

Annex D: Details of stakeholder representations received during the consultation

Introduction

This Annex contains TfL's consideration of representations and objections received from stakeholders.

For the purposes of analysis, the representations have been categorised into broad 'themes' and 'sub-themes' according to the issues raised. This means that a representation from a respondent that commented on more than one issue has been split up accordingly and dealt with under the appropriate theme.

When analysing the representations and objections to the consultation, best endeavours were made to accurately record all issues raised.

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Theme A: The principle of the Low Emission Zone

Sub theme	Stakeholder	Representation
A1: Support/Oppose a LEZ		
A1	Association of International Courier and Express Services (AICES)	Supports the underlying principle of the LEZ, but with some practical concerns.
A1	Asthma UK	Fully supports the implementation of the LEZ.
A1	BAA	Overall welcomes the proposals and is keen to see the projected air quality improvements brought forward.
A1	Bromley PCT	Strongly supports the LEZ as the direct positive health impacts outweigh the possible negative ones.
A1	Central London Partnership	Supports the use of a Scheme Order to implement the LEZ.
A1	City of Westminster	In 1999, the City Council commissioned TRL to develop proposals for a practical model for a Low Emission Zone (LEZ). This showed that an LEZ for all of London would be more beneficial than one confined to central areas. Continues to support the principle of a London LEZ, as the most effective of the options considered for reducing the most harmful emissions generated by road transport.
A1	City of Westminster	Continues to support the proposed approach of introducing the LEZ through a Scheme Order. Recognises that this is the quickest statutory process to enable the scheme to be implemented, and that significant delay would diminish the air quality benefits of the LEZ.
A1	Consortium of Bengali Associations	Supports proposal to introduce a LEZ in Greater London.
A1	East Ayrshire Council	Supports the general principle of introducing measures to reduce vehicle emissions in towns and cities.
A1	Environment Agency	Fully supports the introduction of the LEZ, as it will be an important way of reducing public exposure to poor air and improving public health. The fact that the greatest benefits would be experienced amongst deprived communities is another major point in support of the LEZ.
A1	Environmental Industries Commission	Welcome the proposals outlined by the Mayor in the proposed Scheme Order to establish a London Low Emission Zone (LEZ). Believe that a LEZ will be an important measure to help achieve air quality objectives in London, with the clear benefit of improved public health for its residents and visitors alike.
A1	Essex County Council	Recognises the importance of the scheme and the potential health and environmental benefits that bringing forward the obligation to implement cleaner engine technology can bring to London and the wider South East area.
A1	Freight Transport Association	Recognises and supports the Mayor's legal obligation to improve air quality and backs the principle of a low emission zone that will accelerate the introduction of newer, cleaner vehicles.

Sub theme	Stakeholder	Representation
A1	Friends of Capital Transport	Warmly welcomes the LEZ as it would encourage modal shift from private to public transport and lead to more frequent services.
A1	Friends of the Earth	Supports the proposals for a LEZ, but is disappointed that the revised proposals have relaxed standards and introduction dates in some cases, and some reduced benefits, compared to the original proposals.
A1	GLA Conservative Group	Overall, the principle of this policy is correct, and by targeting the most consistently polluting vehicles, it is fair.
A1	Greater Manchester Passenger Transport Executive (GMPTEx)	Is supportive of the principles behind the Low Emission Zone, and the role that cleaner buses can play both in improving air quality, and in attracting and retaining passengers.
A1	GLA Labour Group	Strongly supports this scheme as it seeks to improve the health and quality of life of the people who live and work in London.
A1	Haringey PCT	Given our responsibility for improving the health of the local population, we warmly welcome the introduction of such a scheme.
A1	Harry Cohen MP	Agrees with the LEZ proposal
A1	Havering PCT	Overall supports the LEZ as it will result in a net positive health impact.
A1	Healthy Southwark Partnership	Supports the Scheme Order for a Greater London LEZ as part of our aim, and that of our partners, to tackle inequalities and improve the health of the population in Southwark.
A1	Kent County Council	Refers to earlier response from the Leader of Kent County Council, dated 18 May 2006 and confirm that Kent welcomes, in principle, the implementation of a Low Emission Zone for Greater London.
A1	London Ambulance NHS Trust	Support proposal to introduce a LEZ in Greater London.
A1	London Borough of Richmond upon Thames	Broadly supportive of the LEZ and welcomes modifications made since the consultation on the TAQS revision in early 2006, but has concerns about signage.
A1	London Borough of Bexley	Supports the concept of a Low Emission Zone (LEZ) to help improve London's air quality and address the EU's directive on reducing pollutants. Bexley's Local Implementation Plan 2005/6 to 2010/11 also endorses the principle of a LEZ.
A1	London Borough of Brent	A key objective of the proposed London LEZ is to improve the health of Londoners and protect those most susceptible to poor air quality by reducing the health impacts of air pollution. Views the LEZ proposals submitted as the most effective way of reducing air pollution in London.
A1	London Borough of Brent	Welcomes the Mayor's proposals for implementing a London-wide Low Emission Zone and views the LEZ Scheme Order as the most expedient method for achieving this.
A1	London Borough of Croydon	Broadly supports and welcomes the proposed London Low Emission Zone as an important measure to improve the quality of the environment and the health and wellbeing of people in Croydon. Has given a long-standing commitment to the principle of a low emission zone. Croydon's existing air quality action plan, adopted by the Council in 2002, contains as its key proposal "the designation of Croydon as a low emission zone, preferably as part of a London-wide zone, which would prohibit access to London to

Sub theme	Stakeholder	Representation
		goods vehicles, buses and taxis unless they met a certain minimum standard of exhaust emissions". The Mayor's proposals therefore assist the Council in delivering one of its key environmental policy objectives.
A1	London Borough of Greenwich	As an air quality initiative, fully supports the proposed low emission zone. Agrees that the proposed LEZ would deliver significant progress towards improving air quality in London and the health of people who live, work in and visit the city.
A1	London Borough of Hackney	Is broadly in support of the Mayor's Scheme Order for a Greater London LEZ. We anticipate and appreciate the benefits that the LEZ will bring especially with respect to improvements in Air Quality and the Health of residents. Recognise that implementation of the proposed LEZ will result in significant progress towards achievement of the air quality objectives for Nitrogen Dioxide and fine particulates within the borough.
A1	London Borough of Hackney	The adopted transport policies in Hackney support the implementation of London LEZ. Proposal 3.Pr2 of the Mayor's Transport Strategy (MTS) requested boroughs to set out their policy response and progress on the Low Emission Zone. The Hackney Air Quality Action Plan Policy 1 demonstrates the necessary Council support for implementing a LEZ; this was further endorsed in the Hackney Local Implementation Plan (LIP). The move towards improved air quality in London is further backed up by the policy preference towards active and public transport over the use of private car.
A1	London Borough of Harrow	The Air Quality Action Plan, declared for the whole of the borough of Harrow in January 2002, stated that 'Harrow Council supports the principles of a LEZ for London in principle' and Harrow is committed to supporting the Mayor's Air Quality Strategy to: 'minimise the adverse effects of air pollution on human health and to improve air quality to a level that everyone can enjoy, making London a more pleasant place in which to live, work and to visit'.
A1	London Borough of Havering	Supports the proposals in principle.
A1	London Borough of Hillingdon	Supports the proposal to introduce a Low Emission Zone (LEZ) in Greater London. The implementation of the Low Emission Zone would help Hillingdon, along with the rest of London, move closer to achieving both the national and European air quality standards
A1	London Borough of Hounslow	Agrees that there is a need to tackle emissions from road transport in order to improve local air quality. Given that air quality is both a cross-discipline and a cross-boundary problem, schemes that can be co-ordinated and implemented on a regional London-wide basis are likely to be the most successful in bringing about emissions reductions and air quality improvements. The implementation of the LEZ would also help the borough move closer to adhering to both National and EU air quality standards – along with the rest of London. Hounslow therefore maintains its support for the Low Emission Zone.
A1	London Borough of Islington	In general supports the introduction of the Low Emission Zone for London to provide much needed air quality improvements in our city. Pleased to see that the LEZ scheme is flexible and can evolve

Sub theme	Stakeholder	Representation
		over time to attain more air quality improvements
A1	London Borough of Lambeth	Supports use of a Scheme Order rather than a TRO to implement the LEZ, as fewer implementation risks using this method.
A1	London Borough of Merton	Supports any initiative aimed at tackling congestion and/or pollution. The LEZ is a good start in helping to achieve the air quality objectives and EU limit values.
A1	London Borough of Newham	It is recognised that the LEZ will not in itself ensure that London meets air quality standards and targets. However it is a significant step in the right direction.
A1	London Borough of Redbridge	As stated in our Air Quality Action Plan, Redbridge believes that the LEZ would bring air quality benefits for London. We therefore generally welcome the proposals for its introduction and recognise that it will contribute to the reduction of those pollutants most harmful to human health.
A1	London Borough of Southwark	Recognises the need to improve air quality across London and the implementation of a London wide LEZ is supported within our air quality improvement plan and our consultation draft local implementation plan
A1	London Climate Change Agency	Supports the Mayor's proposed Low Emission Zone.
A1	London Fire & Emergency Planning Authority (LFEPA)	Welcomes the proposals for the Low Emission Zone. These contain no major issues that will adversely impact on LFEPA's plans to comply with the emissions standards as published in Spring 2006. Fleet replacement programmes are progressing well and the initial target of Euro III emission compliance by February 2008 will be achieved for most of the fleet without the need for wholesale exhaust gas after-treatment.
A1	London Liberal Democrats	Supports the introduction of a LEZ in London as an initiative to reduce levels of harmful pollutants from road transport. As the consultation documents make clear, road transport is the major contributor of particulate emissions in London, responsible for around 1,000 accelerated deaths each year, and comparable numbers of people suffering from respiratory problems. Road transport is also a significant supplier of NO ₂ , associated with impaired lung function and increased allergic reaction.
A1	Olympic Delivery Authority	Overall welcomes the efforts to support air quality within London and the predicted health benefits to be gained for Londoners. Therefore in principle supports the initiative.
A1	Royal Borough of Kingston upon Thames	In principle supports the introduction of LEZ, which is aimed at improving the health and quality of life of people who live, work and visit London through improving air quality and move London closer to achieving the national statutory air quality objectives and European Union limits.
A1	Royal Borough of Kingston upon Thames	The introduction of the LEZ is welcomed and supported as a significant means of reducing emissions of PM ₁₀ and NO _x within the borough boundary and meeting Air Quality Objective exceedence limits. This is particularly important as the latest Borough Updated Screening Assessment (USA) of air quality identified that the actions highlighted in the Air Quality Action Plan to reduce motor vehicle use on borough roads and encourage

Sub theme	Stakeholder	Representation
		alternative transport options had not resulted in demonstrable reductions in projected pollutant levels. The Air Quality Action Plan confirms the Council's support for a London LEZ and the Council's commitment is further stated in the Local Implementation Plan.
A1	Royal College of Nursing	Keen to explore new ways of tackling issues around pollution, congestion and the related public health concerns. The proposed Low Emission Zone and the current Congestion Charging programme are positive methods of addressing these problems and should be welcomed.
A1	Royal Institution of Chartered Surveyors	Strongly supports the ethos and principles behind the Scheme Order for a Greater London Low Emission Zone.
A1	Slough Borough Council	Welcomes measures that will improve air quality in the region and the associated health benefits.
A1	The Society of Motor Manufacturers and Traders Ltd	In principle the industry is in support of processes that accelerate the uptake of cleaner vehicles and enhance local air quality. Encourage the implementation of a well thought out, easy to understand, and straightforward local air quality zone. Support the plans for a London Low Emission Zone.
A1	Surrey County Council	Confirm overall support for the scheme as set out in the accordance with the Order.
A1	Tandridge District Council	The concept of this Low Emission Zone is supported in principle particularly in view of the expectation that there will be air quality and health benefits for both road users and the general population not only for the Greater London area but also outside it, including Tandridge District.
A1	Thames Gateway London Partnership	Support the introduction of a LEZ in Greater London and welcomes the benefits which will be provided by the scheme.
A1	Thames Gateway London Partnership	The benefits of the LEZ will be particularly welcomed in areas of the Thames Gateway likely to experience considerable growth in travel. Regeneration of the area, as well as major projects including the Olympics, Crossrail and the Thames Gateway Bridge will lead to increases in freight. The substantial increase in homes and jobs in the Thames Gateway is likely to lead to increased demand for goods and services as well as public transport, all of which will impact upon air quality.
A1	Thames Gateway London Partnership	Welcomes any scheme which encourages people to think about vehicle emissions. Had the TfL scheme not been proposed, were proposing to implement a local LEZ for the proposed Thames Gateway Bridge. Welcome the additional benefits which a London wide scheme will provide.
A1	Thames Gateway London Partnership	Supports the LEZ and welcomes the expected benefits to the environment and health. Keen to see the greatest benefits from the scheme and seek reassurance that every effort will be made to encourage operators to meet the 2012 standards at the earliest opportunity. Would like to be assured that a mechanism will be in place to encourage this.
A1	Transport 2000	Continues to support the introduction of the LEZ. The LEZ proposals should go further.
A1	UK local authorities	9 local authorities support the proposal to introduce a LEZ in London.

Sub theme	Stakeholder	Representation
A1	Watford Borough Council	Broadly in agreement with the proposal to introduce a LEZ in London on the grounds of air quality as it is likely to improve air quality in the capital and improve the quality of life of its residents.
A1	West Sussex County Council	Would agree with the principles behind the London LEZ.
A1	City of Westminster	Continues to support the proposed approach of introducing the LEZ through a Scheme Order. Recognises that this is the quickest statutory process to enable the scheme to be implemented, and that significant delay would diminish the air quality benefits of the LEZ.
A1	Guild of British Coach Operators	Does not oppose the principle of the LEZ, but believes the proposals as set out are unfair, unworkable and counter-productive. Welcomes the changes made after the first consultation, but believes they do not go far enough in meeting the concerns of the bus and coach industry.
A1	The Showmen's Guild of Great Britain	A consideration of the various impact assessments and information provided to consultees suggests that the particular circumstances of the Guild have not been considered. The Guild supports the objective of achieving better air quality but believes that the consequence of the application of the Order to its Members will be disproportionate of any benefit derived.
A1	London Borough of Barnet	Whilst generally supportive of the principle of reducing harmful emissions to the environment, objects to the making of this order. The reasons for this objection relate to the level of effectiveness of the proposal, the adverse impacts, the timing of the proposals and the method proposed to implement and enforce the scheme.
A1	Road Haulage Association	Strongly urges the Mayor to abandon the LEZ in its proposed form, as it has become increasingly apparent that there will be a large cost to London ratepayers and to business for very little environment benefit.
A1	Royal Mail	Strongly oppose the LEZ in its proposed form.
A1	The Society of Motor Manufacturers and Traders Ltd	Is concerned that the LEZ as proposed will not succeed with the objectives. The zone is a complex amalgam of dates, vehicle types, standards and most importantly emissions levels. This will compromise the cost effectiveness and practicality of TfL's plans. This is not in the best interests of TfL, vehicle operators, vehicles manufacturers or most importantly the citizens of London for whom the air quality improvement is intended to help
A2: Revenues		
A2	The Association of British Drivers (ABD)	Oppose the proposition in Annex 3 to the Scheme where the application of any surplus generated from the scheme is discussed. It should be made clear that any surplus on the scheme is to be minimized and how such surplus or loss is to be calculated should be clearly specified. Any unexpected surplus should be applied to specific air quality improvement measures and not to any general transport programmes. Consider it exceedingly important that this scheme is not used as a general revenue raising provision by TfL.
A2	London Borough of Hillingdon	Concerned about how revenue from the scheme will be used.

Sub theme	Stakeholder	Representation
A3: Increased bureaucracy		
A3	Construction Plant-hire Association	In recent years, managers in industry have had more pressures forced upon them than ever before due to the many changes in legislation and the introduction of government sponsored certification, registration and reporting schemes which, added together, have substantially increased costs and the administrative workload and made life ever more complicated. The LEZ scheme should therefore be kept as simple as possible.
A3	City of Westminster	Need to minimise administration by reducing any duplication with that required for the 'London Evening and Weekend Lorry Ban' scheme run by the Association of London Government (now 'London Councils').
A4: Other principle issues		
A4	Friends of the Earth	The Mayor and TfL must rethink their support for the Thames Gateway Bridge as currently proposed as this would add to air quality breaches, when less polluting ways of helping improve access in the local area and develop the Thames Gateway sustainably have not been properly considered.
A4	Transport 2000	It unfortunately continues to be necessary to point out the anomaly of TfL pursuing proposals, such as the Thames Gateway Bridge, which will lead to further deteriorations in air quality at the very time when it is preparing to introduce the LEZ.
A4	London Borough of Barking and Dagenham	The 'Mayor's Transport and Air Quality Strategy Revisions: London Low Emission Zone' document refers to the risk of infraction proceedings if EU target values for specified pollutants are exceeded. It is unclear whether this is one of the drivers of the LEZ; however if it was found that there is a real risk of fines then this would likely constitute a strong argument in favour of the LEZ.
A4	London Borough of Hillingdon	LEZ may become redundant as newer vehicles come into circulation and improve the standard of air quality.
A4	Environment Agency	The LEZ is important as it is the first in the UK and should influence and generate proposals for similar schemes in other cities and regions.

Theme B: Suggested alternatives to a LEZ

Sub theme	Stakeholder	Representation
B1: Incentives based on Congestion Charge or other Road User Charging schemes		
B1	Park Royal Partnership	There are opportunities to promote best practice and positively encourage all vehicles in London to be environmentally sustainable. For example, operators should, in return for utilizing the cleanest and quietest vehicles, be offered a discount on the congestion charge. Hybrid cars can claim an exemption from this charge, so there is a precedent. Such options should be

Sub theme	Stakeholder	Representation
		considered prior to a decision on the implementation of the LEZ.
B1	Royal Mail	Vehicles which are compliant with the LEZ should be made exempt from or given a discount on the congestion charge.
B1	The Society of Motor Manufacturers and Traders Ltd	The LEZ, potentially in conjunction with the Congestion Charging zone, offers the opportunity for TfL to incentivise and increase the uptake of these vehicles in London. The Congestion Charge scheme already appears to be changing emphasis away from just congestion to environmental. It is regrettable that no facility appears to have been laid in the scheme order to acknowledge the investment by manufacturers and operators in new, clean technology. A system of discounts through the Congestion Charge zone would have benefits in and outside the zone. Many of these vehicles would be used throughout London. This is a missed opportunity to further improve air quality in Greater London, one that other European countries acknowledge, recognise and support.
B1	London First	<i>Transport 2025</i> indicates that Road User Charging will account for 33% of the Mayor's CO ₂ reduction target. Therefore London First calls for the outline plans for the implementation of Road User Charging to be published as soon as possible.
<i>B2: Ban instead of a charging scheme/ London Councils should administer LEZ (TRO Option)</i>		
B2	Royal Mail	If the LEZ remains as it is proposed, would support an outright ban on non-compliant vehicles. It is difficult to assess how allowing non-compliant vehicles to enter the zone if they pay between £100 and £200 per day will improve air quality and meet the objectives of the LEZ.
B2	Association of British Drivers	Why not simply ban vehicles that are not compliant with newer vehicle emission standards after a certain date? This has been used in other countries without difficulty. It seems a very complex and expensive system to simply bring forward air quality improvement by a few years because as older vehicles get scrapped there should be a substantial improvement anyway.
B2	Environment Agency	Notes that a Scheme Order is the chosen method of implementation. Would have preferred other methods, such as an eventual ban on the most polluting vehicles, but recognise that other options have been considered and that socio-economic factors must be taken into account.
B2	London Councils	TfL's chosen legal mechanism for the LEZ is a Scheme Order under the GLA Act 1999. The Traffic Regulation Order (TRO) option has been rejected on the basis of complexity and the time it would take to implement. However, if this were to be done via London Councils' Transport and Environment Committee rather than the individual boroughs, it need not be as complicated. There is, in any case, an established precedent in the London Lorry Control Scheme where the boroughs have delegated their responsibilities with respect to this TRO to London Councils.

