

Emma Best AM
(By email)

Our reference: MGLA031022-0402

Date: 28 October 2022

Dear Emma

Thank you for your request for information which the Greater London Authority (GLA) received on 3 October 2022. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

Any correspondence or communications involving the Mayor of London Sadiq Khan, the Deputy Mayor for Transport Seb Dance, the Deputy Mayor for Environment and Energy Shirley Rodrigues, the Mayor's Chief of Staff David Bellamy, or the Mayor's Deputy Chief of Staff Richard Watts, from 1st July 2022 until 2nd October 2022 in relation to any of the following matters:

- *The TfL ULEZ consultation response memorandum circulated among senior TfL officials shortly after 29th July 2022, which stated 66% of consultation respondents voted against the ULEZ expansion and 24% voted in favour.*
- *The TfL ULEZ consultation response memorandum circulated by TfL officials in August 2022, which stated 59.4% of consultation respondents voted "Not At All" in response to the ULEZ expansion, 7.6% said it should be "Later", 20.1% said it was the "Right Date", 11.7% said it should be "Earlier" and 1.1% said "Don't Know".*
- *The criteria that should be set for determining whether the TfL ULEZ consultation responses are deemed "duplicate" or "not genuine," whether they should be excluded, or whether multiple responses should be counted as one entry.*
- *Any views expressed as to how the ULEZ consultation report should be drafted or how responses should be counted.*
- *Janet Daby MP's remarks regarding the ULEZ expansion allegedly being subjected to "dirty tactics" to "manipulate the outcome" published in the Evening Standard 6th September 2022 and 7th September 2022, and on BBC News on the 7th September 2022.*
- *The Telegraph report on leaked ULEZ consultation data, published online on the 30th September 2022 and in print on the 1st October 2022.*

Please find attached the information we hold within the scope of your request.

I can confirm that the GLA holds further information within the scope of your request, however we consider that this is exempt information by virtue of the disclosure-exception provisions found under regulation 12(4)(d) of the EIR. Regulation 12(4)(d) is engaged when the request

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relates to material that is still in the course of completion, unfinished documents or incomplete data. If the information in question falls into one of these categories, then the exception is engaged. Guidance¹ published by the Information Commissioner clarifies:

“The fact that the exception refers to both material in the course of completion and unfinished documents implies that these terms are not necessarily synonymous. While a particular document may be itself be finished, it may be part of material still in the course of completion. An example may be where a public authority is formulating and developing policy.”

The same guidance also clarifies that material which is still in the course of completion can include information created as part of the process by which it formulates policy and reaches decisions.

It is not necessary for the GLA to demonstrate where disclosure might have a particular adverse effect in order to engage the exception, but any adverse effects of disclosure may be relevant in the public interest considerations which the GLA is required to balance in order to decide whether the information should be withheld.

There is a strong public interest in the release of information that would inform and engage public debate on issues pertinent to transport strategy. Disclosure would also therefore help reassure the public that we are considering the most appropriate options and advice regarding the ULEZ consultation.

There is a general public interest in transparency in relation to transport related matters in London. Disclosure of this information would enable members of the public to understand the decision making process.

Effective policy and decision making should be informed by engaging with the public and key stakeholders; however this engagement needs to be structured to be effective. In this instance, the information you have requested will form the basis for how TfL will shape the strategy and how GLA officials will seek to influence that strategy.

Following the closure on 29th July of the consultation on the proposals to expand the ULEZ London-wide, TfL has been preparing a comprehensive report to enable the Mayor to make a decision on next steps. The report will include analysis of the responses submitted during the consultation, the Integrated Impact Assessment, and other materials relevant to the Mayor's decision. The report will be published following the Mayor's decision on whether to go ahead with the proposals, with or without modifications.

TfL expects to share the reports for the Mayor's consideration in the coming months, with the Mayor's subsequent decisions published before the end of the year, as well as laying the MTS revision before the Assembly. It would not be appropriate to side-step due process by providing a running commentary on the analysis that is underway.

The GLA therefore considers that the best interests of the public – i.e. the public interest – is best served by ensuring that public authorities continue to deliberate robustly and comprehensively, considering all options and their potential impacts, in order for the best possible decisions to be taken.

¹ [eir material in the course of completion.pdf \(ico.org.uk\)](https://ico.org.uk/your-data-matters/understanding-data-protection/section-45-exceptions-to-the-right-to-access/)

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If you have any further questions relating to this matter, please contact me, quoting the reference MGLA031022-0402.

Yours sincerely

Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

[REDACTED]

From: Shirley Rodrigues
Sent: 25 August 2022 14:12
To: [REDACTED]
Subject: Re: Media Request - HIJACKED ULEZ CONSULTATION

I'd let our comms colleagues do that. Just need a speedy answer.

