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29 July 2022

Tel: 020 8356 3373

Dear Sadiq,

**Improving air quality and Londoners' health, tackling climate change and reducing congestion (ref: ULEZ Expansion/RUC Consultation)**

Thank you for the opportunity to participate in the ULEZ expansion consultation.  
Please find our full response attached.

Hackney welcomes the proposal to extend London's Ultra Low Emission Zone (ULEZ) to cover the whole of Greater London as far as it goes, but believes that the proposal needs to now include the introduction of stricter emission standards. We would also like to take this opportunity to highlight the case for significant traffic reduction through road user charging and put Hackney forward as a lead local authority in any future pilot projects.

In the light of new public health evidence of the lethal effects of exposure to Nitrogen Dioxide and particulates pollution and the consequently new more stringent World Health Organisation (WHO) exposure limits, we agree on the need to do more to protect the health of Londoners.

Although the ULEZ scheme does make progress towards reducing traffic related emissions and damage to populations exposed to poor air quality, it fails to proportionally benefit Inner and Central London where most of the people living in areas of exceedance live. Historically Hackney pushed to be a part of the original



ULEZ and for more rapid expansion of the zone which we have welcomed at each stage. In particular, the scheme does not contain any proposals designed to progress the Central London zero emission zone promised for 2025 in the Mayor's Transport Strategy

Stricter controls are also needed to tackle harmful pollution from particulates (PM2.5 and PM10) which cannot be fully addressed through reducing tailpipe emissions but need to be linked to road traffic reduction.

Hackney welcomes the consultation on the introduction of distance-based road user charging but believes the pace of change needs to be much faster. This is especially important in the context of the acknowledged need to reduce traffic in London by 27% by the end of the decade. We support the use of such a scheme to achieve a 'just transition' to a net zero carbon London by 2030 and propose that Hackney be made a pilot area for the introduction of a road user charging scheme as well as the introduction of zero emission pilot(s) such as an extension of the Shoreditch ULEV Streets zone, which we were pleased to welcome you to a few years ago.

Hackney would also support being a part of an interim camera-enforced Congestion Charge Zone style zone using the cameras at the current ULEZ area boundary. We would also support a return to the stricter hours of the existing Congestion Charge Zone.

Yours sincerely



Philip Glanville  
**Mayor of Hackney**



Cllr Mete Coban  
**Cabinet member for Environment and Transport**

## **ULEZ Expansion/RUC Consultation Hackney Response (20 July 2022)**

### ***Summary***

Hackney welcomes the proposal to extend London's Ultra Low Emission Zone (ULEZ) to cover the whole of Greater London, but believes that the proposal needs to now also include the introduction of stricter emission standards.

These are needed to protect the health of Londoners in the light of new public health evidence of the lethal effects of exposure to Nitrogen Dioxide and particulate pollution and the consequently new more stringent World Health Organisation (WHO) Air Quality Guidelines. The latest World Health Organisation (WHO) guidelines recommend a PM<sub>2.5</sub> target of 5µg/m<sup>3</sup>. The recommendations are clear that "no threshold has been identified below which no damage to health is observed" and therefore this target is based on achieving the lowest concentrations of PM<sub>2.5</sub> possible.

The scheme does make progress towards reducing traffic related emissions, however, we need to do more for the populations exposed to poor air quality in Inner and Central London where most of the people living in areas of exceedance live. In particular, Hackney would like to see progress towards the Central London zero emission zone promised for 2025 in the Mayor's Transport Strategy and would like to see the designs reflecting this commitment.

Stricter controls are also needed to tackle harmful pollution from particulates (PM<sub>2.5</sub> and PM<sub>10</sub>) which cannot be fully addressed through reducing tailpipe emissions but need to be linked to road traffic reduction.

Hackney welcomes the consultation on the introduction of distance-based road user charging but believes the pace of change needs to be much faster. This is especially true in the context of the acknowledged need to reduce traffic in London by 27% by the end of the decade.

Hackney is setting itself a target of a 15% reduction in traffic by 2026, however with over 40% of the borough's traffic being through traffic we need London wide traffic reduction to achieve this.

We support the use of such a scheme to achieve a 'just transition' to a net zero carbon London by 2030 and would support a well designed scheme that achieves traffic reduction without placing the burden on already stretched communities and workers, for instance through an intelligent charging mechanism. We propose Hackney as a pilot area for its introduction and would welcome working together to design such a scheme.

Alternatively or additionally Hackney would support being a part of an interim camera-enforced Congestion Zone style zone using the cameras at the current ULEZ area boundary. We would also support a return to the stricter hours of the existing Congestion Charge Zone.

