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Sent via email

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To Transport for London

Surrey County Council response to TfL consultation on the draft Ultra- Low Emission Zone Expansion.

On behalf of Surrey County Council, I welcome the opportunity to respond to the consultation on the draft Ultra-Low Emission Zone Expansion through this covering letter to accompany our full on-line response to the consultation questions.

Introduction

Surrey shares a significant length of boundary to the south and west of the Greater London Authority (GLA). Seven of our eleven district/borough councils make up this boundary (Tandridge, Reigate & Banstead, Mole Valley, Epsom & Ewell, Elmbridge, Spelthorne, and Runnymede). Therefore, it is expected that these proposals will impact a significant number of Surrey residents, communities, and businesses particularly those in proximity to the proposed ULEZ boundary. This response has been made gathering views from our Members and Public Health, Environment, Transport & Infrastructure services.

In general, the council supports the overall themes presented in the proposed expansion of the ULEZ, recognising that it is no longer sustainable to continue to plan for increasing private vehicle use as the dominant mode of travel within London. The council also supports economic growth in a sustainable and environmentally responsible way and recognises that this must be at the forefront of any future infrastructure planning, so the council fully supports TfL in their ambitions to achieve this.

Whilst the council is supportive of the evolution of this approach, moving from planning for vehicles to prioritising public transport and active travel to improve air quality. The council have concerns over the impacts that this may have on Surrey residents, businesses, transport networks and environment which are considered to have not been adequately quantified or addressed in the consultation supporting documentation for the council to comprehend the impacts to its residents, to support the implementation of the ULEZ schemes until these have been addressed, these are set out in the following paragraphs below.

I also encourage you to ensure that the sub national transport body, Transport for the South East (TfSE), is engaged with the proposals given they also represent the interests of councils and local authorities across our area up to the GLA boundary.

Impacts to Surrey

Whilst in principle we agree with the overall objectives and vision goal to reduce vehicle emissions through less car use, there is a lack of detailed evidence in the supporting consultation documents to fully understand the benefits and/or dis-benefits of the scheme could have on our residents to provide any support until further assessments have been made available on the physical, environmental, and social impacts to Surrey residents bordering the Greater London. This should include assessing the impacts on traffic volumes, congestion, vehicle emissions and air quality that may occur because of the expected border displacement, as drivers turn around or re-route at the entry point to the ULEZ or divert spending more time on Surrey's highway network to avoid paying the charge.

For information the Borough of Spelthorne have declared the whole borough as an Air Quality Management Area (AQMA). So any displaced traffic of the most polluting vehicles would exacerbate air quality issues, so mitigation will be required to address this.

A full economic impact assessment should be undertaken to ascertain the financial impact on Surrey's residents and businesses. Where support is made available to reduce the financial impacts this should be made available and advertised to Surrey communities with priority for funding being given to those specified in the documentation as being at risk of negative impacts.

Members and residents in proximity to the proposed ULEZ boundary have raised concerns over the proposals. The council supports measures which enable its residents and businesses to receive assistance in making the changes necessary to comply with the ULEZ standards.

The supporting documentation does not include an Equalities Impact Assessment.

Required Mitigation

Key to the ULEZ expansion being a success, the council proposes that the scrappage scheme set out in TfL's consultation must be extended to Surrey residents. Whilst we understand the ULEZ boundary takes turn around points into consideration, looking holistically at the aim of this scheme, the environmental benefits would be far greater with less compliant cars on the road around London as well as within it. Additionally, Surrey strongly believes that a scheme needs to be put in place alongside the ULEZ to support those families that are unable to purchase a newer compliant vehicle, hence making travel more difficult. The expansion of the scrappage scheme is the first and most vital step for Surrey residents in ensuring equal opportunities and accessibility to employment, health care and other destinations. This scheme should not discriminate between Londoners and Surrey residents living or working in close proximity as the ULEZ would in affect create a new constraint on travel that people in Surrey can do even on a short distance local basis.

The council would also like to stress the importance of Surrey and its need for significant improvements to its connectivity and accessibility into and out of London-

the impact of through trips on public transport and both strategic and local highway networks are significant. We know that many of our residents regularly travel into London to access NHS facilities, with an estimated 28,000+ Surrey residents registered to London GP practices. These journeys are required for regular check-ups, and/or travelling to places such as the Royal Marsden, St Helier & Kingston Hospitals for specialist appointments. Many visits require lifts from family, friends, or carers, who would be financially impacted by the scheme, for such important visits. Revenue from PCNs should be used to provide additional active travel measures and additional or extended bus services to provide suitable alternatives for Surrey residents and should not be used to offset any shortfall in existing TfL funding.

