is fundamentally unfit for purpose.

1.8. In brief the headlines for the items of key concern are:

- The **Integrated Impact Assessment (IIA)** is considered unfit for purpose and in the Council's view, this in itself, quite apart from the detailed concerns and argument, undermines the Mayoral case. The Council's case is set out in the Appendix as well as being argued in detail throughout this report.
- **The nature of the Borough:** Hillingdon, a gateway between West London and the rest of the UK, has far more in common geographically, demographically, culturally, logistically and financially with towns outside Greater London than it does with inner London. Once again the Mayor, whose personal understanding and appreciation of issues in Hillingdon is unknown, has sought a 'one size fits all' taxation approach
- **The private car** is and is likely to remain, for the foreseeable future, a vital tool for people who live and work in Hillingdon. Shifting transport modes to more sustainable means is undeniably something that should be the aim, for those who have a choice, but if there is no alternative, punishing these people for having no alternative is immoral and unreasonable
- **Inflation** has been reported this summer as being at a forty year high (9.4% in June 2022) and this has a fundamental impact on a vast number of the local population.
- Related to inflation, **Fuel poverty** is a real challenge of our time; the underlying causes are well understood and in fairness are largely outside the Mayor's or the Council's spheres of influence. However the proportion of household bills spent on transport has climbed alarmingly this year already and in that context imposing a further tax on hard pressed families is ill-judged
- **Public Transport** is one of the key aspects of movement in Outer London where the Mayor has direct control and influence, but it is also one of areas of major weakness and with few exceptions little evidence over the past half century of the kind of transformational investment needed to support and sustain a change from the private car. In simple terms, the changes already needed have never come, are needed now more than ever, and future investment seems unlikely, even if the Mayor does achieve his ULEZ tax objective. Furthermore, the Mayor's public transport reach hardly extends beyond the GLA boundary, and yet thousands of people who work and study in Hillingdon come from areas outside Greater London with poor public transport choice.
- The reality of **Air Quality** in Hillingdon as a whole is open to debate. The demographic and geographic points, detailed in this report, are important to the context, as are the

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ironies of the fact that the roads with the more severe AQ impacts are under the control of either the Mayor or National Highways. Investment in tackling air quality should be targeted and focused where the problems have been measured and quantified rather than a blanket approach.

- **Health Services** are already under pressure, but fundamentally in Hillingdon this is not really because of a local air quality challenge but through lack of services and difficulty of accessing them. The ULEZ proposals offer nothing to benefit this aspect.
- **Vulnerable groups** are even more reliant on their existing limited transport choices; taxes which penalise them further but offer no hard benefits are of no benefit to them. These groups are also in many cases reliant on others – such as supportive family members or carers – and access to health services, already themselves under pressure, is a key challenge for many where public transport is not viable.
- **Commercial businesses** are already struggling to survive, and further taxes will only have a negative impact on their viability. Faced with the choices that such an increase in costs will have for them, their employees and their customers, many businesses may decide to relocate outside the GLA boundary or even to cease trading. The impact on the local economy of this can be seen as wholly negative. Ad hoc dialogue with local businesses and chambers of commerce indicate that many small businesses feel uncertain of their approach to the ULEZ extension plans having not been engaged directly in any meaningful way; a common view is that the Mayor's plans are being rushed through with little thought to the economic impact on outer London businesses and those who rely upon trading across the GLA boundary.
- Whilst it is obviously for **Heathrow Airport Limited** to provide their own considered response, we already know from dialogue with them that many of their concerns echo our own; the impacts on staff travel, especially from those living outside the GLA boundary, is seen by HAL as a major challenge if these people are penalised with no practical incentives.
- **Vehicle scrappage** is a blunt tool that if it works, will only benefit a fraction of residents who live in the Borough and logically will have no benefit whatsoever to the people who travel to and from Hillingdon in the course of their daily lives. Even extending the 'boundary' for eligibility would inevitably prove to be an imprecise tool and no doubt would undermine the financial case for the ULEZ operating model.

Motion and Declaration at Full Council of July 14th 2022:

'The motion was put to the vote and it was unanimously:

RESOLVED: That this Council calls upon the Mayor of London to listen closely to the returns he receives in respect of the consultation exercise on the proposed extension of the ULEZ to include the outer London Boroughs.

Whilst this Council is fully committed to decarbonisation by 2030 and have already taken many steps to reduce our carbon footprint, we are very aware that the introduction of a ULEZ scheme here would have a severely negative effect on both our residents, the businesses situated here and the staff of our partner organisations such as the NHS.

This Council asks the Mayor of London to understand that in Hillingdon, residents and businesses alike do not have the ready option of a good public transport alternative to using their cars and that distances are too great to make walking or cycling a sensible option for most.

This scheme, if implemented, would be a crippling daily tax on our poorest residents and working population, adding to the already increased costs they have with high fuel prices.'

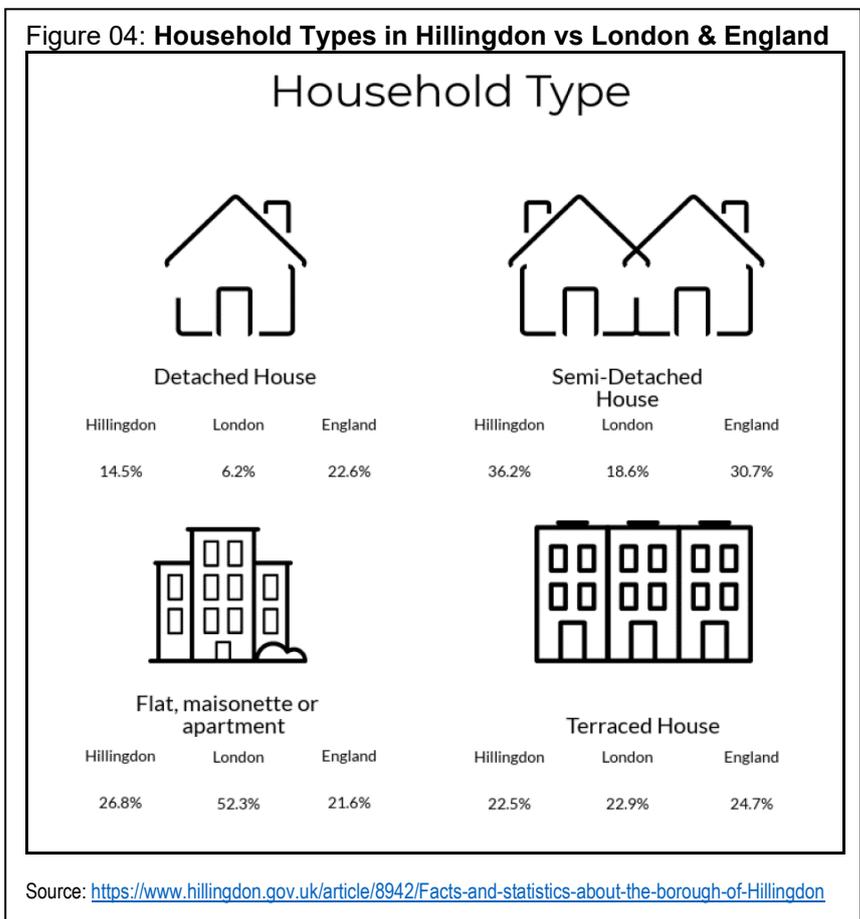
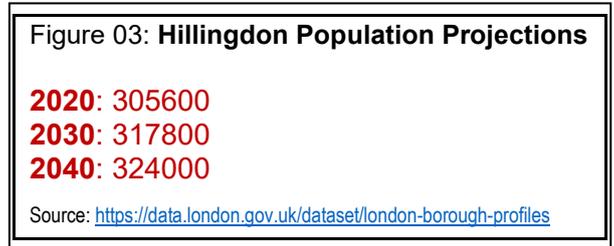
2. HILLINGDON IN COMPARISON WITH LONDON AND ENGLAND

2.1. A significant volume of data about the London Borough of Hillingdon is publicly available on the Council website³, and relevant extracts only are drawn out here. There is also wider data available⁴. Inevitably much analysis on a ward-by-ward basis has relied on the outgoing layout; details of the new wards are given on the website⁵.

2.2. The Mayor, in setting out his objectives for Greater London, tends to look at London as a whole; the distinctions between inner and outer London can sometimes be lost.

2.3. It is not possible within the scope of this document to explore the whole range of data which sets out the different nature of Hillingdon as an Outer London Borough, but the example in the diagram at right from the Council's 2017 report is illustrative; it is clear that the nature of much of the housing in the Borough is closer in nature to the "English average" than to the London one; in other words there are fewer 'flats, maisonettes or apartments' in Hillingdon as a percentage than across London as a whole, and more semi-detached and detached houses. In simple terms, the housing character of Hillingdon may be considered more closely aligned to a typical English town than the rest of London – whose population is obviously spread more densely in inner and central London.

2.4. This is something that is obvious to almost anyone who lives or works in Hillingdon, as well as the casual visitor, who is likely to remark on the similarities of character and place to suburban towns like Aylesbury, Slough, Watford, Rickmansworth, Feltham and Reading to name just a few typical examples. Whilst there are pockets that echo areas further in towards the centre of London, these are the exception rather than the rule.



³ <https://www.hillingdon.gov.uk/article/8942/Facts-and-statistics-about-the-borough-of-Hillingdon>

⁴ <https://data.london.gov.uk/dataset/london-borough-profiles>

⁵ <https://www.hillingdon.gov.uk/ward-boundaries>

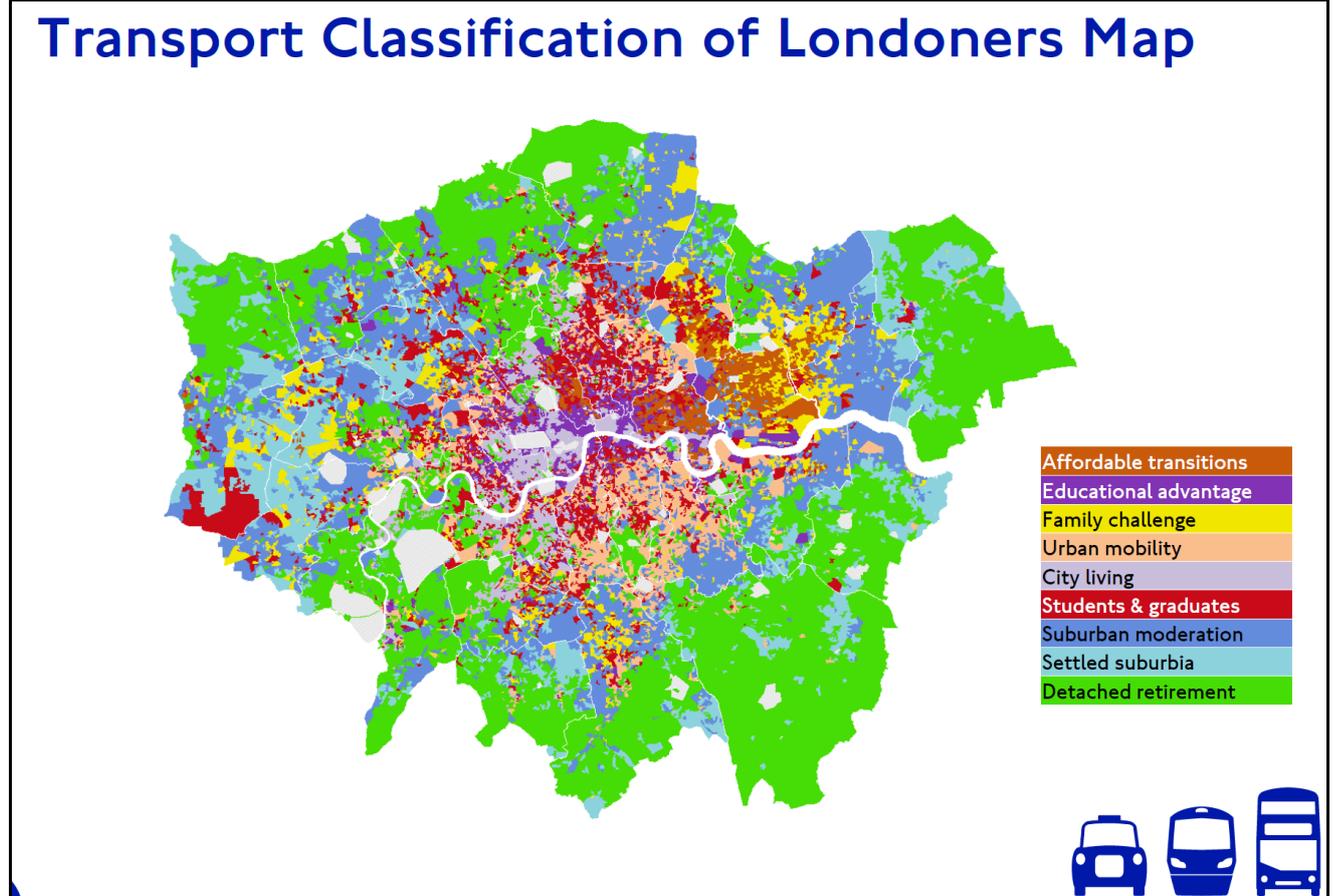
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2.5. Other statistics broadly follow suit; for example, home ownership in Hillingdon at the time of the 2011 Census was 62.9%, versus a similar level of 63.5% across England but a significantly lower 48.2% for London as a whole. As development of new housing increases, it seems likely that the proportion of flats, maisonettes and apartments will rise in

GLA WEBSITE: "Hillingdon is where town and country meet, with 800 acres of woodland, country parks, fields and farms, several rivers and the Grand Union Canal. The borough maintains over 200 green spaces, adding up to about 1,800 acres, so there are many wonderful walks in Hillingdon. Ruislip Lido has one of London's few beaches. The borough has more land under the prestigious Green Flag status than any other London borough".

Source: <https://www.london.gov.uk/in-my-area/hillingdon>

Figure 05 TfL's 'Transport Classification of Londoners'



London Borough of Hillingdon TCoL Profiles

Transport Classification Percentages in Hillingdon	(%)
Affordable Transitions	1.0
City Living	0.0
Detached Retirement	31.0
Educational Advantage	0.0
Family Challenge	7.0
Settled Suburbia [see later Londonwide Graphic]	30.0
Students & Graduates	4.0
Suburban Moderation	26.0
Urban Mobility	0.0

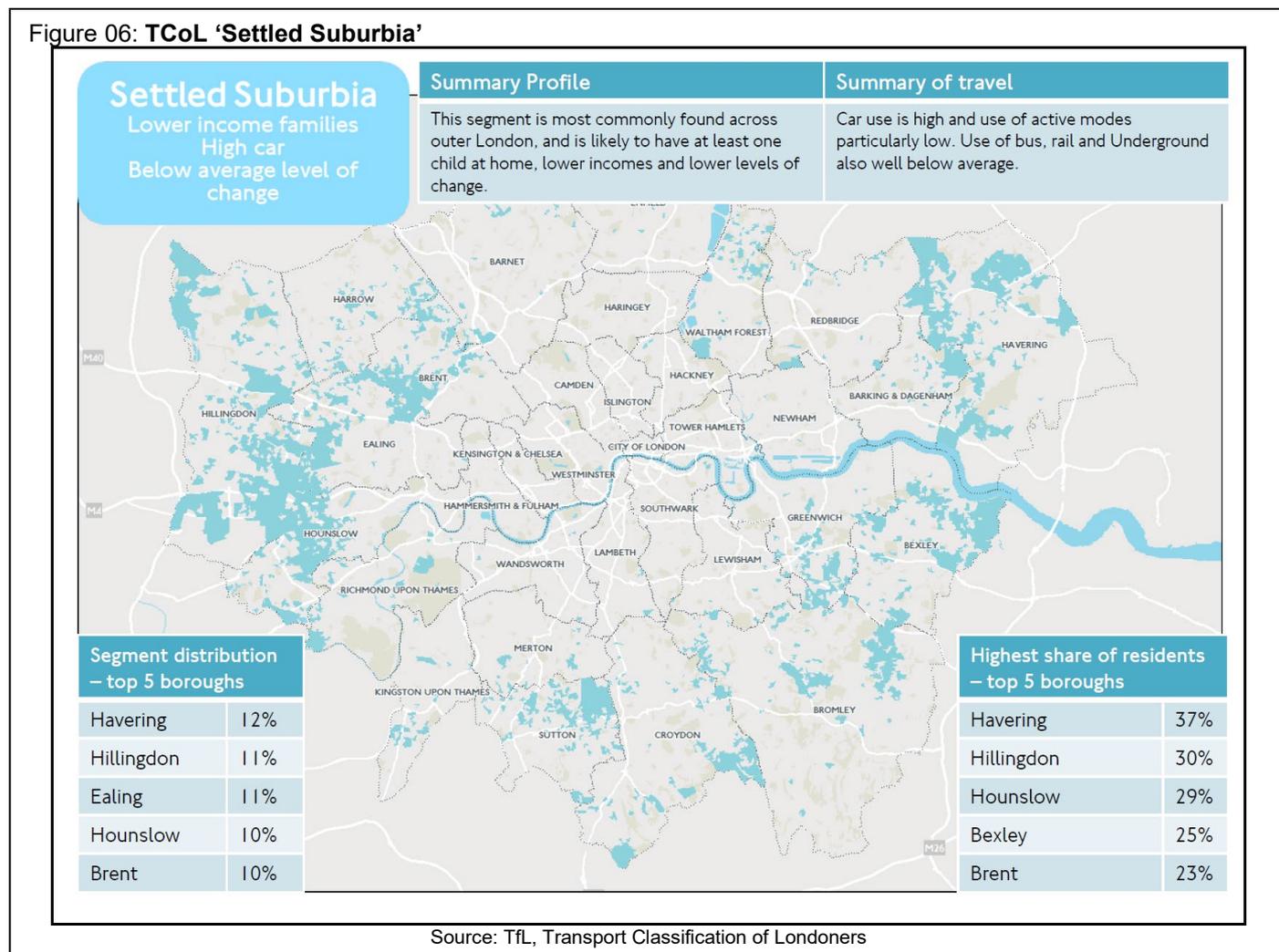
Source: TfL, Transport Classification of Londoners

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line with societal changes, and it seems noteworthy that in some boroughs, such as nearby Ealing, some of this new housing is in the form of high-rise developments where many of them are alongside busy roadways, including some that are under the management of the Mayor.