Get [Outlook for iOS](#)

From: [REDACTED]@london.gov.uk>
Sent: Thursday, August 25, 2022 2:10:31 PM
To: Shirley Rodrigues [REDACTED]
Subject: RE: Media Request - HIJACKED ULEZ CONSULTATION

Hi,
Will do. Once I have an answer I will try and form it into a coherent sentence for Sarah.
Thanks
S
[REDACTED]

[REDACTED]@london.gov.uk

From: Shirley Rodrigues [REDACTED]
Sent: 25 August 2022 14:09
To: [REDACTED]
Subject: Re: Media Request - HIJACKED ULEZ CONSULTATION
Can you pls also check with TfL & legal status n what we can say.
S

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From: [REDACTED]@london.gov.uk>
Sent: Thursday, August 25, 2022 2:07:49 PM
To: [REDACTED] <Shirley.Rodrigues@london.gov.uk>
Subject: FW: Media Request - HIJACKED ULEZ CONSULTATION

Hi all,
[REDACTED] please see the below.
What can we say about the consultation process and how we will respond to feedback at this stage? If you could get me something this afternoon that would be great.

Thanks,
[REDACTED]

Just emailing to see if I could get some comments for a story I'm working on regarding the ULEZ consultation. Lewisham Labour MP Janet Daby has exposed a campaign by a motorists' lobby group which aimed to hijack the consultation and bombard it with negative feedback. FairFuel UK, which is funded by the Road Haulage Association and Logistics UK, claims that 5,000 of its members, most of them from outside London, responded to the consultation. The group's leader, Howard Cox, has been accused of being a climate change denier and has shared offensive messages about Sadiq Khan on social media.

Looking for a general response but also, more specifically, will this be taken into account during any decision making? Does it undermine the legitimacy of the consultation? And will any genuine concerns raised by Londoners during the consultation be addressed?

From: [Elliot Treharne](#)

To: [REDACTED]; [Shirley Rodrigues](#); [Sarah Brown](#); [REDACTED]
[REDACTED] [Seb Dance](#); [Will Norman](#)

Cc:

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Date: 02 October 2022 08:56:43

Hi everyone

For information, please see below a press release put out by Fair Fuel on Saturday.

Thanks

Elliot

For Immediate Release

ULEZ Expansion Convincingly Opposed in Leaked TfL Consultation Result

The Result of the Transport for London Consultation Process to expand the ULEZ zone have been published in a leaked communique to the Daily Telegraph.

- **2 out of 3 respondents to the consultation have opposed the project.**

Howard Cox, Founder of FairFuelUK said: 'MP Janet Daby hysterically accused me of 'dirty tricks manipulation' in the ULEZ Expansion consultation process. She is a typical left wing anti-democrat and a hater of drivers. In addition, a genuine and credible TfL whistle-blower substantiated just how scared London's Labour politicians are, by telling me: TfL has been ordered from upon high to ignore 5000 emails from real people, supplying their genuine home addresses and opposing the ULEZ expansion, all because FairFuelUK put in place a way for them to object to Mayor Khan's pure cash grabbing plan. With or without my help, 66% don't want ULEZ to be expanded in London. Any manipulation of the consultation result by Khan's cohorts will be met with a significant legal response.'

In the latest press release from the GLA Conservatives they state:

"An investigation by The Telegraph has revealed the results of the ULEZ expansion consultation and found submissions were removed without proper oversight or public scrutiny on the grounds that they were allegedly "duplicate or not genuine", disproportionately reducing the opposition vote."

In early September, Labour MP Janet Daby attempted to discredit entries from FairFuelUK motorists who used templates to respond to the consultation, claiming that they had attempted to 'manipulate the outcome' (Evening Standard, 7 September). This refers to one-click templates used by campaign groups on both sides of the argument, where respondents could pre-fill some of the form by clicking a link. An example from a pro-ULEZ campaign group is linked here. Whistle-blowers wrote to FairFuelUK's founder Howard Cox and told GLA Conservatives Assembly Members that this justification has been used to

disproportionately exclude votes against the ULEZ expansion. **We understand from their evidence that pro-ULEZ template responses have not been excluded to the same extent, or at all.**

Consultations held by public bodies must comply with the law, the key principles of which are set out in the Gunning Principles. If responses are improperly excluded in a way that favours a particular side, this may breach the first and fourth principles. Public officials working on the consultation are also required to comply with the Nolan Principles.

If Khan proceeds with the policy regardless, those affected by the ULEZ expansion may have grounds to pursue legal action against TfL and the Mayor's Office, per the legal principles outlined above.