The Integrated Impact Assessment describes a negative impact for some groups in society (e.g., care workers (particularly Black, Asian and minority ethnic people and women), pregnant and maternal women). Measures must therefore be put in place to support these disadvantaged groups to ensure the proposal does not widen the health inequality gap in Surrey. These journeys are a necessity and must be recognised as so.

By way of illustration, Surrey's location adjacent to London, and the proximity of both Heathrow and Gatwick airports, generates considerable demand for movement within, to, from, and through the county. The road network in Surrey carries 80% more traffic than the average for the Southeast region; its A-roads carry 66% more traffic than the national average¹. Accessibility and connectivity in Surrey should be paramount. To make this successful and ensure we are not severing our community, active travel alternatives and public transport must be improved in terms of regularity, as well as affordability. The expansion of the ULEZ is not a standalone scheme but requires new initiatives from TfL to make the behaviour change they seek a practical reality across the London border. The extension of the Zone 6 oyster card scheme on rail services would contribute to this improvement and should be seriously considered by TfL before extending the ULEZ and potentially leaving residents disconnected.

Furthermore, with countless key workers working and living with London and Surrey, this is an issue that must be addressed. If nothing more, the last three years have shown just how highly we depend on our key workers- whether that be nurses, teachers, or carers, our community depend on them. We propose that for those 'pan London' key workers who regularly travel into the ULEZ for work purposes, an exemption should be enforced. It seems that those who may need the most help with suffer the most if the scheme was implemented without these exemptions. We cannot support the scheme where healthcare or education is negatively impacted due to the ULEZ expansion and the charge this will bring to many families, on top of the rising cost of living crises.

With several schools being close to the London/ Surrey border, there is concern for those families who will be impacted by the ULEZ expansion and the additional costs this will bring, on top of the cost-of-living issues. Whilst public transport is an option

¹ Surrey Infrastructure Study 2017.

for many, we must still consider those who do not fall into this category and make travel accessible to all. We see many disabled children who do not qualify for government funded school transport but are still unable to get themselves to school independently due to physical and mental health issues.

Whilst we understand the public will have access to information around the extension of the ULEZ, we feel TfL need to take responsibility to spread awareness of these changes, to prevent residents incurring unnecessary charges. There must be noticeably clear highway signing that meets Surrey's specifications, so drivers understand when they are approaching or entering the zone along with clear advice about appropriate alternatives. This may mean exemptions to some A roads or motorways.

Given that there are only 13 months between the close of this consultation exercise and the planned implementation of the expanded ULEZ, I would be grateful if you could confirm when you plan to complete analysis of the consultation responses and reply to the issues we and others are raising. It is essential we understand the timeframe between your conscientious consideration of responses and the time that will remain for you to implement the ULEZ in the event we need to consider our options based on the strength of your response and the mitigations you plan to implement.

Summary

Surrey County Council supports TfL's vision and goals, and in particular the goals to improve health, wellbeing, and quality of life for everyone through this strategy, as these align with the council's recently adopted LTP4 (Local Transport Plan 4). The council look forward to providing continued support to the expansion of the ULEZ by delivering a safe, sustainable, and integrated transport system that makes the Southeast more productive and competitive, whilst improving the quality of life for all residents, in London and beyond.

Transport for London has a duty to respond the points raised in the council's response to this consultation to understand the extent of these impacts, within a reasonable timescale, so that we can inform our residents. It is imperative that sufficient time is allocated for the council to go back to our members and residents with any queries they have raised, before the ULEZ expansion is actioned. The 'go-live' dates to implement the scheme by August 2023 is seemingly ambitious when considering the level of discussion this has raised, so we would like to stress the importance of your response once again.

In summary we propose that TfL give more detailed consideration to the following with the ULEZ expansion:

1. More data/assessment to be provided on the impacts to Surrey and its residents.
2. The car scrappage scheme must be extended to Surrey residents
3. Extend Zone 6 Oyster Card scheme
4. Corridors to NHS facilities that are on the border/ consideration to residents that extensively use health facilities within London

5. Additional and or extended active travel and public transport services must be included in addition to the scrappage scheme to provide suitable alternatives for Surrey residents and not used to offset shortfall in existing TfL funding
6. Taxi exemption extended out to local Surrey taxi services
7. Key worker exemption for those who regularly travel over the border, e.g., nurses, carers, and teachers.
8. Consideration for schools on the border that have pupils coming from both London and Surrey.
9. Clear signage and publicity around the proposed changes
10. Provide additional information on the implementation programme, including when the council will be informed of responses and representations included in this response, set out opportunities for further engagement to discuss mitigation measures, including campaigns and communications to Surrey residents on when the ULEZ is operational.

Yours Sincerely,

A handwritten signature in blue ink that reads "Matt". The signature is written in a cursive style and is underlined with a single blue stroke.

Matt Furniss

Cabinet Member for Transport, Infrastructure and Economy

Surrey County Council