

Appendix 1

Analysis of representations received to the Variation Order consultation

Representations have been categorised into 'themes' and 'sub-themes' according to the issue being considered, along with TfL's conclusions. This means that a representation from a respondent dealing with more than one issue will be split accordingly and dealt with under the appropriate themes or sub-themes.

Some of the representations received did not concern the specific content of the Variation Order; rather they concerned the LEZ more generally. These representations and objections are considered under the theme 'Other Issues'.

Proposed Variation: Theme 1: Minor changes to the Boundary of the London Low Emission Zone

Sub-theme	Respondent	Representations	TfL Response
Support changes to the boundary within LB Redbridge	London Borough of Redbridge	London Borough of Redbridge supports the two changes to the LEZ boundary outlined in TfL correspondence dated 29/8/07, items 5 and 6.	Support noted.
Support changes to the boundary within LB Croydon	London Borough of Croydon	The changes that affect the London Borough of Croydon were all at their request therefore London Borough of Croydon do not intend to comment.	Support noted.
Support changes to the boundary within LB Bexley	London Borough of Bexley	The London Borough of Bexley supports the proposed changes within Bexley as it will remove the availability of a through route for the most polluting vehicles along North Cray Road and will reduce the need for signing on some very minor access roads. London Borough of Bexley is grateful for the response to their concerns.	Support noted.

		<p>The alteration will unfortunately result in the need for some additional signs on other very minor roads and the final zone boundary will still require a route for the excluded vehicles along narrow residential streets in another part of the zone in Crayford. Discussions are being held separately on these matters, but London Borough of Bexley would not wish the Variation Order to be delayed for their outcome. The variation will also require an amendment to the Section 8 Agreement that Bexley has agreed to sign.</p>	<p>The amendment of the boundary will result in the removal of some boundary points and the creation of some new boundary points. The total number of boundary points in Bexley would be about the same with or without this variation. Some of the roads to be signed are minor in nature but for a consistent treatment of all roads affected close to the boundary and to give greater clarity to drivers, TfL believes the additional boundary points are necessary.</p> <p>Subject to the Mayor's decision on this boundary change, the amendment to the section 8 agreement, which allows TfL to implement the signs on the new boundary, can be made quickly through a simple exchange of letters.</p>
Support changes to the boundary within LB Barnet	Freight Transport Association	The Freight Transport Association specifically support the proposed addition of a route between Galley Lane and Stirling Corner in LB Barnet as the original proposed turnaround was likely to be problematic at peak times.	Support noted
	London Borough of Barnet	London Borough of Barnet strongly supports the variations numbered 3 and 4 in the Order, and offers no view on the remaining variations.	Support noted
		The London Borough of Barnet supports the variation to exclude Barnet Road from the scheme, as this is what was requested as part of our response to the main Scheme Order consultation.	Support Noted

		<p>In amending the boundary to permit vehicles to exit the filling station at Stirling Corner without entering the zone (which London Borough of Barnet also supported), the boundary now occurs at a point where it is not possible for non-compliant vehicles to turn round - other than by entering private property. The Council considers it likely that some drivers may not understand advanced signage at the roundabout exit and will enter Barnet Road without realising that they cannot proceed beyond the filling station exit. We raised our concerns about the possible problems at this point in our response to the main Scheme Order consultation. Excluding the whole of Barnet Road from the zone would overcome this problem.</p>	Support Noted
		<p>London Borough of Barnet also expressed concerns about the safety and feasibility of providing a turn-back facility at Galley Lane, even though this was not part of the scheme proposal at the time of the consultation. Our response suggested and supported an alternative proposal of excluding the whole length of Barnet Road to enable this to operate as a turn back facility for Galley Lane (and Stirling Corner). We were disappointed that this proposal was not accepted by Transport for London as part of the main Scheme Order and obviously welcome its proposed inclusion now.</p>	Support Noted
Other Boundary Issues	Freight Transport Association	The Freight Transport Association are generally content for all the proposed changes to go ahead.	Support noted

	London Borough of Barnet	<p>London Borough of Barnet's response to the main scheme order consultation stated "It is most important to avoid creating any road safety problems as a result of the scheme boundary." This view remains unchanged and applies not only to avoiding a safety problem (at Galley Lane) by making the Variation Order, but also to the detailed design of the modified boundary.</p>	TfL concurs with LB Barnet's view.
		<p>London Borough of Barnet has considerable concern over the inclusion of "Field End" in the chargeable area. This road is approximately 120m in length, serves 9 houses, and its junction with Barnet Road is located close to a sharp bend which has a poor accident record. London Borough of Barnet would be concerned if the inclusion of this road in the charging area resulted in non-compliant vehicles being parked on Barnet Road to avoid paying the daily charge. Therefore for road safety and environmental reasons, London Borough of Barnet would urge TfL to remove this, and all other no-through roads along Barnet Road from the chargeable area. This would also aid consistency for drivers using Barnet Road as all through roads would be chargeable and all no-through roads would be excluded.</p>	<p>TfL considers that non-compliant vehicles are very unlikely to park on boundary routes to avoid entering the zone. Vehicles making deliveries to London are likely to become compliant as most will also have business further inside London. It is considered that larger vehicles such as removal lorries would not choose to park some distance away from the building they are serving. Furthermore, if they were non-compliant and only occasionally visiting London, are likely to pay the daily charge.</p> <p>Nevertheless, TfL will keep this matter under review.</p>
<p>TfL recommends that no changes should be made to the Variation Order as a result of these representations.</p>			