If the consultation is found to be illegitimate, this could also put TfL's finances at risk. Sadiq Khan was required to hold a consultation on the ULEZ expansion by the TfL financial settlement agreement with the Government. If the consultation is found to be illegitimate, he may be in breach of this agreement."

What MPs and Key Influencers Have Said on ULEZ Expansion

Penny Mordaunt MP said: "This is likely to have a disproportionately negative impact on those in the outer boroughs, and on businesses in places nearby, like those in Portsmouth. This is poor timing given the pressures small firms and families are under."

Robert Halfon MP said: "This would be yet another tax for hardworking motorists in greater and outer London. It will be a hammer blow my Harlow constituents many of them are van drivers who have to travel to Greater London every day. Instead of assaulting working people with extra costs, the Mayor should be trying to cut the cost of living."

Gareth Bacon MP said in his Tweet: "Transport for London's own assessment finds that expanding ULEZ will have little to no effect on air pollution levels in Greater London. It will also have a negligible effect on carbon emissions. It's about raising money, not about cleaner air."

Richard Tice, Reform Party Leader and Broadcaster said: "We must cut taxes to cut the cost of living and create growth but instead Comrade Khan is impoverishing the poorest & the lowest paid. Disgraceful"

Howard Cox, Founder of the much-respected FairFuelUK Campaign says: "Most rational people, all across the UK are baffled how one man can have the singular power, via his left wing idealistic ill-informed green agenda, be allowed to even contemplate punishing London's drivers yet more so. It is proven* that expanding the cash grabbing ULEZ further will have a negligible reduction, if any, on roadside emissions. His own data tells him, this is the case. This ill-thought-out plan is simply an easy cash grab by a virtue signalling myopic, to pay off the massive debts he has accumulated for his own political intentions. All as per usual, at the inevitable expense of already high taxed and demonised drivers."

Duncan White, Director of the Alliance of British Drivers said: "Whilst ULEZ currently affects mainly older diesels or petrol vehicles, do not be fooled into thinking this will last. As soon as the system is in place there will inevitably be moves to tighten the rules. Your compliant car could soon be the next target of daily charges. Indeed, we expect all petrol and diesel cars to eventually be included. "Do not assume this is just a London issue. Mayors and councils all over

the country are closely watching this scheme with eager eyes".

Ian Churchlow, Vice Chairman on the Motorcycle Action Group said: "The extension of the ULEZ in London is the expansion of a regressive tax that disproportionately affects the least well off in society. Motorcyclist's contribution to London's emissions is negligible yet we are being penalized for helping to reduce congestion. Every motorcycle used instead of a car reduces congestion and improves travel times for all road users."

Lance Forman, Owner of H. Forman & Son Smoked Salmon said: "Like many small businesses making deliveries to customers, first we had to face the congestion charge and then the ULEZ charge. These charges are bad for business, pushing up their costs and ultimately prices for their customers. Extending the reach as Khan is now doing, shows he doesn't care about inflation, doesn't care about business and doesn't care about the cost of living. This is not the time or the place."

- *See Sadiq Khan in denial, when questioned on this policy plan in his own Assembly that the ULEZ expansion will have little or any effect on lowering emissions. <https://twitter.com/i/status/1551961525509914636>
- See more than 100 comments, from a selection of thousands of messages, sent to TfL and Sadiq Khan by the UK public (not just from Londoners) between 24th - 26th July 2022.
- They can be seen at [https://fairfueluk.com/ULEZ Comments July 2022.pdf](https://fairfueluk.com/ULEZ%20Comments%20July%202022.pdf)

Here are just 5 of those public messages to Sadiq Khan he wishes to exclude from the consultation result:

1. I am disabled and can only afford to use my car for shopping as it is. I have no social life whatsoever because of the cost of motoring. You see us as an easy way to raise money. We see it as removing our choice of freedom.
2. I will no longer be able to visit friends, family and to shop in Greater London. Public Transport is not conducive to the places I visit and also makes the journey so very long and costlier. Imagine an elderly person trying to carry 5, or 6 bags of heavy shopping, or boxes of goods around the streets and getting it all on and off several buses and trains. Then carry those bags/boxes for the extra 15 minutes' walk from the nearest public transport to home.
3. My mother-in-law lives in Bexleyheath she is 91 years of age my wife drives into Bexleyheath most days to go shopping for her and to help her. We will not be able to afford to visit her so she will be left on her own who will look after her. The government is behind this too. The Consultation which is organised by TfL is very biased to bringing this charge in. If this country wants civil unrest, I suggest they carry on down this route. I pay my road tax so should be able to drive where I want.
4. If the mayor was serious about reducing congestion, he would be imposing measures on industry that makes up a huge percentage of the pollution in cities rather than targeting motorists who are already taxed beyond sensible measures with VAT, fuel duty AND VED.
5. It is time to stop this Parasitic practice to cripple not just Londoners but the Whole Country. We already contribute enough paying Road Tax, A portion of our Council Tax to Highways, Residents Parking and extra Climate Change when parking

