

HILLINGDON COUNCIL'S PLAN OF ACTION AGAINST ULEZ (ULTRA LOW EMISSION ZONE)

Cabinet Member(s)	Councillor Douglas Mills
Cabinet Portfolio(s)	Corporate Services
Officer Contact(s)	Dan Kennedy, Central Services
Papers with report	Appendices 1 & 2 - Hillingdon air quality distribution maps

HEADLINES

Summary	Full Council on 12 January 2023 requested that Cabinet formalise a plan of action to implement the Council's policy of opposition to the Mayor of London's decision to expand the Ultra-Low Emission Zone (ULEZ) to Outer London. This report sets out the Council's strategy along with delegated authority to approve any necessary action and related expenditure.
Putting our Residents First Delivering on the Council Strategy 2022-2026	This report supports our ambition for residents / the Council of: Have opportunities to earn an income that supports their families This report supports our commitments to residents of: A Thriving Economy
Financial Cost	No direct financial implications associated with the recommendations at this stage. However, any future costs incurred in developing and implementing the Council's Plan of Action are expected to be funded from Earmarked Reserves.
Relevant Select Committee	Property, Highways and Transport
Relevant Ward(s)	All Wards

RECOMMENDATIONS

That the Cabinet:

1. **Welcome and concur with the Council motion adopted on 12 January 2023 opposing the extension of ULEZ to Hillingdon and Outer London;**
2. **Note the significant impact Hillingdon residents, visitors and businesses will experience from the extension of the ULEZ to Outer London from 29 August 2023 and calls on the Mayor of London to withdraw the scheme and to improve the public transport across the Borough.**
3. **Note the legal powers available to the Council to implement the appropriate action and communication plan.**
4. **Agree to receive an update on the Council's legal position.**
5. **Delegate authority to the Leader of the Council and the Cabinet Member for Corporate Services to oversee the plan and take all necessary decisions to oppose the Mayor of London's decision, including any necessary expenditure to deliver the Plan.**
6. **Authorise the Corporate Director of Central Services to formally implement any actions as directed by the Leader of the Council and/or Cabinet Member for Corporate Services.**
7. **Agrees to receive reports back on the matter, as and when required, to update the Council and residents.**

Reasons for recommendation

The recommendations set out in this report fulfil the request from Full Council on 12 January 2023 that Cabinet formalise a plan of action to implement the Council's policy of opposition to the Mayor of London's decision to expand the Ultra-Low Emission Zone (ULEZ) to Outer London.

The extension of the ULEZ to Hillingdon and other Outer London Boroughs will disproportionately and adversely impact residents on low incomes and local businesses and comes at a challenging financial time when they can least cope with additional expenditure.

The recommendations will position Hillingdon Council to take action to ensure the impact of the ULEZ extension is fully understood by residents and businesses and there is a co-ordinated and targeted plan to oppose the expansion of the existing scheme.

Alternative options considered / risk management

The alternative option to 'do nothing' in response to the announcement from the Mayor of London to extend the ULEZ scheme to Outer London has been rejected. The extension of the ULEZ to Hillingdon and Outer London will have a significant disruptive impact on residents' daily lives, local businesses and the local economy and therefore it is imperative the concerns from the scheme are fully understood and the scheme is challenged.

Democratic compliance / previous authority

Full Council on 12 January 2023 requested Cabinet agree a plan of action and the necessary budget to set out the Council's policy of opposition to the decision to expand ULEZ. The Council's Constitution also provides that Cabinet will have full authority to respond to this matter, including

to promote the economic, social or environmental well-being of Hillingdon, community leadership, expenditure and joint working as required. Cabinet may delegate authority for the efficient implementation of the action plan and any other decisions.

Select Committee comments

None at this stage.