Sub theme	Stakeholder	Representation
B2	London Councils	The implications of the Scheme Order approach are also different from a TRO-based approach. The Scheme Order essentially allows operators to pay to pollute, albeit for a large sum, which further reduces the marginal benefits purported to come from the LEZ. The TRO option would on the other hand, ban polluting vehicles from Greater London, and as such, maximise the health benefits.
B2	London Councils	Concerned that the GLA Act 1999 states under Clause 9 (4) of Schedule 23 that "A road shall not be subject to charges imposed by more than one charging authority at the same time", which means no borough can introduce a charging scheme in the future, should it want to (since the LEZ will cover the whole of Greater London). Would therefore prefer to see a TRO used as the legal mechanism for the proposed LEZ, which could be developed in partnership with the boroughs. Would oppose the use of a Scheme Order on the grounds that see a TRO as the preferred legal mechanism for the reasons stated above.
B2	City of Westminster	In a previous consultation response, proposed that consideration should be given to alternatives to the Scheme Order mechanism for any subsequent developments to the LEZ, so is disappointed that there is no sign that this has been considered.
B2	London Borough of Barnet	A lorry control scheme operating for environmental reasons has been in operation in London for over 20 years. Although the Council does not currently participate in the London Lorry Control Scheme (for a number of reasons), an updated and modified scheme jointly operated by the boroughs and TfL could have significant advantages over what the Council considers to be a centrally imposed scheme. Concerned over the difficulties operators will have in dealing with two entirely separate schemes operated by two different organisations and would consider it inappropriate for the LEZ to result in pressure for changes to be made to the operation of the borough scheme.
B2	London Borough of Ealing	Has reservations regarding TfL's chosen mechanism for the introduction of a LEZ, namely a Scheme Order. The Traffic Regulation Order (TRO) option was rejected in the initial consultation on the basis of complexity and the time it would take to implement. However, this need not be the case if it were done via the London Council's Transport and Environment Committee rather than individual boroughs, as was the case with the London Lorry Control Scheme and the London-wide Vehicle Emission Testing Programme. Both these resulted from the individual boroughs delegating their responsibilities with respect to the respective TROs to the then ALG (now London Councils). Is concerned that with the Scheme Order in place, the borough cannot introduce another charging scheme in the future, should it want to.

Sub theme	Stakeholder	Representation
B2	GLA Conservative Group	Some boroughs have expressed concern that, once in place, a LEZ would mean that they would not be able to introduce similar road pricing schemes in particular areas, as two authorities cannot introduce separate schemes in the same area. This would limit the abilities of some boroughs to respond to local pressures and to implement unique policies to deal with them. The LEZ could, however unintentionally, restrict a borough's ability to function properly in this area.
B2	London Borough of Hillingdon	Clarification is needed on the implications of the GLA Act 1999 on the implementation of the LEZ. The Act states under Clause 9 (4) of Schedule 23 that 'a road shall not be subject to charges imposed by more than one charging authority at the same time', which means no borough can introduce a charging scheme in the future, should it want to (since the LEZ will cover the whole of Greater London).
B2	London Borough of Hounslow	Seeks clarification on the use of the GLA Act 1999 on implementation of a scheme order. The Act states under Clause 9(4) of Schedule 23 that 'A road shall not be subject to charges imposed by more than one charging authority at the same time'. Hounslow interprets this to mean that as Local Authority, they cannot introduce a charging scheme in the future, should the LEZ be adopted.
B2	Royal Borough of Kensington and Chelsea	TfL proposed to introduce the LEZ using a Scheme Order under Schedule 23 of the Greater London Authority Act 1999. In our response to the consultation in April 2006 we objected to this on the grounds that the Scheme Order essentially allows a polluter to pay to pollute rather than actually banning the polluting vehicle and also that no borough can introduce a charging scheme in the future, should it want to. The Traffic Regulation Order (TRO) option has been rejected by TfL as it would need to co-ordinate the actions of up to 34 traffic authorities. Will continue to object to the use of a Scheme Order and recommend that a TRO could be brought in via the London Councils Transport and Environment Committee, as it has for the London Lorry Control Scheme.
B3: Need for central Government action		
B3	Royal Borough of Kensington and Chelsea	When faced with criticism that the LEZ is an inefficient tool that will deliver only marginal benefits, the response from TfL and the Mayor of London has generally been along the lines that there is nothing better that could be done at this level of government, and that it needs central government to intervene. This seems to us an argument for pushing central government to engage with this issue, rather than providing it with the convenient get-out that London is dealing with London's air quality problems. The paucity of ideas coming from central government on the air quality agenda should be challenged; fears that the LEZ proposal will take the heat off ministers for the next few years.
B3	Healthy Southwark Partnership	TfL should lobby for national initiatives to halt rising air pollution, as a means of reducing pollution related illness in the national population, and potentially increasing physical activity through

Sub theme	Stakeholder	Representation
		active travel.
B4: Incentives to exceed the Euro Standards used in the LEZ		
B4	Freight Transport Association	The estimated total cost of £120 million to set up and run the scheme until 2016 could go a long way to providing incentives to invest in cleaner vehicles. Germany has received confirmation from the European Commission that they would support new measures by the German government to encourage early uptake of cleaner technologies. An annual budget of €100 million will enable Germany to provide grants on a national basis to transport operators who purchase vehicles with Euro 5 standard engines ahead of mandatory introduction in October 2009. This will give huge environmental benefits across all pollutants by incentivising rather than penalising commercial vehicle operators. The Freight Operator Recognition Scheme (FORS) would be ideally placed as a distribution mechanism for grants for investment in cleaner technologies.
B4	London First	There is currently no incentive for operators whose vehicles already meet the emission standards set out in the LEZ to continue upgrading their fleets. Operators should be encouraged to exceed minimum emission standards by upgrading fleets to Euro IV (before January 2012) and Euro V (when available). This could be achieved by offering a non-financial incentive such as allowing extended loading/unloading times or dedicated loading bays. This form of incentivised scheme could also be adopted when effective NO _x abatement technology becomes available.
B4	London Borough of Islington	TfL has said that there might be some grant availability from the EST for retro-fit emission reducing equipment such as additional traps and even conversions to SCR and EGR of up to 30% but not on new vehicles. Will be looking to invest in the latest Euro 5 vehicles, far less polluting than retro-fits, and will apparently not be financially aided for doing a greater service.
B4	Road Haulage Association	It was hoped that the government would give an incentive to business to invest in environmentally beneficial commercial vehicles, as has been the case in other European member states, but the Chancellor has decided against this.
B4	The Society of Motor Manufacturers and Traders Ltd	Apparent lack of incentives for cleaner vehicles. At no point is reference made to any incentive for operators to use ultra clean vehicles or new, higher Euro standard vehicles. The development of these vehicles, often associated with lower carbon emissions, remains an ongoing focus of the industry.
B4	Royal Mail	The London Lorry Control Scheme should be waived for all vehicles that meet the agreed criteria, as diversions typically use more fuel and therefore create more pollution.

Sub theme	Stakeholder	Representation
B5: Grants for retrofitting vehicles		
B5	The British Association of Removers Limited (BAR)	Asks if the Mayor/TfL has applied for European funding in relation to the London LEZ proposals, concerning the retrofitting of particulate filters or any other relevant development aids, to assist and encourage operators in reaching what may otherwise prove to be very difficult and, for many, unsustainable targets. Understand that a problem exists, which must be tackled, and that UK legislation must comply with the requirements of relevant EU legislation. New vehicles already comply with strict environmental standards under EU legislation and with the proposals being put forward under the London LEZ. This is not the case for older vehicles which were put in place before the improvement in standards and before the LEZ proposals were put forward. Alleviation of cost in any updating or retrofitting exercise is therefore both practical for operators and beneficiary to the environment. However, such matters need to be solved in a sensible, fair and practical way, ideally with the cooperation of professional operators within the industry.
B5	The British Association of Removers Limited (BAR)	As European funding has been made available for environmentally improvement-related transport measures - in Italy and Denmark (& perhaps other EU countries?), it would seem only right that the UK should have at least equal access to funding for schemes similarly aimed at reduction of pollution levels.
B5	London Councils	The introduction of the LEZ will inevitably encourage or require vehicle operators to purchase new vehicles to meet the new higher emissions standards. The purchase of new vehicles is not good for the environment as this will increase the use of non-renewable resources and will also increase pollution due to the manufacturing process. This increase might even wipe out all predicted benefits from the LEZ. Some form of incentives should therefore be given to retrofit vehicles with abatement equipment, as this is a more environmentally sustainable option.
B5	London Borough of Hillingdon	Since the purchase of new vehicles is not good for the environment, increasing the use of scarce resources and increasing pollution during the manufacturing process, incentives should be given to retrofit vehicles with abatement equipment, as a more environmentally sustainable option.
B6: Alternative fuel vehicles		
B6	Consortium of Bengali Associations	There should be some incentive for electric powered vehicles and CNG and hydrogen powered engines.
B6	Royal Institution of Chartered Surveyors	An increase in the use of alternative fuels sources would go some way to reducing carbon emissions but must be coupled with a fundamental shift in transportation modes, mainly to public transport, cycling and walking.
B7: Other incentives for cleaner vehicles		
B7	GLA Conservative Group	Measures to reduce emissions in the long term must be based on positive incentives, and it is unfortunate that this scheme is based

Sub theme	Stakeholder	Representation
		on negative incentives.
B7	Park Royal Partnership	There is a large measure of "stick" in the proposals, without very much in the way of "carrot". We believe that if solutions are to be sustainable, they need to work with the grain of human behaviour. We have a huge economy here in Park Royal that needs protecting and businesses should be incentivized rather than penalized.
B7	The British Association of Removers Limited (BAR)	Whilst still have some concern over reliability/long-term mechanical issues, in respect to retrofitting, feel that encouragement and incentives for operators are a far more practical and cooperative measure than 'blanket' introduction of heavy daily charges and fines for non-compliant vehicles.
B8: Links to other strategies		
B8	London First	It is imperative that all the Mayor's current initiatives aimed at improving air quality are implemented in a holistic manner to ensure maximum benefits. For example, the highest vehicle emission rates for all pollutants occur at the lowest speed of 5km/hr and lowest emission rates occur above 40km/hr. It is therefore essential to reduce congestion to ensure that emissions levels are kept to a minimum.
B8	Transport 2000	Clearly further action is necessary to ensure that London meets air quality standards. We therefore support moves to introduce measures, including traffic reduction measures, to reduce emissions from cars.
B8	Royal Institution of Chartered Surveyors	An increase in the use of alternative fuels sources would go some way to reducing carbon emissions but must be coupled with a fundamental shift in transportation modes, mainly to public transport, cycling and walking.
B8	London Borough of Ealing	Appreciates the detail TfL have gone into in examining other options regarding reducing transport-related emissions and views the LEZ as the most practicable option. However, recognise that other options may be more effective at reducing transport-related emissions.
B8	BAA	Maintaining our current airside vehicle age limits and extension and improvement of the Clean Vehicles programme delivers an effective "emissions limits" on airside vehicles.

Theme C: Business Case

Sub theme	Stakeholder	Representation
C1: Proposed LEZ has a poor business case		
C1	GLA Conservative Group	Asks that the costs are reviewed, and that a clearly favourable cost/benefit ratio be fully established before this scheme is fully implemented.
C1	London First	Transport for London's <i>5-year Investment Programme 2005/06-09/10</i> (December 2005) gave a benefit:cost ratio of 0.4:1 for LEZ. Would like to see an update of the benefit:cost

Sub theme	Stakeholder	Representation
		ratio in view of the decision to exclude NO _x emissions from the scheme, as this poses further questions about its viability.
C1	London Borough of Hillingdon	Concerned about TfL's high financial outlay - £120m until 2015/16 - for the scheme.
C1	London Borough of Harrow	The air quality improvements predicted by TfL for this scheme would appear only to bring forward the improvements in PM ₁₀ by between 2 and 4 years depending on when the scheme would be finally implemented. This would be in comparison with the 'do nothing' situation of allowing the freight fleet to be upgraded naturally. Therefore is the scheme cost effective and offering best value?
C1	Road Haulage Association	Strongly urges the Mayor to abandon the LEZ in its proposed form, as it has become increasingly apparent that there will be a large cost to London ratepayers and to business for very little environmental benefit.
C1	Road Haulage Association	Has previously raised concerns regarding the TfL cost-benefit analysis of the proposals in their original form, in terms of the vehicles to be included. Unfortunately, even after the Mayor's amendments, there is still nothing new or independently verifiable that goes any way to prove that the implementation of the scheme would bring any quantifiable benefit to Greater London that would not be achieved anyway by 2015, in fact the claimed benefits of the LEZ are now less than they were in early 2006.
C1	Road Haulage Association	Believes the LEZ has been shown to be hugely expensive and burdensome for little benefit.
C1	Road Haulage Association	The recent report commissioned by TfL identifies costs of at least £310 million to users of road transport services and we feel this figure further undermines the proposed scheme. Suspects that were this cost and the direct costs of setting up and administering the LEZ better understood by London ratepayers their view of the proposals would change radically.
C1	London Borough of Hammersmith and Fulham	It is clear that the LEZ scheme will not result in any net proceeds as the income from payments or fines will be far less than the implementation and running costs.
C1	Thames Gateway London Partnership	It is noted that the cost of setting up and running the scheme are in excess of the revenue likely to be generated. Seek assurance that TfL have identified the scheme which provides the best value for money and that all costs have been included in the analysis, including costs to local businesses and residents.
C1	The Society of Motor Manufacturers and Traders Ltd	The zone is a complex amalgam of dates, vehicle types, standards and most importantly emissions levels. This will compromise the cost effectiveness and practicality of TfL's plans.
C1	CBI London	Concerned about the cost of the scheme and the low benefit:cost ratio.
C1	Central London Partnership	The projected benefits compared to the high costs are

Sub theme	Stakeholder	Representation
		disappointing.
C1	London Borough of Bexley	The value for money justification for the proposed scheme has still not been clearly established, and at best the cost/benefit analysis appears marginal.
C1	GLA Conservative Group	The consultation states that the costs of the proposed scheme are between £125 million and £130 million, with income estimated at between £30 million and £50 million. Putting aside the clear environmental and air quality benefits, we would continue to question whether this scheme provides rigorous enough value for money, given that it would only run until 2015/2016. For such a cost, a longer-term commitment should be given.
C1	UK local authorities	Asks who will pay for the infrastructure to set this LEZ up.
C2: Assessment of alternatives		
C2	The Association of British Drivers (ABD)	Although in favour of steps to tackle the excessive air pollution in London, particularly from larger diesel engine vehicles, believes the proposed scheme is not justified. The cost is excessive and there would be a few simpler alternatives that would have minimal cost to construct, and no more costs on vehicle operators.
C2	London Borough of Barnet	Given the vital need for investment in London's transport system, has concerns that the costs of implementing the LEZ may not deliver the same level of benefit (both financial and environmental) as investing in other transport schemes. For example, investment of £130m in congestion reduction schemes could help to considerably reduce total vehicle emissions and increase economic efficiency. The Eddington study is particularly relevant in this regard.
C2	Central London Partnership	Has concerns over the cost-benefit of the LEZ, and would like TfL to set out different cost-benefit ratios for different boundaries.
C2	London Borough of Southwark	TfL should undertake a cost benefit analysis to better understand the various circumstances in which the LEZ could operate.
C3: Data presented in the Scheme Order consultation material		
C3	London Borough of Ealing	Still has reservations regarding the overall cost effectiveness of the scheme. TfL suggests that with regards to concentrations of PM ₁₀ the LEZ will effectively bring forward air quality standards by up to 3 or 4 years, in comparison to doing nothing and relying on the natural vehicle replacement cycle. This appears to be less optimistic than previous figures released during the consultation on the draft Transport and Air Quality Strategy Revisions in 2006. In fact whilst the predicted air quality benefits appear to have decreased with the new modelling carried out, the costs of the scheme appear to have actually risen. Also, the range of figures supplied in terms of estimated health benefits (using DEFRA and CAFÉ methodologies) seems very broad and

Sub theme	Stakeholder	Representation
		suggests that making decisions on such Benefit-cost ratios is little better than guess work.
C3	London Borough of Brent	The information submitted also suggests that the cost of the scheme has increased whilst providing less health benefit than previously stated. Whilst appreciates that the number of receptors exposed has also reduced would like to know the other reasons for these differences.
C3	London Borough of Brent	The Economic Impact Assessment study submitted indicates that the estimated cost of implementing the scheme is 20% greater than indicated in the previous consultation documents.
C3	London Borough of Brent	The information submitted also suggests that the cost of the scheme has increased whilst providing less health benefit than previously stated. Whilst we appreciate that the number of receptors exposed has also reduced what are the other reasons for these differences?
C3	London Borough of Hammersmith and Fulham	The estimation of costs seems to have increased significantly. For example, in the last consultation round, the costs to operators of affected vehicles of the core LEZ scheme were estimated at between £195 million and £270 million for the period to 2015/16. If the standard in 2010 was tightened to include Euro IV for NO _x emissions and LGVs were also included in the scheme, the costs to operators would increase to between £250 million and £390 million. However, in the new Economic Impact Assessment study published as part of the latest round of consultation, the total costs associated with making the vehicle fleet compliant would be approximately £300m to £470m (up to 2016). The costs to vehicle operators could therefore potentially be more than 20% higher than previously calculated. There does not appear to be any consideration of the impact that such an increase in the compliance costs could have on the viability of the scheme itself.
C3	London Borough of Barnet	The very wide range of the estimated economic benefit of the scheme (partly dependent on methodology used) is a serious concern. Given the high implementation costs and costs to industry, the economic benefits of the scheme appear to be highly unpredictable.
C3	London Borough of Southwark	The differing cost benefit assumptions within the Scheme Order documentation and that of the background reports creates general confusion over the running costs and the perceived benefits of introducing the LEZ.
C3	London Councils	Supports in principle the concept of an LEZ to help improve London's air quality and meet the EU's Directive on reducing pollutants. However, due to time slippages, the ever-changing cost:benefit analysis of the proposals put forward by TfL, and the lack of a thorough assessment of alternatives, it does raise significant questions about the worth of the scheme, especially considering that similar standards to those proposed in the LEZ are to be introduced across Europe in the near future. Whilst accepting that

Sub theme	Stakeholder	Representation
		London has poorer air quality than many other European cities, and has responsibilities under the EU Directive to take action, the technical aspects of the scheme that are still not yet worked through mean that the cost:benefit analysis presented by TfL is poor.
C3	Royal Borough of Kensington and Chelsea	The figures presented in the Scheme Description and Supplementary Information on costs do not match the cost figures in the assessment presented by SDG. One scenario assumes that operators take the minimum, least cost approach to achieving compliance with the LEZ standards, whilst the SDG approach used market research to analyse the way businesses are likely to respond to the Scheme. The Scheme Description document should have set out both sets of figures rather than purely dismissing the higher set because TfL consider these show operators are taking action that is 'not rational' in an economic sense. If TfL had used the SDG figures, the LEZ benefit to cost ratio would range from 0.3 - 0.6 rather than 0.4 - 0.8. Even using the figures provided, the benefits appear to be fairly marginal compared with costs, particularly with the Defra methodology.
C3	Road Haulage Association	Several additional and pertinent issues have arisen that have had a major influence on the road haulage and distribution sector and have resulted in most of the feasibility study findings becoming largely unrepresentative of the impact that the proposed scheme would have on Greater London and those goods vehicle operators and van users that ply their trade within the proposed zone.