2.6. In contrast to the above, Hillingdon is also home to Heathrow Airport, and whilst recent impacts of the Covid pandemic on travel has skewed the data, historically the airport and its nearby road network (mostly National Highways or TfL managed) have shown the highest levels of

Figure 06: TCoL 'Settled Suburbia'



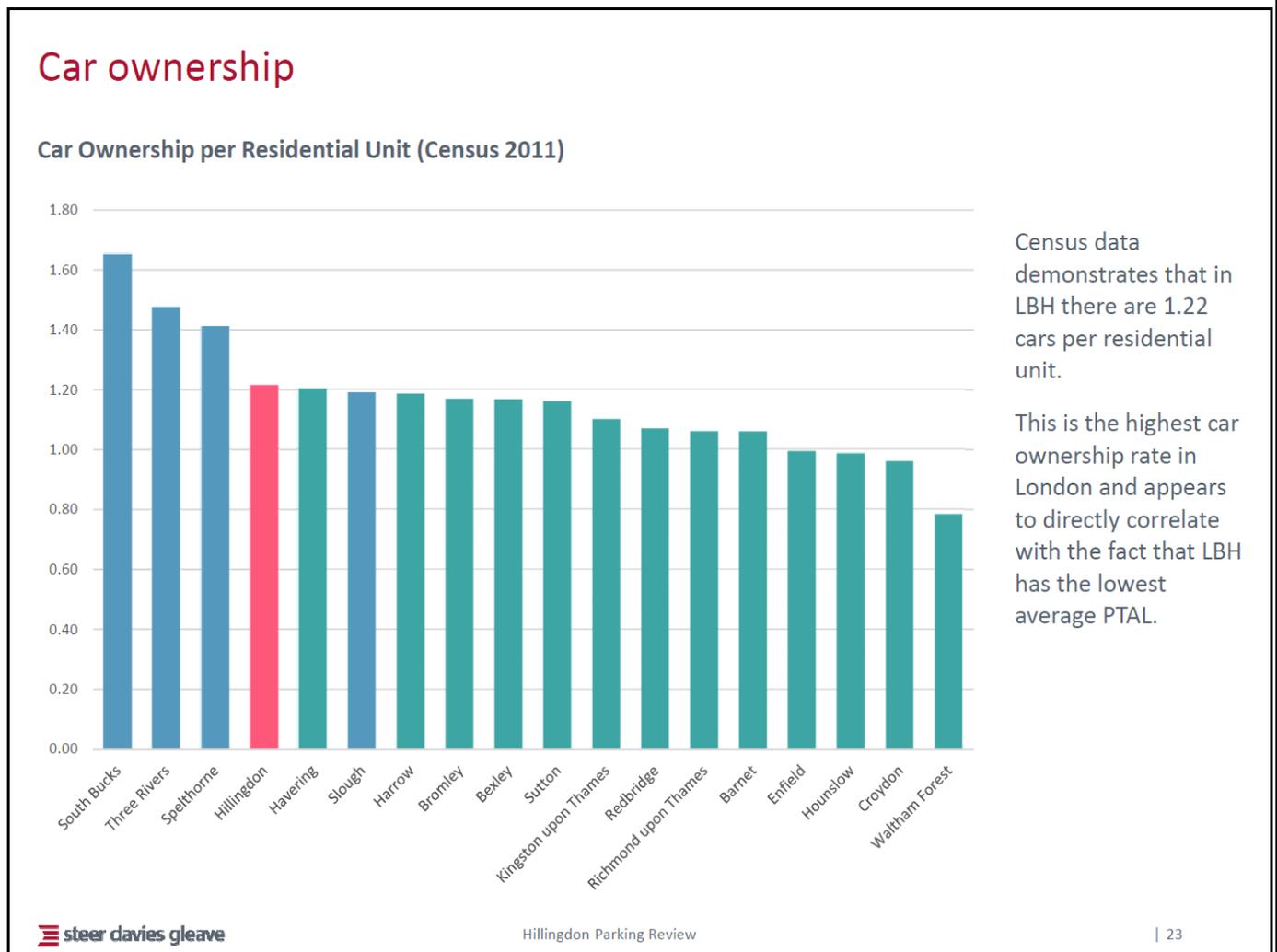
noxious air pollution. In the past, Heathrow Airport Limited (HAL) evolved its own tentative plans for some form of 'LEZ' which would have involved charging a levy on private traffic entering the airport perimeter. It is important to understand how those plans, if still an HAL aspiration, sit with the Mayor's ULEZ proposals.

2.7. TfL's own data sets graphically illustrate the difference between Hillingdon (and similar outer London Boroughs) and those further toward the centre. For example, Figure 06 shows what TfL calls the 'TCoL' or 'Traffic Classification of Londoners', dividing geographical areas into areas where the population is classified according to parameters such as 'settled suburbia' and 'detached retirement'. Even without delving too deeply into the definitions, the graphic clearly shows just another example of how Hillingdon (and particularly those who live there) differ in fundamental ways to areas nearer the centre of London, but at the same time is similar to many other boroughs near the GLA boundary.

Comment: Hillingdon, in common with some other Outer London Boroughs, has many aspects that are closer to the *English* national average than to a *London* average. The Mayor has historically preferred to pursue an artificial, imposed policy of homogeneity across London – ‘one size fits all’ – but the evidence, even TfL’s own datasets, collectively show that London’s inner and outer areas have many fundamental differences of character. The ULEZ extension is unlikely to moderate these differences.

3. ACCESS TO TRANSPORT MODES IN HILLINGDON: THE CAR & VAN

Figure 07: Car ownership in Hillingdon



3.1. The Mayor has set out his typically “pan-London” ambition “...that by 2041, 80% of journeys are to be made by walking, cycling and public transport⁶”. For anyone who knows the distances between centres in Hillingdon, the second largest borough by area in Greater London, the likelihood of achieving these changes in the short term seem unrealistic without transformational investment in all three modes, but most importantly in bus and rail. More likely to be achievable will be mixed-mode transport and if, as the Mayor would prefer, these journeys are to be made without the use of the personal car (whether ICE or electric) then there will need to be a major shift towards the use of public transport.

3.2. Dealing with the status quo, Hillingdon at present has an average of 1.22 cars per residential unit (see Figure 7) making it the highest level of car ownership in Greater London and, as the graphic shows, even that is a lower level than neighbouring shire and shire district authorities. This is hardly unexpected, as the demographic and geography of Hillingdon is not only

⁶ <https://tfl.gov.uk/corporate/about-tfl/how-we-work/planning-for-the-future/encouraging-cycling-and-walking>

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closer to those places outside the Mayor's influence, but is also where a significant percentage of people employed in Hillingdon travel to and from, as illustrated in Table 1 below; more than a quarter of these movements are by car or van.

TABLE 01:

Location of Usual Residence - Travelling to Hillingdon Borough as Place of Work by car or van

Rank	Usual residents location	Number of commuters travelling into LB Hillingdon to work by car or van by origin	Percentage of commuters travelling into LB Hillingdon to work by car or van by origin	Number of commuters by travelling into LB Hillingdon to work by car or van from outside the GLA boundary where the origin is known
1	Ealing	6,452	9.4%	
2	Hounslow	6,315	9.2%	
3	Slough	4,211	6.2%	4,211
4	Harrow	3,943	5.8%	
5	Spelthorne	3,400	5.0%	3,400
6	South Bucks	3,001	4.4%	3,001
7	Windsor and Maidenhead	2,596	3.8%	2,596
8	Wycombe	2,295	3.4%	2,295
9	Three Rivers	2,045	3.0%	2,045
10	Chiltern	1,658	2.4%	1,658
11	Other local authorities in the UK	32,452	47.5%	
Total commuting inflow into Hillingdon driving a car or van		68,368	Volume	19,206
			Percentage of Total	28%

Retrieved from <https://www.nomisweb.co.uk/census/2011/wu03uk/chart> 23rd June 2022

3.3. A key consideration is access to a car per household; an assessment across the Borough (using data assessed under the former ward structure) shows that the lowest numbers of households with access to a car are Harefield (more sparsely populated in any case), followed by Ickenham with, at the other extreme, highest numbers in West Drayton and Botwell – the point here being that access to a car is reasonably uniform across the whole of Hillingdon. The data in Table 02 below which gives this data is based on the 2011 Census.

TABLE 02:

Method of Travelling to work by car or van availability

2011 wards ⁷	All categories: Car or van availability	No cars or vans in household	One car or van in household	Two or more cars or vans in household
Barnhill	5,892	725	2,099	3,068
Botwell	6,426	991	2,502	2,933
Brunel	5,586	684	2,103	2,799
Cavendish	5,955	300	2,102	3,553
Charville	5,944	455	1,953	3,536
Eastcote and East Ruislip	6,097	277	1,774	4,046
Harefield	3,627	193	1,102	2,332
Heathrow Villages	6,154	1,155	2,590	2,409
Hillingdon East	6,250	479	2,205	3,566
Ickenham	5,112	121	1,234	3,757

⁷ Ward boundaries changed for the 2022 local elections, but NOMIS data is based on the previous ward structure

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**TABLE 02:
Method of Travelling to work by car or van availability**

2011 wards ⁷	All categories: Car or van availability	No cars or vans in household	One car or van in household	Two or more cars or vans in household
Manor	6,083	412	2,408	3,263
Northwood	5,176	380	1,940	2,856
Northwood Hills	5,705	439	2,133	3,133
Pinkwell	6,529	807	2,517	3,205
South Ruislip	6,198	515	2,569	3,114
Townfield	6,098	1,081	2,274	2,743
Uxbridge North	6,101	508	1,923	3,670
Uxbridge South	5,672	1,038	2,350	2,284
West Drayton	6,670	908	2,666	3,096
West Ruislip	5,621	470	2,199	2,952
Yeading	6,130	801	2,428	2,901
Yiewsley	6,180	900	2,716	2,564
	129,206			

Source: NOMIS

3.4. As well as high car ownership, Hillingdon also has one of the highest levels of ownership of light vans – the apocryphal ‘White Van Man’, with many small businesses or sole traders dependent upon their van for their livelihood. Figure 08 illustrates the levels of van ownership by residents of the Borough.

1.32 billion vehicle miles were travelled on roads in Hillingdon in 2020

Source: <https://roadtraffic.dft.gov.uk/local-authorities/66>

3.5. What the above tells us is that access to a car continues to remain very important to many residents across the whole of Hillingdon, irrespective of ward. The PTAL scores, discussed later, reinforce the importance of this as a mode of transport, common to Hillingdon and most Outer London Boroughs which sit between the existing 2019 ULEZ boundary and the GLA boundary.

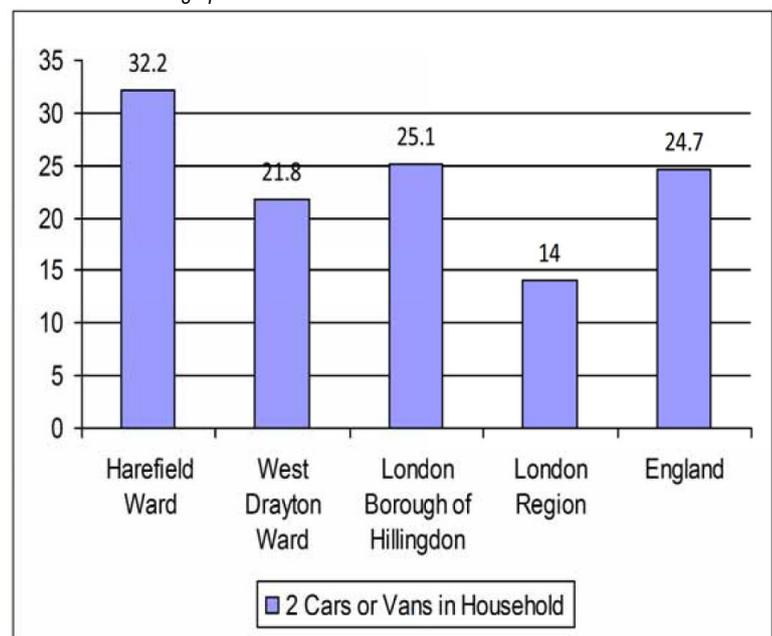
FUEL POVERTY

3.6. In recent months, the international conflict has precipitated a rapid rise in domestic fuel prices (the typical local cost for petrol in Hillingdon rose in the space of a month from £1.65 per litre to £1.86, at the same fuel outlet⁸) an increase of nearly 13%. Measured year on year this is even higher. This clearly equates to a

similar rise for transport costs for those reliant on the private car; if one assumes a typical consumption rate of ten miles per litre, then the extra costs for fuel for a typical day's commute

Figure 08: Access to a car or van in Hillingdon

Note that large parts of Harefield score Zero in terms of PTAL – see later.



Source: www.neighbourhoodstatistics.gov.uk

⁸ Gulf Ickenham Service Station - £1.649/ litre on 19th May 2022 and £1.859/ litre on 18th June 2022

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could range from £0.21 (10 miles) to £1.05 (50 miles) per day. These are very conservative costs; for example diesel fuel, relied upon by many (in particular commercial vehicle drivers) is even more expensive.

3.7. Those small businesses that rely upon a van for work will see significantly higher costs. These increases are least affordable to those on lower incomes who, because of poor public transport choice, have to rely on a car. It may be argued that this is the wrong time to impose a further tax on them, assuming it is warranted at all.

According to a ten-year old DfT Report, of 2012, "**Just over 13% of all household expenditure was on transport**"; with recent fuel cost rises this will inevitably have increased significantly, with a particular impact on the less well paid who nevertheless need to travel to and from work.

Source: [Strategic road network statistics - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/212222/strategic-road-network-statistics-2012.pdf)

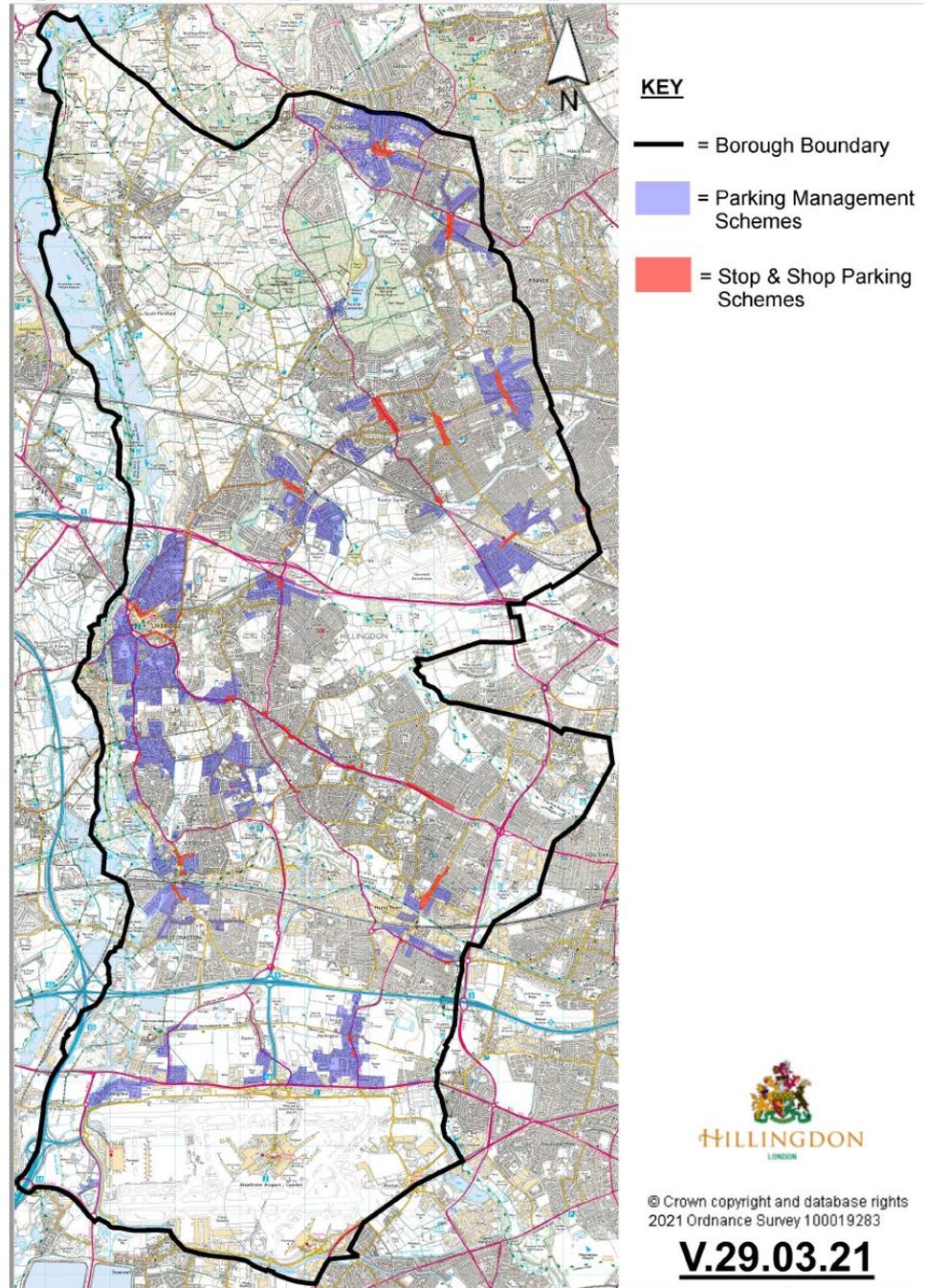
3.8. The fact that in July 2022, inflation up to June was reported at 9.4% (a 'forty year high') and the Bank of England forecasts that it may raise to 11% over the summer, shows that now is a bad time to introduce a fresh charge across the board.

PARKING

3.9. Vehicles which come in and out of the Borough and stay there rather than simply passing through inevitably have to park. The Council recognises that some parking behaviours in residential streets, especially near schools, employment centres and transport hubs such as rail and bus stations, can cause problems for residents. It is for that reason that the Council has a rolling programme of parking management schemes (CPZs).

3.10. However, these schemes are generally resident-driven, largely through petitions, and in

Figure 09: Car Parking Schemes in Hillingdon



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contrast to a typical inner London borough, Hillingdon is not blanketed by car parking restrictions (see Figure 9). The Council sees continued targeting using this approach, with the essential element of community support, as one way to gradually reduce commuter parking in residential streets. Were there to be an equivalent map for a typical inner London Borough, almost the entire area would be shaded lilac.

Comment: Whether the Mayor likes it or not, the car or van remains a fundamentally important transport tool for residents who live, work or study in Hillingdon. A significant proportion of these journeys begin or end outside the GLA boundary, and as shown later, alternatives are severely limited.

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4. THE ROAD NETWORK IN HILLINGDON

4.1. The road network in Hillingdon comprises a mixture of National Highways, Transport for London's 'TLRN' and Borough maintained roads (see Figures 11, 12 and 13). A smaller network is managed by Heathrow Airport Limited within their overall perimeter boundary.

4.2. As an Outer London Borough, the transport situation as a whole is very different to either inner or central London.

Major roads on the TfL 'TLRN' (Transport for London Road Network) within Hillingdon are major carriers of traffic (anecdotally the A312 Parkway/Hayes Bypass is one of the busier and least-well managed roads in the outer TLRN, according to TfL) but there are not very many of them⁹, whereas the further one travels into the London, the density of the Mayor's road network increases dramatically. This is hardly a surprise as most of these major routes were historic radial links in and out of central London.