SUPPORTING INFORMATION

1. The Ultra-Low Emission Zone (ULEZ) has been in operation in central London since April 2019 and then extended to inner London from October 2021. The announcement from the Mayor of London to extend the ULEZ to Outer London, to include the London Borough of Hillingdon, from 29 August 2023 has raised worrying concerns about the significant and adverse impacts extending the scheme will have on residents and local businesses compared to Inner and Central London. Extending the scheme to Outer London will deliver limited improvements to air quality and the wider benefits the scheme is purported to achieve (given air quality in Hillingdon is generally much better on average than Inner and Central London).
2. Extending the scheme to all Outer London Boroughs will mean Hillingdon residents will be required to pay £12.50 per day when they drive within the ULEZ zone using a vehicle which is non-ULEZ compliant. For a resident using their vehicle 7 days a week, this total additional charge amounts to over £4,500 per vehicle, per year.
3. A number of concerns have been raised about the extension of the ULEZ to Outer London. This includes;
 - Limitations of the Public Transport Network in Outer London - The limitations of the existing public transport network in Hillingdon and Outer London means many residents have little option other than to drive to their place of work, for leisure and / or for retail activities. Compared to inner and central London, where ULEZ is already in operation, public transport coverage is considerably more limited in Outer London. There have been no plans published showing how public transport will be improved in Hillingdon following the extension of the ULEZ scheme.
 - Residents on Low Incomes, Including Older People will be Affected More - For those on lower incomes, including older residents, who are more likely to be driving an older, non-compliant ULEZ vehicle, they will experience a disproportionately higher impact from the charge on their household finances. This will come at a time of rapidly rising costs of living when household budgets are already under considerable strain.
 - Significant Impact on Jobs and the Local Economy - In turn, businesses are concerned that they will lose good staff as they seek to move to alternative jobs to avoid driving their vehicle in the extended ULEZ zone and / or seek higher paid employment in other organisations. Concerns about recruiting and retaining staff

exist across many businesses in Hillingdon, especially those working in lower income roles including the health and care sector, as well as retailers.

4. The financial impact and therefore threat from extending ULEZ to Outer London is very real and significant for residents and businesses operating in Hillingdon. The introduction of the additional charge, particularly to lower income households is anticipated to have a disproportionately higher impact, which will drive workers out of Hillingdon to look for alternative employment to avoid them driving their vehicle in the extended ULEZ zone.
5. Hillingdon is fully committed to and supports improvements in air quality across the Borough. However, the Council is concerned that the blanket and rapid extension of the ULEZ to all Outer London Boroughs does not differentiate and take into account the differences in air quality compared to Inner and Central London. There are significant areas of Hillingdon which are already achieving much higher levels of air quality than Inner and Central London (see appendices 1 and 2 – the guide measures of air quality standards are; 40ug/m³ is the nitrogen dioxide annual mean objective and for PM_{2.5} it is 10ug/m³ across London). The extension of the ULEZ also does not take into account the disproportionate impact the extension of ULEZ will have on lower income households, including those who have no alternative, reasonable option other than to use their vehicle given the limited public transport networks available, and in turn how this will be of serious detriment to essential public and commercial sector businesses.

Council Action in Support of Residents and Local Businesses

6. Given these concerns, as requested by Council on 12 January 2023, it is proposed that the following action is taken to influence the Mayor of London to withdraw the blanket extension of the ULEZ to Outer London in the best interests of and for the benefit of residents, as well as local businesses at this financially challenging time;
 - Work with other local authorities and businesses using external specialist professional support where needed, to challenge the Mayor of London to withdraw the extension of the ULEZ scheme and to improve public transport in Hillingdon.
 - Investigate, review and challenge the veracity of the evidence used by the Mayor of London as the basis for the decision to extend the ULEZ into Hillingdon and Outer London.
 - A communications and engagement programme to raise awareness of the concerns arising from the extension of the ULEZ scheme, particularly those areas of the Borough which will be disproportionately affected by the high daily charge. This could involve for example using deprivation data to pilot a targeted programme of communications to two or three wards where analysis shows that a large number of residents are likely to be on low income or benefit support. The aim of the action would be to make them aware that from August 2023, if they have a vehicle that fails the Mayor of London's ULEZ test, they will be charged £12.50 each day for its use throughout the London Region. To assist affected residents, this would involve signposting them to information about how to apply for the vehicle scrappage scheme. There would be ongoing monitoring of the effectiveness and outcomes of the communications and engagement programme.

Financial Implications

There are no direct financial implications associated with the recommendations at this stage. However, any future costs incurred in developing and implementing the Council's Plan of Action against ULEZ are expected to be funded from Earmarked Reserves.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

The recommendations set out in this report will ensure residents and local businesses are aware of the extension of the ULEZ scheme to Outer London, including Hillingdon, how this will affect them and to facilitate an action plan in opposition to the extension.

Consultation carried out or required

No consultation on the proposed action has been undertaken. The recommendations set out in this report are to implement the request from Full Council that Cabinet formalise a plan of action to implement the Council's policy of opposition to the Mayor of London's decision to expand the Ultra-Low Emission Zone (ULEZ) to Outer London.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report, noting that there are no direct financial implications associated with the recommendations at this stage and that any future costs incurred in developing and implementing the Council's Plan of Action against ULEZ are expected to be funded from Earmarked Reserves.

Legal

Legal Services confirm that the Council has power pursuant to its general power of competence under section 1 of the Localism Act 2011 to develop an action plan in opposition to the Mayor of London's proposal to extend ULEZ.

BACKGROUND PAPERS

[Council motion – 12 February 2023](#)