

# The New Ultra Low Emission Zone

## A Greater London ULEZ Expansion

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The UK is hosting COP26 in Glasgow in November this year and there will be an international spotlight on the UK's commitments to tackling climate change. As part of the Government's ambition for a green recovery post-COVID, there is growing awareness of the health dangers posed by air pollution. The World Health Organization ('WHO') has already recognised it to be the greatest global environmental health risk and it is estimated to cause the equivalent of up to 40,000 early deaths a year.

COVID-19 has laid bare health inequalities that the Government must address by setting tough targets to lower levels of air pollution across the country. The Environment, Food and Rural Affairs Committee has called on the Government to address levels of poor air quality in England, highlighting a 'strong and established' case that air pollution disproportionately affects those from lower socioeconomic backgrounds. The Government has taken an important step by banning the sale of new petrol and diesel cars by 2030, but more must be done to encourage a green recovery that rebuilds the economy towards a greener, cleaner future.

In December 2020, a Coroner's Court found that air pollution above legal limits and the WHO guidelines "made a material contribution" to the death in 2013 of nine-year-old Ella Adoo-Kissi-Debrah who grew up around the busy South Circular road in London. She became the first person to have air pollution officially listed as a cause of death on her death certificate.

The Ultra Low Emission Zone (ULEZ) was first confirmed by then Mayor of London, Boris Johnson, in 2014 as a key measure to tackle the capital's illegal air pollution. However, even at that time it was known to not go far enough.

The Government's own research has found that Clean Air Zones ('CAZs'), which are based on the ULEZ, are the best way to rapidly reduce illegal and harmful levels of air pollution across our towns and cities. Following ClientEarth's three legal challenges against the UK Government, ministers have directed over 60 English councils to identify local solutions to reduce pollution to within the legal limit in the shortest possible time – much of which includes CAZs – and required additional action in London.

## The case for a bigger Ultra Low Emission Zone

As a London MP, the expansion of the ULEZ will affect people and businesses across your constituency. There has been increasing local concern around the impact of air pollution, particularly the threat posed by local hotspots.

Air pollution affects us all, from the time that we are in the womb and into old age. However, some people are more vulnerable to toxic air, including children, older people, and people with chronic illnesses. Air pollution can trigger heart attacks and strokes, increase the risk that asthma attacks lead to hospitalisation or worse, and causes cancer. Studies have also shown that air pollution is stunting the lungs of children growing up in some of the most polluted parts of London.

Some members of our communities are also disproportionately exposed to higher levels of air pollution including people from low-income households, people from ethnic minorities, and outdoor and transport workers.

Legal limits for nitrogen dioxide (NO<sub>2</sub>), which should have been met by 2010, are still being breached across the UK. London has the worst levels in the country at almost two times over the legal limit (an annual mean of 40 micrograms per cubic metre (µg/m<sup>3</sup>)).

Continuing levels of illegal air pollution is locking in health inequalities and future strain on the NHS. Taking action would not only have public health benefits as research from the Confederation of British Industry has shown that cleaner air could boost the UK economy by £1.6 billion per year and provide an economic benefit of almost £500 million per year to London's local economy.

The Mayor of London has a responsibility to take action, alongside the UK Government, and whilst there is no silver bullet, the ULEZ is key to tackling the key source of illegal levels of NO<sub>2</sub> – road transport, and in particular diesel vehicles.

The first stage of the ULEZ was launched in April 2019 and covers central London (i.e. the same area as the London Congestion Charge Zone). However, analysis showed that more action is needed to meet legal limits for NO<sub>2</sub> in the shortest time possible. The Mayor of London has proposed, after substantial public consultation, that the ULEZ will be expanded on 25 October 2021 up to, but not including, the North and South Circular Roads. This will make the expanded ULEZ 18 times bigger than the current zone.

