



# HILLINGDON

LONDON

Sadiq Khan Esq  
Mayor of London  
City Hall  
Kamal Chunchie Way  
London  
E16 1ZE

Ref: IE/rt

28 July 2022

Dear Sadiq

## **ULEZ Consultations**

Please accept this letter and attached documentation as the formal response from the London Borough of Hillingdon to the consultation regarding your proposal to extend the Ultra-Low Emission Zone to the GLA boundary.

Having Heathrow airport in the borough, the M4 and A40/M40 dissecting it and the M25 along our western border, the Council is no stranger to championing and dealing with Air Quality issues. These main generators of our poor air quality might each be addressed without the need to extend the ULEZ to the borough which would cause significant detriment to very many of the people who live or work in Hillingdon as well as significant harm to our local economy. As a Council we are united in opposition to the current plan, which we see as a scheme to generate income and not a carefully targeted and necessary scheme to improve air quality.

The attached document, informed by the views of our partners, sets out our many issues of concern. I specifically draw attention to our view that the Integrated Impact Assessment (IIA) produced at your instigation is not fit for purpose and any decision to expand ULEZ based on it would be unlawful.

It is clear that the proposal is predicated upon a homogeneous London, with no differentiation between its compact, busy centre – with excellent public transport and other choices – and the wider green spaces in outer London where transport choices are often poor and so people are forced to rely upon their cars and vans. The public transport coverage in Hillingdon is in many places inadequate or almost non-existent. To provide a viable alternative to private car use, investment in public transport would need to embrace a wider catchment area than the GLA boundary alone and would need to be

transformational in size. At a time when City Hall is considering cutting bus services, it is not credible that the necessary investment would be forthcoming.

Your proposal gives insufficient consideration to the detriment it would cause to commercial and shopping centres, as well as employers, that rely upon customers or workers that live beyond the GLA boundary. Such people will not be entitled to any ULEZ vehicle scrappage, and their public transport choices – already more expensive and even poorer in terms of coverage than the London Bus services inside the GLA boundary – is likely to make them decide to go elsewhere. Many of our local employers including in the public sector depend upon workers that live outside of the GLA boundary and it is the lower paid people in vital service sectors, such as health and wider care services, who seem destined to pay the price of the ULEZ or, more likely, to seek employment elsewhere. I note that our colleagues at Heathrow Airport Ltd with their substantial and widely sourced workforce, share this concern.

I am not aware you having visited Hillingdon during your Mayoralty and I encourage you and your team to visit Hillingdon and engage in meaningful dialogue with the Council to see why our challenges are very different from those in central London. ULEZ may well be appropriate for inner and semi-inner London but it is not appropriate for Hillingdon and other, less damaging options should be explored.

Yours sincerely



Cllr Ian Edwards

**Leader of the Council**

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