4.3. Access to these fast trans-London road corridors within Hillingdon is poor too; for example, the A40 Western Avenue slices through Hillingdon east to west, carrying large traffic volumes, but the ability of residents and commuters to cross north-south is severely restricted, with road crossings only at Swakeleys Roundabout, Hillingdon Circus and Polish Air Force Memorial roundabout. The highest vehicle mileages are achieved on these road networks which are managed by TfL and National Highways (formerly Highways England)¹⁰, and yet the Council has no control over them. These major roads are key sources of vehicle emissions, and significant proportions of the traffic

Figure 10: TfL 'TLRN' and Highways England 'M' Roads in Hillingdon:

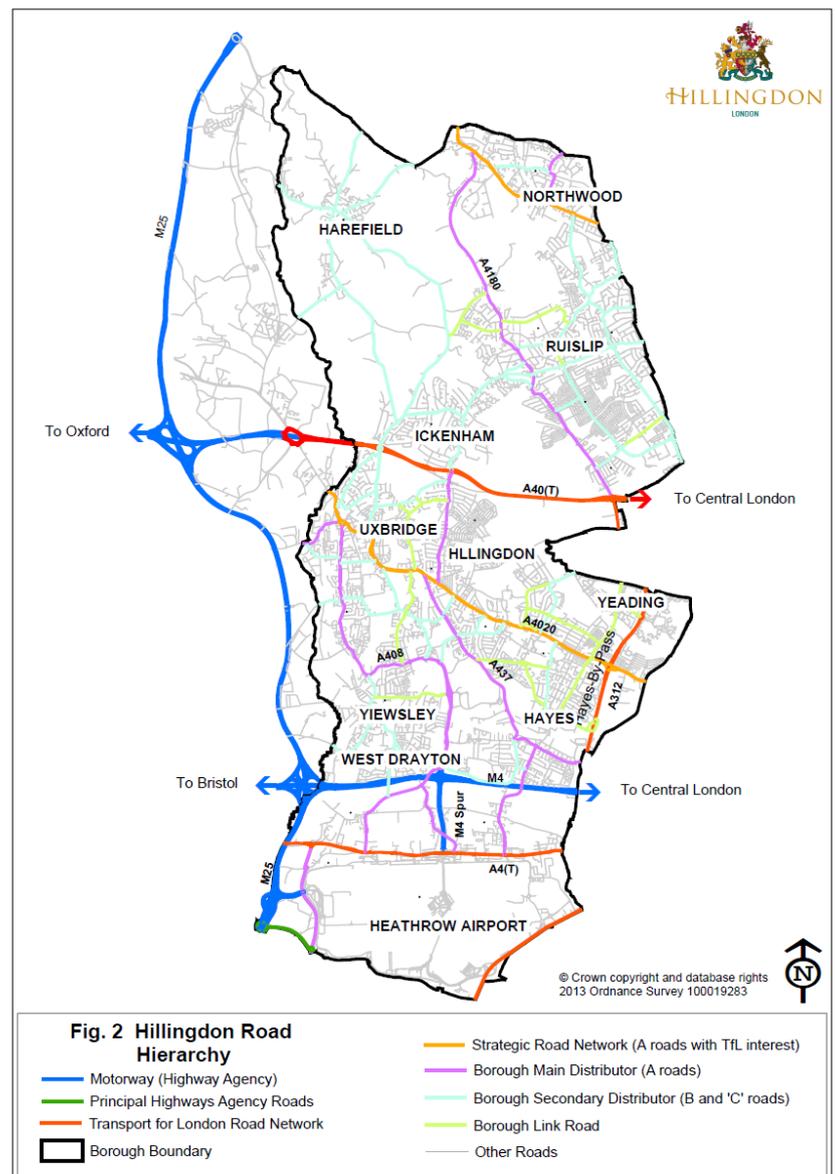
Transport for London:

- A4 Great West Road
- A40 Western Avenue
- A312 Parkway
- A414 Rickmansworth Road (part)
- A30 Great South-West Road

National Highways:

- M25 London Orbital Motorway
- M4 Motorway

Figure 11: Road Hierarchy in London Borough of Hillingdon



⁹ The A4020 Uxbridge Road, a key east-west corridor through the centre of the Borough, is regarded by TfL as part of a 'Strategic Route Network' (SRN); the road is owned and maintained by the Council, but there is an obligation to consult with TfL on any proposed major changes to the SRN

¹⁰ In an officer meeting of March 23rd 2022, TfL conceded that they need to initiate dialogue with National Highways with regard to their roads, to see for example if the ULEZ will apply to those roads, and how they might be enforced

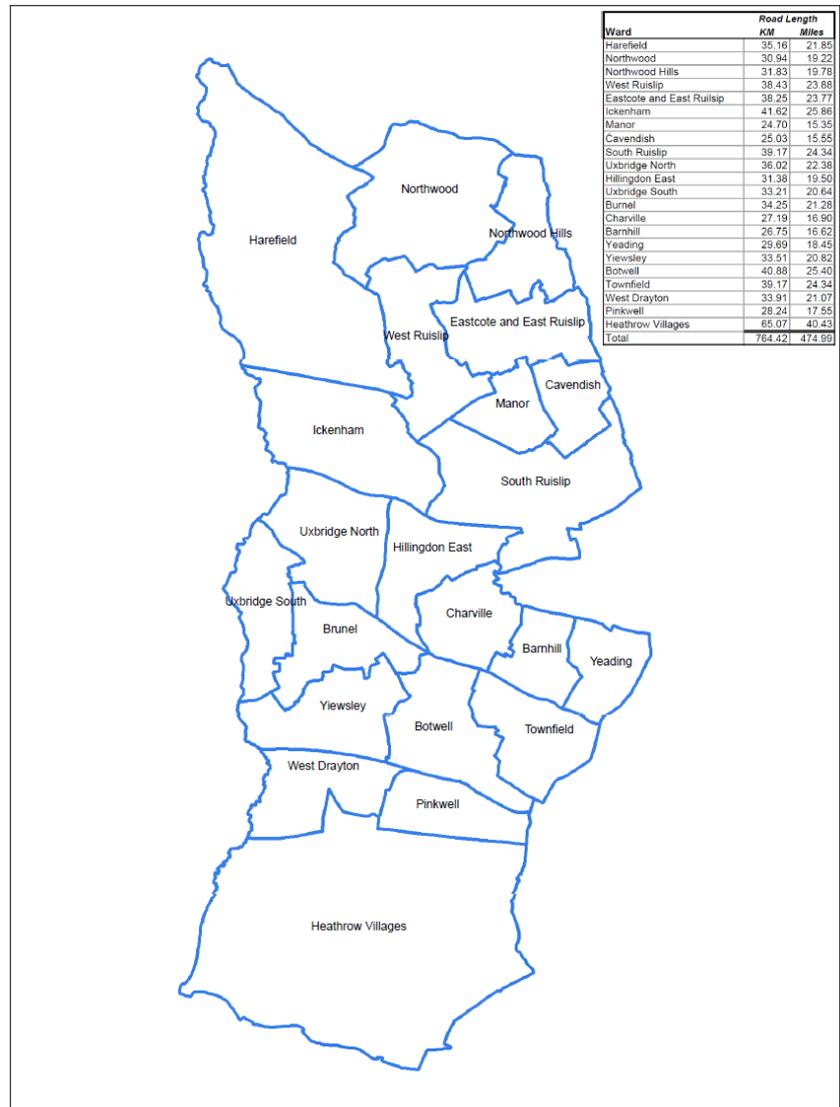
LONDON BOROUGH OF HILLINGDON RESPONSE TO THE MAYOR OF LONDON'S PROPOSAL TO EXTEND THE ULTRA LOW EMISSION ZONE TO THE GLA BOUNDARY

on them enter the Borough at one end, simply pass right through and exit at the other.

4.4. Public transport on these major road corridors (see also later) is also patchy; for example, on the A40 there are only the Oxford to London Victoria coach services in operation (which call at Hillingdon Circus). This means, therefore, that a major source of transport-related impacts of all kinds, including air quality (also discussed later) stems from these strategic corridors which slice through Hillingdon but are not controlled by the Council; the logical extension of this argument is that the Mayoral ULEZ expansion plans impact the whole of Hillingdon but in a very unequal manner.

Comment: The major proportion of daily mileage on roads within Hillingdon takes place on roads that are managed either by the Mayor or by National Highways. However the ULEZ proposal does not focus in on these more significant sources of vehicle pollution; instead it is a blunt tool which penalises everyone who lives or travels within Hillingdon whatever the environment immediately adjacent.

Figure 12: Road network (with pre 2022 Wards) in Hillingdon



Classified & Unclassified Road Lengths
(in kilometers and miles)
© Crown copyright and database rights 2012 Ordnance Survey 100019283

Figure 13: Borough Roads

- 764km of Borough
- 132km of Borough Main Distributor Roads
- 87.1km of Borough Secondary Distributor Roads
- 21.3km of Link Roads

Source: Borough Data for Highways

5. PUBLIC TRANSPORT IN HILLINGDON

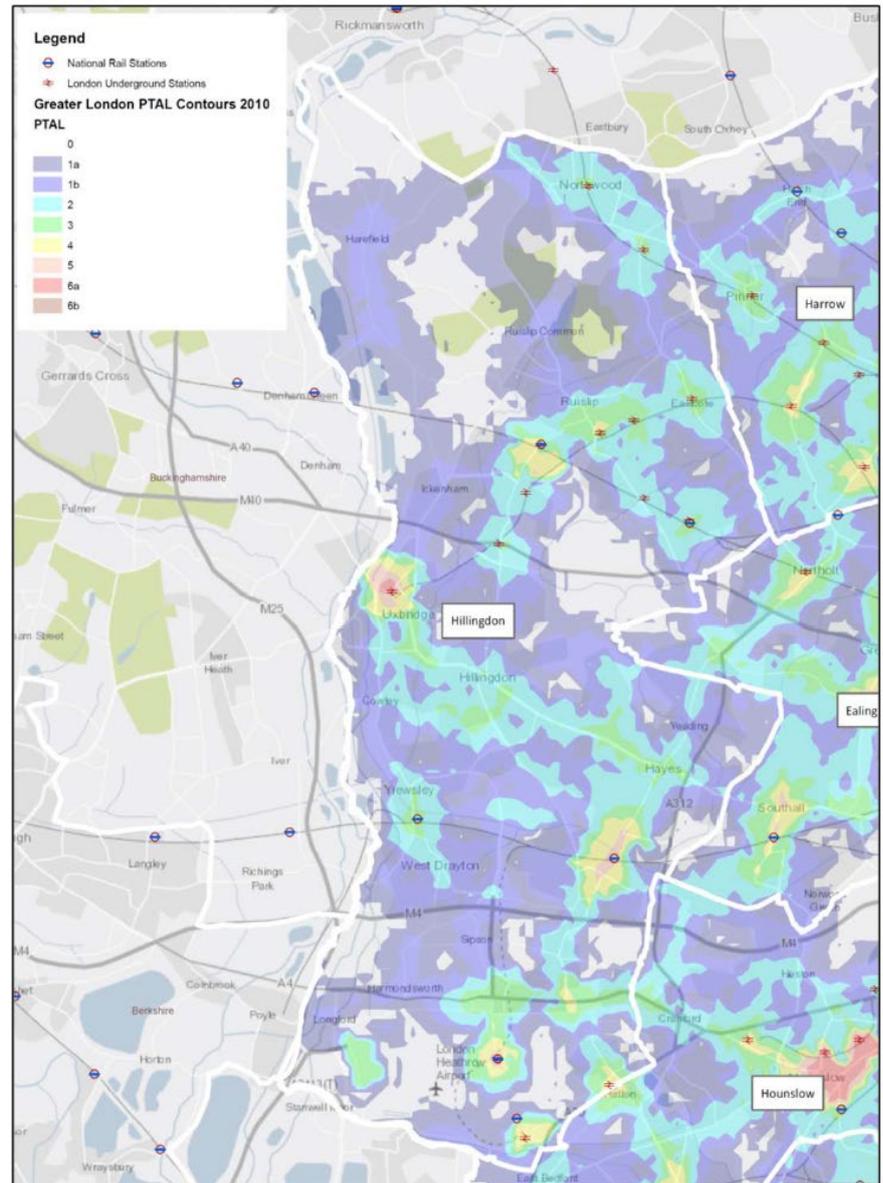
5.1. Transport professionals use criteria to assess accessibility to public transport using a statistical tool known as 'PTAL' which is generally a reasonably good indicator, but falls down in one key way – where the accessibility is bound by directions of travel.

5.2. Figure 14 shows the overall picture as poor, with the obvious exceptions of tight-knit areas around rail stations and urban centres. The majority of Hillingdon falls in the 'Zero – 2' categories (white, violet and pale blue in the map). The Metropolitan Centre of Uxbridge has the highest PTAL score of '6a' (orange colour on the map) but this apparently 'good' access to public transport comes with a fundamentally important caveat; most of that public transport connectivity is one-way and of no use to the people referenced in Table 2 above who travel from outside Greater London.

5.3. As an outer London Borough, Hillingdon-centred public transport journeys are either radial (with poor rail provision in this direction) or into and out of inner London; in other words, whilst many public transport journeys based in central London can be truly multi-directional, providing an inner London resident with a wide variety of connectivity, and often a great choice between rail and multiple bus routes, those starting or finishing in Hillingdon tend to face London-wards. Figure 15 contrasts Hillingdon with other London statistics.

5.4. Some parts of Hillingdon are particularly poorly served by public transport, the best known and most frequently cited example being Harefield, which has no rail station and very limited bus service provision. Other areas do benefit from limited rail through services (such as the

Figure 14: Public Transport Access Levels – 'PTAL' Levels across Hillingdon



Note how even where 'PTAL' is high in Uxbridge, this is effectively uni-directional – in other words it does not benefit destinations outside the GLA boundary to the same extent as London-facing journeys

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Metropolitan Line to Chesham and Watford) and there are of course national rail links (most outside the TfL remit) but overall public transport connectivity is limited and biased towards radial links.

5.5. There are some non-TfL services which originate outside London, but for the most part these terminate in key centres such as Heathrow, Uxbridge and Northwood. Residents living in the fringes of the Borough thus have a choice of disjointed services run by a variety of operators and little cross-regional connectivity. The point therefore is that not only should TfL avoid reducing bus service provision in outer London but in fact should instead be looking at improving it in light of present shortfalls.

5.6. The concern here is that if bus services in Outer London are generally assessed as 'poor' and already in decline, the suggestions coming from within TfL that they may be forced to be cut further due to 'managed decline' through revenue shortfalls would seem to indicate

that bus services – the only really viable potential transport alternative to the car for many Hillingdon residents – will be in decline as the Mayor seeks to effectively drive them out of their private cars.

5.7. These points were put to TfL at the officer meeting of March 23rd 2022; in response TfL said that the present scenario foresees a reduction in bus services by 4%, but mostly in central London (in part to reduce some duplication there with the new Elizabeth Line service) but a 'worst case' with so-called 'managed decline' of **18% in Outer London**. The analogy officers used was the use of a heftier stick and a smaller carrot.

5.8. Officers also reiterated the point that not only is TfL bus service poor in terms of coverage, it is and is likely to remain London-centric; Uxbridge as a good example has fair links into London but poorer (and often far more expensive¹¹) bus connections outside the GLA boundary. Whilst the prospect of TfL extending their bus service reach ever more

Figure 15: PTAL Comparisons for Hillingdon and other London areas

PTAL Comparisons



LBH has a significantly greater percentage of the population that live within an area with a PTAL of 2 or under than the overall London average with 86% of residents located in an area of PTAL 2 and below.

Figure 16: Comment on HS2 Construction Staff Travel:

The HS2 High Speed Rail Project slices through Hillingdon, between Northolt/ South Ruislip and Harefield/ Denham, impacting swathes of the northern part of the Borough including Ruislip, Ickenham and Harefield. In the spring/ summer of 2022, activity is ramping up with the imminent launch of the Tunnel Boring Machine at West Ruislip.

A key issue for the workforce is transport; despite the fact that West Ruislip rail station is nearby and buses serve High Road Ickenham, HS2 and their contractors admit that public transport for those in their workforce coming from outside London is poor, and what there is, is expensive: hence many travel to site by car.

At a meeting of May 17th 2022 an HS2 Contractor admitted that this was 'only an issue in Outer London'

The ULEZ expansion will not help with this issue. HS2 construction is set to continue through much of this decade.

¹¹ By way of example, a bus fare from Iver Heath to Uxbridge is already £7; this helps show why many people choose to come to Uxbridge by car.

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into Surrey, Berkshire, Buckinghamshire and Hertfordshire (as relevant examples¹²) is surely remote, the fact remains that there are no improvements envisaged that will benefit cross-GLA boundary public transport movements.

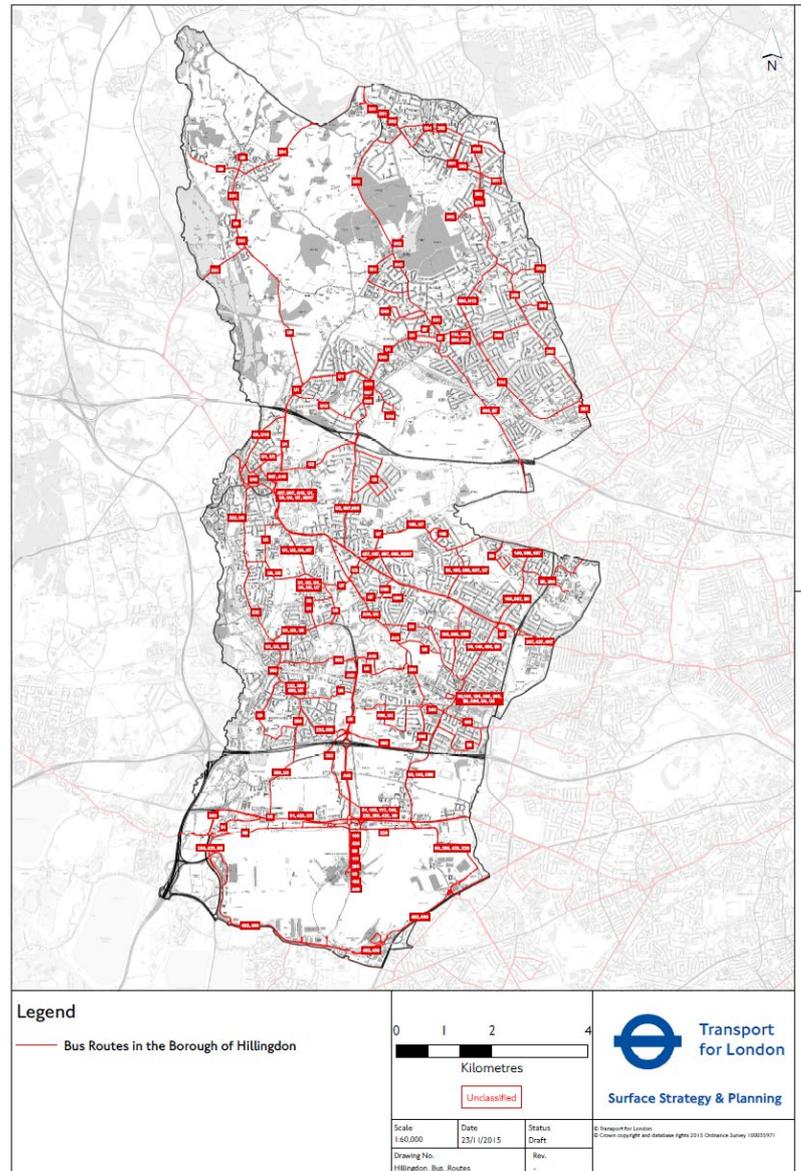
Comment: Public Transport coverage in Hillingdon is poor and unlikely to improve significantly in the near to medium term. If the Mayor wants to entice people out of their cars and vans, there needs to be a viable alternative: at present there is none and the anticipated cuts across the London Bus Network (see Figure 17) make the necessary investment appear highly unlikely to arrive any time soon.

Figure 18: Recent Statement from TfL on cutting bus services:
"Buses are the backbone of our transport network and are critically important to reducing car use, congestion, road danger and pollution. We have always adjusted our bus network to reflect our changing city, but the devastating impact of the pandemic on our finances has required a more significant review."

Our plan to achieve the savings required by the Government includes a 4% reduction in bus kilometres. Demand has reduced over the years on some roads leading into central and inner London due to changing travel patterns, which have been accelerated by the pandemic."

Source: TfL <https://haveyoursay.tfl.gov.uk/busreview>

Figure 17: TfL Bus Services in Hillingdon (2015 plan)



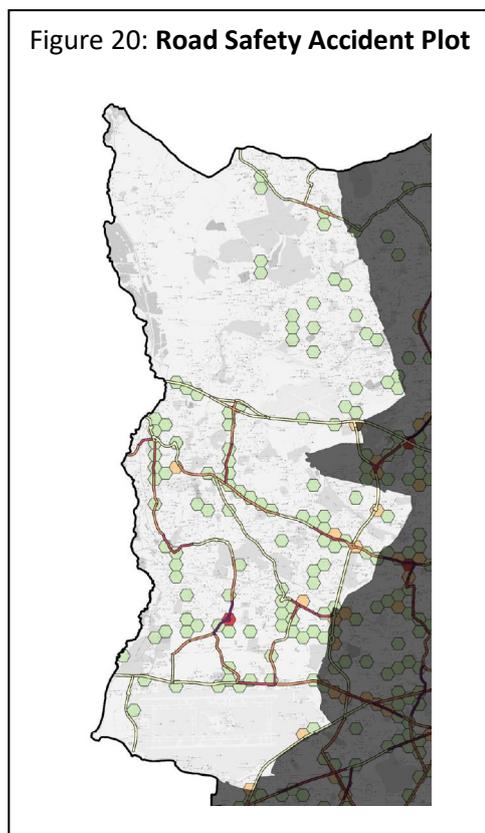
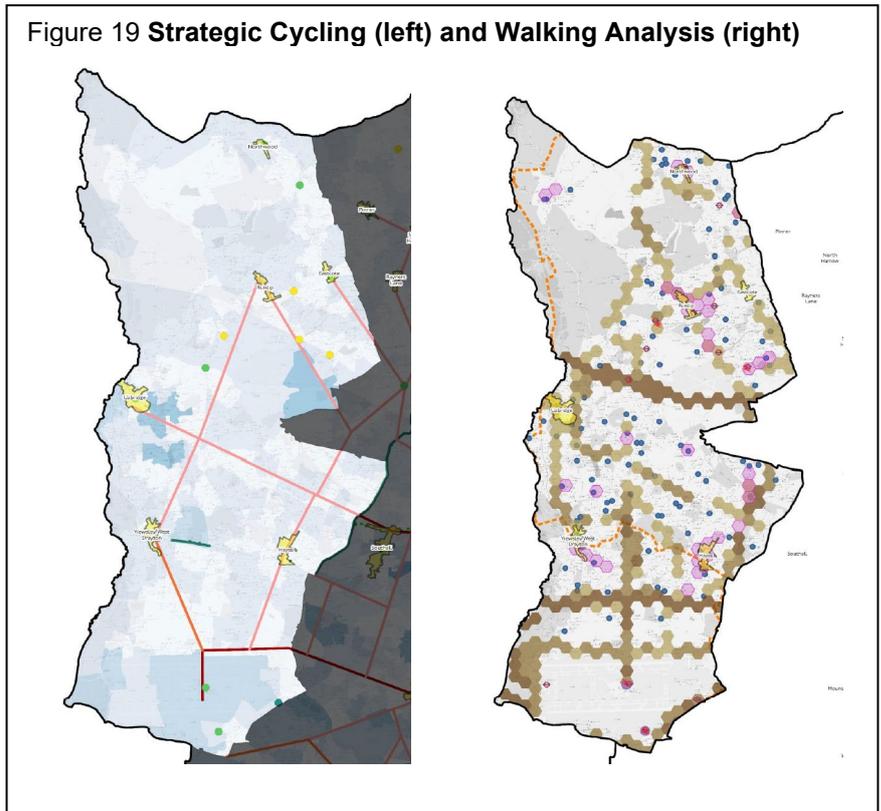
Note the large gaps in coverage and the lack of cross GLA Boundary routes other than the 331 in the north and west. This map from 2015 (the latest available) does not show the recent 278 Bus Route

Bus Routes in the Borough of Hillingdon

¹² These 'shires' are all – like TfL – Public Transport Authorities ('PTA') in their own right; they are encouraged to collaborate in terms of Bus Service Improvement Plans (BSIPs) as required by Central Government, but the level of in the integration across the GLA boundary into and out of London seems likely to remain a low priority for them as they tackle what are for them greater priorities.

