

Annex C: Summary of stakeholder responses

Introduction

This annex is a précis of all stakeholder responses received during the consultation period, 13 November 2006 to 2 February 2007 and during the additional consultation period on the amendment to the Scheme Order to ensure the inclusion of motor caravans, ambulances and heavier hearses in the LEZ. The stakeholders are listed by organisation category.

The representations received focussed on:

- The business case
- Impacts on London's economy
- Impacts on the business sector
- Impacts on the public and community sectors
- Boundary issues
- Streetscape issues
- Discounts and exemptions
- Enforcement of non-UK registered vehicles
- Vehicles to be included
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- The principle of a LEZ
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	Slough Borough Council
	Surrey County Council
	Tandridge District Council
	Warwickshire county Council
	Watford Borough Council
	West Sussex County Council

1. Business Organisations

Association of British Drivers

ABD considers that the LEZ proposal is not justified on the basis of cost and that a ban on older vehicles would be a simpler alternative. They oppose any potential inclusion of cars and do not consider the scheme should extend beyond 2015. They oppose the application of any surplus revenue in Annex 3 of the Scheme Order and state that any surplus should be applied to air quality improvement measures and not to general transport programmes or general TfL revenue.

The Association of Circus Proprietors of Great Britain

The Association of Circus Proprietors is concerned about the economic impact of the proposed LEZ on circuses and seeks an exemption for travelling showmen on the basis that their vehicles are specialised, often custom made, do limited mileage and are expensive to replace. Circuses already benefit from the reduced travelling showman's excise licensing fee and exemptions from statutory requirements on the basis that their vehicles do limited mileage. Also express concern that training opportunities for young performers will be limited in London if small circuses end up closing down.

Association of International Courier and Express Services (AICES)

AICES supports the principle of the LEZ but expresses concern that cars have been excluded, state that the economic impacts of the LEZ should be monitored, that motorways should be excluded and that the LEZ should initially commence with a smaller boundary, which could be expanded if successful.

BAA Plc

BAA Heathrow welcomes the LEZ proposal but has concerns about an increase in NOx emissions from particulate abatement equipment and seeks the introduction of a NOx standard and the inclusion of motorways in the LEZ. Should motorways not be included in the LEZ, BAA would be willing to consider the LEZ applying to private landside roads at Heathrow.

Brewery Logistics Group

The Brewery Logistics Group expresses concern that the LEZ is not cost effective for the improvement in air quality, that commercial vehicles are being targeted over cars and about the enforcement of foreign vehicles. They consider the night time lorry ban should be ended.

British Association of Removers (BAR)

The BAR is concerned about the impact the LEZ will have on their specialised sector and that the LEZ will impact negatively on small business and lead to job losses. They suggest incentives or funding should be provided to help alleviate the costs in updating or retrofitting older vehicles to comply with the proposed LEZ and ask whether the Mayor or TfL has considered applying for European funding in relation to the LEZ as such funding has recently been made available for retrofitting buses and lorries with particulate filters in Italy, Denmark and Germany to reduce pollution from older vehicles and contribute to the protection of human health and the environment

British Vehicle Renting and Leasing Association (BVRLA)

The BVRLA supports the LEZ but would wish to ensure that members would be able to transfer the liability for any fines incurred to the vehicle user/operator and would seek to work closely TfL to ensure members are aware of the scheme.

Confederation of British Industry (CBI)

CBI welcomes the deferral of the Euro IV standard to 2012 and the exclusion of a NO_x standard from the scheme but remains concerned at the low benefit: cost ratio and that the scheme targets commercial vehicles but not cars. CBI states that the administration of the scheme should minimise the impact on business, the public information campaign should cover the country, not just London, and urges regular and independent monitoring of the environmental and economic impacts of the scheme.

Confederation of Passenger Transport

The CPT supports the use of Euro standards for the LEZ and states that including cars into the zone would address one of their main concerns. They suggest that historic vehicles (pre-1973) should be exempt from the scheme regardless of whether they are used for hire or reward, and that 'not for profit' organisations should not be exempted. CPT request that the daily charge should cover a 24 hour period and they do not currently support the inclusion of motorways in the LEZ.

Construction Plant Hire Association

The Construction Plant Association agrees that non-road going vehicles should be exempt but that the criteria for this should be the same as the criteria used for exempting plant from using white diesel on the roads, which is well understood and would be simple to apply.

Covent Garden Market Authority

Covent Garden Market Authority state that the need to reduce emissions should be balanced with the need for London to be supplied on a daily basis with quality fresh produce and expresses concern about the impact of the LEZ on small and medium businesses, that the July 2008 implementation may not allow small operators enough time to comply and about the enforcement of foreign vehicles.

Environmental Industries Commission (EIC)

EIC welcomes the proposed LEZ and states that retrofit pollution abatement equipment would be available for both heavy duty and light duty vehicles. EIC states that TfL should announce the test and certification procedure for the LEZ as early as possible so that systems can be supplied to all affected operators in good time prior to the implementation of the order. EIC considers that combined PM and NO_x reduction technologies would be available by 2012 when the LEZ emission standard is tightened and would welcome the reconsideration of a NO_x standard for the LEZ.