Proposed Variation: Theme 2: Other issues concerning the London Low Emission Zone

Sub-theme			
Impacts	London Borough of Barnet	London Borough of Barnet's support for the exclusion of Barnet Road from the LEZ scheme area takes into account environmental impacts as well as road safety and traffic management issues. The existence of a 7.5T movement ban across much of the borough already restricts the use of roads for 'through' movement by lorries. In terms of network-wide considerations, the combination of Galley Lane/Barnet Road as an alternative route to the A1 (which directly links the two ends of this route) is a relatively unattractive option. Taken together, London Borough of Barnet believes the risk of significant numbers of non-compliant vehicles using Barnet Road is low and will have negligible impact on air quality in the area.	TfL concurs with LB Barnet's view.

		<p>In their response to the main Scheme Order consultation, London Borough of Barnet also expressed concerns about the negative environmental impacts of the scheme. These concerns are relevant to the proposed variation. In particular, the Council has concerns that roads on the boundary need to be signed, and in addition to visual impacts, the manufacture, erection and maintenance of these signs will have environmental impacts. Notwithstanding the need to ensure drivers are aware of the operation of the scheme, the Council considers it essential to minimise sign clutter and this can be achieved by carefully considering whether all roads on or near the boundary should be included within the zone.</p>	<p>There is always a difficult balance between providing the required driver information for a robust and enforceable scheme and avoiding visual clutter. TfL considers that the benefits of maintaining a robust boundary for improving driver understanding and achieving a consistent approach to the scheme outweigh the disbenefits of additional signing. TfL is very keen to minimise the visual impact of new signing as far as possible, whilst maintaining satisfactory notification to drivers. TfL has sought sign solutions that are as sensitive as possible to the streetscape by, for example, combining existing signing with the new signs.</p> <p>TfL commissioned an independent non-statutory Environmental Report on the impacts of the proposed LEZ, to support the Scheme Order consultation. This includes an appraisal of the likely effects of the scheme signage upon the local landscape. The report concluded “these signs would have a negligible impact on townscape and visual amenity”.</p>
		<p>London Borough of Barnet considers that small cul-de-sacs leading off excluded roads should also be excluded to avoid the need to provide excessive numbers of signs - especially where the benefits of including the side roads is marginal, or that their inclusion within the zone may cause traffic impacts on the main road.</p>	<p>TfL considers that including cul-de-sacs provides the benefits of maintaining a robust boundary for improving driver understanding and achieving a consistent approach to the scheme as well as providing some protection to the residents of the cul-de-sacs.</p>

		<p>The section of Barnet Road between Stirling Corner and Galley Lane has a total of 29 side roads. Of these, 16 are private, 7 are public highway 'through roads' and 6 are public highway 'no-through roads'. Although London Borough of Barnet accepts that the through roads should be included in the zone, they believe there is a strong case for excluding the seven public highway no-through roads from the charging area. In some cases, these roads serve no more than 6 houses and the likelihood of non-compliant vehicles using them is therefore small. The environmental 'cost' of signing these roads is unlikely to be offset by any reduction in vehicle emissions.</p>	<p>TfL will not place entry signs at the entrance to private roads. However, for the reasons set out above TfL considers that as far as practicable all public highways leading off a boundary or excluded route should be within the zone, including where they are cul-de-sacs or enclaves.</p>
<p>TfL recommends that no changes should be made to the Variation Order as a result of these representations.</p>			

Appendix 2

Responses received to the consultation on the Variation Order 2007 undertaken between 29 August and 3 October 2007

Stakeholder Responses

London Borough of Redbridge
London Borough of Croydon
London Borough of Bexley
London Borough of Barnet
Freight Transport Association

No individual members of the public responded to the consultation.

