



Councillor Colin P. Smith

**LEADER OF THE COUNCIL
LONDON BOROUGH OF BROMLEY**

Mayor Of London
City Hall
Kamal Chunchie Way
London
E16 1ZE

26th July 2022

Dear Mister Mayor

Bromley Council's response to TFL's ULEZ consultation

Bromley Council supports the objective of improving air quality and to this end has published a comprehensive Air Quality Action Plan 2020-2025 with a matrix of twenty-five actions. The Council is committed to ensuring that its operation is carbon net zero by 2027. In addition, a further 5,000 trees are being planted on the borough's roads to add to the existing 36,000. We are also continuing our rollout of LED street lighting, installing new electric charge points, and investing in renewable energy.

The Council, however, disagrees strongly with the proposal to extend the Ultra-Low Emission Zone (ULEZ) to outer London by August 2023. Bromley is, geographically, the largest London Borough, and contains many rural areas which have little public transport and where, unlike inner London, residents are dependent on their cars. The Council is particularly concerned about the impact on the self-employed, small businesses which rely on their vehicles to conduct their trade and on elderly residents and others on fixed incomes. Already facing substantial increases in fuel costs, the imposition of a daily charge to drive in the borough will be an additional financial burden and, for many, without the means purchase a compliant vehicle, it will mean they can no longer trade or afford to drive. The imposition of the ULEZ charge on motorists, including those entering Bromley from neighbouring counties will also be detrimental, especially for those like nurses, police officers, supermarket shelf fillers and others working anti-social hours when public transport is not available.

The Council therefore calls on Sadiq Khan, the Mayor of London, to abandon his plans to extend the ULEZ. We would like to see the £200m he will spend implementing ULEZ on practical solutions such as improving the public transport network in outer London, invest in making the TfL bus fleet net-zero ahead of the current 2034 target and fund a more generous scrappage scheme.

Key points that TFL should take into consideration:

- Bromley has the highest estimated percentage of Road miles meeting the Air Quality Objective for NO₂.
- The length of time since the implementation of the current ULEZ, including the impact of CV-19, is not sufficient to consider the merits of the scheme. This includes whether there are benefits of further expansion or the extent to which outer borough already benefit from the

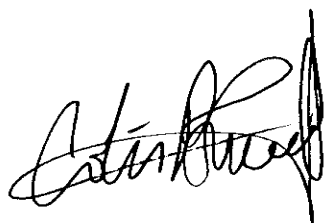
existing ULEZ due to AQ being transboundary. Extension may not be justifiable on a cost-benefit analysis due to potential diminishing returns.

- The Mayor of London is setting policy aligned with WHO recommendations which were made in October 2021, insufficient scrutiny of the feasibility of these levels has taken place.
- The Environment Act 2022 has yet to set levels.
- Implementation of the current ULEZ could be justified as a proportionate measure based on AQ data for inner London Boroughs, however this arguably is not the case for extension to all outer London Boroughs, particularly Bromley which has some of the best air quality in London and our Annual Status Reports demonstrate a consistent downward trend in pollutant levels.
- We are committed to improving air quality further through implementing the Borough's Air Quality Action Plan 2020-2025 which sets out proportionate actions that we will take to reduce air pollution in compliance with the regulatory framework in relation to Air Quality.

The latest London Atmospheric Emissions Inventory 2019 was published in December 2021. This model of Air Quality includes the impacts associated with the operation of the central London Ultra Low Emissions Zone (ULEZ) but not the introduction of the London wide Low Emissions Zone (LEZ) and ULEZ. You can see from the infographics (in Appendix A) which prove that Bromley has the some of the best air quality in London. As a local authority, we are committed to doing everything we can to reduce our emissions and have ambitious target to reach NetZero by 2027. In addition to air quality action plans, we also have an ambitious Carbon Neutral Strategy <https://www.bromley.gov.uk/downloads/file/1348/net-zero-action-plan-year-1-2019-20> which highlights the innovative and positive ways we will reduce our impact on the environment without negatively impacting residents' pockets.

Bromley remains a green borough with some of the cleanest air in London. We have more parks and trees than any other London borough and we are doing more to improve our air quality by planting over 5,000 new trees, installing new electric vehicle charging points, establishing new woodlands and investing in green energy.

