

# Briefing The London-wide expansion of the Ultra Low Emission Zone

June 2023



## Summary

The expansion of London's Ultra Low Emission Zone (ULEZ) follows the previous success of the scheme in central and inner London and is intended for outer London boroughs to reap the benefits of cleaner air and better public health. The ULEZ aims to remove the most toxic, polluting vehicles from the capital's roads through incentives and penalties, improving public health and protecting the environment.

Clean air zones are specific areas where targeted action to reduce local air pollution is often carried out by charging the most polluting vehicles for entering them. They are one of the most effective ways to reduce traffic pollution. Clean air zones are designed to encourage a shift to alternative modes of transport and cleaner vehicles. Comprehensive research demonstrates their success, with over 250 of them across European cities.

Our report *Not going the extra mile* identified that the UK cannot remain on track for net zero by switching to electric vehicles alone, a 20-27 per cent reduction in the number of car miles driven by 2030 is also needed.<sup>1</sup> As well as tackling air quality, clean air zones can support these efforts, as has already been seen with 50,000 fewer vehicles driving into the existing ULEZ zone on an average day.<sup>2</sup>

The UK's cross party consensus on climate action through a net zero carbon goal is undermined by party political opposition to the London-wide ULEZ expansion and hinders efforts to improve public health and the economy. There are clear and obvious improvements that should be made to the roll-out of clean air zones in the UK – and we look to devolved mayors, including the mayor of London, with the active support of central government, to resolve these problems. The roll out of clean air zones should not burden the very people they are there to protect.

## The political context of clean air policies

Polling by YouGov in July 2022 showed that twice as many Londoners support ULEZ expansion than oppose it.<sup>3</sup> More in Common found a higher level of support than opposition in London, although the result was less favourable amongst Conservative voters nationally.<sup>4</sup>

In recent months, political objections to the ULEZ expansion and other clean air policies elsewhere in the UK has intensified, demonstrated by the Greater London Authority facing a legal challenge to the expansion from five Conservative-led outer London boroughs.

Possible's [research](#) identified a correlation between boroughs opposing the scheme's expansion and those which have implemented fewer electric vehicle chargepoints, protected cycle lanes and bus priority lanes, hindering efforts to create a greener and healthier city for all. Bexley and Harrow, two of the five boroughs bringing the legal challenge are the only London boroughs that have not installed local air quality monitoring equipment. All local authorities should introduce measures which make sustainable travel easier to reduce public opposition to behavioural change policies.

Legitimate debate around aspects of policy design and implementation are important to ensure policies are fair and effective, including the following factors: their impact on lower income motorists, the availability of alternative modes of transport and the generosity of scrappage schemes. However, it is worrying that, in the case of the ULEZ and some other clean air schemes, opponents have attacked the need for action and appear opposed to tackling air pollution.

## **ULEZ London-wide expansion**

The ULEZ expansion will come into force on 29 August 2023. When it does, it will apply to an additional five million Londoners. It will operate all day every day, charging non-compliant vehicles £12.50 daily for driving in the zone. Transport for London (TfL) data shows that, on average, nine in ten cars driving in outer London on a given day are already compliant, with compliance levels rising. Therefore, most drivers will not be charged.

The £12.50 daily charge is priced specifically to discourage driving of non-compliant vehicles while allowing for the occasional car journey to be made, which follows the polluter pays principle.

The expansion will be accompanied by a scrappage scheme of £110 million. This will allow families receiving child benefit, disabled drivers, charities, and all London small businesses to scrap or adapt their non-compliant vehicles. Successful applicants can use the grants to buy annual bus and tram passes or put the money towards the purchase of cleaner vehicles. The grants range from £2,000 for cars, £5,000 for wheelchair accessible vehicles and up to £9,500 for businesses. Grace periods are also available to those with disabilities, meaning they have extra time to adapt before being subject to the daily charge.<sup>5</sup>

The ULEZ expansion will be accompanied by the biggest ever increase in outer London bus services, with one million additional kilometres added to the network, including the recently announced Superloop.

## Why the ULEZ expansion is needed

The ULEZ is a three pronged approach: to support public health with better air quality, reduce emissions from transport and make economic savings by reducing congestion. It will also help to address inequality.

### Health

The damaging impacts of air pollution on human health are well known and were the focus of the UK chief medical officer's 2022 annual report. The UK Health Security Agency estimated the burden of long term exposure to air pollution amounted to between 29,000 to 43,000 deaths in the UK in 2019.<sup>6</sup>

Imperial College London recently collated evidence of the impacts of air pollution across the human life course. The effects are evident from conception through to old age and include higher rates of miscarriage, low birth weights and stunted lung growth in children, as well as increased risks of asthma, cancer, strokes, depression and dementia.

The health impacts of air pollution are acute in London, causing approximately 4,000 premature deaths across the city each year.<sup>7</sup> Around 600,000 Londoners live with lung conditions. Nearly 60 per cent of those live in outer London. On average, these areas have older populations, so suffer London's highest number of deaths because of poor air quality.<sup>8,9</sup>

Despite improvements in the city's air quality, all London boroughs were recently found to exceed the World Health Organisation's limits for air pollution, except Bexley and Harrow, where local air quality monitoring equipment has not been installed.<sup>10</sup>

While efforts to improve air quality are working, far more still needs to be and can be done to tackle air pollution in the capital.

