

## **Epping Forest District Council Response to TfL Consultation on Proposals to Extend the Ultra Low Emission Zone (ULEZ) London-wide From 29 August 2023**

### **Background**

Population and transportation in Epping Forest District

Epping Forest District is in the south-west of Essex abutting both Hertfordshire and Greater London, specifically the London boroughs of Waltham Forest, Enfield, Redbridge, and Havering. Based on ONS data from 2021, the District has a population of around 135,000.

The south-west of the District is served by the London Underground Central Line (both the main line and the 'Hainault via Newbury Park' loop). Epping Station is the eastern terminus and there are 7 other stations in service in the District. There is one national railway station in the District – at Roydon on the Liverpool Street to Stansted and Cambridge line, although other railway stations (Broxbourne, Sawbridgeworth, Harlow Town and Harlow Mill) are close to, and accessible from, the District. The Central Line used to run further than Epping through stations at North Weald and Blake Hall to the end of the line at Ongar. Blake Hall station closed in 1981 with the line closing in 1994.

Some areas of the District have relatively good transport links with both the M11 and M25 motorways running through the area and the A406 being a short distance from the south of the District. However, in the rural areas there are accessibility issues for some without private transport, especially in outlying villages. In addition, making east-west trips across the District by public transport is extremely challenging.

Around half of the District's working residents commute out of the District for work, with the largest proportion travelling to London.

### **Air quality in the District**

Air quality in the District in relation to human health is generally good with nitrogen dioxide (NO<sub>2</sub>) and particulates (PM<sub>10</sub>) levels below the UK legal limit value for these pollutants. The District does have one air quality management area (AQMA) declared for exceedances of the 1 hour mean and annual mean for NO<sub>2</sub> near the B1393/ Theydon Road junction at Epping, Bell Common attributed to vehicle emissions. Source apportionment work conducted by Bureau Veritas on behalf of the Council in December 2021 concluded that by 2024, our AQMA for NO<sub>2</sub> will be in compliance with the air quality limit values. It further concluded that NO<sub>2</sub> concentrations will be below 10% of the air quality limit value by 2026.

The District, together with the London Boroughs of Waltham Forest and Redbridge, also has a Special Area of Conservation (SAC) which is an international designation applied to sites whose habitats and species have significant ecological importance. The Epping Forest SAC (EFSAC) is sensitive to pollutants which include oxides of nitrogen (NO<sub>x</sub>) and ammonia (NH<sub>3</sub>) and because of this, there are pollutant critical levels set for these pollutants. With respect to the EFSAC, vehicle tailpipe emissions are the main source of pollution (with catalytic convertors being the primary source of NH<sub>3</sub>). It is known that much of the EFSAC is in an unfavourable condition. Under the UK legislation the Council is a competent authority with a duty to ensure that plans and projects can only be permitted where there will be no adverse effect either alone or in combination with other plans and projects on the Forest. This is a matter which has been the subject of considerable and ongoing discussion as part of the examination into the Council's emerging Local Plan in order to shape an appropriate policy framework to mitigate the effect of new development on the EFSAC.

In addition, to support the delivery of new development Epping Forest District Council has produced an [Air Pollution Mitigation Strategy](#) (which is currently an Interim Strategy), which provides a list of measures to be implemented in order to mitigate any effects on the EFSAC. One such measure, should it be demonstrated to be necessary through on-site monitoring and subsequent air quality modelling, is the creation of an EFSAC specific Clean Air Zone.

As part of the work to assess air pollution impacts on the EFSAC, ANPR data was obtained to assess fleet composition. It found that in terms of euro class split, the 2019 ANPR data showed that the car and LGV fleet using the roads through the EFSAC is for the main part newer than that in the EFT outer London fleet, but older than the EFT UK average outside of London. Older vehicles with less rigorous euro standards are typically more prevalent in the local vehicle fleet for both 2017 and 2019 ANPR surveys.

## Climate Change Emergency

Epping Forest District Council declared a climate emergency in September 2019 and made a commitment to do everything within its power to become a carbon neutral District by 2030. A Climate Change Action Plan has recently been adopted by the Council. Actions to address air quality and climate change are closely linked, so many of the measures in our Climate Change Action Plan will also support improvements in air quality in the District and have beneficial effects on both human health and the EFSAC. As 65% of the District's carbon emissions come from on road transport sources, maximising opportunities to make it easier for residents and businesses to transition to using Ultra Low Emissions Vehicles (ULEV's), encouraging sustainable transport choices and reducing the number of journeys made by vehicles is a major component of this Plan.

## Response to the ULEZ expansion consultation

Epping Forest District Council welcomes the opportunity to respond to this consultation. As seen from our background information above, we share a common goal of improving air quality and reducing carbon emissions. With the south of our District bordering three London boroughs and being in close proximity to the A406, the expansion of the ULEZ will undoubtedly have a direct impact on our District. Having reviewed the consultation documents, in principle we support the aims of the expansion put forth by TfL but also have concerns that TfL and the Mayor of London need to address.

### Concern 1: Traffic displacement

Insufficient information has been provided to demonstrate that Epping Forest District would not be impacted by drivers avoiding the ULEZ boundary. The present ULEZ has a clear boundary (A406) which allows drivers to avoid the ULEZ whilst also avoiding residential roads however, the proposed new boundary is not as defined and provides more opportunities for drivers to divert to residential roads and use alternative routes to get to their destinations. Additionally, there is a concern that drivers from both our District and outside who currently drive into London may decide to park near a tube station in our District to avoid paying to enter the London wide ULEZ. This in turn can result in increased vehicle movements in our District and the creation of congestion and pollution hot spots.