Theme D: Timetable

Sub theme	Stakeholder	Representation
<i>D1: Proposed timetable is correct</i>		
D1	London Borough of Brent	Allows for coaches, buses and lighter lorries (between 3.5 tonnes and 12 tonnes) to be given more time to comply and be brought into the scope of the LEZ from mid-2008. This is a wise approach to take and should ensure that the financial implications associated with the required changes do not have an adverse impact on smaller operators. These could include, for example, Brent Transport Services and Community Transport Operators such as Brent Community Transport. Such organisations are not cash rich and if they had to find immediate funds to use for engine modifications or new vehicles, their core business operations could be affected.

Sub theme	Stakeholder	Representation
D1	London Borough of Brent	By Autumn 2010, the LEZ will be extended to heavier diesel-engine light goods vehicles and minibuses, the lightest LGVs (mainly car derived vans) would be excluded from this stage as they have car-like emissions. This appears to be a reasonable time-frame for light goods vehicles. Such vehicles tend to be operated by very small companies (for example - trades people such as plumbers, builders, electricians).
D1	London Borough of Brent	Allows for the standard for lorries, coaches and buses to be tightened in early 2012 to Euro IV for particulate matter (rather than 2010 as previously consulted on). This changed proposal follows representations that a 2010 start would impose unreasonable compliance costs on vehicle operators. This seems reasonable and will avoid accusations of not giving local businesses and operators of coaches, for example, enough time to comply. Indeed, finding the funding to make the necessary upgrades to larger fleets with small profit margins, could prove a challenge for some organisations.
D1	London Borough of Brent	The LEZ would start with heavier lorries defined as those over 12 tonnes (rather than 7.5 tonnes as proposed in the January 2006 consultation). Indeed, the heavier the vehicle, the larger the engine and mostly (but not always!) the more polluting the engine. However, this is a sensible way of categorising the larger, more polluting vehicles to ensure a shift towards cleaner engines. It also allows the operators of smaller (lighter) vehicles - generally those from smaller organisations, more time to upgrade their vehicles/retro-fit pollution reducing equipment, if they choose to.
D1	City of Westminster	The proposed phasing of the introduction of the first stage of the scheme makes good sense. Supports the new proposal for Euro III/3 for particulates (PM) to be applied to heavier diesel-engine LGVs and minibuses from October 2010.
D1	City of Westminster	Changes to the proposed scheme, such as delayed introduction of the Euro IV/4 requirement, have contributed to producing predicted reductions in air pollution that are not as good as those forecast at the time of the previous LEZ consultation. However, recognises that the scheme as now proposed will have benefits in accelerating improvements in air quality in London, beyond improvements that would take place for other reasons. For this reason supports the scheme commencing from February 2008.
D1	Environment Agency	Agrees with the proposed timetable. This gives fleet operators time to comply.
D1	Environmental Industries Commission	Agree that the LEZ legislation, on the basis of impact and practicality, must start with heavy-duty diesel vehicles. Even though the manufacturers of diesel engines for trucks and buses have made great progress to reduce their emissions, driven by increasingly stringent European legislation, the inherent longevity of these engines and vehicles means that the problems of pollution from older diesel engines will

Sub theme	Stakeholder	Representation
		remain with us for some years.
D1	Environmental Industries Commission	With regard to the delay of this second phase of the LEZ from 2010 to 2012, note that this will allow many fleet operators to comply as a consequence of their natural vehicle replacement cycles, normally 5 to 6 years. This should address the concerns of many of these operators.
D1	British Vehicle Rental and Leasing Association (BVRLA)	Pleased that some of previous comments have been taken on board especially with regards to delaying the introduction of the Euro IV standards for trucks to 2012, albeit this has made the introductory process more complicated with the number of different introductory dates.
D1	London Borough of Hackney	The revision to have Euro 4 engines by 2012 rather than 2010 is accepted as this gives reasonable amount of time for Hackney and other operators to renew its fleet.
D1	London Borough of Lewisham	The staged introduction of the Euro III standard in 2008 will have a negative net effect on Lewisham as all its vehicles will already be compliant, but it will allow more time for commercial operators to comply with the LEZ.
D1	London Borough of Newham	The revised 2012 target for Euro IV compliance is welcomed as giving operators more time to adapt as compared with the original target of 2010.
D1	Association of International Courier and Express Services (AICES)	Welcomes the decision to defer the introduction of the Euro IV standard from 2010 to 2012.
D1	CBI London	Welcomes the deferral of the Euro IV standard to 2012.
D1	Central London Freight Quality Partnership	Welcomes the deferral of the Euro IV standard to 2012.
D1	Federation of Small Businesses	Welcomes TfL's decision to move the commencement date of vehicles meeting Euro 4 emission standards from January 2010 to January 2012. Businesses will benefit from a greater period of time to comply with vehicle standards at Euro 4.
D1	London Borough of Lewisham	All Lewisham's vehicles will meet the Euro IV in 2012 requirement, with the exception of 30 large buses and a mobile library. The mobile library service will be discontinued in 2007 following a major redevelopment of the central library. The large buses will be replaced during 2007/08 and will therefore be compliant.
D1	London Borough of Havering	If the business community expresses concerns, the Mayor should consider phasing the introduction of the LEZ to allow businesses more time to adapt.
D2: Proposed timetable is premature		
D2	Federation of Small Businesses	From now to January 2008 is an insufficient and unfair period of time to introduce the scheme.
D2	Federation of Small Businesses	Industry sources suggest that 50% of all lorries come into London at least once a year. Concerned that members from across the UK will drive up to London in February 2008 and will be alarmed to see a sign alerting them to a charge of £200 for entering a zone, for which they had no prior

Sub theme	Stakeholder	Representation
		knowledge. 57% of operators have a one-vehicle fleet and so many will not be a member of a big trade association such as the Road Haulage Association, therefore the majority of small operators, who will be hit hardest by the scheme order, will lack any knowledge or understanding of the scheme. TfL has a responsibility to organise a national campaign to better inform operators as to the potential costs of the LEZ scheme. Strongly urges TfL to shift the date of implementation back by 6 months to enable businesses to have time to prepare.
D2	St John Ambulance, London (Prince of Wales) District	Fully committed to making vehicles as environmentally friendly and modern as possible, and replacement choices made with this firmly in mind. With likely Olympic commitments will be undertaking a more determined replacement programme before 2012. As a charity, mindful that such replacements have to be made with due regard for the effective use of charitable funding. It would be impossible to fully replace the fleet within the timescales given.
D2	London Borough of Islington	Large vehicles are being penalised first when in proportion to their carrying capacity, are relatively sustainable. By not targeting 3.5 tonnes until 2010, this could force suppliers into smaller vehicles causing more pollution and congestion on London's roads.
D2	London Borough of Islington	In 2005, before this consultation period began, bought vehicles with Euro 3 engines, the best available at the time on these models. These vehicles cost about £130,000 and were planned to be in use for 8 to 10 years. But in 2010, just 5 years on, this will require further retro-fit and then again in 2012 if Euro 5 is required by then.
D2	London Borough of Islington	Runs some very specialised equipment that at present may take between 6 and 8 months from time of ordering to PDI and delivery. TfL have informed us that the period between final decision post consultation and implementation of the LEZ is likely to be as little as nine months. This simply does not leave any window for getting new vehicles in
D2	London Borough of Islington	The timetable does not allow for a staggered replacement programme to prevent cost spikes.
D2	London Borough of Islington	The timetable does not account for the increased demand on new vehicles that manufacturers may not be able to meet.
D2	Royal Mail	The timescale proposed is problematic for commercial operators. The average life span of a truck is between 5 and 8 years, and under the scheme vehicles just over 6 years old in 2012 will not be acceptable. This places a high cost burden on operators.
D2	Guild of British Coach Operators	The proposed introduction date of July 2008 for coaches is likely to cause difficulties as it falls in the middle of the industry's busiest period. A more logical date would be September 2008. Once the season is over, older (non-compliant) vehicles are likely to be parked up or withdrawn

Sub theme	Stakeholder	Representation
		rather than being retrofitted to meet the new standards. It is therefore logical to do so at the end of the period rather than midway through that peak season.
D2	Hertfordshire County Council	Concerned that the provision of some home to school services across the boundary will not be sustainable. These journeys are very short, and take place only in the morning and the evening. The additional costs could therefore not be borne either by parents or by the local authority. These routes are primarily run by smaller operators with less ability to bear compliance costs. To allow operators and local authorities to adapt, the LEZ should be introduced at the end of the academic year, not the end of July.
D2	London Borough of Hackney	Concerned that some parts of the scheme are proposed to be implemented in 2008 and fleet managers are not yet fully clear as to requirements (note how long it takes for us to acquire vehicles).
D2	Road Haulage Association	Autumn 2010 is too early for introduction of Euro III/3 standard for PM for heavier vans and minibuses.
D2	Covent Garden Market Authority	Most of the businesses based at New Covent Garden Market are small and medium sized enterprises. Implementation of the LEZ for HGVs between 3.5 and 12 tonnes by mid 2008 may not allow these companies sufficient time to update their vehicles or fit them with the appropriate equipment.
D3: Proposed timetable commences too late		
D3	London Borough of Lambeth	Oppose the deferral of the Euro IV standard from 2010 to 2012, as it will reduce the impact of the LEZ on air quality.
D3	London Borough of Lambeth	Would support the inclusion of LGVs and minibuses from 2008, rather than 2010, subject to further analysis of the impact on small businesses.
D3	London Borough of Ealing	Encourage the introduction of the Euro IV standard for PM earlier than 2012 as it is assumed that this will bring about reductions in PM emissions much sooner than the projections identified by TfL in section 2.34.
D3	London Liberal Democrats	Whilst supports the Euro standards approach as a means to determine vehicle emissions levels, is disappointed that the Scheme Order proposes to delay the introduction of the Euro IV standard for heavier vehicles from 2010 to 2012. Urges the Mayor to reconsider and to revise the Scheme Order to require all HGVs, buses and coaches to be compliant with Euro IV standard from 2010.
D3	London Liberal Democrats	The modelling provided in the consultation shows that the greatest improvements in levels of particulates will be made in 2012, with the move to Euro IV, with the area predicted to exceed annual particulate objectives at that time reduced by 16.2%. Whilst costs to businesses are an important consideration, we believe this shift is justification enough to bring forward the deadline, and to require compliance with Euro IV in 2010. Given that all London buses were compliant

Sub theme	Stakeholder	Representation
		with Euro IV standard in 2006, it seem unduly lenient to wait six years before requiring other traffic to be at an equivalent standard.
D3	City of Westminster	Concerned at the proposed deferment of the Euro IV/4 PM ₁₀ requirement for two years, from 2010 to 2012. This would prolong excess levels of pollution and reduce the potential benefits of the LEZ scheme. This also reduces the incentive for fleet managers to 'leapfrog' Euro III/3, by choosing a Euro IV/4 vehicle when replacing a Euro I or II vehicle.
D3	City of Westminster	The main function of the LEZ is to accelerate procurement of vehicles of higher Euro-vehicle standards, in advance of what would be required otherwise. The effect of this delay in implementation would be to leave wider areas of London, particularly in central London and Westminster, with higher levels of pollutants for longer.
D4: Confusion over phased introduction of the Scheme		
D4	Federation of Small Businesses	The single implementation date of 1st July 2008 will make it easier for businesses to comply and not get confused by a plethora of dates. A single date will enable businesses to have more time to understand the monitoring and enforcement aspect of the scheme. The failure to fully consult with business obliges Transport for London to spend the period from February 2008 to July 2008 to: <ul style="list-style-type: none"> • use better marketing tools to inform the public of the scheme • win back business support by issuing a pilot period with no penalties. Letters can be distributed to those operators who would have been fined if the scheme was live.
D4	Federation of Small Businesses	A fully marketed scheme, with a single commencement date, giving operators a much needed extra period to comply would make the LEZ a slightly easier burden to bear for small businesses.
D4	Federation of Small Businesses	The LEZ system is due to go live in February 2008 for heavier lorries exceeding 12 tonnes. Lighter goods vehicles, buses and coaches (between 3.5 tonnes and 12 tonnes) will be included in the scheme in July 2008. A fairer and less complicated way of introducing the scheme would be to have a single commencement date of the 1st July 2008 for all of the vehicles mentioned above.
D4	Federation of Small Businesses	Having two implementation dates in 2008 will be confusing for operators, especially those who have vehicles of difference sizes, some of which will be within scope in February, and others which will be within scope in July. Therefore proposes a common start date of July 2008 for all coaches and vehicles over 3.5 tonnes.
D4	British Vehicle Rental and Leasing Association (BVRLA)	Pleased that some of their previous comments have been taken on board especially with regards to delaying the introduction of the Euro IV standards for trucks to 2012 albeit this has made the introductory process more

Sub theme	Stakeholder	Representation
		complicated with the number of different introductory dates.
D5: Future of the LEZ		
D5	London Borough of Hammersmith and Fulham	2015/16 appears to be the end date used in the calculations on cost/benefits etc in the supporting information, but there is no indication of what could happen next – short of including cars at some point in the future – despite the Scheme Order's provision for the LEZ to run indefinitely.
D5	British Vehicle Rental and Leasing Association (BVRLA)	Members have also asked us to ensure that if there are any plans to change or tighten up the standards of the LEZ in the future these are communicated well in advance and give Members plenty of chance to plan accordingly. This is something which works very well in the company car tax regime where we are alerted of changes to the banding three years in advance of implementation to ensure businesses can plan accordingly.
D5	Central Council of Physical Recreation (CCPR)	It is to be assumed that the improvements to vehicle emissions will be an ongoing process of which London will wish to take full advantage. Therefore, is it to be expected that all the clubs that fit filters or buy compliant vehicles will be expected to upgrade again within a relatively short timeframe? Those clubs who do find the resources to buy new vehicles will be expecting a good return on their investment, with the British Universities Sports Association (BUSA) estimating that universities expect at least ten years service from a vehicle and many other community clubs requiring double that.
D5	The Association of British Drivers (ABD)	Opposes the proposition that the scheme should be indefinite. See no good reason to extend it beyond 2015 when air pollution levels should have substantially improved, and the parameters of the scheme will certain require major reconsideration.
D5	London Borough of Newham	Work on the future beyond 2012 needs to be continued to consider new standards and the extension of the scheme to other vehicles if it proves to be beneficial.
D5	City of Westminster	Considers that a subsequent date needs to be set for Euro IV/4 to be applied to heavier diesel-engine LGVs and minibuses, as the lifetime of the LEZ is indefinite.
D5	GLA Conservative Group	The consultation states that the costs of the proposed scheme are between £125 million and £130 million, with income estimated at between £30 million and £50 million. For such a cost, a longer-term commitment should be given.
D6: Other timetable issues		
D6	Covent Garden Market Authority	A separate study into transport movements between London's wholesale markets is currently being carried out and suggests that the findings of this study should be taken into account. However, the proposed timetable for implementation of the Low Emissions Zone in February 2008 may not allow for this.

Sub theme	Stakeholder	Representation
D6	London Fire & Emergency Planning Authority (LFEPA)	The proposal to tighten the emission standards from Euro III to Euro IV in 2012 will have a severe impact on the LFEPA fleet unless there is a phased introduction of those standards over a number of years. Our fleet of heavy diesel engine vehicles will be predominantly Euro III and these vehicles will only be between four and eight years old in 2012. The oldest of those vehicles will not be scheduled to be replaced until 2016 the youngest not until 2020.
D6	West Sussex County Council	Suggests that TfL widely publicise the proposals as soon as possible in order that small operators outside London can become aware of the scheme to comply. With sufficient warning small operators not based in London can take necessary actions to avoid paying a daily charge or penalties unexpectedly and allow for the LEZ in their future general business and financial planning.
D6	West Sussex County Council	Asks whether it is practical to allow heavy vehicle operators with 5 older vehicles or fewer more time to modify or buy new vehicles by temporarily registering one or more of their vehicles for use in the LEZ without charge.
D6	London First	The LEZ is being implemented within a very short time frame, with minimum notice for operators to meet the new standards. In addition to the large-scale publicity campaign, the scheme should be shadow run for six months in advance of each implementation stage in order to raise awareness and understanding of the charging and penalty process. This would also give operators the fullest opportunity to take any necessary action to ensure their vehicles are compliant ahead of the introduction of the scheme.
D6	Federation of Small Businesses	A period of leniency between January 2008 and July 2008, to inform business of the LEZ scheme, would be fairer than penalizing them with a charge or a fine for a scheme that they were not properly consulted on.
D6	St John Ambulance, London (Prince of Wales) District	Requests that detailed discussions are undertaken to identify an achievable timetable for the fleet replacements needed to achieve the necessary emission standards. Believe there is a strong and special case for review of deadlines.

Theme E: Vehicles to be included

Sub theme	Stakeholder	Representation
<i>E1: Agree with vehicles included in the LEZ</i>		
E1	Environment Agency	Agrees with the vehicles to be included.
E1	Royal Borough of Kingston upon Thames	The vehicle types that will be targeted (or exempted) represent a reasonable cross section of the most polluting vehicles in London.