Federation of British Historic Vehicle Clubs

The FBHVC has concerns about the definition of heritage vehicles used by the LEZ and would like the exemption for heritage vehicles to include any vehicle over 25 years of age which is not used for commercial purposes and all vehicles constructed before 1973. The FBHVC considers that retrofitting historic vehicles is not possible and would negate the purpose of preservation.

Federation of Small Businesses (FSB)

The FSB would support a single introduction date of July 2008, as it considers the phased implementation could be confusing for operators. The FSB would support the inclusion of the motorways in London in the LEZ but has concerns about signage, the effectiveness of pollution abatement equipment in London driving conditions, the enforcement of foreign vehicles. The FSB is concerned that many operators are unaware of the LEZ proposals

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based on the low level of response to the initial LEZ consultation from businesses and operators.

Finance and Leasing Association (FLA)

The FLA expressed concern that the Scheme Order contains little information on the transfer of liability for penalty charges arising from financed commercial vehicles, but assumes the administrative and enforcement systems for the LEZ would be similar to that used for the Congestion Charging scheme, which it welcomes. The FLA suggest that TfL make amendments to the London Road User Charging Regulations to extend the transfer of liability to all leases or hire agreements over a six month period

Freight Transport Association (FTA)

The FTA backs the principle of a LEZ but has concerns that it targets commercial vehicles over cars. The FTA would prefer a rolling age-based scheme over one using Euro standards, which it considers to be more complicated and expensive to implement, and misses the opportunity to tackle other carbon emissions. The FTA expressed concern that the registration processes are too complex, that there is no practical mechanism for enforcement of non-UK registered vehicles and seeks exemptions for non-compliant vehicles entering the zone for repair and VOSA testing, as well as roadside recovery vehicles and for certain vehicles which would find it economically unviable to operate in the zone. The FTA proposes use of Freight Operator Recognition Scheme to distribute grants to operators using cleaner technologies, such as Euro V.

The Guild of British Coach Operators

The Guild of British Coach Operators expresses concern that the LEZ targets bus and coach operators but does not include cars or light vans. The Guild expresses concern about the economic impact of the LEZ on coach operators and suggests an alternative emission standard of Euro II from September 2008 and Euro III (or Euro II plus particulate trap) from 2010. The Guild proposes that the daily charge should cover a 24 hour period, or that a grace period for the daily charge until 3am be introduced, that vehicles directed into the LEZ when roads are closed should be exempt from the charge and that the exemption for heritage vehicles should include commercial operators of heritage buses and coaches.

Historic Commercial Vehicle Society

The Historic Commercial Vehicle Society suggests a rolling age-based standard of 25 years should be used for the exemption for historic vehicles not in commercial use and a 30 year exemption rule for historic vehicles which have occasional commercial use.

London First

London First has concerns about the cost and effectiveness of the current proposals and recommends that each stage of implementation is preceded by a 6-month 'shadow run' to maximise understanding; that operators be encouraged to upgrade ahead of the LEZ timetable dates through non-financial incentives; that more frequent roadside checks be carried out to check the effectiveness of abatement equipment; and that there is assurance that charges and enforcement will apply non-UK registered vehicles. The LEZ should cover all vehicles and heavy LGVs and taxis should be subject to Euro IV standards. London First also wants publication of outline plans for Road User Charging in London.

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Road Haulage Association (RHA)

The RHA objects to the LEZ as set out in the Scheme Order and considers that there would be little environmental benefit for the costs to London ratepayers and business. The RHA has concerns about the impacts on commercial operators, small businesses and the wider economy and about the enforcement of foreign vehicles.

Royal Mail

Royal Mail strongly opposes the LEZ, as set out in the consultation documents, expresses concern about the economic impact on businesses and seeks a dispensation for cash in transit operations. Royal Mail would prefer an 8 year rolling age based scheme with an outright ban for old vehicles over one using Euro standards, suggest that cars should be included, that the zone should be smaller and that the London Lorry Control Scheme is waived for vehicles meeting the LEZ emission standards and a significant reduction is provided for such vehicles from the Congestion Charge.

The Showmen's Guild of Great Britain

The Showmen's Guild expresses concern about the economic impact of the LEZ on showmen and suggests that showmens' vehicles should be non-chargeable on the basis that the vehicles have low mileage and are more akin to non-road going machinery, such as mobile cranes. They argue for a charge calculated over a 24 hour period rather than from midnight to midnight, given their vehicles often move to set up at night, and by so doing avoid congestion. They also argue that as charges from foreign operators are unlikely to be recovered, it is unfair to penalise their members, who cover no more than 4% of traffic commercial movement.

The Society of Motor Manufacturers and Traders (SMMT)

The SMMT would favour an age-based scheme one based on Euro standards for all pollutants rather than a Euro standard for PM alone. They are concerned that the scheme as currently proposed is too complicated and will not be equally applied to foreign and UK operators. SMMT believe there should be more incentives for cleaner vehicles and have concerns on the impact on the vehicle recovery sector. SMMT support the overall principle of a LEZ to improve London's air quality and the retrofitting of pollution abatement equipment. The SMMT Motorhome Forum suggests that motorhomes should not be included in the scheme as these vehicles are small in number, travel low mileages and, since they are often old, probably impractical to retrofit.