### Environment

Transport is the single largest greenhouse gas emitting sector in the UK, with half of the sector's emissions generated by road transport. Traffic pollutants harm local environments and are a major contributor to global climate change. Switching over to electric vehicles alone, without traffic reduction, will not allow the UK to meet its emissions reduction targets to stay on course in tackling the worst effects of climate change, nor will it address congestion. Electric vehicles still generate environmental pollutants from brake and tyre wear.

Our 2021 report *Not going the extra mile* identified that a reduction of 20-27 per cent of UK car miles driven is needed by 2030 to stay on track to meet the UK's net zero carbon emissions goal.<sup>11</sup> The Greater London Authority has a target to cut car traffic by 27 per cent by 2030.

It is estimated that the ULEZ expansion will save 27,000 additional tonnes of CO<sub>2</sub> by the end of 2023.<sup>12</sup> Moving away from car dependency towards more sustainable alternatives such as public transport and active travel, like walking and cycling, will help to meet local, domestic and international climate targets.

## Inequality

Air pollution is a problem across the whole of London, yet it is more prevalent in poorer communities and areas that have a higher proportion of people from a non-white ethnic background, exacerbating existing health inequalities. In 2019, communities with higher levels of deprivation or a higher proportion of people from a non-white ethnic background, were more likely to be exposed to higher levels of air pollution. NO<sub>2</sub> concentrations in London were, on average between 16 and 27 per cent higher in areas where non-white people are more likely to live.<sup>13</sup>

London has the lowest vehicle ownership in the country.<sup>14</sup> The poorest Londoners are least likely to own a car but are most likely to suffer the consequences of poor air quality, and so have the most to gain from clean air and traffic reduction policies.

The scrappage scheme is designed to offer financial support to take the most polluting cars off the road. The scheme is substantial (£110 million) and is means tested, meaning not all owners of non-compliant vehicles will be eligible to claim. This is a particular concern for lower income outer London residents who are more likely to own a car than lower income inner and central London residents. Because of this, there is a strong case for further improving the scrappage scheme to benefit those on lower incomes. We look to the mayor of London and central government to resolve these issues urgently.

Some non-compliant drivers will have to adapt their travel behaviour or vehicles to avoid the daily charge. Investments to improve public transport in outer London, such as the Superloop bus network, are designed to counter this but may not be in place by the time the ULEZ expansion comes into force and may not benefit those travelling into London from bordering areas. It is vital the means of reducing air pollution does not burden those the policy is trying to protect. There should be continued efforts in the coming months to improve public transport alternatives, in London and other areas with clean air policies in place.

## Economy

Research for Public Health England found that the health and social care costs of air pollution in 2017 were £157 million.<sup>15</sup> TfL estimates that expanding the ULEZ across London could save the NHS £5 billion by 2050.<sup>16</sup> This is because approximately 300,000 fewer Londoners will develop diseases attributed to air pollution and there will be one million fewer air pollution related hospital admissions.

Aside from the cost of ill health, congestion is a huge drain on the economy, costing nearly £60 billion each year.<sup>17</sup> The average driver spent 80 hours in traffic in 2021.<sup>18</sup> London suffers some of the worst congestion of any city in the world. By discouraging the use of the most polluting cars and encouraging the use of more public transport and active travel, the ULEZ will help to bring down this financial burden.

The expansion aims for a high level of compliance rather than being used as means to raise revenue. TfL is legally obliged to invest any revenue it does raise from the ULEZ back into London's transport network.

The expansion of the ULEZ is not a perfect policy. It could go further in terms of pollution reduction and support those needing to adapt their travel behaviours and vehicles to become compliant. Nonetheless, it is an important step in reducing traffic pollutants, supporting the health of all Londoners and the environment.

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**For more information, contact:**

**Sophie O'Connell, policy adviser, Green Alliance**

[soconnell@green-alliance.org.uk](mailto:soconnell@green-alliance.org.uk)

## Endnotes

<sup>1</sup> Green Alliance, 2021, *Not going the extra mile: driving less to tackle climate change*

<sup>2</sup> Mayor of London, February 2023, *Inner London Ultra Low Emission Zone – One year report*

<sup>3</sup> TfL/ YouGov, July 2022, 'ULEZ expansion date poll results'

<sup>4</sup> *Evening Standard*, 19 May 2023, 'Support for ULEZ strongly determined by political leaning, poll finds'

<sup>5</sup> Transport for London, 'Discounts and exemptions'

<sup>6</sup> UK Health Security Agency, June 2022, *Chemical hazards and poisons report: issue 28, reducing health harms associated with air pollution*

<sup>7</sup> Imperial College London, 2021, *London health burden of current air pollution and future health benefits of mayoral quality policies*

<sup>8</sup> Mayor of London, July 2022, *Expanded Ultra Low Emission Zone – six month report: including Low Emission Zone – one year report*

<sup>9</sup> Ibid

<sup>10</sup> Mayor of London, April 2023, 'New highly localised data shows every borough in London exceeds World Health Organisation limits for toxic pollution'

<sup>11</sup> Green Alliance, 2021, op cit

<sup>12</sup> Mayor of London, November 2022, 'Ultra Low Emission Zone will be expanded London-wide'

<sup>13</sup> Logika Noise Air Quality consultants, October 2021, *Air Pollution and inequalities in London: 2019 update*

<sup>14</sup> Office for National Statistics, January 2023, 'Housing, England and Wales: census 2021'

<sup>15</sup> Public Health England, May 2018, *Estimation of costs to the NHS and social care due to the health impacts of air pollution*

<sup>16</sup> Ibid

<sup>17</sup> Department for Transport, 'TAG data book', July 2021, v1 15

<sup>18</sup> INRIZ, January 2023, '2022 INRIZ global traffic scorecard'