Sub theme	Stakeholder	Representation
E1	City of Westminster	Continues to support the proposal that the initial stage of the LEZ scheme should concentrate primarily on the most polluting vehicles: Heavy Goods Vehicles (HGVs), buses and coaches.
E2: Vehicles to which the LEZ should apply		
E2	London First	As the Mayor's Taxi Emission Strategy says, taxis must meet Euro III standards from July 2008. The London Atmospheric Emissions Inventory 2002 Report shows that taxis were predicted to be responsible for producing 3.3% more emissions than lorries, buses and coaches combined. Therefore, in order to maximise the benefits of this scheme, standards for taxis should be tightened to Euro IV to bring them in line with HGVs, buses and coaches.
E2	London First	The current proposal only targets the source of approximately 51.7% of PM ₁₀ emissions in central London. Cars and light goods vehicles are responsible for 39.4% of PM ₁₀ emissions. If the LEZ is to achieve its full potential in improving air quality all vehicles need be to covered by LEZ
E2	Friends of the Earth	All vehicles should be included in the LEZ. Should a decision be made to exclude any of the categories, we recommend that plans be put in place to include them at the earliest opportunity. To that end TfL must annually review (taking into account all new information and trends) whether and when such vehicles could be included.
E2	London Borough of Ealing	Considers that there are a larger number of heavier LGV vehicles serving retail and other outlets in London and suppliers may look to the use of these vehicles in place of HGVs when the HGV requirements come into force from February 2008. Would welcome the requirements for heavier LGVs to be introduced earlier than the planned October 2010.
E2	London Borough of Ealing	Whilst the inclusion of cars in the LEZ could be viewed as a best-practice scenario, would strongly recommend local authority and public stakeholder consultation on this proposal, as and when relevant and appropriate information becomes available.
E2	London Borough of Hammersmith and Fulham	There appears to be a discrepancy between the information on integration of LGVs into the scheme as presented in the public consultation leaflet, and that presented in the other supporting documents: Public leaflet: "The proposed LEZ standards could also potentially be extended to cover diesel-engine LGVs (vans) from 2010, subject to further analysis of the costs and benefits of doing this. Before making a final decision on these extensions to the proposed LEZ, TfL would consider the practical and financial implications of this as well as the views of stakeholders." Scheme description and supplementary information document: "During the public and stakeholder consultation on the Mayor's Strategy revisions in 2006, many

Sub theme	Stakeholder	Representation
		representations were received providing arguments for and against including LGVs in the LEZ scheme. On balance, taking into account likely costs to operators and the expected air quality benefits that including diesel-engine heavier LGVs and minibuses in the LEZ would achieve, the Mayor decided to include LGVs and minibuses in the scheme from 2010."
E2	London Borough of Hammersmith and Fulham	Cars are not part of the current scheme, but TfL are going to look at the possibility of including them at a later date. Is there any indication of when this assessment will be carried out and if there is any timeframe in mind for the expansion of the LEZ to include cars?
E2	Association of International Courier and Express Services (AICES)	Since cars are the single most environmentally damaging group, not clear how their exclusion is consistent with delivering low emissions.
E2	Asthma UK	Pleased that the Mayor has asked TfL to look at the implications of potentially including cars and lighter vans at a later stage.
E2	Brewery Logistics Group	While HGVs are the biggest polluters per vehicle mile, cars are by far and away the largest number of vehicles operating in London (90+%) and therefore create more pollution overall. It is therefore essential if any real benefit is to be achieved that "vote winning cars" are included in the new scheme, surely if living in London, residents would realise the overall benefits for their health and well being and that they should be included in the scheme. Also do they realise that if it was not for the commercial vehicle their quality of life would soon diminish?
E2	CBI London	Concerned that the scheme targets commercial vehicles while ignoring cars, which are the vast majority of the vehicle population.
E2	Central Council of Physical Recreation (CCPR)	12-16 seat minibuses are primarily used by community groups and voluntary/ charitable/not-for-profit organisations, and constitute only a small part of the overall dangerous particle emissions compared to commercial companies. Furthermore, whilst it is hoped that commercial fleets will be able to absorb the additional costs, including minibuses in the scheme will affect the most vulnerable groups in the Capital
E2	Central London Freight Quality Partnership	Urges the inclusion of cars in the scheme.
E2	Central London Partnership	Not enough information on the impacts of including LGVs within the scheme is provided.
E2	Central London Partnership	Recommends the inclusion of private cars within the LEZ in the future, as they are responsible for nearly 40% of emissions of PM ₁₀ from road vehicles.
E2	City of Westminster	Welcomes the inclusion of heavier LGVS and minibuses from 2010.
E2	City of Westminster	Accepts that lighter LGVs will need to be considered alongside cars in a future development of the LEZ.

Sub theme	Stakeholder	Representation
E2	City of Westminster	Welcomes the commitment the Mayor made when he confirmed the Strategy Revisions, that TfL should look into the possibility of including cars in the LEZ at a later date. However, a commitment of this kind needs a date by which the investigation should be done. It appears that no action is currently being taken on this and that there is no clarity about when work will start on this assessment. Asks for assurance of a date when this work will begin and a target date for a report to be produced.
E2	City of Westminster	Continues to support the proposal that the initial stage of the LEZ scheme should concentrate primarily on the most polluting vehicles: Heavy Goods Vehicles (HGVs), buses and coaches.
E2	City of Westminster	Welcomes the inclusion of heavier LGVS and minibuses from 2010.
E2	City of Westminster	Recognises that the Mayor's Taxi Emissions Scheme has the same aims as the LEZ, but it has experienced some slippages in its implementation. There is a risk that this separate regime for taxis might, in future, diverge from and be seen to be separate from development of the LEZ, even though it is currently delivering significant improvements. The Taxi emission scheme should become an integral part of the LEZ scheme.
E2	City of Westminster	Private hire vehicles ('mini-cabs') should be subject to the same LEZ requirements as licensed taxis. Recognise the complexities of adding to the LEZ scheme private hire vehicles other than taxis. But we remain concerned that this is a loophole that provides an unwarranted commercial advantage.
E2	Confederation of Passenger Transport (CPT)	Notes that the Mayor is looking at arrangements to bring cars into the scope of the scheme, which would address one of the main objections of members to the scheme as currently proposed.
E2	Consortium of Bengali Associations	Considers that the LEZ should apply to lorries, buses, coaches, all LGVs, minibuses, SUVs and diesel cars.
E2	Environment Agency	Supports inclusion of LGVs.
E2	Environmental Industries Commission	Believes that it is appropriate that the range of vehicles should be expanded to include light commercial vehicles and other vehicles, as required, to meet air quality limit values. The retrofit technologies required to make these vehicles compliant are already being introduced to the market.
E2	Environmental Industries Commission	Welcomes the fact that the relevant vehicle types for the LEZ have been specified according to their European classification.
E2	Freight Transport Association	Feels very strongly that the freight industry is being targeted as the biggest polluter, whilst other major sources of particulates, specifically cars, are missing from the scheme altogether.

Sub theme	Stakeholder	Representation
E2	Guild of British Coach Operators	By excluding cars, the single largest groups of road vehicles contributing to pollution are excluded.
E2	Healthy Southwark Partnership	Supports the possibility of including high polluting cars into the LEZ scheme at a later date, as suggested in the Scheme proposal.
E2	London Ambulance NHS Trust	LEZ should apply to lorries, buses, coaches, heavier LGVs only and SUVs.
E2	London Borough of Barnet	Notes that TfL have been asked to give consideration to extending the LEZ to encompass cars and smaller LGVs in the future. Since the consultation to date has concentrated on larger vehicles primarily (though not exclusively) those operated commercially, believe that a far more extensive consultation should be carried out before any proposals to include cars and smaller LGVs are pursued beyond the most basic feasibility stage.
E2	London Borough of Barnet	Has concerns regarding the inclusion of minibuses in the proposed scheme. Many minibuses are operated by schools, charitable organisations or the voluntary sector and provide invaluable transport for vulnerable or disadvantaged groups. The use of minibuses should be seen as desirable where the alternative would be for larger numbers of private cars to be in use.
E2	London Borough of Bexley	Heavier Light Goods Vehicles (1.2 to 3.5 tonnes) was not part of TfL's original LEZ proposals and has been included at a late stage. We object to their inclusion until a full assessment on the impact of including this vehicle type has been completed.
E2	London Borough of Bexley	Minibuses (8 plus passengers) were not part of TfL's original LEZ proposals and has been included at a late stage. We object to their inclusion until a full assessment on the impact of including this vehicle type has been completed.
E2	London Borough of Brent	The LEZ would start with heavier lorries defined as those over 12 tonnes (rather than 7.5 tonnes as proposed in the January 2006 consultation). Indeed, the heavier the vehicle, the larger the engine and mostly (but not always!) the more polluting the engine. However, this is a sensible way of categorising the larger, more polluting vehicles to ensure a shift towards cleaner engines. It also allows the operators of smaller (lighter) vehicles - generally those from smaller organisations, more time to upgrade their vehicles/retro-fit pollution reducing equipment, if they choose to.
E2	London Borough of Brent	Allow for coaches, buses and lighter lorries (between 3.5 tonnes and 12 tonnes) to be given more time to comply and be brought into the scope of the LEZ from mid-2008. This is a wise approach to take and should ensure that the financial implications associated with the required changes do not have an adverse impact on smaller operators. These could include, for example, Brent Transport Services and Community Transport Operators such as Brent Community Transport. Such organisations are not cash rich and if they

Sub theme	Stakeholder	Representation
		had to find immediate funds to use for engine modifications or new vehicles, their core business operations could be affected.
E2	London Borough of Brent	By Autumn 2010, the LEZ will be extended to heavier diesel-engine light goods vehicles and minibuses, the lightest LGVs (mainly car derived vans) would be excluded from this stage as they have car-like emissions. This appears to be a reasonable time-frame for light goods vehicles. Such vehicles tend to be operated by very small companies (for example - trades people such as plumbers, builders, electricians).
E2	London Borough of Brent	Welcome the proposal to consider diesel-engine minibuses for inclusion within the LEZ at the same time as the heavier LGVs. It is vital that the potential economic impacts of their inclusion do not significantly disadvantage sectors of the community. Further investigation must be undertaken to ensure that this is conducted prior to implementation of the Scheme Order.
E2	London Borough of Hackney	Concerned that the LEZ does not immediately address light vans and cars.
E2	London Borough of Harrow	The effects on larger goods vehicle operators' business has been considered by TfL. They believe with natural turnover of fleet operators believe that the 2008 conditions will be met. However, it is important that further consultation for LGVs in 2010 would be carried out before the scheme is implemented.
E2	London Borough of Hillingdon	Agrees that LEZ should apply to lorries, LGVs, buses and coaches.
E2	London Borough of Hillingdon	The inclusion of minibuses in the LEZ scheme needs further investigation in regard to the financial implications for small businesses, community transport providers and schools. Financial support would need to be offered to help with retrofitting and compliance
E2	London Borough of Hillingdon	Concerned that the scheme will not cover 4X4s.
E2	London Borough of Islington	The non-inclusion of cars is stated as being for socio-economic reasons but feels that great air quality benefits would be met with the inclusion of cars with certain exceptions where genuinely applicable.
E2	London Borough of Islington	Why target 7.5t GVW when this equates to just 7% of London's transport? If the only reason (as stated by TfL in the Association of London Transport Officers private meeting on the LEZ) for not including cars is for socio-economic reasons then perhaps TfL should instead levy a tax or restrict highly-polluting SUVs and sports cars with superchargers.
E2	London Borough of Lambeth	Consideration should be given to including cars within the LEZ, as they account for large percentages of emissions of PM ₁₀ and NO _x . A progressively implemented scheme would avoid the need for mass retrofitting of abatement equipment

Sub theme	Stakeholder	Representation
		but would encourage the replacement of older vehicles at an early stage.
E2	London Borough of Lewisham	The inclusion of heavier vans will have a negative net effect on Lewisham, as all its vehicles will already be compliant in 2010.
E2	London Borough of Lewisham	The inclusion of minibuses will have a negative effect on Lewisham, as all its vehicles will already be complaint in 2010. However, it will allow schools and voluntary organisations which operate minibuses more time to comply.
E2	London Borough of Merton	Is still concerned that the lightest LGVs are excluded but understands that the scheme needs to tackle the most polluting vehicles first.
E2	London Liberal Democrats	Welcomes the commitment to investigating the implications of including polluting cars within the LEZ at a later date. London should monitor the progress of LEZs being implemented in other cities, such as Berlin, which have incorporated cars and petrol vehicles.
E2	Mark Field MP	The advent of increasing numbers of buses in London must be seen as one of the reasons why air pollution has increased in the Capital. Initiatives to discourage the most polluting diesel engines in London have still to be implemented while central London residents are continuing to be penalised for having cars at home.
E2	Metropolitan Police Service	The proposed extension of the application of the LEZ to heavier LGVs and minibuses could present a problem as operate a greater number of vehicles in these categories. However do not consider these problems insurmountable.
E2	Mobilise Organisation	Concerned that a small group of disabled vehicle users could be unfairly hit by the Low Emission Zone policy. It is unclear whether private cars constructed by converting a light goods vehicle might be caught by the regulations. The type of base vehicle would typically be a Volkswagen Transporter, Ford Transit, Mercedes Vito, Mercedes Sprinter or similar. 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 case 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. Because of the massive cost of such vehicles they are often used for more than 10 years before they can be replaced. To make such vehicles subject to a financial penalty for use in the LEZ would be grossly unfair and would deprive some disabled people of their mobility.
E2	Park Royal Partnership	The number of vehicles being targeted is relatively low and consequently the projected level of improvements in air quality to be achieved is questionable, until all sources of emissions are considered, including private cars.
E2	Road Haulage Association	LEZ should apply to HGVs, buses, coaches, all LGVs, minibuses, SUVs, diesel cars, petrol cars and motorcycles.

Sub theme	Stakeholder	Representation
E2	Royal Borough of Kingston upon Thames	As emission standards for different vehicles have been confined to PM ₁₀ , welcomes the timing of including LGVs and minibuses.
E2	Royal Borough of Windsor and Maidenhead	Coach travel offers a very competitive alternative to trains (as trains are very expensive and unreliable). We are aware that an increasing number of old and highly polluting vehicles are operating to and from London and the borough, also coaches normally travel more and at a higher speed than HGVs. London has possibly the busiest coach traffic in the country and it would be more appropriate to prioritise and regulate this sector.
E2	Royal College of Nursing	In the longer term, we would also seek reassurance that these proposed measures will not be detrimental or cause transportation difficulties for the many nurses who travel around London to get to work, who work in community settings and who deliver essential services to community patients.
E2	Royal Mail	The proposed scheme unfairly targets just 6% of the London vehicle population - the 94% made up of cars will not be included. This is despite the fact that commercial vehicles over 3.5 tonnes are responsible for just 16% of road transport emissions of PM ₁₀ and cars for 39%. Cars should be included if the purpose of the scheme is to improve air quality and reduce emissions.
E2	Royal Mail	The LEZ should apply to diesel cars, petrol cars, lorries, buses, coaches, all LGVs, minibuses, SUVs and motorcycles.
E2	Thames Gateway London Partnership	Cars are currently exempt from the LEZ, however would welcome further investigation into future phasing to include such vehicles, in order that air quality can be further improved in London and greater health benefits felt.
E2	The Association of British Drivers (ABD)	The latest proposals suggest that "TfL is to look at the possibility of including cars in the LEZ at a later date". Opposed to any inclusion of cars within the scheme, although the Scheme Order does not seem to include any such provision in any case.
E2	Transport 2000	Should apply to all vehicles

E3: Motorcaravans, Hearses and Ambulances

E3	Ambulance Service Association	Disappointed that TfL has decided to propose this change having previously advised at the time when the proposals were first issued for consultation and ASA has sought clarification on the matter, that ambulance would not be included. The amended proposals were advised to the London Ambulance Service but as far as ASA is aware neither this association nor the NHS ambulance services from outside of London, who will be affected, were told of the changes.
E3	Ambulance Service Association	Concerned by the proposal to extend the LEZ to cover NHS ambulances and urge that this proposal is dropped.

Sub theme	Stakeholder	Representation
E3	St John Ambulance (Kent)	Newest ambulance is now 5 years old but have other vehicles that are quite old. Although based in Kent, regularly run casualties from Brands Hatch into Queen Mary's Hospital Sidcup and Kent's mobile treatment unit (registered in 1984) covers most of its annual mileage when taken to Erith for its annual service & MOT, it did less than 30 miles during 2006.
E3	South East Coast Ambulance Service NHS Trust (SECAMB)	Some of the area dependent upon SECAMB is located within the proposed LEZ. Light Commercial Vehicles operated by the Trust fall into category N2 Ambulance vehicles between 3500 – 12000 kilograms gross vehicle mass. Although ambulances are replaced regularly, because of the high cost of replacement, they are operated for a maximum life and it is envisaged that the Trust would still be operating some non compliant LEZ Scheme Order vehicles in July 2008 when the LEZ scheme is due to be implemented for this class of vehicle. Therefore if the proposed LEZ scheme order is implemented some ambulance vehicles operated by the Trust will attract LEZ charges if operated in the zone.
E3	South East Coast Ambulance Service NHS Trust (SECAMB)	Operates a small number of highly specialist major incident vehicles. Because of the high procurement cost and the very low annual mileage, these vehicles are not replaced frequently, and although they are in excellent condition they are old. These vehicles are only deployed to major incidents when required and replacement for the purpose of reducing emissions is neither practical nor economically viable.
E3	The Caravan Club	The proposed amendment to the LEZ Scheme Order is fundamentally flawed in its placing of motor caravans in a vehicle category other than M1. Paragraphs 2(d), 2(e), 2(f) and 2(g) state that motor caravans can form part of vehicle categories N1, N2 and N3. This is incorrect. The UN ECE document 'Classification and Definition of Power-Driven Vehicles and Trailers' provides a definition of a motor caravan as a special purpose M1 category vehicle constructed to include accommodation space with specified equipment. This equipment should be rigidly fixed to the living compartment; however, the table may be designed to be easily removable.
E3	The Caravan Club	While it is likely that the base vehicle on which most motor caravans are constructed would fall into one of the 'N' categories, once conversion to a motor caravan has taken place, the vehicle moves to category M1, irrespective of its size, weight, engine capacity etc, which means that in classification terms it becomes a 'motor car'. It has been stated in the LEZ proposal that it is not intended to include cars in the LEZ at this stage.

