



# Elmbridge Borough Council

... bridging the communities ...

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The Mayor of London  
City Hall  
The Queen's Walk  
London  
SE1 2AA

22 December 2022

Dear Mr Mayor,

I am writing to you on behalf of Elmbridge Borough Council to provide you with our view of your decision to extend the Ultra-Low Emission Zone (ULEZ) London-wide.

As you know, 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 significantly impacted by the introduction of ULEZ London wide.

At a meeting of Elmbridge Borough Council on Wednesday 7 December 2022, Councillors reconfirmed their commitment to improving air quality in the borough while also agreeing to act on behalf of the Elmbridge community, to work to improve the implementation of the extension of Ultra Low Emissions Zone (ULEZ) being introduced in August 2023. A copy of the Notice of Motion agreed by our Full Council is attached at Appendix 1 of this letter.

We recognise the aims of the ULEZ extension and how it aligns closely with our Air Quality Action Plan (AQAP) but the extension as it is does not address our concerns nor those of Elmbridge residents and businesses.

We know the communities of Elmbridge are linked with those of Greater London. We also know our residents travel to hospitals, businesses and other services in Greater London and are concerned by the £12.50 ULEZ daily charge, and the potential for large fines for non-compliant vehicles. It is our view that this will have a disproportionate impact on Elmbridge's small businesses and our residents on lower incomes i.e., those already hit the hardest by the rising cost-of-living. It is also the case that our community is often more reliant on their cars and does not have access to the Tube or bus networks of Greater London as an alternative travel option.

As stated by the Leader of the Council earlier this year in a letter to you, we anticipate the following negative consequences 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 Transport for London (TfL) before the ULEZ is introduced:

- A cost benefit analysis of the ULEZ London wide expansion
- A more in-depth study of air quality monitoring and the impacts of the ULEZ London wide expansion
- Reassurances from TfL that public transport close to Elmbridge will be vastly improved to ensure the value of the ULEZ area is achieved.
- A proposal regarding an exemption for Elmbridge residents attending healthcare appointments in the ULEZ proposed area, e.g., Kingston hospital
- 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 scheme such as NHS patient reimbursement, minibuses used for community transport, charities, schools etc. It should also include discounts for those seeking work in London.

In our view 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 to be completed. We urge you and TfL to work with us and our colleagues at Surrey County Council to improve local public transport and cycle ways and other sustainable travel initiatives such as the expansion of Zone 6 beyond Hampton Court and Thames Ditton to include stations such as Esher, Walton-on-Thames, Hersham, Hinchley Wood, Cobham, Oxshott, Claygate, Weybridge and others.

We also think that it is hugely important than any net revenue generated by TfL the proposed extension should be reinvested to provide better suitable, appropriate and affordable public transport links between Elmbridge and the ULEZ London wide area to better mitigate its impact. Afterall, in the same way that air doesn't acknowledge administrative boundaries, neither do people's lives.

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

Yours sincerely

A handwritten signature in cursive script that reads "Adam Chalmers".

Adam Chalmers  
Chief Executive  
Elmbridge Borough Council

## Appendix 1: Council meeting - 7 December 2022

### **Elmbridge Borough Council's Agreed Notice of Motion regarding proposed Ultra Low Emissions Zone**

This Council has a commitment to improving air quality in Elmbridge as detailed in our Air Quality Action Plan; this aims to reduce damaging emissions in the Borough as quickly as practically possible. While we have therefore welcomed the introduction of measures to improve air quality in Central London, we have concerns about the recent announcement by the Mayor of London to expand the Ultra-Low Emissions Zone (ULEZ) to all London boroughs for the following reasons:

- there is consistent and cross-party support for this Council to reduce its emissions and impact on the environment as quickly as practically possible;
- the communities of Elmbridge are inextricably linked with key points of infrastructure (businesses, hospitals, shops, services, etc.) within Greater London;
- the ULEZ £12.50 daily charge, and potential large fines for non-compliant vehicles, will have a disproportionate effect on small businesses and those on lower incomes already hit hardest by the cost-of-living crisis and inflation;
- the evidence and economic modelling of the impact is wrongly focussed on the impact only on Londoners and revenues for the Mayor of London, ignoring the impact on Elmbridge residents who do not have access to the alternative means of transport of tube and bus networks within the Greater London area;
- tax payers' money set aside for the Mayor to spend on reducing air pollution would be better spent on public transport, cycle ways, and other initiatives rather than a network of ULEZ cameras that penalise lower income households and those that must travel for work;
- to expresses support to expand Zone 6 beyond Hampton Court and Thames Ditton to include stations such as Esher, Walton, Hersham, Hinchley Wood, Cobham, Oxshott, Claygate, Weybridge and others; and therefore:

This Council therefore resolves that the Leader and Chief Executive write to the Mayor of London to express our opposition to the expansion of ULEZ without engaging with both EBC and Surrey County Council (as our public transport provider) to agree mitigation measures against the short-term impacts of the expansion of the ULEZ.