6. WALKING, CYCLING AND ROAD SAFETY IN HILLINGDON

6.1. The Council recognises the multiple benefits of getting people to walk and cycle; as such there is work under way looking at priority routes which, for the most part, will take advantage of Hillingdon's ample open spaces and green corridors, amongst them the towpaths of the Grand Union Canal, home to Hillingdon's emergent 'Quietways'.



6.2. This network is being developed despite the lack of present TfL funding and it is intended that these routes will provide clear health and access benefits. But it would be naïve to imagine that these will be capable of providing a 'quick fix' in terms of travel between our town and village centres.

6.3. In a similar manner, road safety hot spots are reviewed but the data suggests that overall, RTC (road traffic collision) levels have not shown any surprising trends.

ROAD SAFETY EDUCATION AND PUBLICITY

6.4. The Council rightly proud of its track record in terms of school travel and road safety, and some of the high level statistics are shown in Figure 21

Figure 21 **STARS in Hillingdon**

IN 2021/2022, the Hillingdon STARS Team achieved:

- Practical Pedestrian Training - **12,819**
- Bikeability Level 1-3 - **12,040**
- Cycle Skills Training - **87**
- Walking maps - **80** schools have their Walking Maps (26 schools still to be completed)
- **4** schools took part in the Idling Action London Campaign funded by The Mayors Air Quality Fund, quote from Val Beale '*Each borough was only allocated two events this year but thanks to you getting very quick responses from the schools we grabbed four.*'
- **20** schools received a Theatre performance and follow up workshops from Abbie Ayre and The Shed of Science around air quality
 - **38** schools received virtual Theatre in Education tours from The Riot Act around road safety and sustainable travel
 - STARS Accreditation:
 - **15 Gold**
 - **4 Silver**
 - **4 Bronze**
 - **19 Engaged**

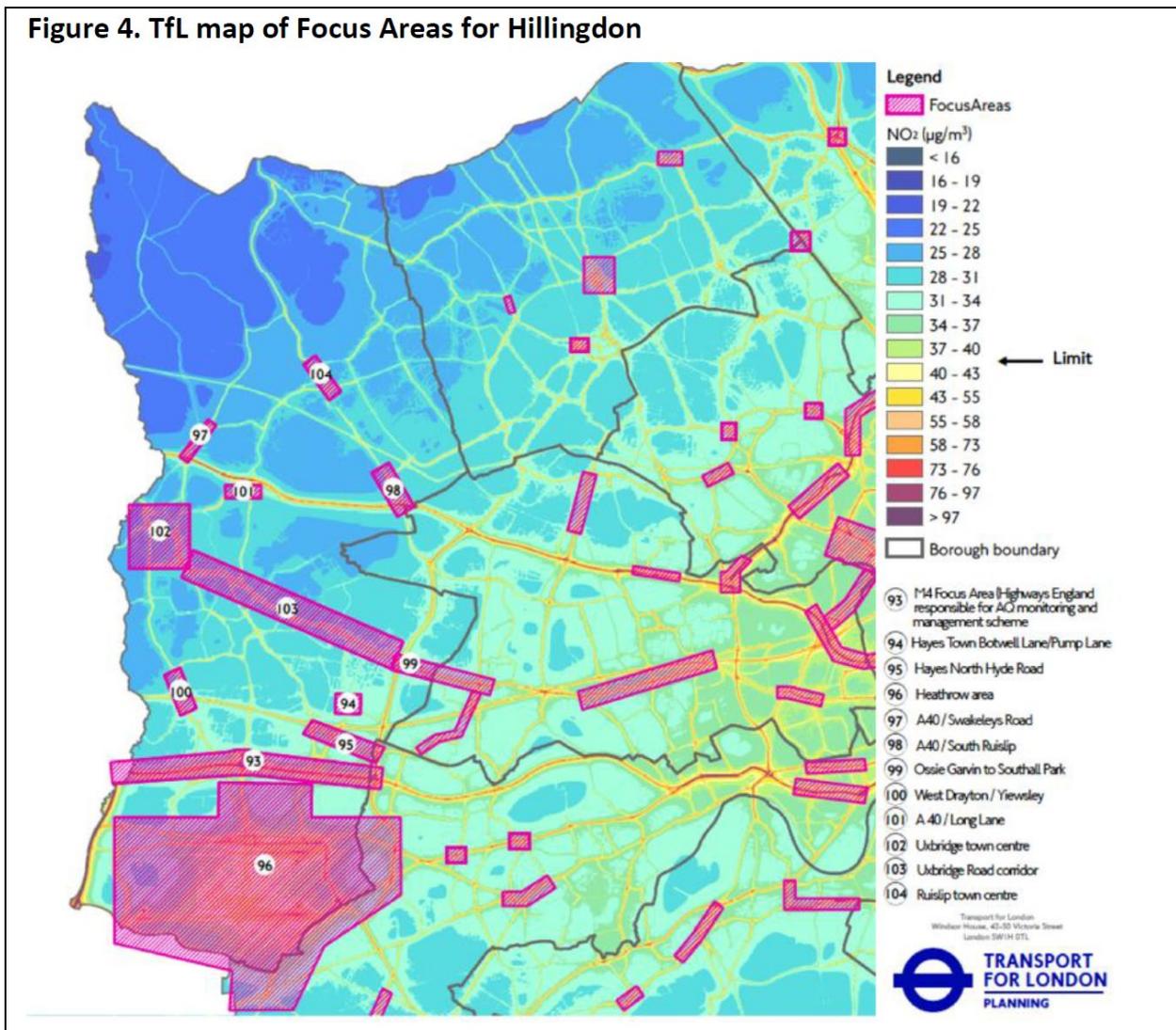
Figure 22 **Road Safety in Hillingdon**

The London Borough of Hillingdon is the second largest outer Borough in London with a population of 273,936 people living in an area of 44.67 sq miles. The collision data from 2019 shows there were 109 KSI casualties and 750 slight injuries in the Borough. The percentage of casualties in comparison to population was 0.33%. If we compare this casualty data with neighbouring outer London Boroughs such as Ealing and Hounslow, which have a casualty percentage against the population at 0.35% and if we compare this with inner London Boroughs we are safer and overall the 13th safest Borough in London.

Comment: With a thinly-spread highway network the levels of RTCs in Hillingdon are considered fair for an outer London Borough, and the opportunities for safe and healthy walking and cycling are being embraced. However it is considered simply untenable that the high levels of these modes that may be possible in central London, where they can dovetail with public transport, will be a practicable substitution in total in outer London.

7. AIR QUALITY IN HILLINGDON

Figure 23: TfL Focus Areas within Hillingdon in terms of AQ



7.1. The Council has its own Air Quality Action Plan¹³.

7.2. The proposed expansion is intended to improve air quality in Outer London by encouraging individuals to use sustainable transport or switch to cleaner vehicles. The report states most vehicles in London are already compliant with ULEZ emission standards and that it is important that owners of those remaining non-compliant vehicles are encouraged to switch to other sustainable modes or use cleaner vehicles, including car club vehicles.

¹³ <http://www.hillingdon-air.info/laqm.php> **Background:** Under Part 1V of the Environment Act 1995 the framework for local air quality management (LAQM) was introduced. Every local authority has a statutory duty to review and assess the local air quality within their boundary and, where appropriate, declare an Air Quality Management Area along with the provision of an Air Quality Action Plan (AQAP) to improve air quality. In 2003 the Council declared an Air Quality Management Area. This was followed by the development of an Air Quality Action Plan which was adopted by Cabinet in 2004. In 2016, supervision of the LAQM system in the Greater London Authority (GLA) area was devolved to the Mayor of London. In accordance with the London-specific guidance, updated pollution information and action plan measures published by the GLA, local authorities across London have been required to undertake a review of their current Air Quality Action Plans. This ensures future actions on air quality are taken forward using the most up to date information on predicted pollution levels and on the measures best placed to help improve air quality.

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7.3. The accompanying ULEZ Integrated Impacts Assessment report looks at Environment, People and Economy. In regard to the impacts of the Proposed Scheme on air quality it states for each named objective;

- **reducing emissions across Greater London** - moderate positive results for NO_x and minor positive for PM₁₀ and PM_{2.5};
- **having a beneficial impact on exposure to air pollution and achieving WHO Interim targets across Greater London** - minor positive impacts for NO₂ but neutral for PM_{2.5};
- **meeting legal compliance across Greater London** - impacts are minor positive;
- **tackling climate change** - negligible beneficial impact on carbon emissions across Greater London which is described as neutral;
- **impacts on people resulting in better health outcomes for Londoners** - a minor positive impact.

7.4. The remainder of the impact objectives studied (including under People and Economy and Business) are mainly minor negatives with the rest moderate negatives and neutral impacts.

7.5. The World Health Organisation (WHO) recently published updated information on air pollutants and their health impacts and has recommended tighter guidelines for both NO₂ and PM_{2.5}. There are a series of interim targets for each pollutant and an ultimate target. The Government consultation on Environmental Targets is currently running and there is a proposal for a more stringent target for PM_{2.5} along the lines of the WHO interim target of 10ug/m³ with a timescale to be attained by 2040. The Mayor has already committed to meeting the WHO interim target of 10ug/m³ for PM_{2.5} in London by 2030, and thus the new targets are tougher and more stringent.

7.6. The ULEZ consultation assesses the scheme against the more stringent interim targets for NO₂ although it should be noted that, unlike PM_{2.5}, there is no current consultation on the adoption of these targets.

7.7. Whilst the implementation of the ULEZ appears to have benefits in regards to reducing levels of NO₂, the assessment indicates it is a less effective mechanism in regard to reducing levels of PM_{2.5}. In terms of public health, the pollutant used as the public health outcome indicator is PM_{2.5}. The dominant proportion of PM_{2.5} associated with road transport are non-exhaust emissions therefore these are not reduced just by the use of cleaner vehicles (the non-exhaust emissions are associated with tyre and brake wear and resuspension of particles as vehicles travel on the roads). The report therefore identifies that for addressing PM_{2.5} it is essential to also reduce the number of trips made by motor vehicles and enable more trips by walking, cycling and public transport.

IMPACTS IN HILLINGDON (ALL BASED UPON PREDICTIONS FOR 2023)

7.8. With the implementation of the ULEZ there is a reported reduction of 6.9% in overall NO_x emissions, 2% in PM_{2.5} emissions and 0.9% in carbon emissions from road transport across the borough.

7.9. The % population predicted to be exposed to exceedances of the interim WHO targets with and without the ULEZ are tabulated below:

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Table 03: Pollutant levels and exposure with and without ULEZ			
Pollutant level	Population exposed (%)		
	No ULEZ	With ULEZ	difference
NO2			
30ug/m3 (interim WHO limit)	0%	0%	Implementation has no impact
NO2 20ug/m3 (lowest interim WHO limit)	53%	48%	15,900 population will meet the lowest interim target
PM2.5			
10ug/m3 interim WHO target, Mayor's target for London	3%	3%	Implementation has no impact

7.10. For Hillingdon, whilst there are benefits for reductions in NO2, the implementation of the ULEZ will only reduce the levels of PM2.5 emissions across the borough by 2% and will not change the level of public exposure to this pollutant.

7.11. It should also be noted that the ULEZ does not appear to have an impact on places where pollution levels are higher, such as air quality hotspots. This is demonstrated in the maps provided below (taken from ULEZ Integrated Impact Assessment Report – see also later critique of that report¹⁴) and confirmed in the accompanying text which states that the annual mean NO2 AQO legal limit of 40 µg/m3 is modelled to be achieved across most of the air quality study area, *apart from small areas of central and inner London, along major roads and in the vicinity of other major emission sources (e.g. Heathrow Airport), both with and without the Proposed Scheme* (para 5.1.4)

Figure 24: 2023 NO2 concentrations without ULEZ

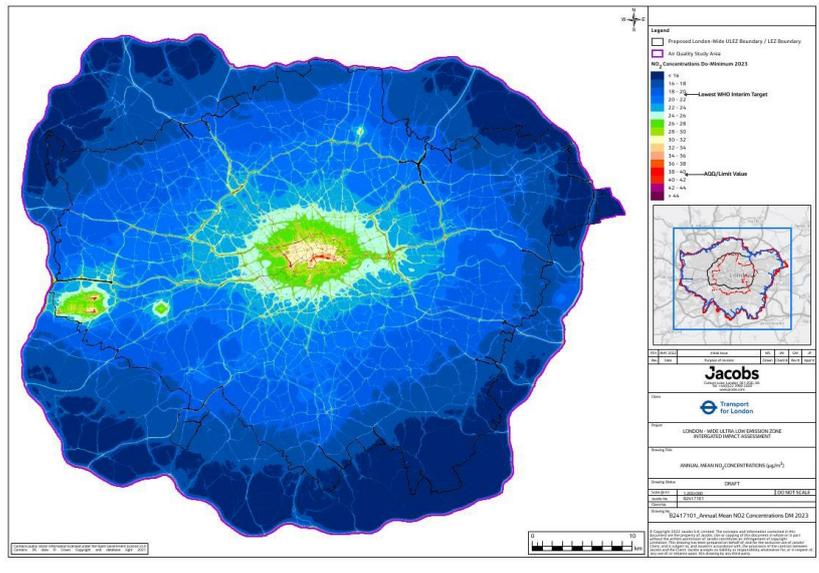
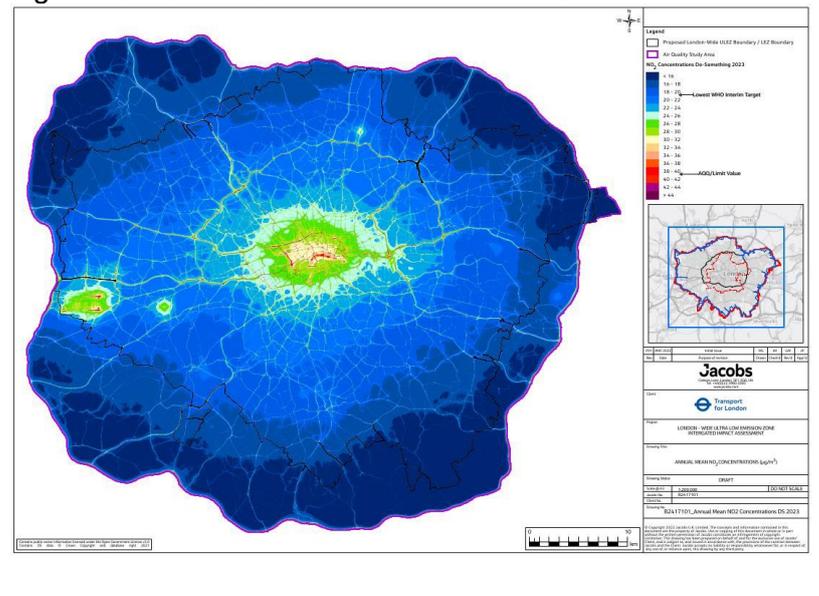


Figure 25: 2023 NO2 concentrations with ULEZ



¹⁴ Report by Jacobs: "London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA) Document no: 01 Revision no: 01 Transport for London 94202/53 ULEZ Scheme Integrated Impact Assessment 17 May 2022"

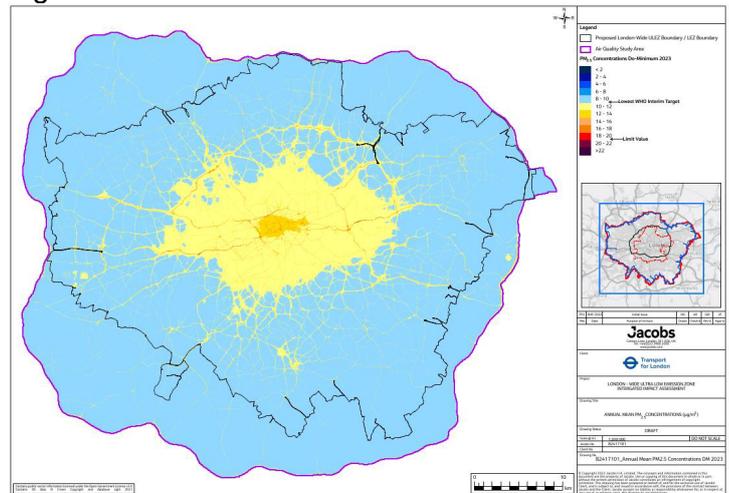
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7.12. The higher levels of pollution in the south of the borough around Heathrow airport and around the major road network remain both with or without the implementation of the ULEZ. More targeted interventions to address these areas will still be required.

7.13. The implementation of the ULEZ may bring difficulties in tackling hotspots given that that improvement interventions for the area around Heathrow have already been dismissed. The ULEZ Integrated Impact Assessment (**Table 8-2, suggested mitigation measures not considered feasible**¹⁵) notes that an intervention for improved public transport both between outer boroughs and from outside London to Outer London particularly to serve Heathrow, is not feasible in the current financial climate, given funding constraints and reduced fare revenues from public transport.

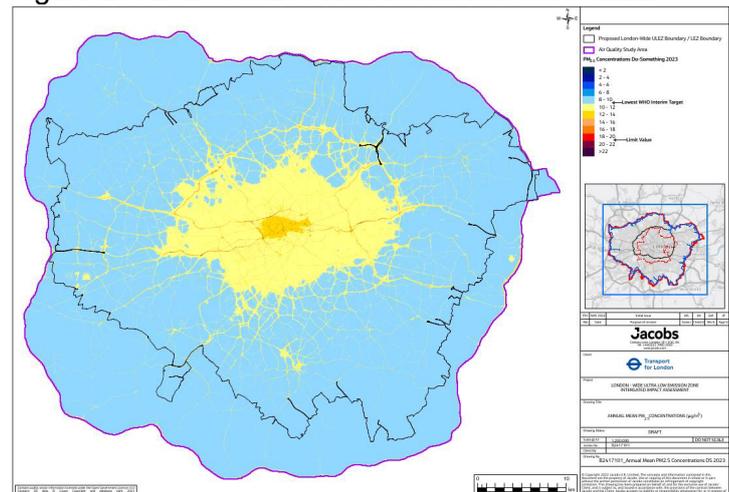
Comment: Whilst there are benefits from the ULEZ in reduced NO₂, in order for the ULEZ to be effective as an intervention to improve public health the additional measures outlined in the ULEZ report, i.e. to reduce the number of trips made by motor vehicles and enable more walking, cycling and public transport to address the issue of PM_{2.5} will be required. The ULEZ would need to be accompanied by a detailed transport strategy for boroughs in Outer London to ensure that the necessary modal shift could occur. As seen from the information provided in Table 8-2 there are financial restraints which may make the provision of such a scheme unfeasible.