Sub theme	Stakeholder	Representation
E3	The Caravan Club	Not convinced that owners and potential owners of specific models of motor caravan will have easy access to the relevant information needed to judge whether their vehicle is compliant with the LEZ requirements or not. As an example, the current VCA CarFuelData website lists only one diesel engine option (2.3l) for the pre-2007 Fiat Ducato (the most common motor caravan base vehicle choice), when in fact two further engine choices were commonly specified (2.0l and 2.8l).
E3	The Caravan Club	The proposal is stated as aiming to target 'heavier diesel engine motor caravans ambulances and hearses'. By our estimate, the defined weight threshold at which vehicles would potentially become compliant (2500kg) would include over 98% of all motor caravan models currently available in the UK. In effect, all motor caravans are therefore potentially within scope, and not merely the 'heavier' ones.
E3	The Caravan Club	For the 12% of motorcaravan owners who own no other vehicle, the western edge of the LEZ would in effect prohibit them accessing Heathrow airport by road.
E3	City of Westminster	Agree with proposal that motor caravans, ambulances and hearses – that in other respects are comparable to the LGVs and HGVs are covered by the Scheme Order – should not be exempt vehicles in relation to the LEZ.
E3	City of Westminster	Recognise that some may consider that ambulances and hearses should be treated as special cases. There is as strong a case for these to have cleaner emissions as there is for other vehicles. After all, the prime purpose of the LEZ is to benefit the health of Londoners.
E3	City of Westminster	In respect of motor caravans, it seems as appropriate to require cleaner exhausts from such vehicles as it is for other van types of the same power and weight.
E3	London Borough of Hillingdon	Welcomes TfL providing additional clarity to the scheme by making explicit the inclusion of motor caravans, ambulances and hearses.
E3	Society of Motor Manufacturers and Traders' Motorhome Forum	Seeks reconsideration of inclusion of motor caravans in LEZ because the numbers of motorhomes in London is very small: The overall number of motorhomes in use in the UK is 136,000 out of total parc of some 30 million vehicles.
E3	Society of Motor Manufacturers and Traders' Motorhome Forum	Motorhomes are leisure vehicles, not commercial ones: their inclusion in the proposed LEZ has major implications for their owners, private individuals, not businesses. The economic implications for owners who live within London boroughs cannot be compared to a business that has the option to replace, renew, move or upgrade.
E3	Society of Motor Manufacturers and Traders' Motorhome Forum	Motorhomes travel very low mileages: the average mileage travelled by motorhomes is about 6,000 miles per annum, close to fifty percent of all other vehicles, and considerably less than commercial vehicles.
E3	Society of Motor Manufacturers and Traders'	Motorhomes are used sparingly in urban environments: anecdotal evidence suggests that the motorhomes are not

Sub theme	Stakeholder	Representation
	Motorhome Forum	extensively used in urban environments.
E3	Society of Motor Manufacturers and Traders' Motorhome Forum	The age of the motorhome parc is high: motorhomes have a very long life span compared to all other vehicles. The SMMT estimates that, at most, 50% of the parc is under 10 years old; of the other half 35% are thought to have been registered before 1991, many of these dating back to the 1980s and before.
E4: Other vehicles to be included issues		
E4	London Borough of Ealing	Would like to know why standards have not been introduced for petrol engine HGVs and other vehicles identified as part of the scheme. Fleet operators may opt for petrol-driven vehicles in order to become exempt.
E4	Central London Freight Quality Partnership	Welcomes the inclusion of heavier LGVs and minibuses. But unclear how the difference between an LGV and some estate cars will be identified on the street or from the DVLA log book. Suggests a simplification by including all van type vehicles with panels instead of windows and pick ups.
E4	London Borough of Hillingdon	Privately owned large vehicles such as motorhomes need to be mentioned as part of the LEZ.
E4	London Borough of Hillingdon	Concerned that other forms of transport such as trains and planes will not be covered by the scheme.
E4	London Borough of Hounslow	As Heathrow Airport is one of the largest sources of emissions immediately to the west of Hounslow, clarification is requested as to whether the Heathrow airside vehicles are included or exempt. Airside vehicles do not leave the airport boundary but still contribute to poor air quality.

Theme F: Proposed LEZ emission standards

Sub theme	Stakeholder	Representation
F1: Euro standards versus an age-based scheme		
F1	Central London Freight Quality Partnership	Doubts the effectiveness of identifying Euro IV vehicles. Recommends assessment through an age-based standard which would be straightforward to assess in the street and in the office.
F1	Central London Partnership	An age-based standard would be easier to enforce than one based on Euro standards.
F1	City of Westminster	Accepts that the further evidence provided in the current consultation has now made a credible case for the LEZ to be based on Euro-vehicle standards.
F1	Confederation of Passenger Transport (CPT)	Supports the use of Euro particulate standards for large vehicles, rather than a rolling age.
F1	Consortium of Bengali Associations	Considers that the emission standard of Euro IV for PM from 2012 for diesel-engine HGVs, buses and coaches is appropriate.

Sub theme	Stakeholder	Representation
F1	Environmental Industries Commission	Agrees with the proposed emissions criteria which vehicles covered by the LEZ must meet in order to be compliant. Considers it appropriate that emissions criteria are based on emission standards rather than the age of the vehicle. This gives the operator of a non-compliant vehicle the choice between replacing that vehicle, or the much more economic option of purchasing exhaust emissions retrofit technology.
F1	Freight Transport Association	The UK freight industry, together with vehicle manufacturers, have been leading the way with investment in cleaner technologies which have reduced levels of key pollutants more than 20-fold over recent years. However, the benefits of such progress can only be reaped if those newer, cleaner vehicles and fuels are introduced progressively into the vehicle parc, not hindered by skewed market levers that encourage the extended use of older vehicles.
F1	Freight Transport Association	Using Euro-standard PM equivalents is confusing and complicated. The current proposal would allow in some Euro I & II vehicles which comply with Euro III PM standards. Euro I came into force in 1992, so this could potentially mean that in 2011, there will be vehicles that are 19 years old but are nevertheless compliant with the scheme and therefore operating in London. According to the SMMT, a number of vehicle manufacturers have confirmed that they produced pre-Euro III engines that were compliant with Euro III PM standards. However these vehicles are unlikely to meet current Euro standards on other pollutants such as NO _x and Carbon Monoxide (CO).
F1	Freight Transport Association	A rolling age scheme of 8 years for goods vehicles (with potentially a 12-year limit for coaches and 10-year limit for vans) would be far simpler and cheaper to administer both for vehicle operators and for TfL. It would also allow for significantly greater air quality improvements than the scheme set out at present, giving Londoners the overall health benefits they rightly deserve. Insofar as more modern vehicles are better suited to the use of bio diesel, it would also facilitate the reduction of the freight industry carbon footprint – including that of public sector operators.
F1	London Ambulance NHS Trust	Emissions standard of Euro III for PM from 2008 for diesel-engine HGVs, buses and coaches is too severe.
F1	London Ambulance NHS Trust	Introduction of a higher standard of Euro IV for PM from 2012 for diesel-engine HGVs, buses and coaches is too severe.
F1	London Ambulance NHS Trust	Emissions standard of Euro III for PM for diesel-engine minibuses and heavier LGVs is too severe.
F1	London Borough of Ealing	Encourage the introduction of the Euro IV standard for PM earlier than 2012 as it is assumed that this will bring about reductions in PM emissions much sooner than the projections identified by TfL in section 2.34. Would welcome any further scenario modelling information regarding reductions in PM emissions for the 'phased introduction' proposed vs the introduction of the Euro IV standard earlier.

Sub theme	Stakeholder	Representation
F1	London Borough of Hillingdon	Agrees with the proposed emissions standards.
F1	London Borough of Wandsworth	Advises the Mayor to introduce regulations mandating authorities and other operators to introduce new compliant vehicles at a certain age rather than at a fixed date, as for each year life extension of each vehicle which is not scrapped early, this alternative approach would save some 16 per cent of that vehicle's averaged annual NO _x emissions and 43 per cent of its averaged annual PM ₁₀ emissions.
F1	Royal Borough of Kensington and Chelsea	Would like to recommend that TfL consider an alternative policy proposal to mandate London authorities and other operators to replace specialist vehicles when they reach a certain age, say 16 years, with Euro IV compliant vehicles. Further modelling would need to be undertaken, but it might result in an overall improvement in emissions and obviate the waste of considerable levels of resources (financial, energy and material).
F1	Park Royal Partnership	As the FTA suggested, an alternative approach to enforcing a LEZ could be based on the age of the vehicle, with a strong package of incentives for cleaner trucks, rather than engine compliance standards.
F1	Road Haulage Association	Emission standard of Euro III for PM from 2008 for HGVs, buses and coaches is too severe.
F1	Road Haulage Association	Higher emission standard of Euro IV for PM from 2010 for HGVs, buses and coaches is too severe.
F1	Road Haulage Association	Emission standard of Euro III/3 for PM from 2008 for heavier vans and minibuses is too severe.
F1	Royal Mail	Believes the proposed Euro Standards are appropriate.
F1	Royal Mail	Prefer an 8-year rolling age-based scheme rather than one based on Euro standards and abatement technology. This would be simpler to administer and place a lower cost burden on operators whilst still improving air quality.
F1	Thames Gateway London Partnership	Where vehicles reach the end of their useful life within a few years of the LEZ being implemented it will be difficult for operators to build a business case for CRT equipment. This might force acceleration in the replacement vehicles, this will obviously have financial impacts. Operators looking to make investment decisions in the short term will also face a dilemma. Vehicles purchased now with Euro III engines will not be compliant with the 2012 LEZ targets. Seeks assurance that such issues have been fully considered during scheme development. Therefore welcomes the 2012 target date for Euro IV compliance as this gives operators more time to adapt than compared with the original proposed target date of 2010. This will also mean that vehicles will not have to fit abatement equipment twice in a relatively short period of time. However, keen to see the greatest benefits from the scheme and seek reassurance that every effort will be made to encourage operators to meet the 2012 standards at the earliest opportunity. Would like to be assured that a mechanism will be in place to

Sub theme	Stakeholder	Representation
		encourage operators to focus on the 2012 standard as opposed to the 2008/2010 standard, particularly given the short time between the dates.
F1	The Caravan Club	As highlighted by the SMMT in their consultation response, the proposed standard for the LEZ is based on Euro standard PM equivalents, not whole Euro standards, or age. This is complex to understand, difficult to comply with and complicated to enforce. It will lead to increased costs and reduce the effectiveness of the zone.
F1	The Caravan Club	The difficulties facing vehicle users in understanding/complying with this proposal are magnified when the leisure use (ie motor caravan) sector is considered, as opposed to the commercial vehicle sector. While commercial users could reasonably be expected to comply with some restrictions on their regular and/or frequent access to the LEZ, and it might arguably be worthwhile them spending the time, effort and money identifying whether their vehicles comply with the requirements, or can be made to comply, an infrequent leisure visitor is very unlikely to be willing to make such efforts for what might be their only leisure trip into the zone during their ownership of the vehicle. They are likely, therefore, to avoid travelling to London entirely, even if their vehicle might actually be compliant with the zone requirements. By doing so, they will not, therefore, support the many tourist destinations within the LEZ, nor the large number of businesses which support tourist trips.
F1	The Society of Motor Manufacturers and Traders Ltd	Urge the Mayor of London and TfL to reconsider the option of an easy to follow age-based LEZ, that would ensure high levels of compliance and assure Londoners of better overall air quality across a wider range of pollutants.
F1	The Society of Motor Manufacturers and Traders Ltd	Favours a simple, easy to understand and implement vehicle age based LEZ, providing clarity, practicality and quantifiable air pollution benefits. As an alternative to an age-based system, we propose a full Euro standard basis (not just PM), combined with an age delineator. Offering the best opportunity for simplicity for operators, manufacturers and TfL; far more so than the complex system currently proposed.
F1	The Society of Motor Manufacturers and Traders Ltd	The proposed standard for the LEZ is based on Euro standard PM equivalents. This is complex to understand, difficult to comply with and complicated to enforce. It will lead to increased costs and reduce the effectiveness of the zone.
F1	Transport 2000	Euro III standard in 2008 for HGVs, buses and coaches is too lenient.
F1	Transport 2000	Euro IV standard from 2012 for HGVs, buses and coaches is too lenient
F1	Transport 2000	Euro III standard in 2012 for minibuses and heavier LGVs is too lenient

Sub theme	Stakeholder	Representation
F1	UK local authorities	5 local authorities consider that the emissions standard of Euro III for PM from 2008 for diesel engine HGVs, buses and coaches is appropriate, 1 considers it is too severe and 1 considers it is too lenient.
F1	UK local authorities	6 local authorities consider that the emissions standard of Euro IV for PM from 2012 for diesel engine HGVs, buses and coaches is appropriate and 1 considers it is too severe.
F1	UK local authorities	5 local authorities consider that the emissions standard of Euro3 for PM for diesel engine minibuses and heavier LGVs is appropriate, 1 considers it is too severe and 1 considers it is too lenient.
F1	UK local authorities	4 local authorities consider that 2010 is appropriate to introduce a standard for Euro III for PM for diesel engine minibuses and heavier LGVs, 2 consider it is too early and 1 considers it is too late.
F2: The effectiveness of pollution abatement equipment		
F2	Environmental Industries Commission	Are pleased that, from February 2008 up to the end of 2011, the standard relates solely to the emissions of particulate matter (PM) of a vehicle, taking the relevant limit value from the Euro III emissions standard. The retrofit technologies which allow older vehicles to meet this standard are well proven, with over 100,000 such systems supplied across Europe for this type of urban application.
F2	Environmental Industries Commission	Welcomes the tightening of the standard to Euro IV PM standard from 2012. It should be noted that the vast majority of vehicles retrofitted with particulate trap technologies to meet the 2008 standard would also be able to meet this more stringent 2012 standard without further upgrade.
F2	Environmental Industries Commission	For those operators of older vehicles who have chosen the retrofit route to compliance, we are pleased to confirm that combined PM and NO _x reduction technologies have already been successfully introduced to the retrofit market. These products should be readily available for a wide range of vehicles by 2012. Therefore, would welcome the re-consideration of the inclusion of a NO _x standard for this second phase.
F2	Environmental Industries Commission	Welcome the proposals contained in the Scheme Order. The retrofit industry feels confident that it can support the scheme with appropriate technology and capacity. There are a number of UK companies that are active in supplying retrofit devices, and the scheme would therefore give benefit to innovation and competitive advantage in the environmental industry and, therefore, the UK economy as a whole.
F2	Federation of Small Businesses	Concerned about the effectiveness of pollution abatement equipment. Although the kit is shown to work over longer journeys, it is unsuitable for the stop/ start nature of work in a city.

Sub theme	Stakeholder	Representation
F2	Freight Transport Association	FTA members have expressed reservations about the performance of pollution abatement equipment in an urban environment. Extensive operations of vehicles fitted with the conversion kit have now proven that although the kit works over longer trucking journeys, it is unsuitable for the stop/start nature of work in a city and, as such, many conversion kits have now been removed. Comparisons with buses are spurious because despite the stop-start nature of the vehicles, bus engines are running constantly whereas commercial vehicles switch off every time they stop to make a delivery or pickup allowing the engine and after-treatment system to cool down.
F2	London Ambulance NHS Trust	TfL should take full account of the less than ready availability of particulate traps which are proven in congested stop start low mileage conditions. Recently, Renault had to recommend the periodic running at a sustained speed of some of its vehicles with particulate traps to create a sufficiently high trap temperature to bring about regeneration. This is not a practicable proposition in the London environment.
F2	London Borough of Hillingdon	Will abatement be effective in removing air pollutants? Has the technology been proven?
F2	London First	Considering that the effectiveness of abatement technology is greatly reduced by poor maintenance, believes that in order to maximise improvements in air quality, TfL consider how to encourage operators to maintain vehicles to the highest level. This could be achieved by more frequent random roadside checks to supplement the annual inspection.
F2	Road Haulage Association	Disappointed that have been unable, despite repeated requests, to discuss technical matters to do with truck emissions where there are fundamental disagreements between TfL's technical adviser on the one hand and vehicle manufacturers, who are unanimous, on the other. Has no confidence in proposals the basis of which are advised are technically incorrect.
F2	The Society of Motor Manufacturers and Traders Ltd	Highlights the importance of the performance standards of retrofit equipment, particularly in the context of new vehicle standards. Comments that a thorough testing regime for retrofit equipment should be ensured.
F2	The Society of Motor Manufacturers and Traders Ltd	Supports retrofit of quality pollution abatement equipment, fitted to a high standard, tested and maintained to that standard throughout the remaining life of the vehicle. Retrofit equipment has an important role to play for vehicles that have a long life and high economic value; specialist vehicles such as urban bus fleets and waste management vehicles.

Sub theme	Stakeholder	Representation
F2	The Society of Motor Manufacturers and Traders Ltd	The scheme as proposed in the detailed scheme order appears to change radically in 2012. Initially the scheme allows the entry of retrofitted vehicles through the Reduced Pollution Certificate (or equivalent). In the scheme order table 2 - on or after 3 January 2012, vehicle types M3, N3 and N2 will have to comply with ESC <u>and</u> ETC, European steady state and transient cycles. We are not aware of any currently vehicles with retrofit pollution equipment that will be able to comply with this, or any suitable testing stations. So in effect RPC vehicles will be excluded from the zone as from 2012.
F2	The Society of Motor Manufacturers and Traders Ltd	Quality retrofit equipment may not be suitable for light, smaller classes of vehicles such as vans. Engine and load characteristics make engineering of quality solutions difficult. Manufacturers do not envisage a responsibility to become engaged in procedures for the retro fitment of pollution abatement equipment at a cost to themselves.
F2	The Society of Motor Manufacturers and Traders Ltd	The failure of retrofit equipment to consistently attain high standards will have implications for the success of the low emissions zone, implying that health benefits will not be accrued, making the cost benefit case for zone even less certain.
F2	Society of Motor Manufacturers and Traders' Motorhome Forum	Retrofitting emissions reducing equipment is impossible: retro-fitting emission reducing equipment is probably impractical and, given the age of the motorhome parc, unachievable.
F2	South East Coast Ambulance Service NHS Trust (SECAMB)	Pollution abatement equipment which can be retrofitted, although functioning satisfactorily on motorways and rural roads, is not proven to work successfully in urban areas, in the stop – start conditions of dense traffic. Anecdotally, there seems to be some doubt about the amount of particulate traps, and the number of reputable installation companies available in the market to complete this work should all of the vehicles which require it choose to have it fitted. Outside of a VOSA commercial vehicle testing station, there is no way of testing that it is functioning correctly, and it is not economically viable, to install into vehicles which are naturally coming to the end of their useful life.
F2	Thames Gateway London Partnership	Enquiries made to vehicle manufacturers by the London Borough of Lewisham confirmed that simply fitting exhaust treatment to Euro I and II vehicles would not reduce particulate levels enough to obtain a Reduced Pollution Certificate (RPC). Further, a number of operators have reported problems with the use of CRT equipment. It has been reported that the CRT does not function due to low exhaust gas temperatures. Such failures have been reported in Local Authority fleets which consist of short journeys followed by engine shut downs. Wish to be assured that this will be considered.