2. Central Government Departments

Department for Trade and Industry (DTI)

DTI noted that TfL is working closely with the Department for Transport on the detailed proposals for the scheme.

Foreign and Commonwealth Office (FCO)

The FCO is considering the impact of the LEZ on the fleets of foreign diplomatic missions and international organisations. FCO is responsible for ensuring that the UK meets its obligations to them under the Vienna Convention on Diplomatic and Consular Relations and other international agreements. FCO assess that few missions and international organisations would be affected, but one or two will. FCO will make a legal assessment in due course as to whether diplomatic agents and officials of international organisations ought to be exempt from the scheme charges under the provisions of the Conventions (and any possible relevant bilateral consular convention), If necessary, FCO shall seek exemption on their behalf in order to meet international obligations.

Ministry of Defence

The MOD would like clarification of the definition of military vehicles used for the exemption but would wish for the exemption to cover all military vehicles, not just those currently exempted by the Congestion Charging Scheme.

3. Economic Partnerships

Central London Freight Quality Partnership (CLFQP)

CLFQP supports the removal of a NO_x standard from the current scheme, as well as the deferral of the introduction of a Euro IV standard. However, it urges TfL to reconsider the inclusion of cars, and how best to restrict emissions of other major pollutants. CLFQP has concerns over the enforcement of foreign vehicles and how LGVs will be differentiated from some estate cars and proposes that the definition should cover all van type vehicles with panels instead of windows. CLFQP also expresses concern about the economic impact of the LEZ and proposes that some financial support or exemption be provided to aid replacement for smaller enterprises from the courier and removal industry. CLFQP proposes that an age-based standard would be easier to enforce and supports the inclusion of all motorways and trunk roads in the LEZ, as this would be easier for drivers to understand.

Central London Partnership

CLP supports the use of a Scheme Order to implement the LEZ but has concerns over the poor cost/ benefit ratio of the scheme, proposes that consideration be given to including private cars in the scheme and extending it to a NO_x standard to maximise the benefits. CLP also proposes the use of age-based standards rather than Euro standards, for ease of enforcement. CLP is concerned about how foreign registered vehicles would be enforced, and fears that they could undercut domestic operators. CLP is also concerned about the impact on small businesses in the removal and coach sectors, where costs of vehicle replacement are high and vehicles have long life cycles. TfL should consider some form of assistance for these sectors. CLP feels that motorways and trunk roads should not be included, as it could delay implementation of the scheme. However, the level of daily charge and penalty are appropriate.

Park Royal Partnership

The Park Royal Partnership expressed concerns about the impact of LEZ on small businesses in terms of the cost of fleet upgrade, retrofitting or paying the daily charge and suggests an age-based standard should be used and that more incentives are provided for the use of cleaner vehicles, such as an exemption from the congestion charge.

Thames Gateway London Partnership

TGLP supports the LEZ and seeks reassurance that TfL would encourage operators to meet the 2012 emission standards at the earliest opportunity but has concerns about the effectiveness of particulate abatement equipment, the impact on operators, the enforcement of foreign vehicles and the premature scrapping of older vehicles. TGLP consider that motorways should be included, welcome further investigation of the inclusion of cars and consider that any surplus should be ring fenced for relevant freight projects in London.

4. Ethnic and Voluntary Organisations

The Caravan Club

The Caravan Club believes that most motor caravans are in fact the same vehicle classification as the car, meaning that they should not be included within the scope of the LEZ. It believes that the criteria for complying with the scheme are too complex and many owners will not have access to the necessary technical information about their vehicle.

Central Council of Physical Recreation (CCPR)

The CCPR supports improvement of air quality but considers that LEZ as it is proposed will have a negative impact on sports and community activity in the capital. The inclusion of minibuses in the scheme particularly places a cost burden on this sector and may lead to less participation and fewer major events in London, in turn damaging health and community cohesion. The CCPR proposes a full exemption for voluntarily run not-for-profit sports clubs and organisations.

Consortium of Bengali Associations

The Consortium of Bengali Associations supports the proposed LEZ and considers that it should also include cars and that there should be some incentive for electric powered vehicles and CNG and hydrogen powered engines.

Mobilise Organisation

Mobilise was concerned that a small group of disabled vehicle users could be impacted by the LEZ as it was unclear whether private cars constructed by converting a light goods vehicle would be included within the LEZ. These vehicles are chosen as the smallest vehicle that can accommodate the particular user when travelling in a wheelchair or on a wheeled bed. In some cases the disabled person may enter the vehicle in their wheelchair and then either drive from their wheelchair or transfer to the driver's seat. Vehicles are equipped with either a lift or ramps and because of the cost of such vehicles they are often used for more than 10 years before they can be replaced. Mobilise consider that such vehicles should be exempted from the scheme or that the LEZ could deprive some disabled people of their mobility.

5. Greater London Authority Functional Bodies

London Climate Change Agency (LCCA)

The LCCA supports the proposed LEZ.

London Fire and Emergency Planning Authority (LFEPA)

LFEPA supports the proposed LEZ as far as the introduction of the Euro III emissions standards in 2008, by which date most of its fleet will be compliant. However the proposal to tighten the standard to Euro IV in 2012 is several years in advance of its scheduled vehicle replacement programme and will come at an additional cost for which LFEPA will have to seek funding.

