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The Mayor of London

City Hall

The Queen's Walk

London

SE1 2AA

Dear Mr Mayor,

I am writing to you in my role as Leader of Elmbridge Borough Council to provide you with my viewpoints on your proposal regarding the expansion of the Ultra-Low Emission Zone (ULEZ) London-wide.

Elmbridge is located in the North of Surrey and is adjacent to the London Borough of Richmond upon Thames and the Royal Borough of Kingston. We are therefore likely to be impacted by the ULEZ London wide proposals.

We recognise the aim of the ULEZ London wide in reducing the health impacts of air pollution by reducing harmful pollutant emissions from road transport and it aligns closely with our carbon reduction goals. However, we feel that there are too many uncertainties with the current proposal.

Our [report](http://mygov.elmbridge.gov.uk/documents/g4138/Public%20reports%20pack%2011th-Jul-2022%2010.00%20Individual%20Cabinet%20Member%20Decision%20Making%20-%20Leader.pdf?T=10) at Individual Cabinet Member Decision Making (ICMDM) on 11 July 2022 concluded that, while traffic is the leading contributor to emissions for Surrey, it is noted that in the ULEZ proposals there does not seem to be anything about the encouragement of using other modes of transport (active travel/public transport) or the improvement to public transport services in neighbouring Boroughs such as Elmbridge or within London itself. We feel that the proposals could be interpreted as big stick and no carrot approach, which may be TFLs intention.

Officers and members at Elmbridge have worked closely to consider the impacts of your proposals and we would like to highlight the following points that we might expect to see as a result of the expansion:

* Increased traffic flow and congestion on roads such as the A3, Hampton Court Way and Copsem Lane
* Increased use by commuters of town and village centre car parks, leading to a lack of space for shoppers
* Increased use of leisure car parks which may lead to controlled parking zones
* Increased on-street parking which may lead to controlled parking zones
* A lack of affordable and suitable public transport from Elmbridge to the proposed ULEZ
* A change in ULEZ vehicle criteria in future years
* Residents may be discouraged to attend healthcare appointments in London which may lead to an increase in vulnerability
* The scrappage scheme is focussed on ‘Londoners’ only
* Elmbridge businesses may need to upgrade fleet at their own expense to operate in the proposal ULEZ area
* Businesses in Elmbridge may struggle to attract a workforce from the London area due to unaffordable and poor public transport links
* Private hire and taxi firms may need upgrade their vehicles at their own expense to operate in the proposed ULEZ area

Elmbridge would like to see the following from TFL before the ULEZ is introduced:

* A cost benefit analysis of the proposed ULEZ London wide expansion
* A more in-depth study of air quality monitoring and the impacts of the proposed ULEZ London wide expansion
* Reassurances from TfL that public transport close to Elmbridge will be vastly improved to ensure the value of the proposed ULEZ area is achieved.
* A proposal regarding an exemption for Elmbridge residents attending healthcare appointments in the ULEZ proposed area
* A proposal regarding an expansion of the scrappage scheme for Elmbridge residents and businesses

In addition, we would expect TfL to maintain the continued range of discounts for people entering the proposed ULEZ London wide such as NHS patient reimbursement, minibuses used for community transport, charities, schools etc. but also include discounts for those seeking work in London.

It is felt that the implementation date is too soon, as authorities on the border of the proposed expansion have not had enough time to consider the impacts of the scheme, nor have TfL provided any modelling on air quality or traffic flow. Such analysis will take time and we would hope for a delay in implementing the scheme to allow for this.

Notably, Elmbridge wishes to strongly reiterate the point around an investment of the Net revenue generated by TfL to support the necessary, suitable, appropriate and affordable public transport links between Elmbridge and the proposed ULEZ London wide area.

We feel very strongly that Elmbridge should see a tangible benefit from the proposals and revenue generated by TfL.

We look forward to working closely with you on this matter and welcome your feedback on the points raised above.

Yours sincerely



Chris Sadler

Leader of Elmbridge Borough Council