### Action requested:

We ask that TfL model for this or at least provide additional information to demonstrate whether the hypothesis of traffic displacement is valid and if so, propose measures to mitigate the negative impacts. Without this information, Epping Forest District Council would not be able to support the ULEZ expansion.

## **Concern 2: Creation of pollution corridor**

We do not believe that the mitigation measures put forth in our Interim Air Pollution Mitigation Strategy were fully taken into consideration by TfL when modelling the impacts of the proposed ULEZ expansion. One such measure, a clean air zone in conjunction with the proposed ULEZ expansion may create a pollution corridor in the areas of the District caught between the two boundaries.

### **Action requested:**

We ask that TfL model for this or at least provide further information to demonstrate if the hypothesis of a pollution corridor is valid and if so, propose measures to mitigate the negative impacts. Without this information, Epping Forest District Council would not be able to support the ULEZ expansion.

## **Concern 3: Impact on our air quality management area**

Whilst the modelling produced by TfL goes up to the M25 boundary, our AQMA is just outside of this boundary and we are therefore not able to assess the impact of the expansion on our AQMA. The additional information provided to us by TfL states that the scheme is not expected to increase NO<sub>x</sub> emissions on any road links within Epping Forest or within the Epping Forest Areas but the way the data is presented suggests that the data for the A roads, B roads, etc, have been averaged. It is therefore difficult to assess if the ULEZ expansion will increase NO<sub>2</sub> levels in and around our AQMA and delay the time it will take to revoke it.

### **Action requested:**

We ask that TfL provide more detailed information regarding the proposed ULEZ expansion's impact on our AQMA and whether this expansion will delay the time it will take for our AQMA to be revoked. Without this information, Epping Forest District Council would not be able to support the ULEZ expansion.

## **Concern 4: Impact on the Epping Forest Special Area of Conservation**

The ULEZ may influence people to upgrade their vehicles or switch from diesel to petrol. Whilst this may be beneficial with regards to reducing NO<sub>2</sub> and particulate tail pipe emissions, it may result in an increase in ammonia levels as ammonia is a product released by catalyst-equipped petrol vehicles and selective catalytic reduction (SCR) on both light and heavy-duty diesel vehicles. Ammonia is a pollutant of concern for the EFSAC. The additional information provided by TfL states that while ammonia emissions have not been modelled, the baseline proportion of electric vehicles in their model inputs are considerably higher than that assumed in the modelling undertaken to inform the Habitats Regulations Assessment 2021 (HRA 2021) undertaken to support the main modifications to our emerging Local Plan and our Interim Air Pollution Mitigation Strategy. Therefore TfL have suggested that ammonia levels are expected to result in an earlier achievement of the targets set out in the HRA 2021 and the Interim Air Pollution Mitigation Strategy. We feel that a baseline proportion of EV's in the range of 40-50% from 2030 is optimistic and feel that instead there will be an increase in petrol vehicles. This is supported by the follow up response provided by TfL that acknowledges a potential increase in the proportion of compliant petrol vehicles. This is a matter of importance as there is a need under the Habitats and Species Regulations to take a 'precautionary' approach. The HRA 2021 and Interim Air Pollution Mitigation Strategy set out that, based on current available information, a 30% reduction in petrol cars (such that 12-15% of all vehicles using roads through the EFSAC are ULEVs by that year) would need to be achieved by 2033 in addition to any Clean Air Zone to be able to demonstrate no adverse effect on the integrity of the EFSAC as a result of Local Plan development. The EFSAC ANPR data collected in 2019 also showed that the proportion of the vehicle fleet was 43.8% petrol car as opposed to 31.5% of diesel cars.

**Action requested:**

We ask that TfL model for the impact of the ULEZ expansion on the EFSAC in relation to ammonia concentrations. Without this information, Epping Forest District Council would not be able to support the ULEZ expansion.

**Concern 5: Impact on the current public transport system and road network**

Over the past years, TfL has reduced service within our District. The time between tube trains has been increased and some bus routes have been reduced or removed. Should residents decide to use public transport instead of drive, this will add further strain on the public transport system in our District. Conversely, as a result of service reductions some residents may use their cars rather than public transport. This undermines modal shift objectives and could exacerbate vehicle queue lengths within the EFSAC and around our AQMA which could potentially impact on the achievement of our air quality targets.

**Action requested:**

We ask that TfL keep the provision of public transport in our District under review to ensure that residents and people who commute to and from our District for work, education and leisure are not negatively affected should commuter usage increase as a result of the ULEZ expansion; and to avoid an increase in vehicular traffic in our District.

**Concern 6: Insufficient time and scrappage scheme**

It appears that the scrappage scheme proposed to support the ULEZ expansion will only be available to London residents. Additionally, the implementation target date of August 2023 will provide little time for residents and businesses to plan for purchasing a new vehicle, especially during the current difficult economic period. The current delays of receiving new vehicles due to production issues caused by the pandemic, global shortage of key microprocessor chips and the war in Ukraine should also be taken into consideration.

**Action requested:**

We ask that TfL and the Mayor of London expand the scrappage scheme radius to boroughs/Districts that directly border the Greater London border to maximise the effectiveness of the scheme. We also ask that a sunset period extending past the August 2023 implementation date is offered to residents and businesses who reside/operate in boroughs/Districts that directly border Greater London.

**Concern 7: Poor provision of EV charge points in TfL car parks**

There are 8 London Underground Line stations within the District (Epping, Theydon Bois, Debden, Loughton, Buckhurst Hill, Roding Valley, Chigwell and Grange Hill). Presently the TfL car park at Theydon Bois is the only one that offers charging points for taxis.

**Action requested:**

We ask that TfL install EV charge points for taxis and public use at their car parks situated in our District.