outside our own zone. Start charging the cyclists whom he favours so much as they take more than their share of the roads even though they have a dedicated lane they constantly abuse it and appear to that traffic lights were there to be ignored. It is clearly Mr Kahn's intention is to Cripple London by example then the whole Country.

Media Contact: [REDACTED] **Founder of the FairFuelUK Campaign and the Secretary to the APPG for Fair Fuel for Motorists and Hauliers -**
Contact details : [REDACTED]

Background: Since 2011 the APPG for Fair Fuel for UK Motorists and UK Hauliers has examined major issues that impact on UK drivers. Along with FairFuelUK, it has been a major influencer on keeping Fuel Duty frozen since 2011. As well as fuel taxation, other issues addressed by the APPG that impact on drivers, have included congestion charges, ULEZ/CAZs, parking costs, roads investment, unfair treatment for fossil fuelled vehicle owners, solutions to lower emissions, cleaner fuel incentives, alternative technology options and transparent pricing at the fuel pumps with a continual call for PumpWatch. With the expected decline in Fuel Duty revenue, the APPG will also formulate a long-term approach to the future of road taxation and a positive transport strategy for all road users.

<https://fairfueluk.com>

Since 2010 FairFuelUK has saved drivers over £160bn in planned tax hikes in duty and VAT through constructive and objective campaigning. Had FairFuelUK not campaigned to scrap the fuel duty escalator, fuel tax today would be 90p/lt rather than 57.95p/lt. Today we would be paying £2.40+ per litre at the pumps had FairFuelUK not fought for the World's highest taxed drivers. Because of the Campaign, inflation is down 6.7% and £24bn has been put back into consumer spending each and every year since 2011.

FairFuelUK is a public affairs team with no shareholders to satisfy, just an award-winning campaign representing the real concerns of hard-working motorists, families, small businesses, commercial drivers and hauliers across the UK. Decades of fiscal exploitation by successive Governments with little in return, warrants the need for FairFuelUK.

For 12 years, this award winning campaign is funded by the RHA, and previously by Logistics UK and other respected organisations, 1.7m supporters and 146 MPs.

FairFuelUK is fronted by the Campaign's Founder Howard Cox. Funding is through support from key founding backers the FTA (Logistics UK), RHA and regular donations from supporters. Previous backers have included the RAC, Association of Pallet Networks, UKLPG and many others.

campaign@fairfueluk.com

FairFuelUK Campaign

1 Rammell Mews, Cranbrook, Kent., TN17 3BQ
UK

For all inquiries, please contact us at: [07515421611](tel:07515421611)

If you would like to opt out of future emails, please [unsubscribe](#)

From: [REDACTED] @london.gov.uk>

Sent: 30 September 2022 16:53

To: [REDACTED]

[REDACTED] Shirley Rodrigues [REDACTED] : Sarah Brown [REDACTED]
[REDACTED]
[REDACTED] Seb Dance [REDACTED] : Elliot Treharne [REDACTED] : Will Norman [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data
Thanks [REDACTED]
Sharing our line now with the Telegraph – but not our polling data
Best

[REDACTED] Mayor of London's Press Office
GREATER LONDON AUTHORITY
City Hall, Kamal Chunchie Way, London, E16 1ZE
[REDACTED]
[london.gov.uk](https://www.london.gov.uk)

[@LDN_pressoffice](#)

From: [REDACTED] [@london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Sent: 30 September 2022 16:52

To: [REDACTED]
[REDACTED] : Shirley Rodrigues [REDACTED] Sarah Brown [REDACTED]
[REDACTED]
[REDACTED] Seb Dance [REDACTED] : Elliot Treharne <[REDACTED]> Will Norman [REDACTED]
[REDACTED]
[REDACTED]

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data
Hiya

Following final discussions we've decided not to give the polling proactively but to use in follow ups.

Tfl given the green light for the below quote – where I've taken polling reference out.