## *Detailed Comments*

### **Support the Proposal**

Hackney is strongly supportive of the Mayor of London's proposal to extend the Ultra Low Emission Zone (ULEZ) to cover the whole of the Greater London area from August 2023. Hackney previously supported consideration of such a move at the time of the 2018 consultation for the expansion of the ULEZ to cover Inner London inside the North and South Circular roads. All boroughs will be covered to a large extent and the problem of some boroughs being partially inside and partly outside the existing ULEZ boundary will be largely removed.

Hackney believes that the new emissions standards for Outer London are not especially onerous bearing in mind that no petrol cars manufactured within the last 18 years (Euro 4) or diesel cars manufactured within the last nine years (Euro 6) will be affected.

Nevertheless we support a comprehensive scrappage scheme to help mitigate the impact on lower income drivers including some of the groups identified as being negatively affected by the scheme such as disabled people who make journeys using non-compliant vehicles and do not qualify for the Motability scheme and disabled vehicle tax class grace period.

This scrappage scheme should explore including mobility credits to support a transition away from the private car towards cycling and public transport as well as shared mobility such as car clubs, e-scooter and bike sharing schemes; rather than just the purchase of a new vehicle.

### **Emissions in Hackney**

With the ULEZ already covering Hackney, we note that the scheme will only have a limited effect on existing pollutant emissions in the borough including a 2.2% decrease in NO<sub>2</sub> emission compared to 6-8% decrease in Outer London. Decreases in particulate emissions in Hackney are below 0.4% (with a decrease in tailpipe emissions being partly offset by a small increase in emissions from non tailpipe sources. The reason for this is that there will be a marginal increase in overall traffic and resultant CO<sub>2</sub> emissions in the borough because of the elimination of the zone boundary and some trip rerouting.

This highlights the need to achieve road traffic reduction in addition to emissions charging. There is decreasing effectiveness of emissions standards in reducing PM<sub>2.5</sub> pollution where across London, around 90% of PM<sub>2.5</sub> emissions from road transport are now due to non-exhaust sources including brake and tyre wear, and due to abrasion of the road surface over time. Even zero emission vehicles can be problematic in this regard especially where their increased weight could lead to potential increases in tyre wear and road surface abrasion.

### **Need for Tougher Emission Standards**

We are disappointed that the expansion of the ULEZ is not being accompanied by steps towards meeting stricter WHO Air Quality Guidelines on exposure limits to nitrogen dioxide and particulates published in 2021.

These new guidelines recommend progressively bringing NO<sub>2</sub> annual mean concentration levels down to 10µg/m<sup>3</sup>, stricter than the current UK legal limit of 40

$\mu\text{g}/\text{m}^3$ . For annual mean  $\text{PM}_{2.5}$  the new WHO target is  $5\mu\text{g}/\text{m}^3$  compared to the current UK legal limit of  $25\mu\text{g}/\text{m}^3$ . For annual mean  $\text{PM}_{10}$  the WHO target is  $15\mu\text{g}/\text{m}^3$ , compared to the current legal limit of  $40\mu\text{g}/\text{m}^3$ . Each of these three pollutants also has successive interim targets designed to guide the progressive reduction of air pollution in areas where pollution is high.

There has been a significant reduction in the number of London residents who live in areas which exceed the UK legal limits ( $40\mu\text{g}/\text{m}^3$ ) for  $\text{NO}_2$  since 2016, with fewer than two per cent of Londoners (around 170,000) living in areas of exceedance in 2019 (Table 6).

However, almost a third of London residents live in areas which exceed  $30\mu\text{g}/\text{m}^3$ , the level 2 interim target set by the WHO, and all Londoners live in areas which exceed the guideline limit of  $10\mu\text{g}/\text{m}^3$ . It is clear that more needs to be done to reduce the number of Londoners living in areas where  $\text{NO}_2$  concentrations exceed interim target levels of  $30\mu\text{g}/\text{m}^3$  and  $20\mu\text{g}/\text{m}^3$  to minimise the number of Londoners who are regularly exposed to such harmful levels of air pollution. Pollution is the largest environmental cause of disease and premature death globally<sup>1</sup>, with an estimated 10.2 million deaths attributed to the  $\text{PM}_{2.5}$  element of fossil fuel pollution every year<sup>2</sup>. In the UK alone, outdoor pollution is associated with adverse health effects from as early as before birth and throughout the life-course<sup>3</sup>. There are approximately 29,000 to 40,000 deaths and poor air quality causes the premature deaths of approximately 4,000 Londoners every year. Across the country, air pollution costs the NHS up to £3.7 billion annually.