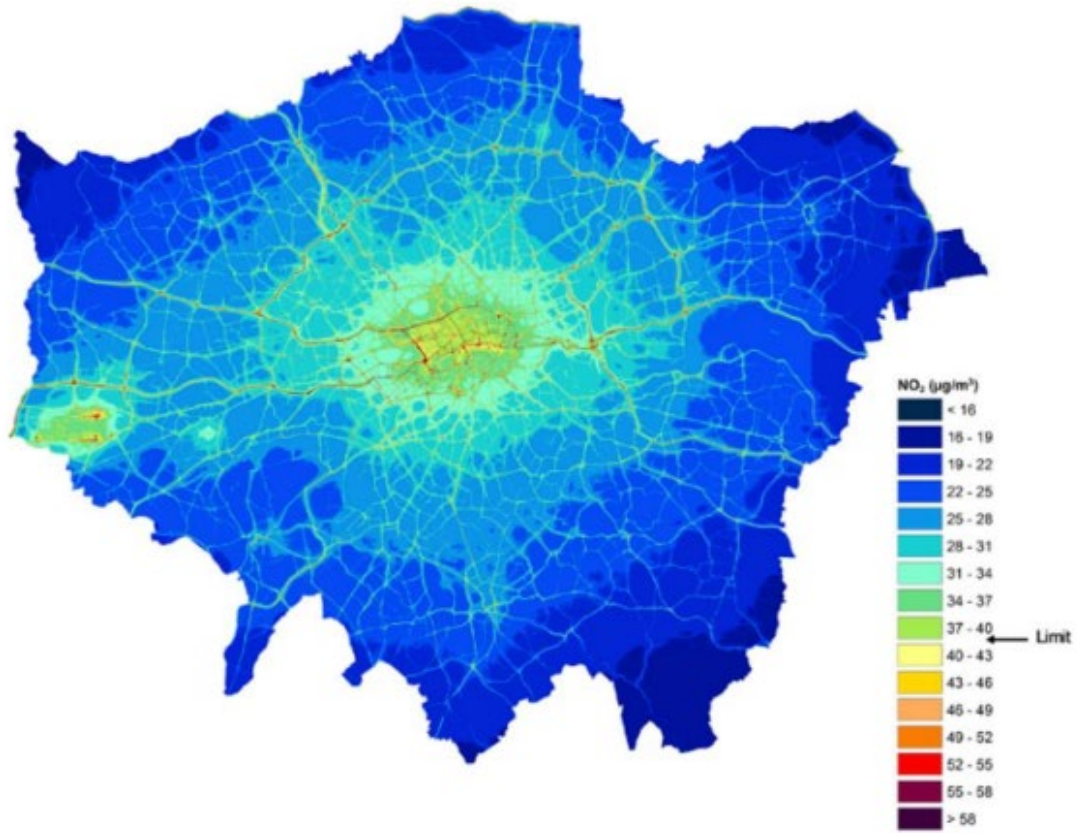
Yours sincerely



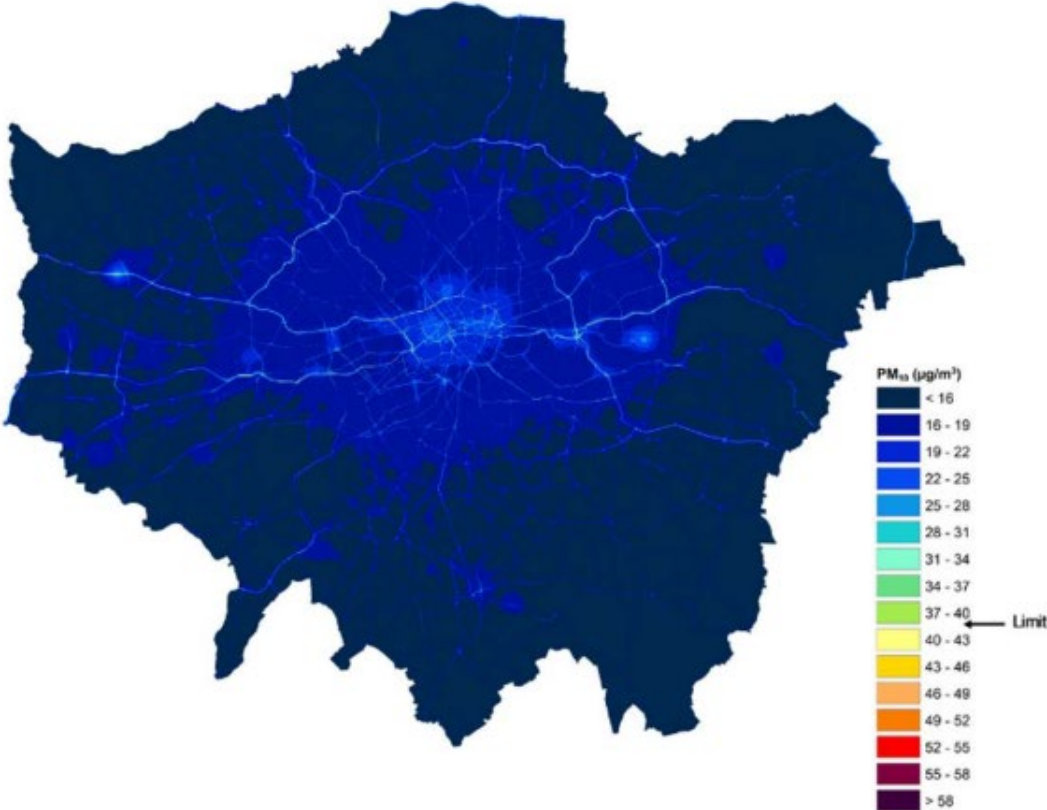
Cllr Colin P. Smith
Leader of the Council
London Borough of Bromley