So this good to go to the tele now – without the polling

Thanks

[REDACTED]
[REDACTED]
[REDACTED]

From: [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Sent: 30 September 2022 16:44

To: [REDACTED]
[REDACTED] Shirley Rodrigues [REDACTED] Sarah Brown [REDACTED]
[REDACTED]
[REDACTED] Seb Dance [REDACTED] Elliot Treharne [REDACTED] Will Norman [REDACTED]

[REDACTED]

[REDACTED] >

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Thanks [REDACTED]

I've just tweaked the line following convo with [REDACTED]

[REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 30 September 2022 16:40

To: [REDACTED] Shirley Rodrigues

[REDACTED] Sarah Brown [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] Seb Dance [REDACTED]; Elliot

Treharne <[REDACTED]>; Will Norman [REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

A few minor amends below.

TfL will publish a consultation report – but not all responses.

Have added a sentence to our line re our own polling results – in bold.

Let me know if any final comments

[REDACTED]

A TfL spokesperson said: “We take our responsibility to run robust and legally compliant consultations extremely seriously. We are using an independent third party to analyse every consultation response we have received, a process that is still ongoing. The results will help to shape any scheme that is taken forward. When finalised we will published a full report that will set out our response to the issues raised by those that took part.”

Information for reporter

- TfL does not filter responses. We take into account some individual responses are linked to petitions and campaigns.

TfL is extremely experienced in running proper, fair and robust consultations, and normal good practice is being followed with this consultation

CITY HALL RESPONSE LIFTED UP FOR EASE

A spokesperson for the Mayor of London, said: “Any suggestion that TFL has sought to influence the results of this consultation are categorically untrue and demonstrate a fundamental misunderstanding of how consultation analyses works. Independent consultation analysis is ongoing and a full consultation report will be published in due course.

“The Mayor is proud of tackling the capital’s toxic air, which currently leads to 4,000 Londoners dying early every year and millions more suffering from asthma and other respiratory illnesses.

“It’s clear this has been the focus of a coordinated campaign of opposition by drivers’ groups such as Fair Fuel UK, including from thousands of people who do not live or work in London. IT’S IMPORTANT THAT THE VIEWS OF ALL LONDONERS ARE TAKEN INTO ACCOUNT AS WE MOVE FORWARD.

“Four million Londoners are now breathing cleaner air thanks to the expansion of the Ultra Low Emission Zone (ULEZ) last autumn. An estimated five million more

Londoners living in outer London are expected to benefit if the ULEZ is expanded London-wide.”

Nearly twice as many Londoners are in favour of the proposed ULEZ expansion than against it as quarter of million people with asthma in London are still breathing toxic air

- 51% of Londoners believe the proposed expansion of the ULEZ should be implemented compared with 27% who think it shouldn't.
- Same percentage of Londoners as last year see the ULEZ as positive (54%), demonstrating that support for the expansion has not been affected by the cost-of-living crisis

Polling commissioned by Greater London Authority reveals that nearly twice as many Londoners (51%) think the proposed expansion of the ULEZ should be implemented (whether before, on or after 29th August 2023), compared with 27% who think it shouldn't [1].

54% of Londoners see the ULEZ as positive, the same number of people as last year, revealing that the ongoing cost of living crisis has not swayed the support of Londoners for the ULEZ.[2] The proposed expansion of the ULEZ London-wide would improve air quality for 5 million Londoners.

Around 4,000 Londoners died prematurely in 2019 because of long term exposure to air pollution, with the greatest number of deaths attributable to air pollution in outer London boroughs.[3] And children can have permanently stunted lungs, with adults suffering a range of illnesses, including lung and heart disease . Over 500,000 Londoners live with asthma and are more vulnerable to the impacts of toxic air, with more than half of these people living in outer London boroughs. While those living in central London have benefitted from the ULEZ, with roadside nitrogen dioxide (NO₂) levels down by 44%, those in outer boroughs have been left suffering the impact of toxic air. The Mayor has been called on to make this fair by expanding the ULEZ London-wide.

Improving air quality is also a matter of social justice, with air pollution hitting the poorest communities and Black, Asian and minority ethnic communities the hardest, as the polling reveals a clear majority (55%) of ethnic minority Londoners that think the ULEZ expansion should be implemented – almost three times (20%) those who don't.

The research also found:

- People without access to a garden or private outdoor space are keen for the ULEZ to expand – 62% - with half of these people wanting it to be implemented sooner
- More than double of those under 50 support its expansion as opposed to those who don't (58% compared with 16% among 18-24 year olds) and 54% compared with 22% of 25-49 year olds)

ENDS

NOTES TO EDITORS

[1] YouGov Plc. Total sample size was 1245 adults. Fieldwork was undertaken between 15th - 20th July 2022. The survey was carried out online. The figures have been weighted and are representative of all London adults (aged 18+).