London Transport Museum

The London Transport Museum has concerns about the hire and reward provision with the exemption for heritage vehicles and would like to see the 1973 cut off date brought forward with the passage of time.

Metropolitan Police Service

The MPS made no comment on the proposal.

6. Health Organisations

Ambulance Service Association

The ASA urges that NHS ambulances should be exempted from the LEZ scheme. Replacing vehicles ahead of the planned programme would be costly to the NHS and the total number of vehicles on the road is small, and specialist vehicles in particular have low mileages and long replacement cycles. Although the proposals would mostly affect London Ambulance Trusts, services outside the capital also regularly transport patients into the zone.

Asthma UK

Asthma UK fully supports the implementation of the LEZ. It is disappointed, however, that there will be no NO_x standard in the initial scheme. Asthma UK urges DfT to prioritise the development of NO_x abatement technology and testing equipment which would allow for the creation of a national testing scheme and the extension of the LEZ proposals to include NO_x. Asthma UK is pleased that the Mayor has asked TfL to look at the implications of potentially including cars and lighter vans at a later stage. Asthma UK welcomes the fact that the LEZ will have most significant health impacts on deprived communities and would like to see a monitoring programme that investigates non-monetary, quality of life impacts. Details could be published in annual progress reports.

Bromley PCT

Bromley PCT supports the LEZ and considers the direct health benefits would outweigh any possible negative impacts.

Haringey NHS Trust

Haringey NHS Trust welcomes the scheme because improving air quality will make an important contribution to improving health and reducing health inequalities. It is interested to see future evaluation of the scheme in terms of its impact on the health and wellbeing of Londoners.

Havering NHS Trust

Havering NHS Trust supports the LEZ as the positive health effects will outweigh the negative but has concerns that the daily charge on non-compliant buses could disproportionately affect lower socio-economic groups, which are more likely to use public transport. The Trust is also concerned by the impact the LEZ could have on community and public health organisations. It suggests the creation of a community chest from money raised by the LEZ, to fund community groups in buying newer vehicles.

Healthcare Commission

The Healthcare Commission welcomes the changes made to the scheme since the last consultation but has concerns about possible negative impact on provision of community transport, meals-on-wheels services and local 'corner-shop' businesses, all of which provide vital services to isolated or vulnerable people. Asks if such organisations might be helped with vehicle upgrades using revenue from fines, with a greater burden placed on bigger organisations with larger fleets.

Healthy Southwark Partnership (inc Southwark PCT)

The Healthy Southwark Partnership welcomes the beneficial effect that LEZ will have on air quality, noting the direct negative health effects of particulate matter and the prevalence

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of pollution-related health conditions, including asthma, in Southwark. Is concerned that vulnerable groups rely voluntary and public sector vehicles to access community services and sports and that there could be negative health and social effects if these organisations cannot afford to operate in the zone. Asks for funding to support vehicle replacement for these groups; Southwark PCT's own fleet is already compliant.

London Ambulance Service NHS Trust

The London Ambulance Service supports the LEZ proposal but considers that the motorways in London should not be included in the LEZ, that the proposed daily charge and penalty charge are sufficient as a deterrent but too high and that the emissions standards are too severe. The LAS considers that specialist vehicles with mileage under 5,000 miles a year, such as those used by the Service for incident support, including in response to terrorist incidents, should be exempted from the LEZ. They expressed concern about the effectiveness of particulate abatement equipment.

NHS National Institute for Clinical Excellence (NICE)

Thinks there is a strong case for the effectiveness of the LEZ in meeting air quality objectives and reducing the harm caused by poor air quality to people suffering from respiratory or cardiovascular disease, especially those in vulnerable groups. Consider it would be valuable if health impacts monitoring of LEZ looked at links between perceptions of the environment and health-related attitudes and behaviour.

South East Coast Ambulance Service NHS Trust (SECAMB)

While the Trust is trying to procure low emission vehicles for the future, it feels that Fire, Police and Ambulance service vehicles should be exempt from the LEZ. The South East Coast Ambulance NHS Trust believes that ambulance vehicles should be exempted from the LEZ scheme as they are from the Congestion Charge. Unlike operators of commercial fleets, ambulance trusts cannot be flexible about their routes and it is not practical to only locate newer vehicles near the zone. Their small number of highly specialist vehicles, deployed to major incidents, are old, have low mileage and very expensive to replace.

St John Ambulance (Kent)

St John Ambulance has some quite old vehicles which, though based in Kent, also transport patients to hospital within the LEZ, and its mobile treatment unit does most of its annual mileage going for an annual service and MOT, also within the zone.

7. London Boroughs

City of Westminster

The City of Westminster welcomes the proposed implementation of a LEZ for London and welcomes the changes made to the scheme since the last consultation but regrets that a NOx standard was not included and that the Euro IV standard has been postponed to 2012. Westminster would also like for the scheme to be progressed with consideration of extending the emission standard beyond Euro III for vans and minibuses and beyond Euro IV for HGVs, buses and coaches. The City of Westminster agrees that motor caravans, ambulances and hearses - which in other respects are comparable to the LGVs and HGVs to be covered by the Scheme Order - should not be exempt vehicles in relation to the LEZ. It does not believe there are grounds to treat ambulances and hearses as special cases.