The 3 main conditions associated with air pollution are lung cancer, respiratory conditions (such as asthma) and cardiovascular disease. There is also emerging evidence for associations with low birth weight, Type 2 diabetes and dementia<sup>4</sup>. These effects are disproportionately experienced by poorer communities compared to more affluent areas, with 66% of carcinogenic chemicals emitted into the air being emitted in the 10% most deprived wards<sup>5</sup>. Using the overall Index of Multiple Deprivation (a measure which accounts for several domains of deprivation), Hackney was one of two London boroughs in the 10 most deprived authorities in England in 2019<sup>6</sup>.

## Scheme Increases Pollution Exposure Inequalities Between Inner and Outer London

Regarding  $\text{NO}_2$  the big impact of the scheme is in the reduced numbers of people exposed at the WHO interim limits (eg  $20\mu\text{g}/\text{m}^3$  for  $\text{NO}_2$  and  $10\mu\text{g}/\text{m}^3$  for  $\text{PM}_{2.5}$ ). But while we support the expansion of the ULEZ, it needs to be recognised that the beneficial impact is largely in Outer London where proportions exposed are already

<sup>1</sup> The Lancet (2017). The Lancet Commission on pollution and health. DOI: [https://doi.org/10.1016/S0140-6736\(17\)32345-0](https://doi.org/10.1016/S0140-6736(17)32345-0)

<sup>2</sup> Vohra, K. et.al (2021) Global mortality from outdoor fine particle pollution generated by fossil fuel combustion: Results from GEOS-Chem. Environmental Research 195

<sup>3</sup> Royal College of Paediatrics and Child Health (RCPCH) (2016). Every breath we take: the lifelong impact of air pollution. Report of a working party.

<sup>4</sup> Public Health England (2018) Health Matters: Air Pollution [Health matters: air pollution - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/health-matters-air-pollution) Site accessed 7<sup>th</sup> June 2022.

<sup>5</sup> The Marmot Review (2010) Fair Society, Healthy Lives.

<sup>6</sup>

<https://www.londoncouncils.gov.uk/members-area/member-briefings/local-government-finance/indices-deprivation-2019>

lower. Inner and Central London where everybody breathes in harmful amounts of these pollutants, hardly benefit at all.

In terms of reducing people's exposure to NO<sub>2</sub> at the 20 µg/m<sup>3</sup> threshold some 343,000 fewer people are expected to be exposed to pollution at this level. But as described in Table 14 on page 69 of the proposal, nearly all of these are in Outer London where exposure levels are already much lower than in Inner London. This is especially iniquitous bearing in mind the much lower levels of people who own and drive cars in Inner London.

This reflects the need for tougher limits to tackle these concentrations of harmful pollutants. Inner London and Central London where 60% of the problem lies has just 0.2% of the beneficial impact at this key NO<sub>2</sub> threshold.

Table 14 Population living in areas of NO<sub>2</sub> exceedance (20 µg/m<sup>3</sup>)

	Total		Exceeding		% Exceeding		No Longer Exceeding
	Based 2023	London-wide ULEZ 2023	Based 2023	London-wide ULEZ 2023	Based 2023	London-wide ULEZ 2023	
<b>Central</b>	218,300	218,300	218,300	218,300	100%	100%	0
<b>Inner</b>	3,854,200	3,854,200	3,854,200	3,853,600	100%	100%	600
<b>Outer</b>	5,115,800	5,115,800	2,702,300	2,360,200	53%	46%	342,100
<b>Greater London</b>	9,188,300	9,188,300	6,774,800	6,432,200	74%	70%	342,700
<b>Non-GLA</b>	980,500	980,500	62,500	57,000	6%	6%	5,500

Disproportionate and iniquitous impacts of the scheme can also be seen with regards to PM<sub>2.5</sub> populations living in areas exceeding 10 µg/m<sup>3</sup> where Inner and Central London currently account for 82% of these residents but benefit from just 31% of the scheme's impacts. Table 15 on page 70 shows the populations affected and those benefiting from the scheme.