[2] YouGov Plc. Polling was undertaken in February 2021 and May 2022. Both surveys were carried out online. The figures have been weighted and are representative of all London adults (aged 18+).

[3] Study shows Mayor's policies will increase life expectancy of children
City Hall analysis reveals all of outer London's monitoring stations are exceeding the new (2021) World Health Organization (WHO) recommended guideline for NO₂ of 10 µg/m³ (annual average).

80% of outer London's monitoring stations are currently showing concentrations above the interim WHO recommended guideline for NO₂ of 20 ug/m3.

Air quality is expected to improve across outer London should the ULEZ be expanded London-wide, benefiting the approximately 5 million people living there. Expanding the ULEZ London-wide will ensure nearly 340,000 additional Londoners in outer London would no longer live in areas exceeding the WHO interim target of 20 ug/m3 which is much tighter than the current UK legal limit of 40 µg/m³ (annual average) NO₂, a reduction of 13%. This includes:

- o an extra 87,000 children in outer London would no longer live in areas exceeding the 20ug/m3 interim WHO guideline

- o With shocking new evidence about the impact of air pollution on dementia, expanding the ULEZ London-wide would ensure 50,000 more people over the age of 65 no longer live in areas exceeding the 20ug/m3 interim WHO guideline. This is a reduction of 14% in outer London.

It is estimated that, with the ULEZ expanded London-wide, 145 schools, most of them in outer London, would also meet the tighter WHO interim target of 20 µg/m3 NO₂.

Mayor of London's Press Office

GREATER LONDON AUTHORITY

City Hall, Kamal Chunchie Way, London, E16 1ZE

london.gov.uk

Out-of-hours: 020 7983 4000

@LDN_pressoffice

From: @london.gov.uk>

Sent: 30 September 2022 16:35

To: Shirley Rodrigues < > Sarah Brown

>: Seb Dance

>: Elliot Treharne

>: Will Norman

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Can I check this point: “but all responses will be published.” – are TfL actually going to publish every single response, or the collated results? Reads as the former which I assume isn't the case?

From: Shirley Rodrigues [REDACTED]

Sent: 30 September 2022 16:30

To: Sarah Brown [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] [Seb Dance](#) [REDACTED] [Elliot Treharne](#)

[REDACTED] [Will](#)

[Norman](#) [REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Hi – if we are sharing the polling data – shouldn't that be in the quote??

From: Sarah Brown [REDACTED]

Sent: 30 September 2022 16:18

To: [REDACTED]

[REDACTED]

[REDACTED] [Shirley](#)

[Rodrigues](#) [REDACTED]

[REDACTED] [Seb Dance](#) <[REDACTED]> [Elliot Treharne](#)

[REDACTED] [Will](#)

[Norman](#) [REDACTED]

[REDACTED]

[REDACTED]

Subject: Re: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Just added that the consultation response is being independently analysed following TfL response

From: [REDACTED]

Sent: Friday, September 30, 2022 4:14 pm

To: [REDACTED]

[REDACTED]

[REDACTED] [Shirley Rodrigues](#)

[REDACTED] [Seb](#)

[Dance](#) [REDACTED] [Elliot Treharne](#) [REDACTED]

[REDACTED] [Will Norman](#) [REDACTED]

[REDACTED]

[REDACTED]

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Thanks all,

[REDACTED] point is actually reflected in the draft TfL response that I have just received.

Suggest we add to that your line in red

Further comments appreciated.

[REDACTED]

A TfL spokesperson said: “We take our responsibility to run robust and legally

compliant consultations extremely seriously. We are using an independent third party to analyse every consultation response we have received, a process that is still ongoing. The results will help to shape any scheme that is taken forward. When finalised we will published a full report that will set out our response to the issues raised by those that took part."

Information for reporter

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A spokesperson for the Mayor of London, said: "Any suggestion that TFL has sought TO INFLUENCE THE RESULTS of this consultation ARE CATEGORICALLY UNTRUE and demonstrate a fundamental misunderstanding of how consultation analyses works. INDEPENDENT Consultation analysis is ongoing but all responses will be published.

"The Mayor is proud of tackling the capital's toxic air, which currently leads to 4,000 Londoners dying early every year and millions more suffering from asthma and other respiratory illnesses.

"A full consultation report will be published in due course – but it's clear this has been the focus of a coordinated campaign of opposition by drivers' groups such as Fair Fuel UK, including from thousands of people who do not live or work in London. The Mayor will base his decision on the views of all Londoners.

"Four million Londoners are now breathing cleaner air thanks to the expansion of the Ultra Low Emission Zone (ULEZ) last autumn. An estimated five million more Londoners living in outer London are expected to benefit if the ULEZ is expanded London-wide."