London Borough of Barking and Dagenham

The Council is concerned that small businesses and community organisations may be particularly adversely affected by the costs of complying with the LEZ. Would like TfL to

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consider what help and financial incentives it could provide to these sectors and also raise awareness of the LEZ via these operators' associations. The council would like reassurance that the LEZ is enforceable on both UK and non-UK registered vehicles; and hopes that funding will be provided to boroughs to deal with any increase in abandoned vehicles as a result of the scheme. The potential risk of London incurring fines if EU target values for pollutants are missed may strengthen the case for the LEZ.

London Borough of Barnet

London Borough of Barnet is generally supportive of the principal of reducing emissions harmful to the environment but objects to the making of the LEZ Scheme Order and has concerns about the use of a Scheme Order to implement a LEZ rather than a borough based scheme; the displacement on non-compliant vehicles outside of London; the cost/benefit ratio of the LEZ, enforcement using ANPR cameras; and the environmental impacts of repeater signage. The Council raises concerns about issues specific to the LEZ boundary in Barnet and about the type of vehicles to be included in the LEZ, including buses and coaches used for school transport, specialist borough vehicles and vehicles for responding to emergencies, such as rail replacement buses.

London Borough of Bexley

Bexley supports the concept of a LEZ but has concerns about the costs and benefits of the scheme and objects to the inclusions of heavier vans and minibuses in the LEZ until TfL presents a full assessment of the impacts of their inclusion. Bexley has concerns about the impact on community and voluntary organisations and on borough specialist vehicles and considers that high value specialist vehicles should be exempt. Bexley believes that the ten year plan for net proceeds should include options for future targeted grant schemes to assist London Boroughs, businesses and the voluntary sector in meeting additional compliance costs.

London Borough of Brent

Brent views the LEZ proposals as most effective way of reducing air pollution in London and views the LEZ Scheme Order as the most expedient method for achieving this. The Council considers that motorways and trunk roads should be included but raises concerns about the differentiation between class 5 and class 6 historic vehicles, the air quality and scheme cost data provided in the consultation documents and the implications of the scheme for future climate change policies.

London Borough of Bromley

Bromley objects to the LEZ Scheme Order in its present form because of the impact on the Council's fleet of vehicles and the impact on traffic patterns from any increase in traffic volumes should businesses choose to use a larger number of smaller vehicles to operate within the LEZ. The Council has concerns about costs of the inclusion of specialist low mileage vehicles, such as winter maintenance vehicles, and seeks an exemption or derogation for borough specialist vehicles.

London Borough of Croydon

Croydon Council broadly supports and welcomes the proposed London LEZ as an important measure to improve the quality of the environment and the health and wellbeing of people in Croydon and the designation of Croydon as a low emission zone is a key proposal in the Council's 2002 air quality action plan. However, the Council has expressed some concerns regarding the proposed LEZ boundary in Croydon, diversion routes and the amount of signage that will be required to make the zone enforceable.

London Borough of Ealing

London Borough of Ealing generally supports the principle of a LEZ but has reservations regarding the use of a Scheme Order to introduce the LEZ rather than a Traffic Regulation Order via London Councils' Transport and Environment Committee. The Council encourages the introduction of the Euro IV standard for PM earlier than 2012, heavier LGVs earlier than 2012 and the introduction of Euro IV standard for NOx. The Council would like to see motorways and trunk roads included in the LEZ and the inclusion of cars within the LEZ dependent on further consultation and would like more information about the decision not to introduce a standard for petrol engine HGVs. The Council expressed concern about the impact on community services of the inclusion of minibuses and about the overall cost effectiveness of the scheme.

London Borough of Greenwich

The London Borough of Greenwich supports the proposed LEZ and the proposed level of charge. The emission standards are consistent with those negotiated for the Thames Gateway Bridge and reflect the emission standards for the Greenwich Peninsula.

London Borough of Hackney

London Borough of Hackney is broadly in support of the Scheme Order for a LEZ but has concerns regarding the cost impacts on contracted borough fleet vehicles, potential clutter from signs, that emissions of NOx are ignored in favour of particulate emissions, that the LEZ does not immediately address light vans and cars and that many fleet managers are not fully clear of the requirements for implementation from 2008.

London Borough of Hammersmith and Fulham

LBHF has concerns about the change in the estimation of costs and air quality impacts from the Strategy Revisions consultation, the definition of the charging area, payment by post, that the charge is too low, the immobilisation of vehicles, the effectiveness of mobile ANPR cameras and the enforcement of foreign vehicles. The Council considers that there should be clear information on those private vehicles which are included, information on the registration process, that payment systems should be integrated with the Congestion Charging scheme, that TfL should monitor the development of NOx abatement technology with a view to including a NOx standard in the future, and that motorways should be included.

London Borough of Harrow

London Borough of Harrow supports the principle of a LEZ but has some concerns that London will still not meet its air quality targets, that the improvements in air quality are small compared with the 'do nothing' scenario, that there could be increased congestion on the LEZ boundary, about the impact on operators of heavier LGVs and minibuses and that a national advertising campaign for operators is required before implementation.