Figure 26: 2023 PM_{2.5} concentrations with no ULEZ



Jacobs report page 56

Figure 27: 2023 PM_{2.5} concentrations with ULEZ



¹⁵ Report by Jacobs: "London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA) Document no: 01 Revision no: 01 Transport for London 94202/53 ULEZ Scheme Integrated Impact Assessment 17 May 2022" pages 126-128

8. HEALTH IMPACTS

8.1. Hillingdon council is strongly supportive of interventions which bring future sustainability and improvements in health and wellbeing. This includes active travel, the role of accessible green and blue space, the importance of well insulated affordable homes, transition to a low carbon economy for better health and air quality for our population.

8.2. We are aware of the potential impacts various air pollutants can have on our residents' health. Air pollution is the largest environmental risk to human health in the UK and environmental pollution remains the largest environmental cause of disease and premature death with an estimated annual 10.2 million deaths world-wide attributed to the PM2.5 element of fossil fuel.

8.3. Hillingdon is home to London's Heathrow airport and is impacted by the environmental impact associated with this national essential infrastructure site; there are significant major road networks that link London and the wider South East with the airport that negatively contributes to air quality and we recognise the detrimental health impact of air pollutants on our residents.

8.4. We have looked at the short, medium and long term health impacts of exposure to the common air pollutants which have been linked to cardiovascular diseases, cancers, type 2 diabetes, dementias, respiratory illnesses including children's lung capacity and asthma. Respiratory diseases are the third highest cause of deaths in Hillingdon (pre-covid-19) contributing to at least 15% of hospital admissions and costing approximately £10m to the health service in Hillingdon annually.

8.5. These health harms are not evenly distributed in our borough with some of the poorest areas facing the highest rates of early deaths from the causes stated, as evidenced in our JSNA¹⁶.

8.6. We have been unreserved and unapologetically vocal about our concerns related to environmental pollution which is why we are pleased to see that you have rightly acknowledged how toxic air pollution gives rise to the greatest health impacts in outer London. Even though levels of NOx, PM10 and PM2.5 might be lower in the outer parts of London (like Hillingdon), the greatest share of premature deaths related to poor air quality are in outer London boroughs. This is partly due to the higher proportion of older Londoners living in boroughs like ours, a group for whom air pollution has great health consequences. The number of individuals with lower levels of income and wealth is greater in outer London; and compared to inner London areas, our residents suffer more from disadvantage and the associated health impacts. Hillingdon's proportion of population aged over 65 years (13%) is higher than the London average (11%) with some areas closer to England's proportion (18%).

8.7. The main reasons why we do not agree with the proposed scheme based on the consultation information is because:

'WHOLE HEALTH' - AND NOT JUST AIR QUALITY RELATED HEALTH- IS IMPORTANT

¹⁶ London Borough of Hillingdon (2022) Joint Strategic Needs Assessment - Hillingdon Council

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Figure 28 : Prevalence of long- term conditions in Hillingdon compared with averages for London

Indicator	Period	Hillingdon			Region England		London		
		Recent Trend	Count	Value	Value	Value	Worst/ Lowest	Range	Best/ Highest
Cardiovascular Disease - Heart, Stroke & Diabetes									
CHD: QOF prevalence (all ages)	2020/21	➔	7,528	2.3%	1.9%*	3.0%	1.2%		
Stroke: QOF prevalence (all ages)	2020/21	➔	3,968	1.2%	1.1%*	1.8%	0.7%		
Diabetes: QOF prevalence (17+)	2020/21	⬆	20,782	8.1%	6.7%*	7.1%	3.5%		
Estimated diabetes diagnosis rate	2018	-	-	82.6%	71.4%	78.0%	54.3%		
Chronic Obstructive Pulmonary Disease (COPD)									
Emergency hospital admissions for COPD	2019/20	➔	540	401	358	415	716		190
Cancer Diagnosis & Treatment									
Percentage of cancers diagnosed at stages 1 and 2	2019	➔	408	52.4%	*	55.0%	-	-	-
Musculoskeletal (MSK) Long-term Problem									
Percentage reporting a long-term Musculoskeletal (MSK) problem	2021	-	-	12.6%	12.1%	17.0%	18.4%		9.1%
Percentage reporting at least two long-term conditions, at least one of which is MSK related	2021	-	-	8.7%	8.3%	12.1%	13.0%		5.7%
% reporting a long term MSK problem who also report depression or anxiety	2016/17	-	-	23.6%	25.9%	24.1%	34.9%		
Prevalence of knee osteoarthritis in people aged 45 and over	2012	-	17,921	17.9%	17.0%	18.2%	20.2%		6%
Prevalence of severe knee osteoarthritis in people aged 45 and over	2012	-	5,970	6.0%	5.4%	6.1%	7.1%		%
Prevalence of hip osteoarthritis in people aged 45 and over	2012	-	10,612	10.6%	10.5%	10.9%	11.8%		9.6%
Prevalence of severe hip osteoarthritis in people aged 45 and over	2012	-	3,117	3.1%	2.9%	3.2%	3.6%		%
Rheumatoid Arthritis: QOF prevalence (16+)	2020/21	⬆	2,028	0.8%	0.5%*	0.8%	0.3%		
Sensory & Communication-related Conditions									
Preventable sight loss - age related macular degeneration (AMD)	2020/21	➔	39	92.8	64.2*	82.0	136.5		24.5
Preventable sight loss - glaucoma	2020/21	➔	10	7.3	10.7*	9.2	20.3		3.9
Preventable sight loss - diabetic eye disease	2020/21	-	-	*	1.8*	0.9	-	Insufficient number of values for a spine chart	
People aged 65-74 registered blind or partially sighted	2019/20	-	150	690	778	536	376		
People aged 75+ registered blind or partially sighted	2019/20	-	795	4,043	4267	3429	1,880		
Access to NHS dental services - successfully obtained a dental appointment	2020/21	➔	1,722	81.2%	79.4%	77.0%	73.4%		3%
Common Mental Health Disorders									
Estimated prevalence of common mental disorders: % of population aged 16 & over	2017	-	41,289	17.4%*	19.3%*	16.9%*	24.4%		
Estimated prevalence of common mental disorders: % of population aged 65 & over	2017	-	4,138	10.3%*	11.3%*	10.2%*	14.6%		%
Dementia									
Dementia: Crude Recorded Prevalence (aged under 65 years) per 10,000	2020	-	88	3.11	2.19*	3.05*	1.16		
Dementia (aged under 65 years) as a proportion of total dementia (all ages) per 100	2020	-	88	4.6%	4.1%	3.5%	2.2%		
Dementia: Recorded prevalence (aged 65 years and over)	2020	-	1,814	4.19%	4.17%*	3.97%*	3.33%		
Estimated dementia diagnosis rate (aged 65 and over)	2022	➔	1,875	65.6%	66.8%	62.0%	51.0%		
New data (significantly) < 66.7%									
Dementia: Direct standardised rate of emergency admissions (aged 65 years and over)	2019/20	-	1,685	3,800	4013	3517	6,100		2,822

8.8. The ULEZ impact assessment focuses mainly on air quality associated with LYL, hospitalisation and monetisation of those based on impacts of diseases related to poor air quality only. With insufficient or no consideration given to wider physical and mental health, social and economic impacts, which are equally as important for people living and working in outer London.

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There is insufficient evidence and clarity around mitigations for factors related to accessibility, affordability for people living with various long term conditions (LTCs), which is a common feature of the current ageing society.

8.9. Figure 28 clearly shows that Hillingdon's morbidity burden due to common causes of illness like coronary heart disease (CHD), stroke, diabetes, and dementia is significantly higher compared with London's averages. This is just those with an identified LTC on GP registers, while there might be many in any population who have not been diagnosed but might suffer from ill health symptoms and present frequently at GP practice or at urgent care.

Inability to access timely care is common among deprived and marginalised population groups and communities resulting in delayed diagnoses and early mortality.

OUTER LONDON POPULATIONS AND THEIR NEEDS ARE DIFFERENT TO INNER LONDON

8.10. Distances and transport connections are very different in outer London areas as compared to central London and Inner London which would make a much larger and disproportionate impact on the lives of people who will be disadvantaged through this scheme on the basis of their age, disability, health condition, income, employment, and geographic area

TRANSPORT TO HEALTH SERVICES

8.11. Research shows that people stop driving due to health concern or age which means they depend upon others to take them to run errands like weekly shopping and access to health care appointments, which will be compromised for older people who depend on their car and or family members who use family car to support older / disabled dependents for hospital, GP and other healthcare visits and appointments. We expect there to be those who do not qualify for the schemes identified in your impact assessment (e.g. Motability, attendance allowance). We believe there to be many of those who might have impairment(s); and those who might not fit the complex categories for NHS reimbursement. We feel this impact is understudied with inadequate and inappropriate mitigations. We know from an Age UK research (Moore GH, 2015¹⁷) that:

- 1.45 million of those 65 and over in England find it difficult to travel to hospital, whilst 630,000 of those 65 and over find it difficult or very difficult to travel to their GP. It is the oldest old who find it the hardest - less than half of people over 80 find it easy to travel to a hospital.
- It is the people with the worst health and the lowest incomes who struggle the most to travel to health services.
- Of the people who find it 'very difficult' to travel to their GP, 71% are in fair or poor health. This contrasts with people who find it 'very easy', of whom just 22% are in fair or poor health.
- The average weekly household income of those who find it easiest to access their GP is £526, compared with an average income of £313 for those who find it most difficult.

NHS BACKLOGS, MISSED APPOINTMENTS AND THE LOOMING DANGER OF EXTRA DEATHS

¹⁷ Clearly costs will have escalated considerably subsequent to this Age Concern report, especially in the first half of 2022; nevertheless many of the fundamental findings of this third-party report remain relevant and illuminating

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8.12. Due to COVID lockdowns and shielding arrangements, many people with long term conditions have not been able to attend preventative diagnostic services (e.g. cancer screening) prescribed medical procedures (e.g. hip replacements) and treatments for their conditions like diabetes, heart disease and cancers. As per data published by the British Medical Association (BMA, 2022); a record of over 6.6 million people are waiting for treatment and it will take years to clear the backlog.

8.13. The ongoing need for stringent infection prevention control measures and workforce shortages mean it will take even longer to work through as demand continues to rise. Experts predict these backlogs and the delays in diagnoses and treatment will inevitably result in preventable mortality. Under the current conditions public services should be doing everything to support people's attendance at their long overdue appointments – especially considering those with long term conditions (Moore GH, 2015) already have problems accessing primary and secondary care due to difficulty in getting to their GP or hospital complicated by age, morbidity and poor public transport without adding schemes like ULEZ which have not considered its impact on people.

INADEQUACY OF PUBLIC TRANSPORT AND SOCIAL WELL-BEING

8.14. Public transport is not meeting the needs of many older people or young families. The most frequent reasons for not using public transport among those 65 and over are that it's not convenient and does not go where you want. Driving remains the most common form of transport for older people in the UK, with 68% of households where someone is aged 70+ having their own car (Moore GH, 2015). Disruptions to people's social networks and connections: Young families with small children or families with older parents pushed to make difficult choices. The importance of these aspects came to the fore during COVID-19 lockdowns. There is lack of clarity around mitigations around social connectivity.

Figure 29: CASE STUDY, COURTESY OF HEALTHWATCH HILLINGDON (Names anonymised)

Impact of ULEZ on residents and the NHS – a Patient/ Carer Experience

"X is his mother's Carer, as such he takes her to regular appointments at [a well-known Major Hospital within the existing ULEZ boundary]. This requires driving into the new ULEZ zone. His car does not comply with the ULEZ requirements, consequently he incurs a £12.50 charge each time his mother attends an appointment.

X's mother is registered disabled, has a blue badge, and receives attendance allowance. X has contacted TfL regarding an exemption and has been told that he needs to re-register his car to his mother in order to receive a tax exemption. He was advised by TfL to contact the DVLA to do this, however the DVLA have said this is not something they would arrange. X does not understand why he should have to do that anyway, and that there must be a number of carers who use their own vehicles as part of their caring responsibilities.

*On further investigation it appears that LNWH NHS Healthcare Trust are running a scheme, for patients that are eligible, **to claim back any ULEZ charges they incur for attending appointments that they would be unable to use public transport for.** Whilst this is positive for patients, the claims process is lengthy, placing additional stress onto Carers as well as an already pressured NHS.*

X is just one unpaid Carer who has contacted us regarding his experience. Our concern is regarding how many other carers and patients may be adversely affected by the ULEZ and if the NHS is being placed under further financial burden as a consequence."

The nature of hospital and healthcare provision in Outer London makes it clear that a system of the ad hoc kind referred to in this one case study would surely be untenable across the whole spectrum of vulnerable groups reliant on carer support.

8.15. In the current environment, many outer London residents who are struggling with the increased cost of living also have low access to public transport and the urgency to change their cars or retrofit at this time of financial challenge especially when other options have not been considered is unnecessary. Putting further pressure on already stretched family finances might impact negatively on the circumstances, relationships and mental health of many. These impacts remain unstudied and unexplored

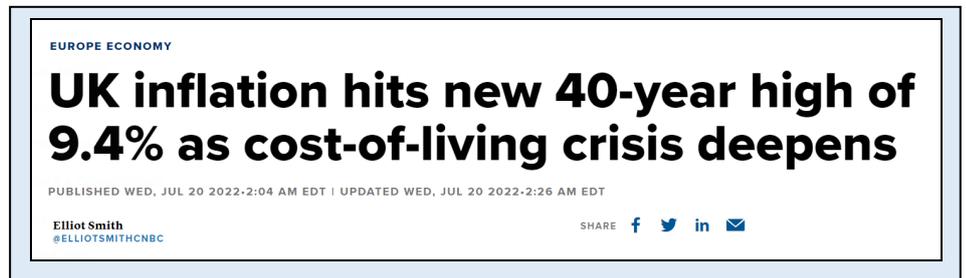
8.16. A blanket extension of the scheme, which produces moderate air quality benefits for inner London, might be potentially harmful for the outer London population. It would be irresponsible and inequitable to not consider and mitigate the wider health impacts on outer London population whose needs based on their living environment, living and working conditions are very different from those living in Central London

8.17. The ULEZ extension, without considering and mitigating the wider comprehensive health impacts has the potential to be damaging, inequitable and unjust. There are missed opportunity costs that could be realised through a properly considered approach that would involve mitigation of wider negative impacts and enhancement of positive impacts and could potentially serve as a good practice example for national and international use. On the other hand, ignoring the wider impacts would be a lost opportunity for learning lessons for the future.

Comment: The evidence so far appears to be that the plan to extend the ULEZ has been undertaken with a little or no regard to the detailed equality impacts which will have serious implications for many more vulnerable groups and those for whom access to primary and secondary health care is vitally important. Access to healthcare is crucial over the next few years for people caught in NHS backlogs, especially older people, young families and disabled people from socially deprived communities; for whom public transport is not meeting the needs. Further work needs to be done, and mitigations scoped, before rushing in to a plan without these impacts having been assessed and given proper credence. Many vulnerable groups are also reliant upon others – carers, who may be relatives – and the means of supporting these vital links in the lives of those less able to access health care has simply not been quantified. It is the Council's view that the ULEZ extension, without any meaningful mitigations, will simply serve to widen inequality and result in avoidable morbidity and mortality for those living in Hillingdon and outer London..

9. IMPACTS ON VULNERABLE & LOWER SOCIO-ECONOMIC GROUPS

9.1. Fundamentally, as already noted, the Mayor's proposals have arisen at a time of unprecedented national financial turmoil, with record levels of inflation and specific fuel price escalation caused by the conflict in Ukraine. However the proposals will have a disproportionate impact on many of those in society least able to overcome them.



9.2. The Ultra-Low Emission Zone (ULEZ) granted an exemption to disabled people who are eligible for vehicle tax exemption; this will expire on 26th October 2025 when all non-compliant vehicles will incur the daily charge.

9.3. The proposal to further expand the ULEZ to cover 96% of Greater London with no long-term exemptions proposed beyond October 2027 will disproportionately affect many older and disabled people. This is a complete disregard for the equality of older and disabled people with more complex travel requirements who will incur greater costs and are unable to use alternative modes of transport.

9.4. The Mayor of London and Transport for London are urged to reconsider the economic, social, environmental, and ethical issues of this proposal and not allow this to become policy without implementing meaningful long-term exemptions or other mitigation measures to counter the adverse impact it will have on older and disabled people.

9.5. The London Borough of Hillingdon requests that the disproportionate impact on older and disabled people is evidenced with a robust Equalities Impact Assessment, with following issues addressed before any decisions are made:

9.6. Only 37% of the overground and underground network has step free access, most of which is in central London and therefore older and disabled people in outer London have a greater dependency on a private vehicle¹⁸.

9.7. There is a limited availability of taxis within the London Borough of Hillingdon primarily owing the more lucrative work generated by Heathrow airport. This presents an issue to local residents needing wheelchair accessible taxis to travel shorter distances with the borough and thus requiring their own vehicle.

9.8. Wheelchair Adapted Vehicles (WAVs) cost on average £40,000 more than a standard equivalent non-adapted vehicle and are in general more expensive vehicles given the need to accommodate a wheelchair user. The vehicle is often only used for local journeys and therefore have a relatively low mileage. As a result, disabled people requiring such a vehicle tend to own or lease these vehicles for longer than non-adapted comparable vehicles. Motability WAV customers, for example, with 25,000 miles at the end of their five-year lease agreement or have certain

¹⁸ Department for Transport: Transport: Disability and Accessibility Statistics, England 2020 (Statistical Release, 22nd September 2021)

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adaptations fitted, may be required to keep their vehicle for a further one or two years, with a possible extension of up to 10 years¹⁹.

9.9. Considerable time and effort are required to adapt a wheelchair accessible vehicle as the majority are not an off-forecourt purchase, but are custom-made for an individual. The time involved will result in some people losing their independence as they are forced to replace their perfectly good WAV with a new compliant vehicle. ULEZ compliant vehicles as part of the Proposed Scheme are demonstrated to have a neutral impact in reducing particulate matter percentage²⁰. The insignificant cost benefits to the environment would have a high negative impact on lower socio-economic groups.

9.10. The scrappage scheme contribution of £2,000 is a meagre incentive and a token gesture to disabled people who are amongst the least economically able to afford a new vehicle given that a replacement WAV with adaptations can be up to £100,000. The Mayor's December 2017 Integrated Impact Assessment (IIA) suggested that there are a range of affordable compliant vehicles that provide a better alternative to exempting vehicles used by London's 245,000 Blue Badge holders. This was questionable at the time and remains a valid concern still.

9.11. The Integrated Impact Assessment identified a disproportionate impact on the owners of diesel-powered Wheelchair Adapted Vehicles (WAVs) (11% petrol versus 65% diesel) when the ULEZ was extended to Inner London in 2021. However, TfL estimates that around four out of five cars within the expanded zone would meet the minimum emission requirements and would therefore not be liable for the charge²¹. There appears to be a disconnect between the reality for many older and disabled people and the published research findings, and LBH would particularly like to see further evidence to support this statement.

9.12. The Integrated Impact Assessment ULEZ Further Proposals research clearly identified a higher percentage of 'disabled' tax class non-compliant vehicles in London compared to 'PLG' taxed vehicles²². This is further highlighting the disproportionate adverse impact on disabled people who own 'disabled' tax class vehicles and regularly drive into the expanded ULEZ area.

9.13. As there is no guarantee that Euro 4 and Euro 6 emissions will remain compliant vehicles in the future, Transport for London needs to develop a strategy to combat the absence of any viable fully electric options for WAV users. Failure to do this will result in many older and disabled people not having the option of 'future proofing' by investing in a fully electric vehicle.

9.14. The reductions to Universal Credit, increases in charges for social care, and soaring energy, petrol and food prices will have a disproportionate and cumulative impact on older and disabled people, as well as those who provide formal and informal personal, social and medical care services who are often in the lower socio-economic group.