Table 15 Population living in areas of PM<sub>2.5</sub> exceedance (10 µg/m<sup>3</sup>)

	Total		Exceeding		% Exceeding		No Longer Exceeding
	Based 2023	London-wide ULEZ 2023	Based 2023	London-wide ULEZ 2023	Based 2023	London-wide ULEZ 2023	
<b>Central</b>	218,300	218,300	218,300	218,300	100%	100%	0
<b>Inner</b>	3,854,200	3,854,200	3,326,500	3,313,000	86%	86%	13,500
<b>Outer</b>	5,115,800	5,115,800	770,200	739,500	15%	14%	30,700
<b>Greater London</b>	9,188,300	9,188,300	4,315,000	4,270,800	47%	46%	44,200
<b>Non-GLA</b>	980,500	980,500	24,900	24,500	3%	3%	400

## What has happened to Zero Emission Zones?

There is also no mention of the proposals of Proposal 35 currently in the Mayor's Transport Strategy to implement zero emission zones (ZEZs) in town centres from 2020 and in central London from 2025. By the time that this proposal comes into effect London will be less than 18 months away from the planned central London ZEZ date.

### **Welcome inclusion of 2030 Net Zero Pathway in Revised MTS**

Hackney welcomes the revision of the MTS to take account of the changes described in this scheme and are pleased that the revisions make mention of the 2022 Element Energy report on London's 2030 net zero target. The report, which highlights the need to frame London's traffic problems in the context of the triple challenge which also includes the climate emergency and traffic congestion as well as air pollution, outlines the need to reduce vehicle km traveled on London's roads by 27% by the end of the decade.

While we welcome the anticipated modest traffic reduction effect of the ULEZ in Outer London where in many boroughs CO<sub>2</sub> emissions have been rising in recent years, the current scheme has no traffic reduction effect in Inner London.

### **Road User Charging**

Hackney welcomes the inclusion in the consultation of the first steps to introducing the next generation of road user charging in London but is disappointed that the introduction of such schemes are described as being "many years away from being ready to implement such a scheme".

Hackney strongly believes that the pace of change needs to be faster especially if London is to make progress in reducing traffic by 27% by 2030 in line with the 'accelerated green' pathway to a net zero carbon city by that date. We propose that Hackney be made a pilot for the early introduction of such a scheme. We have been laying the groundwork for road user charging in the borough for a number of years with a study using Inrix data into Through Traffic in Hackney (Peter Davidson Consultants, 2019). This was followed up by a 'Scoping Study for a Road User Charging Scheme in Hackney' (Atkins 2020) and a Workplace Parking viability study (Steer Group, 2020).

Alternatively or additionally Hackney would support being a part of an interim camera-enforced Congestion Zone style zone using the cameras at the current ULEZ area boundary.

### **Road User Charging - Outcomes**

Hackney believes that it is important that a distance-based road user charging is introduced in the capital. The scheme should aim to reduce traffic in London to help address the triple emergency of air pollution, climate emergency and traffic congestion.

Beyond that this form of road user charging can contribute to other transport objectives. These include

**Health** - Reducing general motor traffic can enable road space to be reallocated to unlock the potential for active travel to greatly contribute to the physical and mental health of Londoners.

**Buses** - reduced general traffic can help support London's bus network in terms of bus reliability and speed.

**Vision Zero** - Reduced traffic will help reduce this source of road danger and enable extra protected space to be devoted to vulnerable road users such as cyclists and pedestrians.

### **Just Transition**

Distance-based road user charging needs to also take account of factors such as income, disability and journey purpose. Otherwise it is just a scheme for improving motoring conditions for the rich. There needs to be a '**just transition**' to '**net zero carbon**'. The limited road space in London and road user charging should be prioritised for tightly defined 'essential traffic' such as supporting the mobility of disabled people and freight, servicing and emergency trips. The road user charging system needs to embed this principle, while still aiming that most other trips should switch to walking, cycling or public transport.

Best practice and robust data privacy safeguards also need to be a really important consideration in the implementation of each and every scheme in this consultation.

Road user charging needs to build on emissions-based charging and take account of vehicle type, but also should ramp up to heavily penalise second or third cars owned by the same individual. Charges could vary by time of day, area to discourage travel during peak hours; in heavily polluted and congested areas.

### **Need to embed road traffic reduction**

The scheme needs to guard against creating a fresh wave of induced traffic as reduced congestion could lead to quicker journey times meaning that even with charging there is a danger that the generalised cost of travel could remain the same bearing in mind the value of time. Reduced traffic levels need to be embedded through continued investment in road space reallocation to benefit sustainable modes.

The use of the 'the availability of alternatives to car use' could be a useful element so long as it was not used to create discounts to road user charging in areas of London where there is less public transport such as Outer London and unduly dilute the overall effectiveness of the scheme.

We also believe that if the scheme is well designed it has potential to be an income generator for transport investment in London as revenues from emissions-based pollution tax revenues decline.