London Borough of Havering

Havering supports the LEZ in principle, and welcomes the impact it would have on the environment and public health. However, the Council is concerned at the potential negative impact the LEZ could have on small businesses and the local economy as a whole, and asks TfL to identify realistic and workable solutions, such as grants or phased introduction, before the scheme commences. The Council also has concerns over the enforcement of foreign vehicles.

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London Borough of Hillingdon

Hillingdon believes that the LEZ should include motorways and spur roads around Heathrow Airport, as this is a hotspot area for air pollution in London. Would like TfL to consider providing grants, particularly for specialised vehicles to assist boroughs, community transport operators and small businesses to achieve compliance. LEZ may prevent boroughs introducing their own charging schemes in future. Hillingdon welcomes TfL providing additional clarity to the scheme by making explicit the inclusion of motor caravans, ambulances and hearses. Reiterates that small businesses would need financial support to ensure compliance; and would like clarity on whether horse boxes and specialist borough vehicles are included in the scheme.

London Borough of Hounslow

Supportive of LEZ as schemes to improve air quality will work best when implemented on a London-wide basis. Requests that motorways and other roads around Heathrow are included within the LEZ as this is hotspot of air pollution in London. Raises concerns about enforcement of non-UK registered vehicles and asks for clarification of air quality benefits outside London.

London Borough of Islington

Concerned that the air quality improvements are not as great as previously thought; in particular questions the decision not to include NO_x emissions. There is no incentive for operators to exceed the emissions standards and the timetable does not leave enough time to take delivery of new vehicles, which will also be costly. Should be exemption for gritters.

London Borough of Lambeth

Lambeth supports the use of a Scheme Order to implement the LEZ rather than a TRO, as there are fewer associated risks. The council does not, however, agree with the deferral of the introduction of the Euro IV standard from 2010 to 2012, as it will further reduce the impact of the LEZ in terms of achieving limit values. Similarly, Lambeth would support the early introduction of a NO_x standard, or at least more research into how a standard might be implemented in the future. Lambeth supports the inclusion of LGVs and minibuses within the LEZ, but argues for these vehicles to be included from 2008 rather than 2010, subject to analysis of the impacts on small businesses. Finally, bearing in mind their significant contributions to emissions of PM₁₀ and NO_x, the council argues for the inclusion of diesel cars within the LEZ. A progressively implemented scheme could avoid the need for mass retrofitting of abatement equipment, but would encourage the replacement of older vehicles at an early stage.

London Borough of Lewisham

Lewisham's Fleet Replacement Programme will ensure compliance with the LEZ. However, there are problems replacing 30 large accessible buses to meet clients' requirements and for which retrofitting is not an option. The Council has therefore decided to replace these vehicles during 2007/08 to ensure compliance.

London Borough of Merton

Merton supports the LEZ as a good start in helping to achieve the air quality objectives and EU limit values and improve the health and quality of life of people in London. They note that the proposed boundary will need clear signage and publicity and ask about the impacts of traffic diverting in order to avoid entering the zone. The authority asks if TfL has applied for any new powers in regard to enforcing charges and penalties on non-UK

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registered vehicles and hopes that the processes for certifying the fitting and maintaining abatement equipment will be clearly set out.

London Borough of Newham

Newham believes that the LEZ is a step in the right direction towards enabling London to meet air quality standards and targets but has concerns about enforcement and monitoring of the zone and would like there to be more work on the future development of LEZ post 2012.

London Borough of Redbridge

Redbridge generally welcomes the proposals and recognises that it will reduce pollutants harmful to human health but has concerns about the costs for boroughs in complying with the emission standards. Although the borough adopted a Green Fleet Policy in 2000 and has taken steps to improve fuel efficiency and the use of alternative fuels, it will still need to spend around £600,000 in order to ensure that its fleet meets the Euro III standard.

London Borough of Richmond upon Thames

Richmond generally supports the LEZ but is concerned about the impact of signage on local roads and requests more information about the design and proposed locations of signage. If concerns cannot be satisfactorily resolved, the boundary should be relocated to the Borough boundary.

London Borough of Southwark

Southwark is supportive of measures to improve air quality but seeks assurances about impact of signage and monitoring sites in the borough. Would like more modelling information and remains concerned about cost impacts on small and voluntary sector operators who may be unable to bear the cost of vehicle upgrades.

London Borough of Wandsworth

Wandsworth would have found it helpful to have had data on the health benefits of the scheme to aid them in setting this benefit against the estimated costs of the scheme to determine whether the same or greater environmental benefits could be achieved in a different way at lower cost. Wandsworth believes that the effects of the Mayor's proposals are likely to be an increase in emissions of nitrogen oxides, increases in emissions of fine particulate matter as well as an increase in emissions of greenhouse gases, when compared to Wandsworth's preferred policy of mandating authorities and operators to replace their fleet at a fixed age. Wandsworth suggests that exemptions be granted to specialist vehicles for which compliance may not be possible but that a duty is imposed for replacement vehicles in this category to be compliant with European regulations.