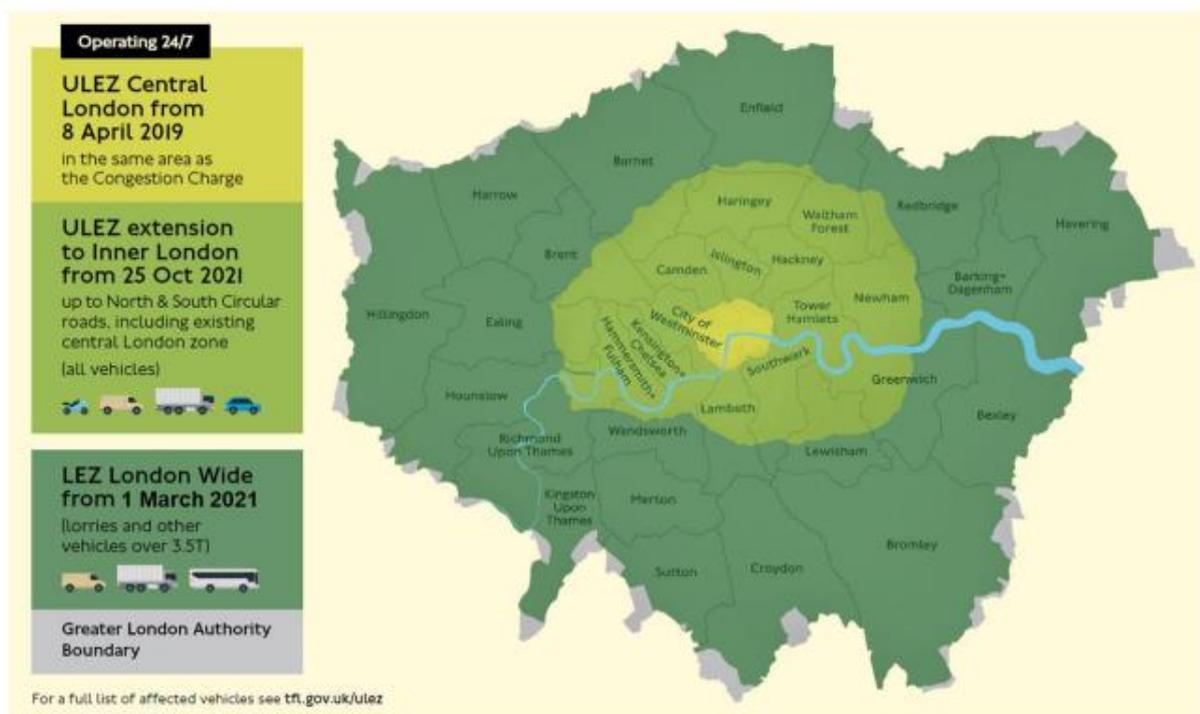
### Who will be affected?

The ULEZ affects all vehicle types from motorbikes and private cars through to buses and lorries. However, a petrol vehicle would have to be more than 15 years old and a diesel vehicle more than 6 years old to not comply with the emissions standards set by the ULEZ.

It is important to note that research has shown that people from low income households are not only on average exposed to higher levels of air pollution but also tend to contribute less to the problem by being less likely to own a car, especially diesel cars, and less likely to drive as much as people on higher incomes.

## Providing help and support

ClientEarth believes that alongside the ULEZ, there is also a need to help and support people and businesses to move to cleaner forms of transport. Since 2019, disabled and low-income Londoners, charities and businesses have been able to apply for funding through scrappage schemes to help them replace or retrofit older, more polluting vehicles or even use the funding for car club membership or public transport season tickets. So far, £61m has been invested and more than 10,000 vehicles replaced or retrofitted. However, we would like to see more done to help people access cleaner transport solution, especially in inner and outer London boroughs where options are more limited.



Source: Transport for London

## Public support for the ULEZ expansion and more

Over the course of the last Mayoral term, Londoners embraced bold action to remove some of the most polluting vehicles from central London and overwhelmingly supported more ambitious proposals to clean up the toxic air in their city. The consultation on improving the ULEZ received one of the highest number of responses to any GLA consultation, with 60% of respondents supporting expanding the zone and, of those, more than half wanted to see it expand beyond the North and South Circulars.

Polling by London Council's in October 2020 has also showed that: 78% of Londoners agreed tackling air quality should be a priority issue; 43% said they felt their health had been affected by London's air quality; and 45% said air quality affects where they choose to live in London.

## Healthy air for all of Greater London

London faces a huge public health challenge and current plans, whilst a positive step in the right direction, fall short of properly addressing the issue the ambitious plans are designed to tackle. ClientEarth remains particularly concerned about specific hotspots in outer London, which persist outside

of the expanded ULEZ boundary. Additionally, there is now a need to reflect on the fact that the WHO recently reduced its guideline level for NO<sub>2</sub> from 40 µg/m<sup>3</sup> to 10 µg/m<sup>3</sup>, which highlights that there is clearly more to do to make sure London's air is safe to breathe.

A comprehensive plan is needed to demonstrate how measures will be implemented in the first year of the Mayor's new term to tackle known and projected hotspots, particularly those around facilities used by vulnerable groups such as nurseries, schools, playgrounds, health centres and hospitals.

Without policies such as the ULEZ, it would have taken 193 years from 2016 for London to meet legal limits for NO<sub>2</sub>. We are keen to work with parliamentarians and other decision-makers, including the Mayor of London, to help London meet current legal limits for NO<sub>2</sub> by 2025 at the latest and set a path toward healthier air for all Londoners.

We would be delighted to schedule a meeting with you to discuss the impact of air pollution on your constituents and local businesses.

*To discuss further please contact:*

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