Sub theme	Stakeholder	Representation
F2	Thames Gateway London Partnership	It is understood that it will be impractical to implement LEZ restrictions on some vehicle types (e.g. military vehicles and cranes). However, perhaps the evolving technological advances in abatement equipment could play a future role in reducing emissions from such vehicles.
F2	UK local authorities	At the present time there are no proven effective means of reducing PM ₁₀ on many vehicles having light duty cycles. The absence of suitable technology will force this authority to bring forward expenditure in excess of £1m in order to prematurely replace non compliant vehicles.
F3: Certification of pollution abatement equipment		
F3	Confederation of Passenger Transport (CPT)	Essential that we have affordable certification schemes for older vehicles that meet the relevant standard but do not have (usually because they cannot get) an RPC. This is an important issue for non-UK operators as well as members.
F3	Freight Transport Association	Has concerns that where a vehicle has been fitted with retrofit equipment, but the operator does not hold a Reduced Pollution Certificate (RPC) "a fitting certificate would have to be provided by the vehicle operator and approved by TfL" There are no mechanisms for providing fitting certificates or testing the equipment once fitted other than the RPC which is carried out at VOSA (Vehicle and Operator Services Agency) test stations; even this method can be somewhat unreliable as VOSA's equipment often has problems in measuring pollutants at the low levels required. Concerned that this will lead to additional administration costs for operators.
F3	London Borough of Islington	There is evidence that if particulate traps are retrofitted to vehicles, that NO _x levels can go up which will jeopardise both air quality and the figures that TfL states it can achieve. Urges TfL to remove the acceptance of vehicles fitted with particulate abatement equipment where those vehicles are not manufactured to the required Euro standard.
F3	London Borough of Merton	Need to set out clearly the protocols and processes for certifying that an appropriate abatement device has been fitted and correctly maintained. This should include any costs or charges incurred.
F3	The Society of Motor Manufacturers and Traders Ltd	Do not consider that requirement for a fitting certificate approved by TfL is sufficiently robust as the Scheme Order does not give details of the certificate requirement, identify the approval method by TfL, make any reference to testing requirements to prove compliance, refer to subsequent test or registration to indicate ongoing compliance. Not reassured that TfL warrants on an ongoing basis the retrofit programme to ensure that the number of vehicles fitted with abatement equipment will fully comply with the standard of testing currently in place, through a scheme such as the RPC.

Sub theme	Stakeholder	Representation
F3	The Society of Motor Manufacturers and Traders Ltd	The ability to obtain technical standards on PM emissions from some foreign vehicles is questionable, as may be the quality, test and durability of emissions equipment applied to some of these vehicles.
F3	Thames Gateway London Partnership	As CRT equipment costs an average of £3,500 to £5,000 it is essential that the certification process is clear to operators before they take action to meet the targets.
F4: Extension to standard for oxides of nitrogen (NO_x)		
F4	Asthma UK	Disappointed 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 .
F4	BAA	Whilst overall the LEZ will have positive impact on air quality, concerned that if many operators fit pollution abatement equipment, this may increase NO _x emissions. Therefore seeks introduction of a NO _x standard as soon as possible.
F4	CBI London	Supports the exclusion of a NO _x standard from the scheme.
F4	Central London Freight Quality Partnership	Welcomes the removal of a NO _x standard.
F4	Central London Partnership	Supports the introduction of a NO _x standard in the future.
F4	City of Westminster	Recognises that satisfactory technical solutions are not yet available to enable a requirement of a NO _x standard for Euro IV at this stage. However, remains concerned at continuing high levels of NO _x within central London. Therefore wishes to see this issue given a higher priority for early implementation of a standard, when technical obstacles have been overcome and certification becomes available. Considers this to be an appropriate issue on which the London Mayor should lobby for speedier intervention at a national level.
F4	Environmental Industries Commission	For those operators of older vehicles who have chosen the retrofit route to compliance, we are pleased to confirm that combined PM and NO _x reduction technologies have already been successfully introduced to the retrofit market. These products should be readily available for a wide range of vehicles by 2012. Therefore, would welcome the re-consideration of the inclusion of a NO _x standard for this second phase.
F4	Guild of British Coach Operators	Welcomes the removal of any reference to a possible NO _x standard.
F4	London Borough of Ealing	Would welcome the introduction of Euro IV standard for NO _x within the LEZ.

Sub theme	Stakeholder	Representation
F4	London Borough of Hammersmith and Fulham	The scheme currently proposed allows older vehicles to be fitted with PM abatement technology; there is no requirement to fit NO _x abatement technology. However, the recent start of Euro IV heavy-duty vehicle emissions standards means that NO _x abatement technology is developing rapidly. It is therefore recommended that TfL monitors these developments and at a future date reassesses the practicalities, costs and benefits of including NO _x abatement within the LEZ scheme.
F4	London Borough of Islington	Questions the decision not to include NO _x emissions when it is clearly a significant threat to air quality. TfL have announced plans to spend a lot of money working with VOSA (even to the extremes of asking foreign manufacturers/fitters about retro-fitted particulate traps from abroad), and with this expense in mind, surely there must be a solution to incorporate a measurement and restriction on NO _x in this scheme.
F4	London Borough of Lambeth	Would push for the introduction of a standard for NO _x in the first instance, or at the very least more research into how a standard might be implemented in the future.
F4	London Councils	Pleased to see that TfL are clearer in that they have stated NO _x standards will not be used in the roll-out phases described, but due to its equal importance with PM ₁₀ , would like to see further work done on introducing this, as this has a significant effect on the cost:benefit ratio for the scheme as a whole.
F4	London Liberal Democrats	Regrets that the LEZ proposal will not go so far as to include standards on NO _x . Given that the Mayor's Taxi Emissions Strategy requires all taxis to be Euro III for NO _x and particulates compliant by 2008, it is bizarre that the LEZ will not seek to progress other vehicles at a similar rate. The consultation document indicates that there are unresolved issues about certification and testing of NO _x abatement equipment. However, the Mayor has dismissed the relevance of such difficulties to the retrofitting of London's taxis. It will be a lost opportunity if, as with PM _{2.5} , standards on NO _x are not included in the LEZ from the outset. We urge the Mayor to revise the Scheme Order in order to bring in standards for NO _x with Euro IV in 2010/2012.
F4	Slough Borough Council	Since Slough BC's AQMAs were declared as a result of observed exceedences of NO ₂ , are disappointed that the scheme now proposed does not include a standard for NO _x . However recognises the difficulties associated with developing certification and standards for the fitting and testing of retro-fit NO _x equipment. Hopes that this matter can be resolved in the near future.
F4	Thames Gateway London Partnership	Note that there is no consideration of the impacts of Nitrogen Oxides in the latest proposals, would like to see that future regulation phasing takes this pollutant into consideration, once technology allows for it.

Sub theme	Stakeholder	Representation
F5: Tightening of proposed LEZ emission standards		
F5	London First	Since TfL acknowledges that the biggest area of freight transport growth is heavy vans, in order to maximise the benefits of this scheme, standards for heavy LGVs should be tightened to Euro IV to bring them in line with HGVs, buses and coaches.
F5	London Liberal Democrats	Would also like to see the Euro 4 standard applied to minibuses and LGVs from 2012, two years after this group of vehicles enter the LEZ. Given that Euro 4 standards became mandatory for vehicles registered from the end of last year, this would still allow a substantial time frame for people to upgrade or retrofit.
F6: Other proposed LEZ emission standards issues		
F6	City of Westminster	As Euro V/5 vehicles can be expected to become available from 2009, we consider that a forward plan should be agreed at an early stage for application of this and higher LEZ standards beyond 2012.
F6	City of Westminster	Vehicles that have met a specific Euro-emission standard before that standard became mandatory will not be identified by the 'date of first registration' that TfL plan to use. So, their operators will have to apply to TfL for the vehicle's Euro standard to be verified, and for the vehicle to be registered for operation within the LEZ area. Among those required to comply with this registration process will be 'early adopters', who have procured a vehicle of a higher Euro-emission standard than was required at the time of purchase. We would like further consideration to be given to ways of avoiding 'early adopters' being subject to more bureaucracy than those who have not given such priority to higher air quality standards.
F6	Confederation of Passenger Transport (CPT)	Owners of late-registered vehicles that do not meet the "expected" Euro standard but are placed on the register of exempt vehicles by a third party should not be liable to any penalty.
F6	Freight Transport Association	There are approximately 60,000 vehicles operating wholly or partly in London that will not be of Euro III standard in 2008. This could result in a massive demand for fitment of abatement equipment. FTA is concerned about whether there is enough capacity for reputable agents to fit this equipment. It will not be acceptable if operators are not able to bring vehicles into London because they are unable to get equipment fitted.
F6	Guild of British Coach Operators	Proposes a revised timetable of Euro II from 2008 and Euro III (or Euro II plus particulate trap) from 2010. This would reflect normal coach and bus replacement cycles.

Sub theme	Stakeholder	Representation
F6	Guild of British Coach Operators	If operators are to make investment decisions about vehicles upgrading or replacement, they need certainty of the payback period for the investment. Hence, proposes a system of grandfather rights so that if a vehicle complies with the relevant standards at the point that it is introduced, that vehicle can remain in use for the rest of its economic life.
F6	Guild of British Coach Operators	The London LEZ will not be the only one, so believes that the Government should establish common standards to apply to all such schemes.
F6	London Borough of Greenwich	The proposed LEZ emissions standards are consistent with those the Council successfully negotiated in the legal agreement relating to the proposed Thames Gateway Bridge. They also reflect the emission standards achieved for heavy goods vehicles, buses and coaches in the LEZ on the Greenwich Peninsula.
F6	London Borough of Hillingdon	It is appropriate to introduce emissions standards of Euro III for diesel-engine minibuses and heavier LGVs in autumn 2010.
F6	The Society of Motor Manufacturers and Traders Ltd	By focusing on a single emission standard, TL have overlooked the fact that many pre-dated Euro III (October 2000) vehicles were produced and approved to the Euro III standard for PM. Volvo, Daimler Chrysler, MAN ERF, Iveco, and Scania all produced engine variants to this effect and these were sold in significant numbers. In practice this means that a so-called Euro I or Euro II compliant vehicle may achieve the PM standards to Euro III for the Low Emission Zone, though not the other standards on other pollutants. This makes for an extremely complicated issue for all parties engaged in the operation of the Zone, and remember this issue applies to foreign vehicles as well as UK trucks. No official documentation will carry details of the individual vehicle levels of PM (or other pollutant compliance). The Zone will therefore be totally impractical to enforce.
F6	The Society of Motor Manufacturers and Traders Ltd	SMMT members want to see an effective and easy to use LEZ; basing the zone on PM equivalent standards will not achieve this.
F6	South East Coast Ambulance Service NHS Trust (SECAMB)	The method of determining which vehicles are compliant for the purposes of this scheme is unreliable, and unnecessarily complicated, in that some vehicles registered before October 2001 and categorised as Euro 1 or Euro 2 meet the PM compliance of the Euro 3 standard. In addition, the registration date of converted specialist vehicles often bears no relation to the date of manufacture, so that some vehicles could be listed as compliant when they are not.
F6	Thames Gateway London Partnership	The future of this RPC scheme is also uncertain once Euro IV engines are introduced. Request clarification on this issue.

Theme G: Boundary

Sub theme	Stakeholder	Representation
G1: Proposed LEZ area is appropriate		
G1	City of Westminster	In 1999, the City Council commissioned TRL to develop proposals for a practical model for a Low Emission Zone (LEZ). This showed that an LEZ for all of London would be more beneficial than one confined to central areas.
G1	Environmental Industries Commission	The Scheme Order designates all of Greater London as the area in which the LEZ will apply. Agree that this is the most effective option to produce the necessary benefits in the required timescale.
G1	Consortium of Bengali Associations	Proposed boundary is appropriate.
G1	London Ambulance NHS Trust	Proposed boundary is appropriate.
G1	London Borough of Ealing	Believe that the LEZ boundary is suitable and support exclusion of the M25 as an alternative route for non-compliant vehicles.
G1	UK local authorities	Boundary is acceptable as long as it is not used as a basis for extending Congestion Charge zone.
G1	UK local authorities	5 local authorities consider the proposed boundary is appropriate.
G2: LEZ should cover a reduced area		
G2	UK local authorities	1 local authority considers the proposed boundary should be a smaller area.
G2	Association of International Courier and Express Services (AICES)	The scheme should begin with a smaller area and then be expanded should it prove successful.
G2	Royal Mail	LEZ should cover a smaller area. The emissions map of London pollution levels shows that the area outside the North/South circulars has a relatively low level of pollution in relation to the zone inside the North/South circulars. Rather than introducing a scheme to cover all of the London boroughs what consideration has been given to limiting the area to inside the North/South circulars, but omitting these roads? This would tackle pollution in the worst affected areas and be at less cost to TfL and industry and be a more acceptable proposal.
G3: LEZ should cover a larger area		
G3	Healthy Southwark Partnership	Measures should be undertaken to ameliorate any negative health effects on the health of those living outside the zone, such as a national extension of the Low Emission Zone.

Sub theme	Stakeholder	Representation
G3	Royal Borough of Kingston upon Thames	Parts of the borough will be excluded from the zone and therefore some residents will not enjoy the benefits of the improved air quality but will have to bear the costs. This is being promoted as a London-wide proposal but it is clearly not. Therefore requests extension of the boundary to cover the whole borough.
G3	Royal Borough of Kingston upon Thames	The currently proposed boundary does not coincide with the boundary of the London Boroughs with the adjoining Counties, as it tries to provide for “escape” routes for non-compliant vehicles. This raises certain concerns in its philosophy, benefits and practicality. The “escape route” philosophy is understandable but should only be relevant for an initial period. It also bears more relevance to the enforcement regime than the actual zone boundary.
G3	Transport 2000	The LEZ should cover a larger area.
G3	UK local authorities	1 local authority considered the proposed boundary should be a larger area.
G4: Inclusion of motorways and trunk roads		
G4	City of Westminster	Recognises that there are very few places within Greater London that could be accessed solely from a motorway or trunk road, and that, therefore, the additional air quality benefits of their inclusion would be very small. Considers it desirable for them to be included, to enable clearer communication of the scheme, to avoid ambiguities and to prevent confusion to road users. However, would not wish achievement of this to delay implementation of the LEZ beyond February 2008.
G4	BAA	Advocates the inclusion of the strategic road network in London. Particularly would support the inclusion of the M4, M4 spur, A4 and M25 in order that there are no potential loopholes for vehicles to access Heathrow roads outside of the LEZ.
G4	London Borough of Hillingdon	The area both in and around Heathrow is currently exceeding national air quality objective limits and is predicted to exceed European air quality limits in 2010. Heathrow is also one of the largest single land-use generators of traffic within the UK, a significant proportion of which is freight accessing the airport. From the maps provided within the consultation there are predictions for reductions in PM along the M4 corridor, which would benefit the residents living in close proximity to this motorway. With regards to this Hillingdon would urge TfL to work with the Secretary of State to ensure that the M4, the M4 Airport Spur, the A3113, the T5 spur from the M25 and the section of the M40 which runs from the borough boundary to the M25 are included as designated roads within the Low Emission Zone. Without this inclusion there is no emissions control over the vehicles entering what is acknowledged as one of the key hotspot areas of air pollution within the

Sub theme	Stakeholder	Representation
		Greater London Authority
G4	London Borough of Hillingdon	The London Borough of Hillingdon strongly urges that all motorways inside of the proposed boundary including the M1, M4, M11, A3113 and the section of the M40 which runs from the borough boundary to the M25 be included as part of the LEZ.
G4	London Borough of Hounslow	The area both in and around Heathrow is currently exceeding national air quality objective limits and is predicted to exceed European air quality limits in 2010. Heathrow is also one of the largest single land-use generators of traffic within the UK, a significant proportion of which is freight accessing the airport. From the maps provided with the consultation, there are predictions for reductions in Particulate Matter (PM) along the M4 corridor, which would benefit the residents living in close proximity to this motorway. With regards to this Hounslow requests that TfL works with the Secretary of State to ensure that the M4, M4 Airport Spur, the T5 Spur from the M25, and the A3113 are included within the Low Emission Zone. This is necessary to ensure that there is emission control via the LEZ scheme at this key hotspot area of air pollution within Greater London.
G4	Essex County Council	Where feasible, motorways and trunk roads are included in the proposals to ensure consistency of coverage, with the exception of the M25, which should remain a diversionary route.
G4	Federation of Small Businesses	Supports the inclusion of motorways (except the M25) in the LEZ.
G4	London Borough of Merton	The motorway network should be excluded from the LEZ, other trunk roads should be included.
G4	London Borough of Barnet	M1 Motorway – is aware that TfL cannot implement a charging scheme on the M1 motorway without the consent of the Secretary of State. A copy of this consultation response will be sent to the Secretary of State to make him aware of the Council's views. Considers it most unlikely that many non-compliant vehicles will wish to use the M1 motorway in Greater London if all roads directly connecting to it are included within the scheme boundary. The required signage and resolution of technical issues involved in including the M1 within the scheme boundary are unlikely to be justified by the exceptionally limited environmental benefits. It would appear that the overriding issue to consider is one of safe traffic management.
G4	London Borough of Brent	In order to ensure consistency in application of the scheme and ensure its effectiveness all roads including motorways and trunk roads should be designated for inclusion in the LEZ. This should include roads maintained by authorities other than TfL such as the Department of Transport. Would strongly support the GLA/TfL aim to seek permission from the Secretary of State to ensure this is undertaken.

Sub theme	Stakeholder	Representation
G4	Central London Partnership	Motorways and trunk roads should not be included within the LEZ as their inclusion could cause delays to implementing the scheme.
G4	Association of International Courier and Express Services (AICES)	Motorways should be excluded from the proposed scheme because vehicles may enter the motorway for a small distance and be unaware and unable to leave the motorway and leave the LEZ altogether.
G4	Central London Freight Quality Partnership	A LEZ including all motorways and trunk roads would be simpler to understand.
G4	Confederation of Passenger Transport (CPT)	Does not support the inclusion of motorways in the Zone. Will review this position when cars are included in the scheme.
G4	Consortium of Bengali Associations	Motorways within London should be included in the LEZ.
G4	Friends of the Earth	Motorways and trunk roads should be included in the LEZ because of their levels of pollution.
G4	Hertfordshire County Council	Supports the inclusion of motorways and trunk roads in the LEZ, subject to there being sufficient turning places at the LEZ boundary so that non-compliant vehicles do not end up rat running through local road networks.
G4	London Ambulance NHS Trust	Motorways should not be included in LEZ.
G4	London Borough of Ealing	Agrees that motorways and trunk roads should be included in the LEZ at the earliest opportunity. Not including them would have major implications with regards to access to Heathrow and its immediate surroundings. Including motorways would allow London boroughs, in whose boundaries these roads exist, to experience the 'blanket' benefits of the scheme.
G4	London Borough of Hammersmith and Fulham	Although the Scheme Order states that all roads are designated, this does not appear to be the case as motorways and trunk roads (i.e. those roads maintained by the Department for Transport, including the M4) are not designated. Although there are no such roads in the Hammersmith and Fulham it is felt that this anomaly will weaken the effectiveness of the LEZ and may potentially be confusing for drivers. All roads within the LEZ should be designated and no roads should be exempt. Therefore strongly support the GLA/TfL in their stated intention to seek consent from the Secretary of State for Transport to include these roads in the LEZ.