London Borough of Westminster

Supports the principle of LEZ as an effective way of improving air quality. Welcomes inclusion of heavier LGVs and minibuses and use of congestion charge cameras to enforce the scheme. While it understands the reasons for not including a No_x standard at this stage, hopes that this will be kept under review and also that there will be a plan for the future development of LEZ, including the possibility of including cars and the development of Euro Standards beyond 2012. Is concerned that the delay in implementing the Euro IV standard lessens the air quality benefits of the scheme and that there are no proposals to provide ongoing information and support to operators about complying with the LEZ.

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London Councils

London Councils supports in principle the concept of a LEZ to help improve London's air quality but has concerns about the low cost/benefit ratio of the LEZ; the accuracy of the costs and benefits provided in the consultation documents; and the use of a Scheme Order to implement the LEZ rather than a Traffic Regulation Order (TRO) via London Councils' Transport and Environment Committee. London Councils also has concerns about the inclusion of borough fleet vehicles, signage and street clutter, the enforcement of foreign vehicles, the effectiveness of enforcement using ANPR cameras only on TfL's road network, the inclusion of Highways Agency roads and the focus of the LEZ on particulates over other pollutants.

Royal Borough of Kensington and Chelsea

Kensington and Chelsea Council expresses concern that TfL proposes to introduce the LEZ using a Scheme Order rather than a Traffic Regulation Order via London Councils Transport and Environment Committee and those improvements to air quality are only slightly better than if the LEZ is not introduced. The Council is also concerned that the charging area is described in a misleading way and believes that trunk roads should be included within the LEZ. Has concerns about the payment system and the enforcement of foreign vehicles. It sees no need for additional cameras or signage within the borough.

Royal Borough of Kingston upon Thames

In principle the Borough supports the LEZ. They have detailed local boundary concerns, in particular, where suitable diversion routes have been selected, and also have some concerns about the signage of the LEZ. The Borough supports the inclusion of LHVs and minibuses in the LEZ, the charges applied and the inclusion of motorways and trunk roads.

8. London Political Representatives

David Drew MP

Supports need to reduce emissions but is concerned that the proposals are not unreasonably restrictive to small businesses. Supports a time-limited exemption for members of the Showman's Guild to enable them to update their vehicles in line with the proposed standards.

GLA Conservative Group

Believes that overall the principle is correct but there should be measures to help small/medium sized businesses comply with the scheme, such as grants toward the cost of retrofitting vehicles. Motorised horseboxes should be exempt from the scheme. Questions if the scheme provides sufficient value for money and asks that there is a more long-term commitment given to the scheme.

GLA Labour Group

The London Labour Group strongly supports the LEZ but is concerned about the enforcement of foreign vehicles and would like TfL to consider incentives to assist commercial operators, particularly small coach operators. Also for TfL to consult with the voluntary sector and community transport organisations in regard to providing grants to help them comply with the scheme.

Harry Cohen MP

Harry Cohen MP supports the LEZ, but is unsure how enforcement would be carried out.

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Liberal Democrat Assembly Members

Liberal Democrat Assembly Members, the London Spokesperson for the Liberal Democrat Parliamentary Party and the Liberal Democrat MEP for London support in principle the introduction of a LEZ in London but have concerns that the Scheme Order does not go far enough, in particular that the Euro IV standard should be brought forward again to 2010, that the Euro IV standard should include PM2.5, that a NOx standard should be included, that the standard for LGVs and minibuses should be tightened to Euro IV in 2012 and that the LEZ should be adapted to include carbon emissions.

Mark Field MP

It is clear that the problem of air quality is worsening, though the LEZ consultation documentation makes clear that the LEZ will have no "significant impacts on traffic levels or congestion", nor will it have any significant impact on climate change. An increasing number of buses in London are one of the reasons why air pollution has worsened, yet there are no measures to discourage the most polluting diesel engine vehicles.

9. Non-Departmental Government Organisations

Environment Agency

The Environment Agency supports the introduction of the LEZ, as it will be an important measure to reduce public exposure to poor air and improve public health. A particular factor in its favour is that the greatest health benefits will be experienced by deprived communities. As this would be the first such scheme in the UK, it should also influence and generate proposals for such schemes in other cities and regions. Whilst the Agency may have preferred an eventual ban on the most polluting vehicles rather than a charging scheme, it recognises that other factors, including socio-economic factors, need to be considered. The Environmental Agency agrees with the types of vehicles included, the charges to be set and the implementation timetable. It also supports the eventual inclusion of LGVs, given their overall numbers.

Olympic Delivery Authority

Expresses some minor informal reservations around the potential impact on small businesses and sports clubs - particularly sports charities. Concerned at the potential for inequitable enforcement, particularly in relation to foreign visitors. Suggests some discount from the charge for these visitors. Olympic delivery partner CLM raise no significant objection apart from potential cost impact down the supply chain for construction vehicles. Is supportive of the LEZ, and to complement the LEZ during the bid a commitment has been made to designate the Olympic Park as an LEZ in its own right during the Games. Will have carbon targets.

10. Professional Organisations

Royal College of Nursing

Welcomes attempts to reduce air pollution and improve the quality of life for all Londoners, and especially those with respiratory and other conditions. It is concerned, though, that the proposed LEZ does not negatively impact on deliveries to NHS facilities or the transport of patients to hospitals and other centres. Similarly, it hopes that it will not cause difficulties for nurses in getting to work or visiting patients. It hopes that LEZ will be part of a range of schemes to improve transport and the city's public health.