We also plan to share with Ollie the GLULEZ polling data that we were due to issue proactively in due course.

The deadline for this is 4.45pm – so swift comments appreciated.

Jon

Nearly twice as many Londoners are in favour of the proposed ULEZ expansion than against it as quarter of million people with asthma in London are still breathing toxic air

- 51% of Londoners believe the proposed expansion of the ULEZ should be implemented compared with 27% who think it shouldn't.
- Same percentage of Londoners as last year see the ULEZ as positive (54%), demonstrating that support for the expansion has not been affected by the cost-of-living crisis

Polling commissioned by Greater London Authority reveals that nearly twice as many Londoners (51%) think the proposed expansion of the ULEZ should be implemented (whether before, on or after 29th August 2023), compared with 27% who think it shouldn't [1].

54% of Londoners see the ULEZ as positive, the same number of people as last year, revealing that the ongoing cost of living crisis has not swayed the support of Londoners for the ULEZ.[2] The proposed expansion of the ULEZ London-wide would improve air quality for 5 million Londoners.

Around 4,000 Londoners died prematurely in 2019 because of long term exposure to air pollution, with the greatest number of deaths attributable to air pollution in outer London boroughs.[3] And children can have permanently stunted lungs, with adults suffering a range of illnesses, including lung and heart disease . Over 500,000 Londoners live with asthma and are more vulnerable to the impacts of toxic air, with more than half of these people living in outer London boroughs. While those living in central London have benefitted from the ULEZ, with roadside nitrogen dioxide (NO₂) levels down by 44%, those in outer boroughs have been left suffering the impact of toxic air. The Mayor has been called on to make this fair by expanding the ULEZ London-wide.

Improving air quality is also a matter of social justice, with air pollution hitting the poorest communities and Black, Asian and minority ethnic communities the hardest, as the polling reveals a clear majority (55%) of ethnic minority Londoners that think the ULEZ expansion should be implemented – almost three times (20%) those who don't.

The research also found:

- People without access to a garden or private outdoor space are keen for the ULEZ to expand – 62% - with half of these people wanting it to be implemented sooner
- More than double of those under 50 support its expansion as opposed to those who don't (58% compared with 16% among 18-24 year olds) and 54% compared with 22% of 25-49 year olds)

ENDS

NOTES TO EDITORS

[1] YouGov Plc. Total sample size was 1245 adults. Fieldwork was undertaken between 15th - 20th July 2022. The survey was carried out online. The figures have been weighted and are representative of all London adults (aged 18+).

[2] YouGov Plc. Polling was undertaken in February 2021 and May 2022. Both surveys were carried out online. The figures have been weighted and are representative of all London adults (aged 18+).

[3] Study shows Mayor's policies will increase life expectancy of children City Hall analysis reveals all of outer London's monitoring stations are exceeding the new (2021) World Health Organization (WHO) recommended guideline for NO₂ of 10 µg/m³ (annual average).

80% of outer London's monitoring stations are currently showing concentrations above the interim WHO recommended guideline for NO₂ of 20 ug/m3.

Air quality is expected to improve across outer London should the ULEZ be expanded London-wide, benefiting the approximately 5 million people living there. Expanding the ULEZ London-wide will ensure nearly 340,000 additional Londoners in outer London would no longer live in areas exceeding the WHO interim target of 20 ug/m3 which is much tighter than the current UK legal limit of 40 µg/m³ (annual average) NO₂, a reduction of 13%. This includes:
o an extra 87,000 children in outer London would no longer live in areas

exceeding the 20ug/m3 interim WHO guideline
o [With shocking new evidence](#) about the impact of air pollution on dementia,
expanding the ULEZ London-wide would ensure 50,000 more people over the age
of 65 no longer live in areas exceeding the 20ug/m3 interim WHO guideline. This
is a reduction of 14% in outer London.

It is estimated that, with the ULEZ expanded London-wide, 145 schools, most of
them in outer London, would also meet the tighter WHO interim target of 20 µg/m3
NO₂.

[REDACTED] a, Mayor of London's Press Office

[GREATERLONDONAUTHORITY](#)

[City Hall, Kamal Chunchie Way, London, E16 1ZE](#)

[london.gov.uk](#)

Out-of-hours: 020 7983 4000

[@LDN_pressoffice](#)

From: [REDACTED]

Sent: 30 September 2022 16:12

To: [REDACTED]

[REDACTED]

[REDACTED] Shirley Rodrigues

[REDACTED] : Seb

Dance <[REDACTED]> Elliot Treharne [REDACTED]

[REDACTED] Will Norman [REDACTED]

[REDACTED]

[REDACTED]

Subject: Re: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Hi

Just tweaked the spokes quote below following conversations with colleagues

Thanks

From: [REDACTED]

Sent: Friday, September 30, 2022 4:10 pm

To: [REDACTED] Shirley Rodrigues;

[REDACTED] Seb Dance; Elliot Treharne; [REDACTED] Will Norman

[REDACTED]

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Might we want to address the accusation that we're deliberately filtering out opposition results,
but not supportive ones – i.e. make it clear that TfL is extremely experienced in running proper,
fair & robust consultations, and normal good practice is being followed in this consultation too?