9.15. The government has now included social care workers, care assistants and home care worker roles on the Shortage Occupation List, recognising the acute shortage skilled people willing and able to work what are typically antisocial hours paid at the London Living Wage. The

¹⁹ Addendum to the Integrated Impact Assessment of ULEZ Further Proposals (December 2017), 18 May 2018 up

²⁰ Table 1: Predicted impacts, committed and potential mitigation and enhancement measures: ULEZ Scheme Integrated Impact Assessment report - 17 May 2022

²¹ <https://tfl.gov.uk/info-for/media/press-releases/2022/may/tfl-seeks-views-on-expanding-world-leading-ulez-london-wide>

²² Integrated Impact Assessment of ULEZ Further Proposals - December 2017

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proposed ULEZ expansion will further disincentivise new recruits and may force many existing care workers, who often struggle to run a vehicle required for door-to-door visits let alone purchase a replacement, to give up the profession altogether. This would have a profound knock-on effect, adding to the burden and sending our already 'broken' social care system into further crisis.

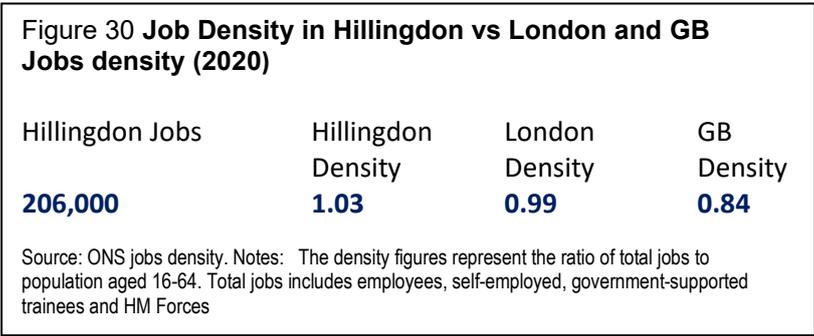
9.16. The protected characteristics of disabled and older people who have no choice but to travel in private vehicles must be safeguarded and the Mayor's Office must consider the following points if the GLA is determined to expand the ULEZ:

- Action an Equalities Impact Assessment covering the issues raised in this document
- Implement an exemption to all 'disabled' class vehicles at the very least and ideally to all vehicles uses by blue badge holders
- Introduce a new and increased scrappage scheme to people who have no choice but to travel in Wheelchair Accessible Vehicles
- Consider a lifetime exemption for 'disabled' tax class Wheelchair Accessible Vehicles with below average mileage and/or fitted with complex/specialist adaptations
- Provide information to WAV users on accredited Euro 4 and Euro 6 retrofit solutions approved under the Energy Saving Trust CVRAS scheme for use in Clean Air Zones.
- Grants to cover the cost of retrofitting Selective Catalytic Reduction (SCR) systems to WAVs should be made available as an alternative to the scrappage scheme.
- Explore the feasibility of offering either an exemption and/or an increased scrappage payment to the key workers supporting older and disabled people who will also be impacted by the extension of the ULEZ.

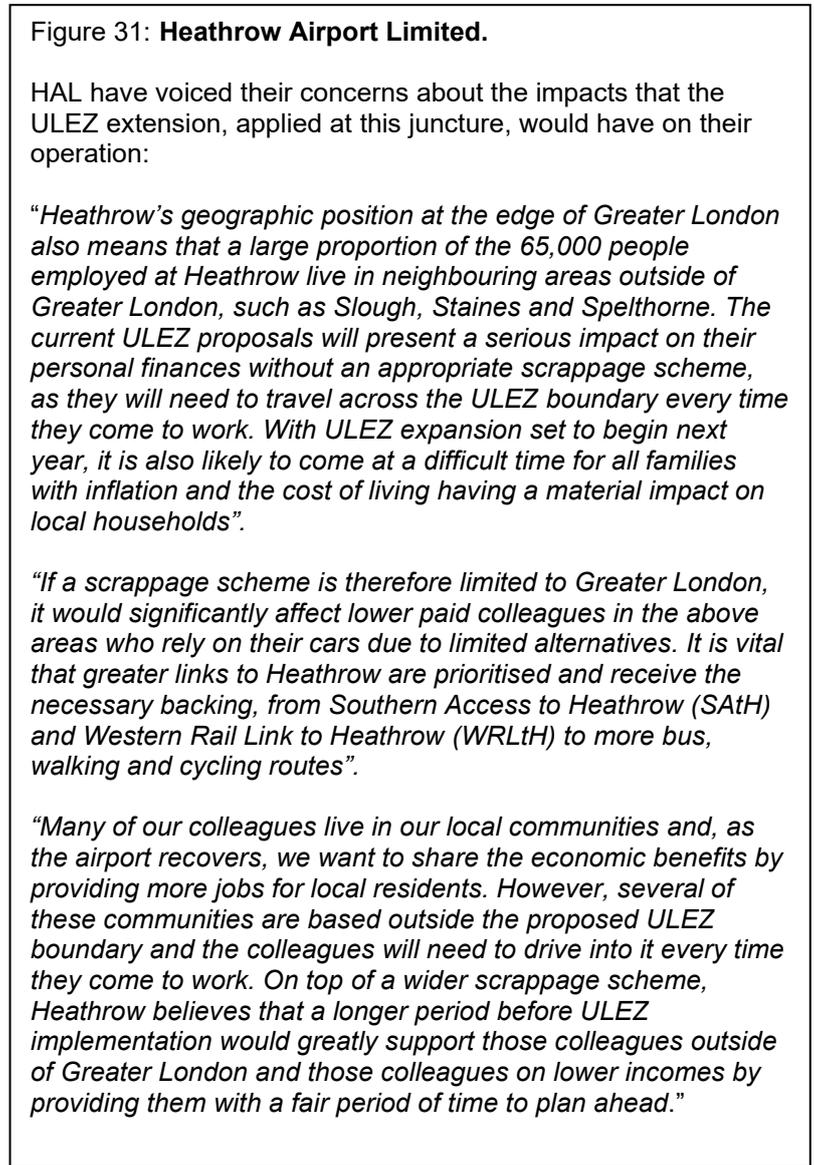
Comment: For a significant number of vulnerable people in Hillingdon – and not only residents, but also those who rely upon the area in some capacity, such as study, work or access to health care – a private vehicle may be their only lifeline. For many of them, reliance upon a third party – a relative or other carer – is also a vital link in the chain. The present ULEZ proposals provide scant reassurance that their very real needs will be catered for.

10. COMMERCIAL IMPLICATIONS FOR EMPLOYMENT AND BUSINESSES

10.1. Some aspects of the impact on Heathrow were touched on above; there are some issues that impact lower-paid staff and HAL's case could be an indication of a wider challenge. Some feedback from HAL is summarised in Figure 31 below. The Councils Partnerships and Business Engagement Manager comments: *'the Mayor's proposal seen ill-thought-through in terms of how an international hub airport works. It seems perverse to apply the new charges before the much need investment in the Piccadilly line is made or indeed scheduled'*.



10.2. *'If there is a unilateral daily charge it will adversely impact the lower-paid shift workers who cannot access public transport easily (due to the shift times) or their place of work is not easily accessible in terms of public transport. Whilst a percentage of Heathrow employees come from London boroughs the fact remains that the boroughs of Slough, Spelthorne, South Buckinghamshire and Windsor and Maidenhead all have significant numbers of residents who work either at the airport or in Hillingdon. As well as the point already made about poor public transport provision in Hillingdon there is similarly a limited level of public transport that supports Heathrow from the West and South West. Again, as with the Piccadilly line – whilst there are designs to improve rail links from south west, they are not funded or to our knowledge planned'*



10.3. *'Without these investments it seems likely that recruitment and employment at Heathrow will suffer. Heathrow are already reporting that securing staff post covid is difficult (shift-work and travel being cited as key barriers). If to this is added a daily ULEZ charge and this situation is likely to be exacerbated'*

10.4. Hillingdon and other Outer London Boroughs had significant concerns about the GLA Boundary

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Charge in terms of its impact on businesses in those boroughs, HAL being the most obvious but not only example, and in particular commercial implications for those both just inside and immediately outside the cordon. Whilst the GLA Boundary Charge may have been ruled out, the ULEZ extension to the GLA boundary will have some similar impacts. Any scheme that involves a boundary or cordon of some kind has key implications for those living or operating nearby; it is very much a matter of direct impact to them in a way that simply does not apply in the same way from the perspective of someone remote from it.

10.5. We acknowledge that Heathrow Airport Ltd has put forward a tentative suggestion that any ULEZ scrappage scheme be extended ten miles beyond the GLA boundary²³; our view is that this is still too restrictive as Hillingdon's workforce comes from much further beyond that arbitrary locus.

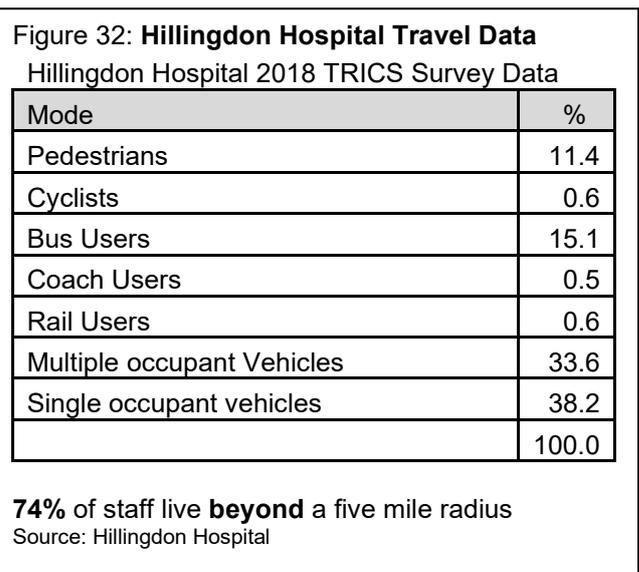
10.6. Mapping of employment as related to Hillingdon may be found on the 'NOMIS' web-site²⁴. The data sets cover levels of employment, break-downs by gender and other categories; those in work and not; so-called 'workless households' and also types of job and levels of qualification. This shows that the job density in Hillingdon is high (see Figure 30) and significantly better than either the London or GB averages.

10.7. An assessment of the implication of the introduction of an artificial cordon on Hillingdon was provided in the earlier briefing note on the GLA Boundary Tax that the Mayor was then considering, but that plan was abandoned.

10.8. Uxbridge is a prime example of the issues that Hillingdon faces as home to employers; although it is the Borough's Metropolitan Centre it sits right at the periphery of the geographic area, abutting South Buckinghamshire and the rival employment centres of New Denham and beyond. Unlike in City Hall, it is possible to sit in offices in Uxbridge and look out across the Colne Valley to the areas outside the GLA Boundary.

10.9. The Partnerships and Business Engagement Manager comments further: *'Slough, Reading and the Thames valley commercial sectors will benefit from the introduction of an extended ULEZ and the flip side of this is that our office centres, Stockley Park, Uxbridge and Hayes, which are already struggling are likely to be impacted further. If the ULEZ were to be extended I would in particular be worried for Stockley Park, which due to its limited public transport is heavily reliant on the car. Adding on another £30 or so a week in terms of travel costs for Stockley Park workers is not going to help make Stockley Park easier to sustain as an employment centre'*.

10.10. It is instructive to look at statistics from some of the key large local employers – such as Hillingdon Hospital, whose staff come from far and wide (see Figure 32) and the majority of whom live outside the usual 'five mile radius'



²³ Quoted from the HAL Response to the Mayor's proposed ULEZ extension

²⁴ Labour Market Profile – Hillingdon: <https://www.nomisweb.co.uk/reports/lmp/la/1946157271/report.aspx?town=hillington>

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commonly quoted as an area with easier scope for modal shift. As noted above, the situation with Stockley Park and other important centres is comparable.

10.11. The high ownership of light vans, a reflection of the preponderance of small businesses and sole traders, has already been discussed; fuel costs are already impacting the viability of many of these businesses and a further tax will not help them.

10.12. Hillingdon Council operates its own substantial fleet, which also draws in a significant number of drivers for whom public transport is simply untenable as a means of getting to and from work. Some fundamental observations include the following:

- As an outer London borough public transport would need to be better able to support staff living in Hillingdon with starting hours of 5am, 6am and 7am
- The same principle also applies to staff living outside Hillingdon, again with starting hours of 5am, 6am and 7am
- Frontline staff, who are on the lowest salaries (Scale 1 £21,399 and Scale 2 £22,179) would have to pay over £3k per year in charges if their car does not meet ULEZ requirements
- This at a time of unprecedented fuel, food, everything else increases that already put frontline staff under pressure
- HGV drivers are still in high demand so moving to non-London boroughs will probably not affect their pay but will save them £3k and place Hillingdon's services under pressure to pay £3k per driver more to cover fines
- Hillingdon borders onto boroughs that would not be directly affected by ULEZ so FTE and agency staff may well choose to work in these areas and avoid the fines, thus again putting pressure on frontline services
- Second-hand cars that meet ULEZ requirements are at a premium costs and probably out of reach for many frontline staff
- New cars are in short supply and there is an extended waiting period, plus are probably out of reach for frontline staff
- Staff in many of these front line services do not have an option of working from home for part of the week to avoid daily fines
- There is a risk that the pressures could increase sickness if staff do not want to or cannot pay fine, particularly at the end of the pay month
- Union pressure to support our frontline service could potentially precipitate industrial action

Figure 33: Hillingdon Fleet Implications

As well as the implications for staff employed in front line services, whose travel choices are limited, the Council has assessed its own fleet as follows:

Does the Council use any vehicles that do not meet the above standards which would therefore have to pay the £12.50 charge? - Yes

How many vehicles are used? – 105 vehicles

How often are these vehicles used? – These vehicles are used daily except for when they are in the workshop for repairs.

For what purpose are these vehicles used? – These vehicles are used mainly by Green Spaces, Facility Repairs and Passenger Services

Comment A: Businesses in Hillingdon are already suffering from well-known impacts such as the Covid Pandemic and fuel cost rises, and the associated inflationary pressures. The imposition at this time of an additional tax will have a

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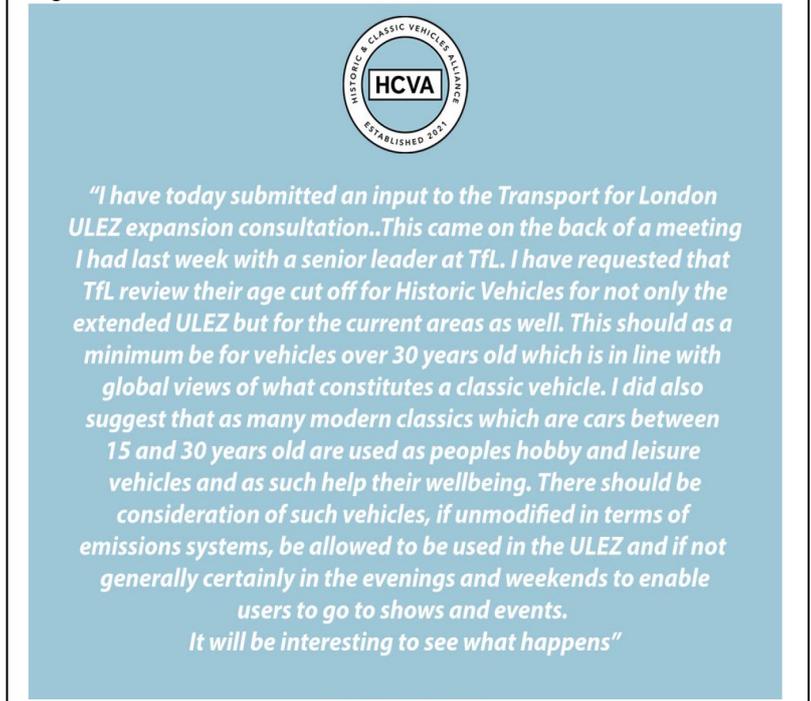
direct impact on how these businesses operate and their employees – especially those on lower pay bands, and consequently the timing and lack of mitigation make it ill-judged and unwelcome.

HISTORIC VEHICLES

10.13. The Mayor proposes to introduce a blanket coverage 24/7 with no weekend or off-peak concessions. The present proposal is to mirror the national definition of 'historic vehicles' to a rolling forty year cut off – thus vehicles older than that will, in the main, be exempt. However there is a fleet of younger vehicles which still fall into the broad category of historic or classic vehicles, many of them as noted by the Historic & Classic Vehicle Alliances as between 15-30 years old and seldom used as commuting vehicles of choice.

10.14. Many of these vehicles are owned and treasured by enthusiasts and the proportion of these vehicles in outer London is inevitably much higher than within the existing ULEZ cordon. When used, they are generally on the roads at weekends or evenings outside the peak period, but the Mayor's proposals will force charges on their owners every time they are used on roads within the GLA boundary. This seems to be an invidious and unnecessary financial burden, and will have a collateral impact on the associated classic car businesses that presently thrive in outer London.

Figure 34: HVCA Views



Comment B: The ULEZ is supposedly intended to be operated 24/7, with no let-up for either off peak weekday evenings or weekends. This means that occasional use of vehicles that are considered internationally to have some historic merit, even if they are not over forty years old, will be unfairly penalised, and in outer London and nearby towns, this will have an adverse impact on the small businesses such as garages which service this sector.

11. VEHICLE SCRAPPAGE

11.1. The Mayor has spoken in general terms about extending the vehicle scrappage scheme from the one that already operates on the inner London ULEZ.

11.2. In his December 2021 report, the Mayor states: *'to support the transition to cleaner vehicles the Mayor invested £61 million in scrappage schemes to help low income and disabled Londoners as well as charities and small businesses prepare for the ULEZ. Between them the scrappage schemes have helped remove over 13,500 older, more polluting vehicles from London's roads.'*

11.3. It is fair to ask how, in a period of declining TfL Finances, the Mayor intends to expand this to cover the Outer London areas he wishes to add to the ULEZ.

11.4. Officers discussed this issue with TfL at the meeting of March 23rd 2022; in essence TfL anticipate that there will be an extended vehicle scrappage scheme, but at this stage the key criteria and funding needed have yet to be defined. Data on vehicle scrappage to date is given in Figure 34.

11.5. Clearly such funding as the Mayor may make available will be ring-fenced within the GLA boundary; whilst the Council may recognise the logic of this from a public expenditure perspective, focusing outlay to benefit 'Londoners', the fact remains that employees who work in London but live outside the ULEZ boundary will be unable to upgrade their vehicles without the benefit of a scrappage grant, and as has been discussed already, their public transport options are already poor and show little signs of early improvement²⁵.

Figure 35: Vehicle Scrappage Proposals from TfL



Comment: The high numbers of people who live outside the GLA boundary but work within Hillingdon has already been discussed, along with their poor alternatives to the private car or van for transport. The ULEZ arrangements will provide no scrappage scheme to help these people who are nevertheless vital to Hillingdon's economy, and they will be negatively impacted by the same financial penalties, irrespective of their income level.

²⁵ It may reasonably be expected that the scrappage scheme offer will not extend beyond Outer London where Public Transport provision can be poor (high costs where available, as noted). The consequence will be that people living in the outlying shire districts but working or conducting business in Hillingdon would have to replace a vehicle at their own cost. Working in LBH would therefore become less financially viable. As noted in the report, HAL has suggested an ad hoc ten mile extension to the scrappage boundary but this appears impracticable and insufficient from the Council's point of view, albeit an improvement to a degree.

12. THE CHANGES IN VEHICLE FLEET ON THE APPROACH TOWARDS 'ZEV' POST 2030

12.1. Clearly over coming years, the proportion of non-compliant vehicles will fall dramatically; already Euro IV Petrol cars from ca 2005 onwards are ULEZ compliant, and Diesel vehicles from 2016 likewise. This poses the obvious question of a declining revenue stream where already, according to TfL's own data, around 88% of vehicles are ULEZ compliant, and by 2030 all new vehicles will be non-ICE and therefore 'low emissions'. TfL accept this is a factor, but they commented at the meeting of March 23rd 2022 that *'even EVs, with their heavier batteries, are a source of PM2.5 from their tyres'* which suggests that over time, TfL may seek to raise revenue from EV traffic.

12.2. The Council has embarked upon an ambitious forward programme of support for Electric Vehicles in terms of Electric Vehicle Charge Points (EVCP) and it is inevitable that the vehicle fleet as a whole – private and commercial alike – will see significant changes over the coming decade; however the proportion of electric vehicles will most likely remain relatively low even by the time that the ULEZ boundary changes, assuming that it does.

12.3. When the original ULEZ was introduced, TfL offered a so-called 'sunset' scheme which offered a grace period for residents with non-compliant vehicles of around three years. This time, TfL say, there will be no such grace period²⁶.