Appendix 3

Schedule of Proposed Variations to the Greater London Low Emission Zone (LEZ) Scheme Order

Col. 1 – Ref. No.	Col. 2 – Summary of proposed variation	Col. 3 – Details of TfL’s proposed variation	Col. 4 – TfL’s reasons for proposed variation
1.	Boundary change in London Borough Croydon	Inclusion within the LEZ of the area bounded by Godstone Road, Station Approach, Kenley Lane, Valley Road, New Barn Lane and Old Barn Lane. Godstone Road, New Barn Lane and Old Barn Lane remain outside the LEZ. Station Approach, Kenley Lane, & Valley Road as well as all streets within the area would be inside the LEZ. Sheets 53, 54 & 54C would be amended.	At the request of the London Borough of Croydon, a diversion route for traffic approaching along Hornchurch Hill has been identified that further limits the area that needs to be excluded from the LEZ. This would mean that a larger area of the London Borough of Croydon will be included in the LEZ and therefore stand to benefit from air quality and health improvements that the LEZ is expected to bring.
2.	Boundary change in London Borough Croydon	Extending the point of entry at the Coulsdon Road / Waddington Avenue junction approximately 10m east into Waddington Avenue. Sheet 58A would be amended.	There is a petrol station on the corner of Coulsdon Road / Waddington Avenue. Access into the petrol station is directly off the free boundary route. Exit from the petrol station is onto Waddington Avenue, currently inside the zone. This change allows drivers exiting the petrol station to return back to the boundary route without entering the zone and being liable to pay the LEZ daily charge.
3.	Boundary change in London Borough Barnet	Adjusting the boundary in Stonegrove, at Canons Corner, northwards by approximately 10m, so that the boundary coincides with the exit from the roundabout into Stonegrove. Sheet 165 would be amended.	This change corrects an error in the drafting of the Scheme Order and Deposited Plans as confirmed by the Mayor on 3 May 2007. When Spur Road was included within the LEZ, the boundary in Stonegrove was drawn to allow a charge free exit from a petrol station on the corner of Spur Road and Stonegrove. The entry to the petrol station in Spur Road is now within the zone. Moving the boundary to the exit point of the roundabout is preferable as it allows non-compliant traffic to divert at the point of entry.

Col. 1 – Ref. No.	Col. 2 – Summary of proposed variation	Col. 3 – Details of TfL’s proposed variation	Col. 4 – TfL’s reasons for proposed variation
4.	Boundary change in London Borough Barnet	Create a route, excluded from the zone, on Barnet Road between Stirling Corner and Wood Street. Sheets 181 and 184 would be amended and additional sheets would be inserted.	The previously identified diversion route for traffic approaching along Galley Lane was for vehicles to turn around in the junction of Galley Lane, Wood Street and Barnet Road and return back along Galley Lane. It has been identified that if a bus is using the bus stands on Wood Street it would be difficult for larger vehicles to carry out this manoeuvre. Excluding Barnet Road allows all vehicles to more easily return to the A1 charge free.
5.	Boundary change in London Borough Redbridge	Inclusion within the LEZ of the area bounded by Tomswood Hill, Fencepiece Road and the Greater London Authority (GLA) boundary. Tomswood Hill and Fencepiece Road would remain as uncharged routes through the zone. Sheets 218, 219 & 220 would be amended and an additional sheet would be inserted.	At the request of the London Borough of Redbridge, the addition of this area into the Low Emission Zone will help discourage vehicles from using unsuitable residential streets.
6.	Boundary change in London Borough Redbridge	Inclusion within the LEZ of the area bounded by Brook Road, Whitehall Road, High Road Woodford Green, Epping New Road and the GLA boundary. Brook Road, Whitehall Road, High Road Woodford Green & Epping New Road themselves would remain as uncharged routes. Sheets 208 and 209 would be amended.	At the request of the London Borough of Redbridge, the addition of this area into the Low Emission Zone will help discourage vehicles from using unsuitable residential streets.
7.	Boundary change in London Borough Bexley	Inclusion within the LEZ of Edgington Way, and the area bounded by Maidstone Road, North Cray Road, Vicarage Road, Dartford Road, Baldwin’s Park and the GLA boundary. The dual carriageway section of North Cray Road would also be inside the Low Emission Zone. The single carriageway section of North Cray Road, Maidstone Road, Vicarage Road, Dartford Road and Baldwin’s Park would remain as uncharged routes. Sheets 9, 10, 13, 14 & 15 would be amended, sheets 11 & 12 would be deleted and new sheets would be inserted.	This change is at the request of the London Borough of Bexley to include North Cray Road within the Low Emission Zone as this route is perceived as a potential diversionary route for A20 vehicles heading northbound on North Cray Road and through parts of Old Bexley Village. Including a section of North Cray Road within LEZ may reduce the risk of this occurring.

Col. 1 – Ref. No.	Col. 2 – Summary of proposed variation	Col. 3 – Details of TfL’s proposed variation	Col. 4 – TfL’s reasons for proposed variation
8.	Clarification of requirements for cheque payments	Amendment of Article 7 to state that cheque payments for the daily charge must be made to TfL 10 working days in advance of the day of travel within the Low Emission Zone.	This additional wording has been inserted to ensure the Scheme Order is consistent with TfL’s internal processes. This will make the requirements for paying the LEZ daily charge clearer and easier to understand.
9.	Deletion of all references to ‘Switch’ payments	Deletion of ‘Switch’ in Article 7 (6)(e)(i).	This deletion has been made to make the Scheme Order consistent with current TfL directions. These request the removal of ‘Switch’ in favour of Maestro where reference to this payment method is made.