

## **ADPH London (ADPHL) consultation response to Transport for London – Expansion of the Ultra Low Emission Zone (ULEZ) London-wide from August 2023**

**Date:** 29 July 2022

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### **About this response**

This response is from the Association of Directors of Public Health for London, which represents Directors of Public Health (DsPH) in London's 33 local authorities, and supports them to improve and protect the health of their local populations.

ADPH London brings together DsPH and their teams to work together to address issues which can either only be successfully tackled on a pan-London basis and/or which enhance the ability of boroughs to meet their responsibilities locally, for example through delivering efficiencies, sharing of best practice, reducing duplication, and improving coordination of related work. DsPH have a statutory role to ensure that their local population are safe and that the quality of the air they breathe promotes their health.

Further information on ADPH London, including current priorities, is available online here: <http://adph.org.uk/networks/london/>

This response represents the professional collective response of Directors of Public Health in London local government. At a local level, individual boroughs will submit their own responses to the consultation.

### **Proposal 1 Response - ULEZ expansion London-wide in August 2023**

ADPH London welcomes the opportunity to comment on the proposed plans to expand the Ultra Low Emission Zone London-wide on 29 August 2023, it will help with air quality, climate change and road congestion which have clear implications for improving health in London and it will also unify London in terms of ULEZ and the Low Emission Zone (LEZ). Within the implementation there should be rigorous monitoring, for example looking at access to health care and disruptions to people's social circles and lives, creative and comprehensive ways will have to be found so that any negative consequences of the ULEZ expansion might be mitigated and to learn lessons for the future.

Latest World Health Organisation (WHO) guidelines recommend a PM2.5 target of 5µg/m<sup>3</sup>. WHO recommendations are clear that “no threshold has been identified below

which no damage to health is observed” and that this target is therefore based on achieving the lowest concentrations of PM<sup>2.5</sup> possible. Pollution is the largest environmental cause of disease and premature death in the world today<sup>1</sup> with an estimated annual 10.2 million deaths attributed to the PM<sup>2.5</sup> element of fossil fuel pollution<sup>2</sup>. In the UK outdoor pollution is associated with an annual mortality of between 29,000 to 40,000 deaths and adverse health effects throughout the life-course including from before birth<sup>3</sup>. Poor air quality causes the premature deaths of approximately 4,000 Londoners each year, and nationally air pollution costs the NHS up to £3.7 billion annually.

The 3 main conditions associated with air pollution are respiratory conditions (such as asthma), cardiovascular disease, and lung cancer, and there is emerging evidence for associations with dementia, low birth weight and Type 2 diabetes<sup>4</sup>. These effects are not evenly distributed; poorer communities experience worse air pollution than more affluent areas with 66% of carcinogenic chemicals emitted into the air being emitted in the 10% most deprived wards<sup>5</sup>.

The London Directors of Public Health therefore fully supports the proposed expansion of the Ultra Low Emission Zone (ULEZ) to the whole of London as an evidence-based intervention that will both improve the health of the whole population<sup>6</sup> with disproportionate health benefits to the most disadvantaged. This includes support for those measures that will accompany the introduction of the ULEZ such as encouraging for walking and cycling.

Physical activity has been described by the Chief Medical Officers of the four home nations as a ‘miracle cure’<sup>7</sup> with analysis indicating that increased walking and cycling coupled with decreased private car use could save the NHS some £17 billion (at 2010 prices<sup>8</sup>). NICE (the National Institute for Health and Care Excellence) has noted that walking and cycling are activities that most should be able to fit into their daily lives and are relatively cheap or may save money<sup>9</sup>.

Finally, the London Directors of Public Health note the potential contribution of the ULEZ to combating climate change, noted by the World Health Organisation to be the greatest

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<sup>1</sup> The Lancet (2017). The Lancet Commission on pollution and health. DOI: [https://doi.org/10.1016/S0140-6736\(17\)32345-0](https://doi.org/10.1016/S0140-6736(17)32345-0)

<sup>2</sup> Vohra, K. et.al (2021) Global mortality from outdoor fine particle pollution generated by fossil fuel combustion: Results from GEOS-Chem. Environmental Research 195  
<https://doi.org/10.1016/j.envres.2021.110754>

<sup>3</sup> Royal College of Paediatrics and Child Health (RCPCH) (2016). Every breath we take: the lifelong impact of air pollution. Report of a working party.

<sup>4</sup> Public Health England (2018) Health Matters: Air Pollution [Health matters: air pollution - GOV.UK \(www.gov.uk\)](https://www.gov.uk) Site accessed 7<sup>th</sup> June 2022.

<sup>5</sup> The Marmot Review (2010) Fair Society, Healthy Lives.

<sup>6</sup> Ellison, R. et.al (2013) Five years of London’s low emission zone: Effects on vehicle fleet composition and air quality. Transport Research Part D 23 25-33. <http://dx.doi.org/10.1016/j.trd.2013.03.010>

<sup>7</sup> Dept of Health and Social Care (2019) UK Chief Medical Officers’ Physical Activity Guidelines

<sup>8</sup> Jarret, J. et.al (2012) Effect of increasing active travel in urban England and Wales on costs to the National Health Service. Lancet (London, England) 2012 ; 379: 2198-205. DOI : [10.1016/S0140-6736\(12\)60766-1](https://doi.org/10.1016/S0140-6736(12)60766-1)

<sup>9</sup> NICE (2012) Physical activity: Walking and cycling. Public Health Guideline (PH41).

challenge of the 21<sup>st</sup> century threatening human health and development<sup>10</sup>. Air pollution emissions are a key contributor to climate change, and the largest emitter of PM2.5 (transport) is also a major contributor to emissions of CO2 and greenhouse gases. Improving air quality will therefore deliver critical climate co-benefits and support delivery of the net zero targets set by London local authorities, the GLA and national government.

### **Proposal 2 Response - Changes to the Mayor's Transport Strategy**

We support the updating of the Mayor's Transport Strategy to reflect the October 2021 ULEZ expansion and include the proposal for the London wide expansion in August 2023.

### **Proposal 3 Response - Help shape the future of road user charging**

We would support development of road user charging in the future, however it would be essential that the impact on particular groups in society are considered. Access to adequate transport links that give people an alternative option to driving, need to be in place to ensure that the most disadvantaged in society are not hit the hardest. It is important that there is a scrappage scheme to facilitate a shift to cleaner vehicles especially for low-income households and those who are disabled. Discounts and exemptions should continue especially for those who are registered disabled, people attending NHS appointments and charitable organisations/community transport organisations. Funds from the penalty charge need to be re-invest to support walking and cycling infrastructure across London.

London Directors of Public Health would therefore overall welcome the proposed expansion of the ULEZ as an evidence-based intervention that would both improve health and reduce inequalities.

END

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<sup>10</sup> World Health Organization (2018) Health and Climate Change. [Health and climate change \(who.int\)](https://www.who.int/news-room/fact-sheets/detail/health-and-climate-change) Site accessed 8<sup>th</sup> June 2022