12.4. Electric vehicles are destined to gradually become the mode of choice – whether as private choices or in terms of public transport. In common with most local authorities across the United Kingdom, Hillingdon is developing its own strategic approach to support both these types of vehicles and the infrastructure needed to support them. There is no indication of any intention by the Mayor to sequester any funds to support this important transition; as already noted, there are also questions about the overall air quality impacts of EVs which have yet to be quantified.

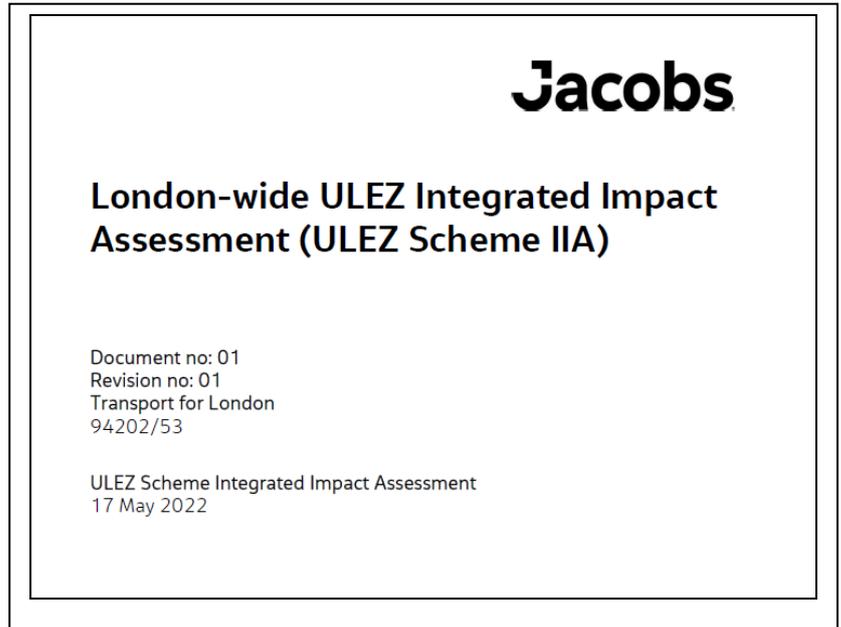
Comment: Whatever the motive power of vehicles in Hillingdon, it is clear that there are relevant emissions to be considered in the medium to longer term. The adoption of EVs is rising but to support this growth there needs to be a sea change in terms of infrastructure provision – and none of this funding is destined to come from the Mayor. There are also questions about particulate emissions and other aspects common to both IC and EV vehicles that this proposal does nothing to address. There has been debate about road user charging ever since the 1964 Smeed Report; the ULEZ tax is a blunt tool which does not solve this problem but instead provides revenue for the Mayor.

²⁶ Officer meeting of March 23rd 2022

13. CRITIQUE OF THE APPROACHES IN THE CONSULTANT'S 'ULEZ INTEGRATED IMPACT ASSESSMENT REPORT' (JACOBS²⁷)

13.1. The Mayor engaged the services of a consultant (Jacobs) to appraise the economic impacts of the ULEZ extension proposals. The Council has studied this nearly 200-page report in the context of Hillingdon and in particular some of the unique aspects of the Borough.

13.2. The commentary below should be read in tandem with the individual topic sections throughout this report, in particular the comprehensive coverage of Air Quality and Health Impacts. ***In addition, a separate appraisal of the IIA is attached as an Appendix to this report.***



13.3. As a key element of the Mayor's justification for introducing the ULEZ extension, the Council considers that the Economic development element of the impact assessment report by Jacobs is poorly developed. The section dealing with the impact on Heathrow for example is surprisingly short and lacks detail. This is a concern, considering Heathrow is the largest employment entity in London and due to the nature of its operation requires considerable vehicle movements in terms of both staff and services.

13.4. In respect of Economic development issues the Jacobs report makes fairly sweeping conclusions based on very limited amounts of data and at the same time appears to be selective in the use of data. It does raise the question that if the study was more detailed / wider it could have potentially reached a different set of conclusions.

13.5. There is further concern that whilst the study does point towards some negative economic development impacts, it generally either deems these minor or that the impacts will be short term, but this appears to be more of an opinion than quantified predictions.

13.6. Much of the mitigation suggested to alleviate some of the potential issues the expansion of the ULEZ zone will have is either unrealistic – such as 'park and ride schemes' in boroughs outside of London, or pretty meaningless e.g. suggestions that out-of-London boroughs have regular dialogue with the GLA. There seems scant evidence of any meaningful commitment from the GLA to work with boroughs on the borders of London to improve transport links or increase services. Nor is there a commitment to the scale of investment needed in public transport infrastructure in outer London boroughs. Without such commitments, as noted throughout this report, the ULEZ proposals would appear to impacted the already economically disadvantaged

²⁷ Report by Jacobs: "London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA) Document no: 01 Revision no: 01 Transport for London 94202/53 ULEZ Scheme Integrated Impact Assessment 17 May 2022"

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sections of the local communities who rely upon Hillingdon to live, study or go about their business.

SELECTIVE USE OF DATA

13.7. It is evident that the primary function of the Jacobs Report is to underpin the basic premise of the Mayor's plan to extend the ULEZ. It is regrettable therefore that to meet this objective, the report appears selective with its use of or interpretation of data. No doubt time and resources limited the report authors' ability to make a meaningful assessment of transport movements across the GLA boundary, but the lack of recognition of this important factor in the real world of local transport movements should not be an excuse to trivialise it through omission.

13.8. For example **Table 4.3** in the Jacobs Report²⁸ looks at travel for business to Hillingdon from South Bucks and Hertfordshire. It does not look at travel for business from a places like Slough, Spelthorne and the wider Thames Valley. Many of the service sector jobs at Heathrow are taken by residents travelling in from these locations for example.

13.9. **Table 4.4** in the Jacobs Report looks at other trips from boroughs outside London into Outer London boroughs but does not acknowledge Hillingdon as a destination. Given Hillingdon is home to Uxbridge, a metropolitan town centre on the border of South Bucks and serving a wide range of towns and communities to the West of London, that would appear to be a significant oversight. The report claims:

“All the major outer London retail centres are well served by public transport”.

13.10. As discussed earlier, in Uxbridge's case this is simply incorrect. Public transport links from out of London neighbouring boroughs are poor. Most visits as a result will be by private car. The Jacobs report does suggest that around 60 per cent of those non-compliant trips are forecast to be lost with almost no mode shift (mainly due to the lack of alternatives and preference

Figure 36: Jacobs Tables 4.3 and 4.4 extracted from Jacobs Report and referenced in this section

Table 4-3. 2023 car trips to outer London from outside Greater London under the existing ULEZ and with the Proposed Scheme - Business

Rank	Origin	Destination	Trips - ULEZ	Trips - Proposed Scheme	% change
1	Essex	Havering	3,800	3,800	-0.8%
2	Herts	Barnet	3,200	3,100	-1.3%
3	Kent	Bexley	3,000	3,000	-1.3%
4	Surrey	Croydon	2,900	2,900	-0.9%
5	Surrey	Hounslow	2,800	2,800	-1.7%
6	Kent	Bromley	2,700	2,700	0.0%
7	Bucks	Hillingdon	2,600	2,600	-1.1%
8	Surrey	Sutton	2,500	2,500	-0.6%
9	Surrey	Kingston	2,200	2,100	-1.9%
10	Herts	Hillingdon	2,100	2,100	-1.4%

Table 4-4. 2023 Car trips to outer London from outside Greater London, under the existing ULEZ and with the Proposed Scheme - Other

Rank	Origin	Destination	Trips - ULEZ	Trips - Proposed Scheme	% change
1	Essex	Havering	20,500	19,800	-3.6%
2	Kent	Bexley	16,900	16,100	-5.0%
3	Herts	Barnet	14,400	13,700	-5.1%
4	Surrey	Kingston	14,000	13,200	-5.4%
5	Surrey	Croydon	12,400	11,900	-4.0%
6	Surrey	Sutton	12,000	11,400	-4.9%
7	Herts	Harrow	11,700	11,000	-5.8%
8	Herts	Enfield	11,400	10,900	-5.0%
9	Kent	Bromley	10,700	10,300	-3.8%
10	Essex	Redbridge	9,800	9,400	-4.3%

²⁸ Page 37 of Jacobs Report

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for using a car). It is expected these trips would transfer to other retail centres outside Greater London or move to home delivery. This is certainly not a good outcome for Uxbridge.

13.11. **Table 4.7** of the Jacobs Report addresses the increased use of public transport and talks of increased public transport provision between outer London boroughs. This is understood and much needed within outer London but there is scant consideration of the improvement in transport links between out of London boroughs to the outer London boroughs. As noted earlier in this report, even where links exist the cost, particularly for those on low incomes is likely to be prohibitive.

13.12. **Table 4.8** addresses the increase in walk / cycle to work /shop from out of London boroughs to outer London boroughs. Not unsurprisingly it talks of significant increases, however just how realistic is this increase. The cycle / walking infrastructure linking employment / shopping destinations between out of London and Hillingdon is nowhere near ready to facilitate / justify this level of expansion and again no funding commitments are evident from any quarter.

IMPACT OF ULEZ ON LOW INCOME SECTOR

13.13. The Jacobs report acknowledges that there will be an impact on the expanded ULEZ on various generic outer London areas, but tends to go on to dismiss most of these are either short term or inconsequential. The prime example in Hillingdon is Heathrow Airport, where the Jacobs report states:

“Overall, a short-to-medium term minor negative impact is predicted on people living outside the Proposed Scheme in urban or suburban areas which would straddle the London-wide ULEZ boundary”

13.14. The Jacobs report goes on to recognise that

“This would disproportionately impact on people on low incomes due to their lesser capacity to upgrade to a compliant vehicle or to pay the charge”.

13.15. However whilst the report suggests, with little evidence, that the proposals will *‘in aggregate have a minor negative impact on employers in outer London’* the suggested mitigation is flimsy. The report recommends mitigation i.e. – Collaborative working between TfL and local authorities adjacent to Greater London, for example, through holding regular meetings up to the implementation of the Proposed Scheme and for the first year of implementation to monitor the impacts of the Proposed Scheme. By that time, the ability to dismantle the architecture of the scheme will clearly have already passed; to use the vernacular this is in effect ‘kicking the solutions into the long grass’.

HEATHROW AND RECRUITMENT

13.16. Elsewhere in the report Jacobs also acknowledge that Heathrow recruitment is likely to be impacted by the ULEZ proposals. It is estimated by Jacobs that around 6 per cent of employees at Heathrow would be impacted by the proposed scheme, with half of these living outside Greater London. This latter group may be more likely to switch jobs to avoid having to enter Greater London. With a buoyant labour market at the present time, employers at Heathrow may struggle to recruit unless wage levels are raised.

13.17. Again the report plays down the impact. One paragraph acknowledges the following

- *Around 190,000 car commuting trips occur each day from outside Greater London into outer London of which 20,000 (10.5 per cent) are estimated to be made by vehicles that are noncompliant with the ULEZ standards.*

13.18. **Given the tight labour market and the lack of alternative modes of transport in many cases there is a risk that a significant proportion of these individuals may seek employment elsewhere putting further pressure on employers.** It should be noted, however, that there are over 230,000 unemployed people in London and at 4.6 per cent the unemployment rate is one of the highest in the UK. Unemployment is also around 1.3 percentage points higher in outer London than inner London.

13.19. The report describes the labour market as both tight and buoyant. Jacobs appear to be suggesting that any difficulties in recruitment will be solved by unemployed residents taking up the jobs that become available if residents from out of London boroughs can no longer afford to travel into outer London to work. This appears to be a somewhat crude and unrealistic argument; the labour market is so much more complicated than Jacobs are suggesting. If one considers, for example, the current employment challenges Heathrow are experiencing, it is not simply a case of unemployed people filling vacancies. With regard to Heathrow, Jacobs acknowledge (after the introduction of ULEZ) that unless wage levels are raised, recruitment might be challenging; already growing transport costs are known to be a significant concern to Heathrow, as highlighted in Figure 28, which represents HAL's own views rather than Jacob's.

ONGOING RECRUITMENT CHALLENGES

13.20. Whilst the report acknowledges the issue of challenges in recruitment, there is nothing in the way of the mitigation proposals that served to address these challenges and even if it was possible to simply raise wage levels it might still not be possible to fill the numbers of vacancies. On 14th July 2022 the results were seen from a survey by the British Chambers of Commerce of its members. The report²⁹ highlighted that there were some 1.3 million vacancies in the UK economy, with *'The construction sector facing the most severe recruitment challenges, with 83% reporting difficulties.....This is closely followed by production and manufacturing on 79%, logistics on 79% and hospitality on 78%'*. Heathrow needs both logistics and hospitality staff. This report serves to raise questions on the validity of Jacobs report conclusions that the ULEZ expansion will have *'in aggregate a minor negative impact on employers in outer London'*.

DISPROPORTIONATE IMPACT ON THE LOW PAID

13.21. Whilst the report concludes the minor negative impact on employers, it plays down the proposed expansion from an employee's perspective. The report mentions the impact on employees who are impacted by the ULEZ proposals, (As quoted above) *20,000 employees from boroughs outside of London but who travel in each day are likely to be impacted and the report suggest may seek employment elsewhere.* This report appears to accept without consideration that significant numbers of workers will be forced to switch jobs and that this is an

²⁹ <https://www.britishchambers.org.uk/news/2022/07/rapid-reform-needed-to-tackle-crippling-staff-shortages-quarterly-recruitment-outlook>

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acceptable consequence of ULEZ expansion.

13.22. Residents of outer London boroughs including Hillingdon may also be impacted if they currently rely on non ULEZ compliant vehicles to travel to work,. It is likely that the lowest paid sections of our communities will be the ones with non-compliant vehicles and who tend to undertake shift or night work when the availability of public transport is either limited or unavailable. Jacobs acknowledge this in the report and concludes that *'for those people who are socio-economically deprived or on low incomes who do own cars, which are non-compliant with the ULEZ standards, the Proposed Scheme may have an adverse financial impact'*. This issue is particularly pertinent to the sectors of Hillingdon communities who work in the aviation support sectors who are required to work shifts. NOMIS 2020 employment figures report that in excess of 33,000 Hillingdon residents are employed within the 'transport and storage sector'. Again the Council's concern is that the Jacob's report either does not consider or plays down the potential impact that the ULEZ expansion could have on residents' access to employment.

13.23. The report acknowledges the issue of lower PTAL scores and the fact that services and jobs are more spread-out in outer London than they are in inner London, therefore making it more difficult for people to walk and cycle to these locations. Where public transport and active travel is less accessible in outer London and the adjacent areas, those on low incomes unable to afford a compliant car may find it more difficult to change their mode of travel to adapt.

13.24. The issue is that whilst the report acknowledges the impact, there is likely to be a short-to-medium term disproportionate moderate negative impact for people on low incomes who travel by a non-compliant private vehicle in outer London it plays down the impact by suggesting it will be a sort term one. From an outer London borough perspective it is difficult to see how the assessment could be anything other than a long-term and ongoing issue for residents on low incomes, without significant investment in public transport provision.

13.25. The report does not say how challenges residents face set out below will be overcome.

- living in areas of limited public transport, (lower PTAL levels)
- needing to transport or a vehicle for employment and
- in the main will struggle to upgrade their vehicles to be ULEZ compliant

Again, the haste to introduce an expanded ULEZ without seriously addressing these issues is a matter of concern.

LIGHT GOODS VEHICLES

13.26. In the report Jacobs highlight that the impact on numbers of Light Goods Vehicle (LGV) trips within the expansion area or into the expansion area from outside Greater London as a result of the Proposed Scheme has not been modelled. But are happy to conclude, the expected change 13.27. is likely to be minimal. However the study suggests that there is an estimated 30,000 noncompliant LGVs travelling within the ULEZ expansion area and from outside Greater London into the ULEZ expansion area each day.

13.28. The Jacobs report quotes that it will cost ***an average of £13,300 to upgrade to a compliant LGV*** and it is estimated the total cost for businesses with non-compliant LGVs between

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2023 to 2030 would amount to £359m. Of this, £96m would impact businesses outside Greater London and the remaining £263m would be borne by businesses within the ULEZ expansion area.

13.29. From an outer London borough perspective the report plays down the impact on the LGV sector without undertaking a specific study. However the number of non-compliant vehicles is considerable as is the cost of upgrading vehicles to meet compliance standards. The concern is there is insufficient information available to assess the impact on outer London borough business but we have an indication of the impact in the calculation of the upgrade costs in Jacobs report.

13.30. Businesses will be faced with the challenge of finding capital to upgrade non-compliant vehicles, pay the daily charge or cease operations. Feedback from the business sector in Hillingdon demonstrates that there is a genuine lack of awareness regarding the ULEZ expansion proposals and the impact it will have. One thing is clear that the ULEZ expansion proposals will incur businesses additional expenditure, which will ultimately be passed on to consumers.

MITIGATION PROPOSALS

13.31. There are a number of proposals to mitigate the impact of ULEZ and many of these are well intentioned and laudable. However without any resources to enable their implementation it is difficult to see these proposals being delivered. For example –

- *Promotion of car sharing for those locations/trips that are difficult to serve by public Transport*
- *Expansion of last mile links (e.g. bike hire/ e-scooters) to enable people from outside Greater London traveling to rail stations in outer London to make onward journeys to their place of employment*
- *Liaise with Heathrow Airport and relevant local authorities to explore opportunities outside proposed London-wide ULEZ boundary for park & ride sites catering for airport employees*

13.32. Each of these three proposals would incur a considerable initial financial outlay and ongoing operational & maintenance costs. It is difficult to envisage the out of London boroughs wanting to either host or pay for these facilities and there is no GLA financial commitment, therefore it is difficult to consider that any of these mitigation proposals are realistic.

Comment: The Jacobs Report is a lengthy document which aims to support the underlying case for expanding the ULEZ; as the assessment above indicates, whilst the report recognises some issues which broadly concur with the Council's own assessment, many of them are then almost dismissed as being either of minimal impact or likely to be reversed out in the short to medium term. The Council's view is that these issues and their real-world impacts should be given serious consideration rather than being lightly dismissed, and furthermore that some of 'mitigations' put forward are insubstantial ambitions, some of them dependent for delivery upon workstreams and funding simply undefined. Attention is also drawn to the Appendix to this report which shows the fundamental deficiencies of the IIA.

14. WHERE WILL THE FUNDS GO?

14.1. The Council Officers put this question to TfL at their meeting of March 23rd 2022; they reiterated the concern that the revenue raised would become part of the Mayor's overall funding regime and could clearly be spent on schemes which have no benefit to Hillingdon residents; indeed, the point was also made again about declining bus services.

14.2. TfL's view is that the revenue will be 're-invested in the transport system' which in

officers' view is an understandable but essentially vague answer. It is also clear that investment – such as scrappage and public transport – will not extend beyond the GLA boundary, despite the fact that TfL services extend well beyond it (e.g., Metropolitan Line).

14.3. In reality any investment to be realised on the back of this revenue exercise will be many years into the future, assuming indeed that it ever materialises in a form that deliver tangible benefits for residents as well as the many other people who rely upon travel into and around Hillingdon for one purpose or another.

Figure 37: Charge levels and emissions standards in ULEZ at present:

Vehicle type (includes hybrid vehicles)	Minimum NO _x emissions standards ¹¹	Daily charge if vehicle is not compliant with ULEZ standards ¹²
Motorcycle, moped etc. – Category L	Euro 3	£12.50
Car and small van – Categories M1 and N1 (I)	Euro 4 (petrol) Euro 6 (diesel)	£12.50
Large van and minibus – Categories N1 (II and III) and M2	Euro 4 (petrol) Euro 6 (diesel)	£12.50

The ULEZ PCN for the non-payment of the daily ULEZ charge for light vehicles is currently set at £130.

Comment: The ULEZ charge is a regressive tax, penalising those least able to afford it. Those who have the funds may choose to upgraded to a newer vehicle – either for general use or as a commercial tool for their business – but the less well off will not be able to do so. Scrappage and other 'incentives' aimed at Londoners will have zero benefit for the many people who travel to Hillingdon in the course of their work or study – and by association, will impact the viability of businesses and institutions reliant upon those people. Considering the present financial context, investment in public transport in this area – and that includes the places outside the GLA boundary - can be considered as little more than a wish for the future, with no clear timelines even if delivery is eventually more likely.