From: [REDACTED]

Sent: 30 September 2022 16:03

To: [REDACTED];

Shirley Rodrigues [REDACTED]

[REDACTED] Seb Dance [REDACTED] Elliot Treharne

[REDACTED] : Will

Norman <[REDACTED]>

[REDACTED]

[REDACTED] >

Subject: RE: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Adding @Will Norman and [REDACTED]

[REDACTED]

[REDACTED] / Teams

From: [REDACTED] -

Sent: 30 September 2022 15:51

To: m [REDACTED]; Shirley Rodrigues <[REDACTED]>; Seb Dance [REDACTED]; [REDACTED]; Elliot Treharne

[REDACTED]

[REDACTED]

[REDACTED] >

Subject: FOR APPROVAL - 4.45PM Deadline - Telegraph - GLULEZ polling data

Hi all,

We have been approached by Oliver Gill at the Telegraph who is running a story on the Ulez consultation, with a deadline of 4.45pm

He says the paper has seen slides that set out unofficial results that have been shared among TfL officials.

The first set was taken shortly after the consultation closed on Jul 29. The second set was from "mid-late August" their sources say.

He has the following data.

<i>Figures in red are our calculations NB - the percentages do not quite add up</i>	<u>Received shortly after consultation closed on July 29</u>	<u>Received mid-late August</u>	<u>Change</u>
<u>Not at all</u>		28237 (59.4%)	
<u>Later</u>		3613 (7.6%)	
<u>Right date</u>		9567 (20.1%)	
<u>Earlier</u>		5553 (11.7%)	
<u>Don't know</u>		532 (1.1%)	
<u>Total supportive</u>	8880 (24%)	18733	+9853
<u>Total opposed</u>	24420 (66%)	28237	+3817
<u>Total respondents</u>	37000+	47052	+10052 approx

Ollie has approached TfL and ourselves with a series of questions:

- A senior source within TfL has claimed that the project teams reviewing the figures are deliberately filtering out opposition results, but not supportive ones.

What does the mayor and TfL have to say about these allegations?

- The initial poll shows 66pc opposition. Would this fit the mayor's definition of "overwhelming"* opposition that would force him to halt his plans to expand the Ulez zone next year?

- If there is a simple majority of Londoners in opposition, will the mayor continue with his plans to expand the Ulez zone next year?

- What external oversight is there over the project teams within City Hall/TfL that are filtering the consultation responses to ensure that they are doing so fairly? Or are the responses being

- Will the mayor/TfL commit to publishing the unfiltered results when the final outcome of the consultation is published?

We are currently waiting for a TfL line and I'll share this shortly.

In the meantime, please see here a draft City Hall line that some of you may have already seen.

Just tweaked slightly

A spokesperson for the Mayor of London, said: "Any suggestion that TfL has sought TO INFLUENCE THE RESULTS of this consultation ARE CATEGORICALLY UNTRUE and demonstrate a fundamental misunderstanding of how consultation analyses works. Consultation analysis is ongoing but all responses will be published.

"The Mayor is proud of tackling the capital's toxic air, which currently leads to 4,000 Londoners dying early every year and millions more suffering from asthma and other respiratory illnesses.

"A full consultation report will be published in due course – but it's clear this has been the focus of a coordinated campaign of opposition by drivers' groups such as Fair Fuel UK, including from thousands of people who do not live or work in London. The Mayor will base his decision on the views of all Londoners.

"Four million Londoners are now breathing cleaner air thanks to the expansion of the Ultra Low Emission Zone (ULEZ) last autumn. An estimated five million more Londoners living in outer London are expected to benefit if the ULEZ is expanded London-wide."

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[year, revealing that the ongoing cost of living crisis has not swayed the support of Londoners for the ULEZ.\[2\] The proposed expansion of the ULEZ London-wide would improve air quality for 5 million Londoners.](#)

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[ENDS](#)

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[REDACTED], **Mayor of London's Press Office**

GREATER LONDON AUTHORITY

City Hall, Kamal Chunchie Way, London, E16 1ZE

[REDACTED]
london.gov.uk

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