Sub theme	Stakeholder	Representation
G4	London Councils	In order to achieve the claimed benefits of the LEZ, believe it is important that some of the currently excluded roads such as the M4 are made part of the LEZ. Agree that TfL continue to seek consent from the Secretary of State for Transport to include these roads, so that some of the most worst affected areas, such as those around Heathrow, do not see vehicles exempted on the M4 for example. Note that there are traffic management issues relating to inclusion of the M1 in the London Borough of Barnet, which have been raised in that borough's submission. Therefore recommend that prior agreement between TfL, the affected boroughs, and the Secretary of State is sought to ensure inclusion of parts of the M1 (or any other motorway) overcomes any practical on-the-ground difficulties.
G4	Road Haulage Association	Motorways should not be included.
G4	Royal Borough of Kensington and Chelsea	The Scheme Order states that all roads within the LEZ are designated roads. This appears to conflict with the details contained within the Scheme Order that say trunk roads will not initially be included. Is keen for these roads to be incorporated as this will reduce confusion.
G4	Royal Borough of Kingston upon Thames	It is already known that the area surrounding the A3 has the worst air quality in the borough and these proposals do not address this. This is a long term initiative so a long term view needs to be taken. Therefore the Council considers that all of the A3 should be included.
G4	Royal Borough of Kingston upon Thames	Welcomes the inclusion of trunk roads and the motorways within the LEZ boundary.
G4	Slough Borough Council	Supports the inclusion of the M4 and other motorways within the LEZ to ensure that the scheme is simple and easy to understand for operators.
G4	Thames Gateway London Partnership	Although much of the M25 falls outside the GLA boundary, believe that not to include such routes, will actually contradict the principles of the LEZ and disbenefit the health of the population.
G4	Thames Gateway London Partnership	TfL modelling has shown that vehicle flow around the M25 will only increase by 0.05% from vehicles diverting away from the zone- therefore believe that this supports the case to include such routes in the LEZ.
G4	Thames Gateway London Partnership	The major poor air quality hotspots are identified as central London (outside the Congestion Charging Zone), Heathrow and the main arterial and orbital roads. The argument given for the LEZ in the first place is to reduce pollutants to benefit the population's health. Although much of the M25 falls outside the GLA boundary, believe that not to include such routes, will actually contradict the principles of the LEZ and disbenefit the health of the population.
G4	Transport 2000	Motorways should be included in the LEZ
G4	UK local authorities	5 local authorities consider that motorways within London should be included in the LEZ and 3 consider that they should not be included.

Sub theme	Stakeholder	Representation
G4	Watford Borough Council	Supports the current proposal to exclude the M25 motorway from the LEZ.
G4	Watford Borough Council	Other motorways, such as the M1, should be excluded from the LEZ.
G4	Watford Borough Council	If motorways are not excluded from the LEZ, we anticipate that non-compliant vehicles may use this as another reason to reroute through Watford, affecting air quality in the borough.
G5: Definition of charging area		
G5	London Borough of Hammersmith and Fulham	The 'charging area' defined in Article 2 of the Scheme Order relates to the area in which persistent evaders' vehicles may be immobilised and/or removed, although LEZ entry charges can only be imposed in respect of the roads within the charging area, designated by article 3k. Therefore, the charging area of Greater London should not be confused with the LEZ itself, which is a slightly smaller area within Greater London.
G5	London Borough of Hammersmith and Fulham	Referring to an area other than that where charges are payable for entry of non-complying vehicles into the LEZ as the 'charging area' is confusing, despite the clarification in the explanatory notes. Consideration should be given to clearer definitions of the 'charging area', the LEZ and Greater London as they all relate to very similar geographical areas. The map provided is also unclear as it is difficult to discern the differences when only shown in black and white.
G5	Royal Borough of Kensington and Chelsea	The Charging Area is defined as the whole of Greater London, but in our opinion, this term is slightly misleading, as it suggests that it is the area in which a charge will be imposed. Instead, this is defined in the Scheme Order as the area in which persistent evaders' vehicles may be immobilised and/or removed, which is an area larger than the LEZ itself.
G6: Inclusion of BAA roads		
G6	BAA	Is willing to consent to the LEZ applying to private landside roads at Heathrow subject to mutual agreement on location of signs, turning points and enforcement rules. Legal agreement allowing the LEZ to apply to BAA roads would be restricted to the LEZ and not other methods of emissions or congestion control.
G6	BAA	Would like to develop a draft protocol outlining how the scheme would be applied at Heathrow. This would include terms of engagement such as consultation and notice periods prior to works commencing, named consultees and key stakeholders, location of scheme, boundary, signage and cameras and proposed enforcement.
G6	London Borough of Hounslow	It is thought that BAA is intending to give TfL the permission to operate the scheme on BAA's private landside roads.

Sub theme	Stakeholder	Representation
		Confirmation of this is needed.
G6	London Borough of Hillingdon	As Heathrow Airport is one of the largest sources of emissions within the south of the borough, clarification is requested as to whether the Heathrow airside vehicles are to be designated as exempt as a) they do not leave the airport boundary and b) are primarily non road-going vehicles
G7: Detailed boundary issues		
G7	BAA	Concerned at the proposed use of Mondial Way off the A4 Bath Road as a turning point for vehicles wishing to divert from the LEZ. This is inappropriate for large vehicles and would seek an alternative for vehicles accessing from the M4 spur or A4.
G7	Essex County Council	Because of the restricted nature of junction 5 on the M11, there is no adequate turning facility (i.e. a roundabout interchange) for non-compliant vehicles before entering the LEZ. Therefore suggests that this stretch of the M11 remains excluded and that adequate advanced signing on trunk roads and minor roads allows vehicles to divert away from the zone.
G7	Hertfordshire County Council	Seeks confirmation that non-compliant bus services can turn around on private property that is just within the zone on the edge of the LEZ boundary.
G7	Hertfordshire County Council	Understands that the London Borough of Enfield has suggested moving the LEZ boundary back to the southern side of the M25 at junction 25. This would have implications for those wishing to access properties on Bulls Cross Ride as they would need to enter the LEZ briefly before crossing back into Hertfordshire.
G7	London Borough of Richmond upon Thames	It is our view that if the concerns about signage cannot be addressed, then the LEZ boundary must be relocated to the borough boundary.
G7	London Borough of Barnet	Excluding the M1 terminal roundabout (Junction 1) from the zone boundary would allow non-compliant vehicles to be turned back at this junction.
G7	London Borough of Barnet	Considers the provision of turn-back facilities for vehicles exiting at M1 junction 2 of the motorway would be difficult and undesirable. Would therefore support the inclusion of the junction 2 slip roads in the scheme order if this is considered to be the most effective measure to prevent non-compliant vehicles from exiting at this junction.
G7	London Borough of Barnet	Junction 4 (M1) provides north-facing sliproads only to and from the A41 (south). Turnback can be achieved at this junction by non-compliant vehicles travelling along the A41 to Spur Road roundabout, albeit with a risk of vehicles performing 'u'-turns prior to the roundabout.
G7	London Borough of Barnet	Junction 3 (M1) provides no access to the public road network, but does provide access to the London Gateway Service Station and a number of depots including one

Sub theme	Stakeholder	Representation
		formerly used for highway maintenance and control facilities.
G7	London Borough of Barnet	<p>M1 Junction 3 – assuming the M1 is excluded from the scheme boundary, the proposed scheme order boundary follows the existing sliproad carriageways on the north-eastern side of the M1. The sliproads at junction 3 were originally planned to link with a roundabout, but the roundabout was not completed at the time of construction of the M1 due to a planned link with the A1. The existing sliproads make use of the partially completed roundabout but there are ongoing safety concerns about this junction.</p> <p>One solution to the safety concerns would be the completion of the roundabout to allow traffic to circulate in a conventional manner. However, the proposed scheme order boundary would include the ‘missing’ part of the roundabout within the zone, requiring a future amendment to the order if a safety scheme were to be implemented. The Council strongly supports the modification of the scheme boundary at junction 3 to reflect the completed roundabout rather than the existing layout. This will eliminate the need for future amendments, without any practical impact on the operation of the LEZ.</p>
G7	London Borough of Barnet	<p>Believe that the scheme should not result in unfair advantages being created. The scheme will clearly disadvantage businesses located within the scheme boundary area over those located outside. The creation of excluded routes and areas has the potential to create disadvantage locally, as well as causing unacceptable traffic management impacts. Where possible, area exclusions should be designed to minimise traffic management and environmental impacts and to guard against unfair commercial advantage. It is most important to avoid creating any road safety problems as a result of the scheme boundary.</p>
G7	London Borough of Barnet	<p>The following comments relate to specific zone boundary issues. It should be noted that much of the borough is covered by a 7.5T movement ban which may restrict the use of roads as diversion routes.</p> <p>A5/A41 – object to the exclusion of parts of the A5 from the zone which we believe has been proposed due to difficulties in signing the boundary at its northern end. Would not wish the northern section of the A5 to be seen as a route which is appropriate for larger vehicles to use as an alternative to the A41. Any difficulties in signing the boundary at the northern end of the A41 can be resolved by excluding the A41 from the borough boundary to (and including) the Spur Road roundabout. This roundabout will provide a convenient facility to allow non-compliant vehicles to turn round.</p>

Sub theme	Stakeholder	Representation
G7	London Borough of Barnet	<p>A1/A411 Barnet Lane – strongly supports the exclusion of the A1 from the borough boundary to (and including) the Stirling Corner roundabout. The exclusion should also include relevant slip roads at the Rowley Lane junction, the A411 Barnet Lane, and any parts of Stirling Way which fall within the borough boundary. The reason for this proposal is to ensure non-compliant vehicles travelling South on the A1 can be safely turned. Furthermore, the A1, A411 and Stirling Way provide the most direct and appropriate routes for vehicles travelling between the M25 and Borehamwood and Elstree.</p> <p>As Borehamwood and Elstree have a number of industrial and retail areas, as well as film/TV studios, it is likely that relatively large numbers of larger and specialist vehicles will need to access this area. Consider the environmental impact of excluding these routes will be minimal in comparison to the environmental impact of vehicles using alternative routes to access Borehamwood and Elstree.</p>
G7	London Borough of Barnet	<p>A1/Shell Filling Station – although the proposed zone boundary places the entrance from the A1 into the filling station at Stirling Corner, the sole authorised exit for this site is onto the A411 Barnet Road. This has two implications. Firstly, entry to the zone would be via private property rather than public highway. Secondly, non-compliant vehicles entering the site could only leave (without paying the charge) by exiting via the A1 entrance. This entrance is not designed for vehicles, especially HGVs, to exit and would pose considerable road safety concerns and may disrupt the movement of traffic.</p>
G7	London Borough of Barnet	<p>Supports the exclusion of (at least parts) of the A411 Barnet Road from the scheme boundary in order to allow non-compliant vehicles to exit the filling station site and return to the Stirling Corner roundabout. However, this poses the additional problem of how the scheme boundary on Barnet Road would be designed.</p> <p>Galley Lane - since no satisfactory turning point is available on Galley Lane, the scheme order proposes an 'escape' route from Galley Lane via Wood Street and High Street Barnet. The effect of this is to exclude a number of residential streets bounded by these roads with a number of industrial and retail sites contained within the area. Considers it likely that these roads will be used by vehicles making deliveries in this area rather than using it solely for the purposes of 'escape'. This could potentially confer an unfair advantage on those businesses accessed from the excluded roads, and adversely affect residents living within the area.</p>

Sub theme	Stakeholder	Representation
G7	London Borough of Barnet	The junction between High Street and Wood Street is also congested and involves very tight turns. Has considerable concerns over the safety and impact on traffic movement resulting from proposals which would result in an increase in larger vehicles attempting turns at this junction.
G7	London Borough of Barnet	Believes it is possible that turning facilities could be provided at the junction of Galley Lane/Wood Street/Barnet Road. However, as TfL were unwilling to contribute towards the cost of a safety and feasibility study of this location, it is not an option can recommend or support at this time.
G7	London Borough of Barnet	In order to avoid the potential for High Street, Wood Street and surrounding roads to be used as through routes for non-compliant vehicles making deliveries (as opposed to avoiding entering the zone), the Council supports a route from Galley Lane via A411 Barnet Road to the Stirling Corner roundabout. Removing the proposed excluded link between Galley Lane and High Street will reduce adverse impacts. The proposed alternative of Galley Lane/Barnet Road is also relatively unattractive as a through route for non-compliant vehicles, particularly for the southbound direction.
G7	London Borough of Barnet	A1000, A1081 & Kitts End Road – to mirror the ‘exempt’ route for the London Lorry Control Scheme, support the exclusion from the scheme boundary of the A1081 and the A1000 (north of their common junction) as well as Kitts End Road, in order to allow non-compliant vehicles using these roads to avoid entering the zone. The geometry of the common junction of the A1000 and A1081 may pose some difficulties for larger vehicles performing the required turning manoeuvre and would wish to see TfL's assessment of the traffic management implications of this proposal, particularly in relation to the Network Management duty.
G7	London Borough of Barnet	<p>M1 Motorway – is aware that TfL cannot implement a charging scheme on the M1 motorway without the consent of the Secretary of State. A copy of this consultation response will be sent to the Secretary of State to make him aware of the Council's views.</p> <p>Considers it most unlikely that many non-compliant vehicles will wish to use the M1 motorway in Greater London if all roads directly connecting to it are included within the scheme boundary. The required signage and resolution of technical issues involved in including the M1 within the scheme boundary are unlikely to be justified by the exceptionally limited environmental benefits. It would appear that the overriding issue to consider is one of safe traffic management.</p>
G7	London Borough of Barnet	Excluding the M1 terminal roundabout (Junction 1) from the zone boundary would allow non-compliant vehicles to be turned back at this junction.

Sub theme	Stakeholder	Representation
G7	London Borough of Barnet	Considers the provision of turn-back facilities for vehicles exiting at M1 junction 2 of the motorway would be difficult and undesirable. Would therefore support the inclusion of the junction 2 slip roads in the scheme order if this is considered to be the most effective measure to prevent non-compliant vehicles from exiting at this junction.
G7	London Borough of Barnet	Junction 4 (M1) provides north-facing sliproads only to and from the A41 (south). Turnback can be achieved at this junction by non-compliant vehicles travelling along the A41 to Spur Road roundabout, albeit with a risk of vehicles performing 'u'-turns prior to the roundabout.
G7	London Borough of Barnet	Junction 3 (M1) provides no access to the public road network, but does provide access to the London Gateway Service Station and a number of depots including one formerly used for highway maintenance and control facilities.
G7	London Borough of Barnet	<p>One issue to consider is that some vehicle operators may wish to operate on the basis that goods or people are transferred from non-compliant vehicles onto compliant ones for onward movement into London. For example, for articulated HGVs this could be achieved in a matter of minutes by simply swapping a non-compliant tractor unit with a compliant one.</p> <p>Believes it is not unreasonable to expect some degree of vehicle swapping to take place, and where possible, safe means to do so should be available. The London Gateway Service Area is one such location, and is already used by some coach companies for passenger transfer. Use of an off-road location such as a motorway service area is far preferable to the use of public highways.</p>
G7	London Borough of Barnet	Considers that, should any parts of the M1 be included in the scheme order, there are significant advantages to excluding the M1 north of (and including) junction 3. This will allow non-compliant vehicle access to the service area and depots, and encourage the use of the service area for vehicle swaps in preference to other potentially unsafe locations.
G7	London Borough of Barnet	<p>M1 Junction 3 – assuming the M1 is excluded from the scheme boundary, the proposed scheme order boundary follows the existing sliproad carriageways on the north-eastern side of the M1. The sliproads at junction 3 were originally planned to link with a roundabout, but the roundabout was not completed at the time of construction of the M1 due to a planned link with the A1. The existing sliproads make use of the partially completed roundabout but there are ongoing safety concerns about this junction.</p> <p>One solution to the safety concerns would be the completion of the roundabout to allow traffic to circulate in a conventional manner. However, the proposed scheme order boundary would include the 'missing' part of the roundabout</p>

Sub theme	Stakeholder	Representation
		within the zone, requiring a future amendment to the order if a safety scheme were to be implemented. The Council strongly supports the modification of the scheme boundary at junction 3 to reflect the completed roundabout rather than the existing layout. This will eliminate the need for future amendments, without any practical impact on the operation of the LEZ.
G7	London Borough of Bexley	With respect to the proposed boundary within the borough, Thames Road and North Cray Road require further consideration before the Scheme Order is made. As part of a road improvement scheme in Thames Road, a new roundabout will be introduced at the junction between Thames Road and Iron Mill Lane. This improvement will be completed by mid-June 2007 and therefore the boundary should be amended to this roundabout. North Cray Road passes through a mainly residential area and the Council is concerned that vehicles that do not comply with the low emissions criteria will be diverted to pass through this area. This would be contrary to the principles behind the Scheme Order. The Council would wish to see North Cray Road included within the Low Emission Zone and those vehicles that do not comply will be able to use existing turning facilities at the roundabouts at the north east and south west ends of the dual carriageway. (Sheets 10 and 14) The alternative route for vehicles that do not comply would be via the M25 London Orbital motorway.
G7	London Borough of Croydon	There will be many existing side roads where there are already a significant number of signs for things such as waiting restrictions, traffic calming, 20mph zones etc, where the introduction of more signs will not be possible or will have an unacceptable impact on street clutter.
G7	London Borough of Croydon	Regarding Deposited Plan sheet 44, would question the need to include Farleigh Dean Crescent in the zone given it is a cul-de-sac serving 12 houses. If it is within the zone then signing will be needed but may be difficult to locate given restricted footways.
G7	London Borough of Croydon	Regarding Deposited Plan sheet 46, extensive signing will be needed to cover the following side roads off Feathered Lane: Courtwood Lane, the slip road serving properties in Featherbed Lane and Falconwood Road, Pixton Way, Holmbury Grove. There will also need to be signing at Selsdon Park Road, Gravel Hill and Kent Gate Way.
G7	London Borough of Croydon	Regarding Deposited Plan sheets 48 and 49, extensive signing will be required to cover the following side roads off Old Farleigh Road: Sandpiper Road, Birdwood Grove, Lynne Close, Hawthorn Crescent, Woodland Gardens, Greystone Close, Benhurst Gardens, Sundale Avenue, Dulverton Road. There will then need to be signing at the signalled junction of Addington Road to enforce the zone eastwards in Addington Road and northwards in Farley Road. Vehicles in Old Farleigh Road cannot turn left at the

Sub theme	Stakeholder	Representation
		crossroads and need to use the slip road just before the junction and this needs to be taken account in the signing proposals.
G7	London Borough of Croydon	Regarding Deposited Plan sheets 49 and 50, extensive signing will be required for all the side roads to the north of Addington Road as follows: Byron Road, Upper Selsdon Road, Ferris Close, Mountwood Close, Habledown Road, Church Way and Sanderstead Hill and Rectory Park at the roundabout.
G7	London Borough of Croydon	Regarding Deposited Plan sheets 50 and 51, side roads to the west of Limpsfield Road will need signing as follows: All Saints Drive, Village Way, Marshall Close, Mitchley Hill.
G7	London Borough of Croydon	Regarding Deposited Plan sheets 53 to 57, this option to allow the vehicles to travel along Godstone Road as far as Station Approach/Hayes Lane is not acceptable and consideration should be given to having the boundary further south at Whyteleaf or Caterham Bypass roundabout. The scheme as proposed will require signing of Devon Close and Garston Lane, and will divert non compliant vehicles along Hayes Lane which is not suitable for this type of traffic being very narrow in places. It will also require the signing of a number of side roads around Park Road and Hayes Lane as follows: Bakers Road, Oaks Way, Foxley Road, Firs Road, Wattendon Road, Steyning Close, Pondfield Road (both ends), Driftwood Road, Highwood Close, Frobisher Close, Old Lodge Lane and Waterhouse Lane.
G7	London Borough of Croydon	Regarding Deposited Plan sheet 58, signing will be needed to prevent non compliant vehicles entering the restricted areas of Coulsdon Road, Homefield Road and Stites Hill Road. This could prove problematic given restricted or lack of footways.
G7	London Borough of Croydon	Regarding Deposited Plan sheets 63 and 64, no consideration is taken with regard to the new Coulsdon relief road, which has recently opened. It would seem unreasonable to allow non-compliant vehicles leaving the M23/25 to be able to travel all the way to Coulsdon and then have to follow a long route to leave the area. The new road has a roundabout at its southern end that could be used to turn vehicles approaching from the south along Brighton Road (A23). As proposed signing would be required for the following side roads: Ullswater Crescent off Marl Pitt Lane, Brighton Road north of Lion Green Road, Chipstead Valley Road east/Woodcote Grove Road/Woodman Road at the junction with Lion Green Road and Barrie Close, Linden Avenue, Woodstock Road, Reid Close and Sandown Road off Chipstead Valley Road.