15. LEGAL CONSIDERATIONS

15.1. Clearly the existence and thus precedence of the present LEZ and ULEZ schemes provides an indication that the Mayor has the necessary legal powers to promote and bring forward the relevant processes to allow him to implement an extended ULEZ³⁰, although equally obviously there are checks and balances in place to ensure there are appropriate consultative steps involved.

15.2. The placement of new equipment, in particular cameras and traffic signs, on Council land and infrastructure would require an agreement between TfL and the Council under the provisions of Section 8 of the Highways Act 1980³¹.

15.3. It is the Council's view that the Mayor's proposals have been presented and are being pushed through with indecent haste; we feel this scheme is not sufficiently thought through and needs a wider impacts assessment, involving exploration of comprehensive human factors. The fact that the Integrated Impact Assessment is seen as fundamentally flawed should in itself be sufficient grounds for the present plan to be halted and a proper thought-through, funded set of aligned proposals should be developed in consultation with all stakeholders.

Figure 38: Views of the Council's Head of Legal Services on the ULEZ extension proposals:

'We believe that the consultation paper has been rushed and consider the Integrated Impact Assessment to be flawed for a number of reasons including:

1. The data relating to traffic appears to have been compiled in 2016. No reliance can therefore be placed on this data.
2. The IIA identifies many adverse impacts that will fall on vulnerable groups, particularly disabled people, yet contains no proper proposals to mitigate these impacts. For example, page 84 identifies "a short-to-medium term moderate negative impact on disabled people and older people who rely on transport by a non-compliant vehicle", but the proposed mitigation merely talks of "to raise awareness of the scrappage scheme" and mentions "a new scrappage scheme" but gives no detail. More importantly, page 96 states: "Older people, disabled people and people with underlying health conditions who are travelling by non-compliant private vehicle to access medical appointments in outer London will experience differential and disproportionate short- medium term moderate negative impact, as they are more likely to require access to healthcare and on a more frequent basis. These impacts could result in adverse health outcomes of patients who are less inclined to access medical treatment due to the cost incurred by the proposed scheme". The proposed mitigation is for: "TfL to work with CCG's, NHS trusts to inform vulnerable patients of the NHS patient reimbursement scheme" and for "a new scrappage scheme for cars should continue to be targeted at low-income Londoners and people on non-means tested disability benefits'.
3. It is clear that no prior consultation has taken place with CCG's or NHS trusts to establish the negative impact on their budgets of the expansion of ULEZ and neither has any proper consideration been given to suitable mitigation measures or changes to the scheme to enable disabled people to travel in non-compliant vehicles for the purposes of seeking medical treatment.
5. We believe that the IIA does not satisfy the requirements of section 149 of the Equality Act 2010 and that any decision to expand ULEZ based on the IIA would be unlawful.

³⁰ In London, the relevant legislation stems from section 295 of and Schedule 23 to the Greater London Authority Act 1999, as amended by Part 6 of the Local Transport Act 2008. The Road User Charging (Enforcement and Adjudication) (London) Regulations 2001; UK Statutory Instruments 2001 No. 2313. <https://www.legislation.gov.uk/ukSI/2001/2313/contents/made> The law relating to penalties imposed in regards to the Ultra-Low Emission Zone (ULEZ) is set out in the Greater London Low Emission Zone Charging Order 2006 as amended. The relevant regulations relating to the possible grounds of appeal are Regulation 13(3) of the Road User Charging (Enforcement and Adjudication) (London) Regulations 2001, as amended. See also <https://commonslibrary.parliament.uk/research-briefings/cbp-7374/>

³¹ <https://www.legislation.gov.uk/ukpga/1980/66/section/8> "Agreements between local highway authorities [and strategic highways companies] for doing of certain works".

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Comment: It is generally accepted that the Mayor of London has reasonable powers to promote and take forward proposals to levy charges on road users across Greater London. However it remains incumbent upon him to both ensure that his impact assessments are fit for purpose and right for the prevailing circumstances.

CONCLUSIONS

- Fundamentally, the Council's view is that the Integrated Impact Assessment (IIA) is not fit for purpose. It is not underpinned by correct, relevant or up to date information and relies on assumptions that have been generated on the back of opaque or missing evidence. It is therefore considered that the IIA does not meet the objectives for the relevant legislative component parts and does not provide a rational or sound basis on which to make a positive determination
- Hillingdon, a gateway between West London and the rest of the UK, has far more in common geographically, demographically, culturally, logistically and financially with towns outside Greater London than it does with inner London.
- The private car and light van is likely to remain, for the foreseeable future, a vital tool for people who live and work in Hillingdon. Shifting transport modes to more sustainable means is undeniably something that should be the aim, for those who have a choice, but if there is no alternative, punishing these people for having no alternative is indefensible.
- National inflation is at a forty-year high and likely to rise further; the impacts on the economy, including businesses as well as lower-paid members of the workforce, are obvious.
- Fuel poverty is already a real challenge in 2022; the underlying causes are well understood. The proportion of household bills spent on transport has climbed alarmingly this year already and in that context imposing a further tax on hard pressed families is ill-judged.
- The scheme will have its maximum impact upon those least able to afford it; the extra burden on low-income families is clearly going to be far greater than those able to afford the imposition of more costs on their daily lives.
- Public Transport is one of the areas of major weakness and the kind of transformational investment needed to support and sustain a change from the private car seems unrealistic.
- The Mayor's public transport reach hardly extends beyond the GLA boundary, and yet thousands of people who work and study in Hillingdon come from areas outside Greater London with poor public transport choice.
- The roads with the more severe AQ impacts are under the control of either the Mayor or National Highways. Investment in tackling air quality should be targeted and focused where the problems have been measured and quantified rather than a blanket approach.
- Health Services are already under pressure, but fundamentally in Hillingdon this is not really because of a local air quality challenge but through lack of services and difficulty of accessing them. The ULEZ proposals offer nothing to benefit this aspect.

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- Vulnerable groups are even more reliant on their existing limited transport choices; taxes which penalise them further but offer no hard benefits are of no benefit to them.
- Commercial businesses are already struggling to survive, and further taxes will only have a negative impact on their viability. The impact on the local economy of this can be seen as wholly negative. Examples include Heathrow and the Council's own operations. It is evident from the feedback the Council has received from chambers of commerce is that many smaller businesses have yet to full grasp the serious impact that the ULEZ extension will have on them and their membership.
- Vehicle scrappage is a blunt tool that if it works, will only benefit a fraction of residents who live in the Borough and logically will have no benefit whatsoever to the people who travel to and from Hillingdon in the course of their daily lives. Heathrow have suggested extending the 'boundary' for scrappage eligibility by an arbitrary ten miles, but the Council's view is that this is not only inadequate to address Hillingdon's own concerns but would be hard to operate in practical terms, as it simply shifts the barrier outwards.
- The Council's view is that such recommendations offered as mitigations are in many aspects too vague and generalistic, and too quick to suggest that obstacles to the ULEZ proposal may either be readily dismissed, quickly obsolescent or may be dealt with through some vaguely defined future mechanisms which are neither properly defined in terms of their hypothetical frameworks, let alone funded.

**APPENDIX: THE COUNCIL'S APPRAISAL OF THE 'INTEGRATED IMPACT
ASSESSMENT'³²**



HILLINGDON
LONDON

ULEZ Consultation

Integrated Impact Assessment Comments

Officer	Ian Thynne
Date	21 July 2022
The following is intended to inform the Council's response to the May consultation on the ULEZ extension to provide coverage of outer London boroughs	

Integrated Impact Assessment

1 Introduction

The Integrated Impact Assessment (IIA) submitted with the ULEZ consultation is not fit for purpose. The IIA is based on significantly out of date baseline information and not supported by clear, precise, and contemporary objectives.

The background IIA framework was simply lifted from previous iterations of the ULEZ consultations and was not updated; nor was the IIA framework consulted upon with those most impacted by the ULEZ changes.

Furthermore, the work undertaken is too generic to identify specific impacts for Local Authorities such as Hillingdon and therefore the conclusions presented in the IIA cannot be reasonably considered to be sound.

2 Scoping and Baseline

A principal complaint with the IIA relates to the framework and baseline information. The IIA states:

The IIA framework is objective-led, with the starting point being the IIA objectives employed for the assessment of the original central London ULEZ scheme in 2019 and its subsequent expansion in 2021. (3.2.1, IIA Framework)

³² Report by Jacobs: "London-wide ULEZ Integrated Impact Assessment (ULEZ Scheme IIA) Document no: 01 Revision no: 01 Transport for London 94202/53 ULEZ Scheme Integrated Impact Assessment 17 May 2022"

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The above correctly identifies the implementation of the ULEZ but fails to acknowledge that the consultation and therefore the IIA Framework is considerably older. The original consultations date back to 2014.

It was not prudent to simply retrofit the original objectives without any recourse to a robust consultation on the framework to ensure it was still effective and sound. The individual impact assessments that make up the IIA are supposed to be based on collaborative work with the key stakeholders. Instead, the authors of the report have simply devised their own approach and excluded the key stakeholders from the development of a key part of the plan making process.

The scope of the framework is inherently linked to the baseline information which informs the subsequent assessment. The correct approach would be to scope out the Framework, for example:

- Step 1 – Identify an objective – i.e. to protect and enhance the economic status of metropolitan centres
- Step 2 – Identify the baseline position that informs the objective – i.e. where, how and why do people use metropolitan centres
- Step 3 – Collect the evidence that supports Step 2
- Step 4 – Undertake a consultation with the key stakeholders to determine if the objectives are appropriate and the baseline information accurate.

Only once the framework and baseline information is properly collated and agreed with the key Stakeholders should the assessment take place and subject to a separate consultation.

In this instance, the objectives were not agreed with the key stakeholders and nor was the baseline and nor was any attempt made to secure a robust and sound evidence base.

Consequently, the objectives are not sufficient, the baseline data is wrong and therefore the IIA is fundamentally flawed to such an extent it provides no meaningful value to the decision maker.

For example, table 4-15 of the Baseline Report is set out below:

Town centre	Car mode share (all trips)	% of car trips by non-Londoners	% of all trips made by non-London car drivers or passengers
Bromley	49%	12%	6%
Croydon	40%	19%	8%
Hounslow	33%	13%	4%
Kingston	39%	24%	9%
Richmond	37%	14%	5%
Romford	48%	16%	8%
Uxbridge	55%	22%	12%
Wimbledon	41%	14%	5%

Source: EDMOND (2016)

Not only is the data so vague as to be unhelpful, but the principal complaint is also that the data appears to have been compiled in 2016. There is no link to this data to enable interrogation and therefore no opportunity to determine its source, the methodology or its value as a dataset.

Furthermore, using data from 2016 to determine the baseline usage of Uxbridge town centre is fundamentally unsound. In normal times, an 8 year dataset such of this should not be informing such a

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significantly impactful plan. In this instance, relying on 8 year old data that does not account for a pandemic that has fundamentally impacted high street activity and behaviours is irrational.

'Edmond 2016' is cited elsewhere as is the London Plan Town Centre Health Check 2017, other sources are not data and none are made available for scrutiny.

The impacts around Heathrow are based on an Employment survey from 2016-2017 (figure 4-11 of Baseline Report) and no date is given to the CAA sourced data for origin/destination of Heathrow passengers in figure 4-12.

Pandemic

Given the significant bearing the pandemic has had on the state of Town Centres and communities in general, it would be prudent to determine how this would be factored into the IIA framework and consulted upon **before** the subsequent assessment. As presented, the impacts of the pandemic and subsequent effects on commuting and economic output are entirely opaque.

In addition, it is worth noting:

The average age of a UK car is now 8.4 years - the highest figure since records began, with almost 10 million vehicles from 2008 and earlier still on the road. (auto express website)

Reasons given for this

The closure of car dealerships during Covid-19 lockdowns and the resulting decline in new car sales has contributed to the rising age of UK cars. The average car on our roads was built in 2011 - a positive in terms of vehicle durability, the SMMT[Society of Motor Manufacturers and Traders] says, but a negative in context of the UK's goal to achieve net zero carbon by 2050. (auto express website)

Finally, the business and employment baseline data appears to be taken from a Jacobs produced Business Register and Employment Survey from 2020. Again, how the Pandemic is factored into the usage of this data is unclear.

The IIA does not present a clear and meaningful understanding as to how the pandemic and subsequent cost of living concerns properly inform the impacts of the ULEZ extension. The assumptions and limitations are not properly set out and no obvious allowances have been made.

Conclusions on IIA Scope and Framework

A key part of an integrated impacted assessment is what baseline information is being used to compare a 'before and after' analysis of a proposed plan. This is why the baseline is established with stakeholders in advance of an assessment to ensure that it has a meaningful application. This IIA scope and framework is entirely unclear, out of date and largely missing. It does not appear to have appropriately responded to the impacts of the pandemic and is not available in full to be adequately scrutinised by businesses and communities.

As a consequence, the IIA cannot be reasonably considered to be fit for purpose. In turn, it would be entirely irrational to make a positive determination on the merits of the Plan.

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3 The Assessment

Notwithstanding the significant failings with the baseline information the IIA fails to provide a coherent response to the information that has been available. In some instances, the IIA is confusing or conclusions are supported by evidence or wild assumptions have been made to contrive a position.

Car Ownership and Compliance

The IIA baseline report provides unreferenced data on existing levels of ULEZ vehicle compliance across London:

As shown the levels of compliance of registered vehicles within the existing ULEZ boundary are generally high, at over 72 per cent, with areas of lower compliance in the north and east of inner London which correspond with areas of high deprivation (e.g. Hackney, Newham). Outer London has large areas with lower levels of compliance (62 – 72 per cent), which also correspond with areas of high deprivation in the north and east (including Hounslow, Ealing, Brent, Barking and Dagenham, north Croydon, southern Kingston upon Thames, south Havering and north Bexley). The lowest levels of compliance (58-67 per cent) are shown in Hounslow.

The data, although poorly presented, indicates that the amount of ULEZ compliant cars is mixed across London. In the existing ULEZ zones compliance rates are over 72%. However, in the areas of outer London, these compliance rates drop significantly to below 60%.

Despite this being the apparent baseline, the IIA states:

The assumed compliance rate for cars in outer London in 2023 is 90 per cent rising to 95 per cent by 2026.

This latter point is reflected in the main ULEZ proposals report:

We have estimated that out of around two million unique cars seen in London every day, around 92 per cent will already be compliant by the end of 2023/53. The introduction of a London-wide ULEZ could increase compliance to over 95 per cent in London. This equates to a reduction in the number of non-compliant cars from 160,000 to around 46,000, with around 70,000 switching to compliant vehicles and 44,000 fewer cars due to behaviour change. (Page 56)

Furthermore, the IIA also concludes:

Around 190,000 car commuting trips occur each day from outside Greater London into outer London of which 20,000 (10.5 per cent) are estimated to be made by vehicles that are non-compliant with the ULEZ standards.

The variety of assumptions and source data is inconsistent and conflicting. The maps presented do not align with the subsequent written assumptions. For example it is difficult to reconcile the data used in the baseline report (identifying 70% compliance of vehicles) to the IIA report using figures of 90% and upwards.

There is a distinct lack of clarity as to how a baseline position of less than 60% compliance cars presented in 2022 rises so swiftly to over 90% in 2023. Particularly given the fact that the average age of UK cars on the road is rising and there is a cost of living crisis.

The compliance rate information (not in the baseline report or IIA) taken from the main ULEZ report lacks transparency. The indication appears to be that the higher levels of take up of compliance vehicles is based on the response to the inner London ULEZ:

Estimates of forecast compliance rates with the proposed changes is based on a combination of the vehicle switching and the travel behaviour change. The time it could take for this compliance rate to

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be achieved is assumed based on monitoring of the ULEZ expansion to inner London, which suggested that the majority of the behavioural response takes place before the scheme is launched (called pre-compliance) and within six to 12 months of the scheme launch. However, lower levels of pre-compliance could be attributed to a shorter notice period. The wider economic context could impact upon compliance, such as the increase in fuel costs, inflation, as well as the scale of a scrappage scheme.

There is no detailed explanation as to how this assumption was reached or how there would be such a marked difference in compliance in such a short space of time. This is compounded by the fact that the scrappage scheme would not apply to outside of London which is a key source of vehicular movements for Hillingdon. Its difficult to understand the rationale for believing that people in outer London and outside London with a far inferior public transport offering would respond to ULEZ in the same way as Inner London. The fact that this work was not consulted on as part of an IIA baseline scope and framework development process only serves to hinder proper scrutiny. Given this is a key assumption that underpins the whole scheme, it is entirely inappropriate to leap to such conclusions.

This would indicate that the IIA is divorced from the baseline information and is assessing a policy based on hope as opposed to the actual evidence.

Impact of the Scheme

The IIA Baseline Report identifies that Hillingdon is not serviced or used strictly by Londoners. There is a significant movement of people to and from areas outside London, in Hertfordshire, Buckinghamshire and Surrey. It also identifies that the vast majority of the transportation is via private car.

The IIA Baseline Report also identifies that Hillingdon has a relatively high degree of vehicle ownership, business and personal, that is currently not ULEZ compliant.

The IIA has used this baseline to reach the conclusion:

Overall, there is likely to be a short-to-medium term disproportionate moderate negative impact for people on low incomes who travel by a non-compliant private vehicle in outer London to access employment or opportunities, due to their lesser capacity to switch to a compliant vehicle and/or to change mode. This could also have the same impact on low income couples, parents with young children and disabled people for the same reasons.

The IIA reaches conclusions that are London wide and does not identify specific impacts for localities. This would appear to 'average out' the impacts of the scheme. In Hillingdon, car ownership is relatively higher than the rest of London and more journeys are made by car than elsewhere in London. Hillingdon also has relatively high levels of movements to and from areas outside Greater London with the majority undertaken (97% from Buckinghamshire for example). Hillingdon also has significant areas of deprivation and extremely poor investment by TFL in the public transport routes. It also has a high proportion of light good vehicles reliant businesses.

The implications of the wider ULEZ on our large scale business providers, communities and our town centres has not been adequately presented. In addition, essential public services in Hillingdon rely on commuters from outer London as well as low paid employment. Widening the ULEZ to target these people could have significant consequences that again, have not been adequately addressed on a borough wide basis.

Uxbridge Town Centre is a Metropolitan centre and strategically important for London. The baseline data on who uses this is from 2016 and dangerously out date. The widening of the ULEZ is likely to raise the value of competing centres to Uxbridge placing it even further at risk than it already is.

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It can be seen from what little evidence that has been provided that Hillingdon would be impacted to a greater degree than other Boroughs and it is noted that this would be the cost of achieving only a 'minor' positive improvement in air quality across London.

Hillingdon would clearly be disproportionately impacted by ULEZ. However, the IIA does not make borough specific conclusions. Hillingdon has over 300,000 residents with a metropolitan centre under significant threat. To fail to a) provide Hillingdon specific baseline data, b) undertake Hillingdon specific analysis and c) identify Hillingdon specific mitigation means the ULEZ poses a significant threat to the borough and its economic, social and environmental performance. Bracketing Hillingdon, as with all boroughs, under one generic umbrella assessment is dismissive and damaging.

4 Conclusion

The IIA is not fit for purpose. It is not underpinned by correct, relevant or up to date information and relies on assumptions that have been generated on the back of opaque or missing evidence.

It is therefore considered that the IIA does not meet the objectives for the relevant legislative component parts and does not provide a rational or sound basis on which to make a positive determination.

The Mayor should:

- 1 Generate an appropriately up to date evidence base that is borough specific
- 2 Develop a new and improved IIA framework
- 3 Set out clearly the assumptions of the pandemic and cost of living impacts and provide supporting evidence.
- 4 Provide a more robust appraisal of the forecasted percentage of ULEZ compliant vehicles on the road including the supporting evidence
- 5 Provide more meaningful data on who travels where and for what purposes with this broken down into detailed borough datasets

Consult on the validity, scope and feasibility of this work and seek specific input from key groups.

The Mayor should then:

- 6 undertake an appropriate IIA that sets out detailed impacts based on the new and improved baseline and framework.
- 7 Provide a specific assessment of the impacts on individual boroughs with targeted mitigation where necessary.

Consult on this updated work that reflects a more coherent and collaborative assessment set against a robust and useable baseline dataset.