Royal Institution of Chartered Surveyors

RICS strongly supports the ethos and principles behind the Scheme Order for a Greater London LEZ. RICS believe transport carbon emissions need to be reduced through a two pronged approach; the reduction of the emissions footprint and by addressing the spatial relationship between the use of land and transport infrastructure.

11. Transport and Environment Organisations

Friends of the Earth

Supports the LEZ but is disappointed that changes in the proposals will mean that there will only be relatively small percentage reductions in areas of London exceeding various UK and EU limit values. Considers that all vehicles should be included in the scheme and that TfL should review the impacts of the LEZ annually with a view to extended the coverage of vehicles included.

Transport 2000

Believes proposals do not go far enough: the proposed emissions standards should be higher and the scheme should cover all vehicles. Concerned that even with LEZ some areas of London will not meet the air quality targets and there needs to be more information about this. It is anomalous that TfL also pursues other proposals, such as the Thames Gateway Bridge, which will undermine air quality.

12. UK Local Authorities

Nine local authorities across the UK provided representations to the consultation anonymously via the questionnaire distributed by TfL. All nine local authorities supported the LEZ proposal but some expressed concerns about the boundary, that specialist local authority vehicles such as gritters should be excluded and about the effectiveness of pollution abatement equipment in light duty cycles.

East Ayrshire Council

East Ayrshire Council supports the general principle of introducing reasonable measures to reduce vehicle emissions in towns and cities.

Essex County Council

Acknowledges that LEZ may have a positive impact on age profile of bus and coach fleet but there could be an increased cost to public sector transport providers, small businesses and freight companies. Also concerned that if minor routes are not fitted with enforcement cameras there may be unwanted through-traffic in towns just outside the boundary.

Greater Manchester Passenger Transport Executive (GMPTE)

GMPTE is supportive of the principles behind the LEZ and the role that cleaner buses can play both in improving air quality and in attracting and retaining passengers.

Hertfordshire County Council

The Council is concerned about the impact of the LEZ on cross-boundary school services, and, as a mitigation measure, the Council proposes that the LEZ should be introduced at the end of the academic year, not the beginning. The Council also seeks confirmation that non-compliant bus services can turn around on private property that is just within the zone without being penalised. The Council has concerns that the inclusion of minibuses from 2010 will put some voluntary services at risk, as well as imposing a cost burden on some council services.

Kent County Council

Kent County Council welcomes in principle the implementation of a LEZ for London but has concerns that the consultation documents did not provide enough information to determine the impact of the LEZ on Kent, particularly on local bus and coach operators.

Royal Borough of Windsor and Maidenhead

RBWM has concerns that the use of particulate abatement equipment could lead to an increase in emissions of NO₂ and that the LEZ does not include a standard for NO_x. RBWM would like additional assessment of the impacts of the LEZ outside of London, including traffic impacts.

Slough Borough Council

Welcomes measures to improve air quality but is concerned about the potential negative impacts of traffic diverting away from the LEZ, particularly in regard to the AQMAs Slough has implemented locally. Motorways should be included but there needs to be more information about management of traffic and ongoing monitoring of air quality, economic and vehicle profile impacts of the LEZ, especially in areas neighbouring the boundary.

Surrey County Council

Surrey County Council supports the LEZ and is pleased to note that as vehicle operators based within and outside Greater London are encouraged to replace or upgrade their vehicles to operate within the LEZ, that air quality beyond the boundary (and hence in Surrey) is likely to improve. Surrey has some concerns about the displacement of older vehicles outside of London, about the boundary and signage and about monitoring the impacts of the LEZ outside of London.

Tandridge District Council

While Tandridge District Council supports the principle of the LEZ and welcomes its positive air quality and health benefits for both road users and the general population, it is concerned that the more polluting diesel vehicles may now be more likely to operate outside London in areas such as Tandridge.

Warwickshire County Council

As part of the development of its Air Quality Action Plan, Warwickshire County Council is considering a number of measures to improve local air quality and, while not considering a low emission zone, will watch with interest the development of the London LEZ.

Watford Borough Council

Is broadly in support of the LEZ but is concerned that non-compliant vehicles will re-route into Watford, causing a detrimental effect on local air quality and traffic levels which will undermine their own attempts to improve the situation. Believes that motorways should be excluded from LEZ and that there should be monitoring of the impacts outside Greater London.

West Sussex County Council

West Sussex agrees with the principle behind the LEZ. West Sussex suggests that TfL publicise the LEZ proposals as soon as possible, particularly in specialist press, so that small operators become aware of the scheme to comply and take account of in future business and financial planning. West Sussex comments that the LEZ will effectively deny small local companies without compliant vehicles economically viable access inside most of the area within the M25 and suggests that small HGV operators be given more time to

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comply by being allowed to temporarily register one of their vehicles for use in the LEZ without charge. West Sussex suggests that NGO and other voluntary organisation minibuses be exempt, as they may not be able to afford to replace or upgrade vehicles, as well as classic vehicles over 25 years old. West Sussex comments that the LEZ may make operators in and outside London sell vehicles rather than upgrade them, reducing the value of pre October 2001 larger vehicles and encouraging operators outside London to buy these second hand vehicles, which reduces the benefit to local air quality.