Appendix A

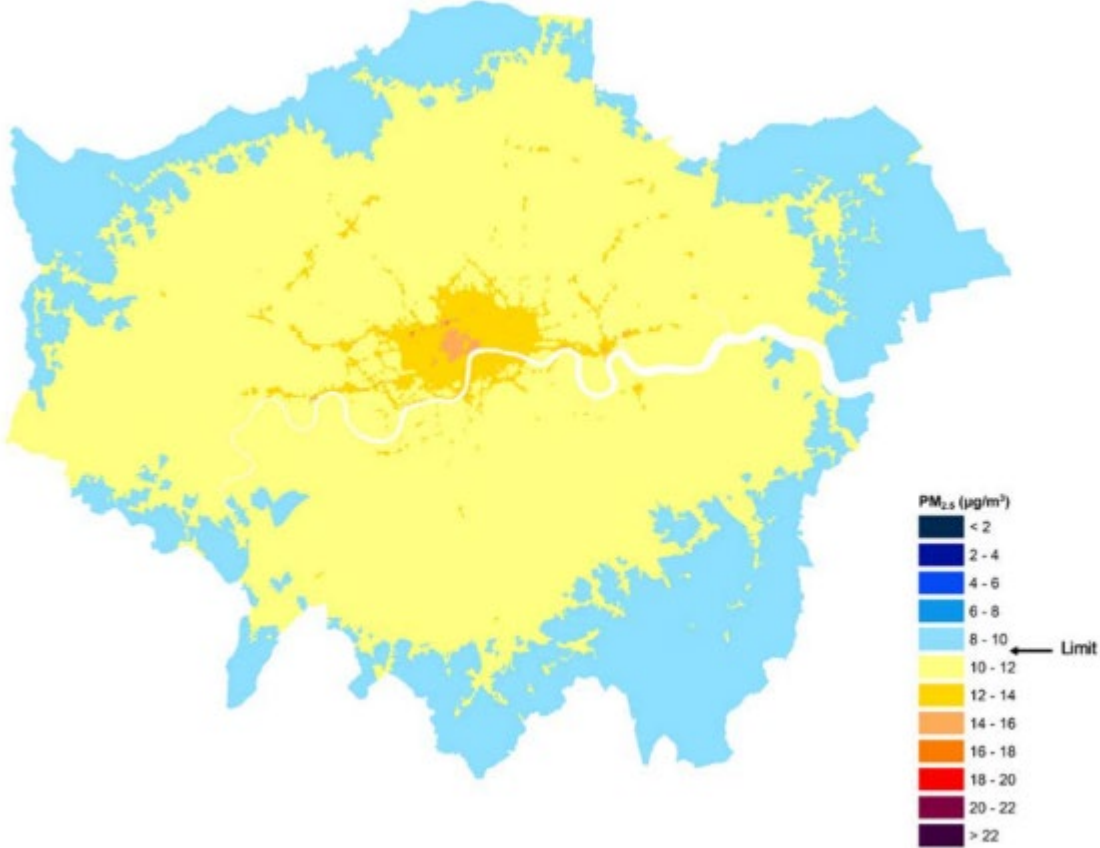
NO₂ Concentrations 2019



PM₁₀ Concentrations 2019



PM_{2.5} Concentrations 2019



Based on the WHO interim guideline of 1

Estimate of % Road Miles meeting 40 ug/m3 NO2 (major road network in LAEI with TLRN defined)

