



HOUSE OF COMMONS

LONDON SW1A 0AA

Sadiq Khan
Mayor of London
City Hall
Kamal Chunchie Way
London E16 1ZE

10 June 2022

I write to raise my concern on your proposals, currently under consultation, to make the Ultra Low Emission Zone (ULEZ) London-wide.

While I recognise that a proportion of those opposing the expansion do so sceptical of the science or unconvinced of the need for action, I should make clear from the start that I firmly believe urgent steps are required to improve air quality across London, including in comparatively leafy suburban boroughs like Bromley where real concern on particulate pollution exists. That is why I have consistently advocated a holistic, evidence-based response to this significant public health problem, raising it repeatedly with ministers in the Department for Environment, Food and Rural Affairs and supporting efforts to enshrine air quality targets in law.

Although then I certainly believe London needs to adopt policies that help it transition to a greener, more sustainable future, your proposals are disproportionate, ill thought through, and will significantly impact residents in outer London boroughs where car journeys for work, school and to see family are a daily occurrence. Indeed, without the same TfL provision as their inner city neighbours, car ownership remains a necessity, not a choice, for the vast majority of people in suburban boroughs. That is particularly the case in Bromley which has the highest percentage of pensioner households in the whole of Greater London. Many in this bracket will own older vehicles caught by the charge but will find themselves ineligible for the tightly drawn and very limited scrappage scheme. It is not difficult to see how someone on a fixed pension income, owning a car bought ten years ago thinking it would be their last, will be unable to find the cash for a compliant vehicle before the introduction date of August 2023.

While I appreciate that there are plethora of studies reviewing the efficacy of emission zones, a common theme, wherever they are, is that they do not provide the silver bullet your proposals are billed to be. As Dr Marc Stettler of Imperial College commented following the publication of his department's study on the ULEZ in November last year:

“Cities considering air pollution policies should not expect ULEZs alone to fix the issue as they contribute marginally to cleaner air. This is especially the case for pollutants that might



originate elsewhere and be blown by winds into the city, such as particulate matter and ozone.”

Emission zones can have an impact, albeit limited, but given the considerable costs involved in implementing and enforcing this project, the significant burden it will place on thousands of households, not to mention the severe cuts you are proposing to make to public transport, would it not be wiser to divert some of the near £400 million earmarked for air quality improvement schemes to these emission reducing services?

From what I understand, under the “managed decline scenario” floated in your Budget – which in plain speak, translates to service cuts – there would be a 9 per cent reduction in tube services, an 18 per cent reduction in bus services, and no new cycle enhancement schemes. At the same time, recent fare increases are hitting passengers hard, particularly the 6.5 per cent fare increase to bus services which, as London TravelWatch has pointed out, are used more frequently by less well-off residents.

There is clearly a lack of joined up thinking in this plan. Precisely when we should be encouraging more people to use public transport to reduce car journeys, you are raising fares and threatening to cut services, all the while potentially hitting residents in outer London boroughs with a £12.50 daily charge when there are insufficient alternative options via existing public transport routes. Instead, you should be increasing services, making the bus fleet greener, expanding and expediting the rollout of electric vehicle charging points, and incentivising, not penalising, people to leave their cars at home through a more comprehensive scrappage scheme.

These proposals are blind to the reality of life in outer London boroughs and demonstrate a fundamental lack of understanding of, or worse, disregard for, the concerns of many of its residents. A more nuanced, evidence-led approach is required, set amongst a wider set of clean air initiatives.

Sir Bob Neill MP