Sub theme	Stakeholder	Representation
G7	London Borough of Croydon	Consider that the boundary needs to be reviewed to find more suitable locations for vehicles to turn without having to follow a long diversion, which in itself will cause more emissions. For a vehicle travelling along Old Farleigh Road to have to then divert along Addington Road to the Limpsfield Road roundabout and back again cannot be considered acceptable.
G7	London Borough of Croydon	Before any scheme is approved an extensive survey of existing signage is required as well as detailed designs of the new signs and locations.
G7	London Borough of Hillingdon	In general supports the proposed boundary of the LEZ, however the boundary does not seem to include the A3113 or the section of the M40 which runs from the borough boundary to the M25. These roads must be included within the boundary for the scheme to be effective.
G7	Royal Borough of Kingston upon Thames	It is already known that the area surrounding the A3 has the worst air quality in the borough and these proposals do not address this. This is a long term initiative so a long term view needs to be taken. Therefore the Council considers that all of the A3 should be included.
G7	Royal Borough of Kingston upon Thames	The location of the large entry signs must take account of residential amenity. Malden Rushett is a case in point. At the junction of A243 and B280, HGVs are likely to have difficulty turning and these unsafe and failed manoeuvres may lead to the use of inappropriate routes.
G7	Royal Borough of Kingston upon Thames	Entry signs to the LEZ in Clayton Road will not offer safe turning facility for HGV because of the potential highway safety hazard posed by junction geometry.
G7	Royal Borough of Kingston upon Thames	Concerns about exclusion of parts of the borough and the A3 trunk road at the LEZ boundary, the potential highway safety implications at some of the junctions to be used by non-compliant vehicles to turn back
G7	Royal Borough of Kingston upon Thames	The currently proposed boundary does not coincide with the boundary of the London boroughs with the adjoining counties, as it tries to provide for "escape" routes for non-compliant vehicles. This raises certain concerns in its philosophy, benefits and practicality. The "escape route" philosophy is understandable but should only be relevant for an initial period. It also bears more relevance to the enforcement regime than the actual zone boundary.
G7	Royal Borough of Kingston upon Thames	The "escape routes" mean that the zone will penetrate well into the borough to enable non-compliant lorries to turn back from the zone e.g. along A3 up to the Malden Roundabout, Malden Road from the borough boundary to the A3, and along Moor Lane/Bridge Road from the borough boundary to the A243.
G7	Slough Borough Council	While supports the inclusion of the M4 in the LEZ, Slough BC would want to see and comment on the revised scheme boundaries if it were to be included.

Sub theme	Stakeholder	Representation
G7	Surrey County Council	Details the roads and each junction where there may be problems. In each case have identified an outline solution in the form of: * a boundary change (so that vehicles can turn round between the warning sign and the charging zone) * additional signing to advise drivers that they are approaching the charging zone * minor improvements to junctions so that HGV can make turns to avoid the zone
G7	Surrey County Council	A309 Hampton Court Way, roundabout provides for U Turns. Possible additional use of Hurst Road. Provide advance signs on A309 Hampton Court Way and A3050 Riverbank
G7	Surrey County Council	A307 Portsmouth Road, no room for U Turns at entry point. Vehicles could try and do a U turn if not well signed.
G7	Surrey County Council	C161 Effingham Road/Balacava Road, no room for U Turns at entry point. Consider possible advanced signing at the Manor Road North junction with the A309 Kingston By Pass. Entry sign to the zone needed on Brighton and Upper Brighton Road.
G7	Surrey County Council	D6801 Lovelace Road, no room for U Turns at entry point. Entry signing to zone needed on Brighton and Upper Brighton Road.
G7	Surrey County Council	C162 Ditton Hill Road, no room for U Turns at entry point. Entry signing to zone needed on A243
G7	Surrey County Council	B280 Fairoke Lane j/w Malden Rushett and Leatherhead Road, no room for U Turns at junction entry point to zone, need signing to help vehicle away from the area. It is suggested that the start of the zone on the A243 to the roundabout at the junction with Brige Road and Hook Road. Provide advance signs ahead of the start of the zone around junction 9 of the M25.
G7	Surrey County Council	B2032 Chipstead Valley Road, very tight turn at Chipstead Road junction with Lion Green Road.
G7	Surrey County Council	A23 Brighton Road, London LEZ will need good advanced signing - no U Turn at entry to LEZ Zone lay by. Surrey County Council has Congestion Charging information boards. Suggested that LEZ information is also shown in this lay by. Plenty of advanced signing required on A23 at roundabouts ahead of Coulsdon in particular. Also provide advanced signing close to junction of M23/M25.
G7	Surrey County Council	C72 Church Lane, leads into Ditches Lane (all in London Authority) - signed as unsuitable for Heavy Goods Vehicles.
G7	Surrey County Council	B2030 Banstead Road/Coulsdon Road, U Turn at roundabout on Chalcon Road is tight, alternative avoidance of entry to the zone at Banstead Road junction with Stites Lane is very tight and uncontrolled. Advanced signing required.
G7	Surrey County Council	GLA Stites Hill Road is outside the London LEZ boundary - the left turn onto Coulsdon Road is very tight. Some form of

Sub theme	Stakeholder	Representation
		turning area is required in the vicinity of this entry point.
G7	Surrey County Council	A22 Godstone Road, start of zone is London Authority - no U Turn at start of zone, would need signing in advance of roundabout at junction B2208. Request that the start of the LEZ zone be extended into the GLA to provide a suitable U turn facility - alternatively it would be necessary to construct a suitable lorry turning area. Suggested that there are advanced warning signs at junction 8 of M25.
G7	Surrey County Council	D457 Heisers Road (Skid Hill Lane). Heisers Road links into Skid Hill Lane (all London Authority), no U Turn available at entry to London LEZ. Requests that as there are no U Turn facilities available at the start of the LEZ Zone that the start of the zone be extended to the A2022 where there is a roundabout that could provide for U Turning.
G7	Surrey County Council	D446 Ricketts Hill Road, approach from Church Hill Road into Ricketts Hill Road signed as 'Unsuitable for Heavy Goods Vehicles', actual zone starts a roundabout at end of Sunningvale Avenue - could increase use of Lusted Hall Lane.
G7	Surrey County Council	C238 Nedfont Road - Map 106 & 107. Long Lane Industrial Area is located just south of its junction with Bedford Road. There are also industrial units located along the eastern part of Bedford Road. The only access to this area will be via the LEZ as the Stanwell Area is covered by a 7.5T.
G7	Surrey County Council	C239 Long Lane - Map 107. Long Lane south of the industrial area has a 6'-6" width restriction located just to the north of Short Lane. Advanced signing at Long Lane/Bedford Road junction.
G7	Surrey County Council	C230/233 Vicarage Road/Groveley Road - Map 102. C233 Groveley Road between A244 Cadbury Road and Vicarage Road has a 7.5 tonne environmental weight restriction. Advance signing to be located at A308/M3 junction 1.
G7	Surrey County Council	Requires changes to the boundary or improvement works at junctions where diverted vehicles may need to turn.
G7	Surrey County Council	Suggests that lorry lay-by locations be considered for key routes into the zone.

Theme H: Operations

Sub theme	Stakeholder	Representation
H1: Hours of operation		
H1	Confederation of Passenger Transport (CPT)	Operators of buses and coaches that have to pay would like to be able to buy 24 hours for the proposed fee, rather than a calendar day. This should avoid the "Cinderella effect" of older buses and coaches that have brought customers into the capital for evening entertainment rushing out to beat the stroke of midnight.

Sub theme	Stakeholder	Representation
H1	Federation of Small Businesses	A further issue of concern to members is whether they will be charged for two days in the LEZ if their operations pass midnight. Businesses are encouraged by the Mayor to travel during off-peak times of day, therefore, it would be unfair to penalise them for working at night and consequently into the next day. The fairest solution is a 24 hour flat rate charge from the point in time which the vehicle enters the zone. A rolling 24 hour period gives small business the flexibility to work during less busy periods.
H1	Guild of British Coach Operators	The proposed daily charging system for non-compliant vehicles is based on calendar days, whereas many coach day trips, especially to the theatres, may not have completely exited Greater London by midnight. It would be inequitable to insist on payment for two separate days just because a one-day job happened to straddle midnight. Therefore suggests the daily charge should be for a 24-hour period specified by the operator, or that a period of grace through to say 0300 on the following day should be allowed.
H1	London Borough of Hillingdon	Strongly supports the proposals for the LEZ to operate 24 hours a day, 365 days a year. If the LEZ did not operate at weekends or on public holidays then the air quality and health benefits of the proposed scheme would be eroded.
H1	The Showmen's Guild of Great Britain	Consider modifying the definition of the "charging day" so that it embraces any 24 hour period as nominated by the operator rather than a 24 hour period running from midnight to midnight, Present proposal works unfairly against members who work the police, highways and London boroughs to move vehicles at night so as to minimise congestion. That cooperation would be undermined if by doing so the operators attracted two daily charges because the journeys spanned two charging days.
H1	The Showmen's Guild of Great Britain	By agreement with the Metropolitan and City of London Police and London boroughs, movements of Members' vehicles usually take place at night on agreed routes, due to the particular construction of the vehicles. A daily charge calculated from midnight to midnight would unfairly penalise members as such night movements may often span two daily periods from midnight to midnight.
H1	Transport 2000	Supports 24 hour a day, 365 days a year operation
H1	Consortium of Bengali Associations	Strongly supports proposals for the LEZ to operate 24 hours a day, 365 days a year.
H1	London Ambulance NHS Trust	Supports proposal for the LEZ to operate 24 hours a day, 365 days a year.
H1	Road Haulage Association	Strongly opposes proposals for LEZ to operate 24 hours a day, 365 days a year.
H1	Royal Mail	Opposes the proposed hours of operation as they will place a disproportionate burden on business like Royal Mail who are required to operate around the clock.

Sub theme	Stakeholder	Representation
H1	Thames Gateway London Partnership	Welcomes the principle that the LEZ should operate continuously 24 hours a day, 365 days a year. This will ensure that the health and related benefits are maximised for all people living, working and visiting London.
H2: Payment of the LEZ charge		
H2	British Vehicle Rental and Leasing Association (BVRLA)	Welcomes TfL's views on how the London Low Emission Zone (LEZ) will interact with the Congestion Charge, for example, it would seem logical that a customer should be able to pay both charges through one call centre or website.
H2	London Borough of Hammersmith and Fulham	Will the Congestion Charge database and LEZ database be cross-checked to see if people have paid one charge but not the other when they should have paid both?
H2	London Borough of Hammersmith and Fulham	Consideration should be given to integrating the LEZ payments administration process with the Congestion Charge payments system as there are likely to be a significant number of vehicles which will be eligible for both charges. Also, the payment methods could be made more convenient than just post, phone or internet in the same way as has been done for the Congestion Charge, where payments can be made at selected shops, petrol stations etc.
H2	London Borough of Hounslow	It makes good business sense to integrate the LEZ payments administration with the Congestion Charging payment systems as there are likely to be a significant amount of vehicles which would be eligible for both charges. The payment mechanisms should be the same for both the Congestion Charge and LEZ charges to avoid confusion.
H2	Guild of British Coach Operators	There should be a facility to pay the charge on the day after a non-compliant vehicle is used, to allow for emergency situations which were not foreseen. In such circumstances, in dealing with an operational emergency, remembering to pre-pay the access charge could be easily overlooked.
H2	Royal Borough of Kensington and Chelsea	The charge can be paid by post right up to (and including) the day of entry into the zone. Is concerned that this may lead to false claims that cheques had been sent by post, but then never arrived. Cheques received by post should have cleared prior to entering the zone. TfL state that ten days should be allowed for cheques to clear, therefore only more immediate forms of payment (either on-line or via the call centre) should be allowed within ten days of entering the zone.
H2	London Borough of Hammersmith and Fulham	Unsure of the current proposal to allow payments to be sent by post on the same day that the charge is applicable. This could cause potential problems if the paperwork and payment goes missing. It may be better to accept only 'instant' payment by credit or debit card over the phone or internet on the day when the charge is applicable or day after and allow the postal option for payments well in advance.

Sub theme	Stakeholder	Representation
H2	Royal Borough of Kensington and Chelsea	The payment system will need to be transparent so that drivers can be clear about the different charges for the congestion charge and the LEZ. Drivers must not be allowed to use any confusion as an excuse for not paying. This potentially will be very confusing for drivers coming in from another country.
H3: General operational processes		
H3	City of Westminster	Welcomes use, where possible, of a 'date of first registration' and a Vehicle Registration Mark, to enable TfL to identify the Euro-emission standard of a vehicle without requiring its operator to undertake a registration process before the vehicle can operate without charge in the LEZ area.
H3	Freight Transport Association	FTA is concerned that the proposed scheme will be complex and expensive to enforce as Transport for London (TfL) will be reliant on several different databases to verify vehicle compliance. These will, it is suggested, include the DVLA database, the RPC list, a list of pre-2001 Euro 3 vehicles, a register of sub-RPC modified vehicles, a register of foreign vehicles, a list of PM compliant Euro 1 & 2 vehicles and a list of otherwise-exempt vehicles.
H3	Freight Transport Association	Operators too are going to find it complex to know whether their vehicles are compliant or not as the proposals are to use assumed dates for Euro standards. They will have to know that they will need to register if they were an early adopter of a Euro standard (hardly an incentive for early uptake of new standards!) or if the vehicle has been retrofitted with pollution abatement equipment.
H3	Essex County Council	Concerned that identifying retrofitted vehicles may be difficult to administrate.
H3	CBI London	Administrative functioning needs to be designed to minimise the burden on business.
H4: Registration		
H4	London Borough of Barking and Dagenham	Whilst it is stated in the 'Scheme Description and Supplementary Information' that "all non-UK operators would need to register their vehicles with TfL", no indication is given as to how this is to be achieved.
H4	London Borough of Hammersmith and Fulham	TfL must make it clear to owners of vehicles that are either exempt or that comply with the emission requirements that they need to register for the scheme. This is another difference between the proposed LEZ and existing Congestion Charging scheme which may create confusion if it is not widely publicised well in advance of the LEZ being introduced.
H4	Thames Gateway London Partnership	Believes that the proposals are sufficiently clear on how operators would register a compliant vehicle and prove its emission levels.

Sub theme	Stakeholder	Representation
H4	London Borough of Hammersmith and Fulham	Will there be any particular action against vehicle owners who accidentally or otherwise register their vehicle as compliant, which doesn't turn out to be the case? Indeed, is there scope for non-complaint vehicles to make it onto TfL's register? How will information be cross-checked – will there be random checks on vehicles, for example?

Theme I: Enforcement

Sub theme	Stakeholder	Representation
<i>I1: Enforcement of foreign-registered vehicles</i>		
I1	GLA Labour Group	Concerned about how the mechanisms for enforcing the scheme on non-UK registered vehicles will work. Would not wish to see UK operators disproportionately affected. Appreciates the work that TfL is doing to broker agreements with international partners. Considers it vital that the enforcement of non UK registered vehicles is fully addressed and that effective mechanisms are put in place prior to the implementation of the scheme. Believes that progress made to date in partnership with UK and European government agencies, London Councils and London boroughs can be further enhanced by working with the UK industry and its European counterparts.
I1	Guild of British Coach Operators	The LEZ should not be introduced until TfL can demonstrate a practical, workable system to ensure that foreign registered coaches are subject to the same restrictions and penalties as British registered vehicles. The draft scheme order still does not explain how - indeed if - this is possible, particularly given the attitude of certain foreign governments and the limitations imposed by data protection legislation.
I1	Brewery Logistics Group	As far as foreign vehicles are concerned, who will ensure that they are up to the required standards before being allowed on the roads within London, and who will be responsible for issuing and receiving payment for the necessary fines? Or it is that they will be allowed to get away with it?
I1	CBI London	Effective enforcement of the scheme on foreign vehicles is important.
I1	Central London Freight Quality Partnership	Has concerns over the enforcement of vehicles based in other countries, particularly those from Eastern Europe and from outside the EU.
I1	Central London Partnership	Concerned about how foreign vehicles will be enforced, especially those from Eastern Europe and outside the EU. If they do not pay the charge, they could pick up extra work by undercutting UK operators.

Sub theme	Stakeholder	Representation
I1	Covent Garden Market Authority	The Low Emission Zone would also apply to non-UK registered vehicles driving within the zone. But as enforcement is through an ANPR system linked to the DVLA it is not clear how non-UK vehicles will be penalized. There should be a level playing field for all vehicles, regardless of where they are registered.
I1	Federation of Small Businesses	Concerned at the continuing inability to enforce the LEZ on foreign-registered vehicles, which would place UK operators at a disadvantage.
I1	Freight Transport Association	Is very concerned about how TfL will be able to enforce foreign vehicles which do not comply with the scheme requirements. Notwithstanding the greater interest shown in cross-border enforcement by DfT since the issue of national road-pricing schemes has risen on the agenda, there is no practical mechanism for enforcing these civil penalties and it is likely that foreign operators will both flout the law and gain competitive advantage whilst continuing to use polluting vehicles.
I1	London Councils	It remains unclear how foreign vehicles will be dealt with in terms of compliance when matching to a UK database. There is virtually no mention of registration and enforcement of foreign vehicles in the November consultation documents. It appears clear that the LEZ as proposed remains wholly unenforceable with respect to foreign registered vehicles. Within TfL's Strategic Review, it was noted that foreign vehicle enforcement was problematic, but also that the number of times an individual vehicle would enter London would be low. As stated in our previous submission, collectively, their impact on London's air quality might still be significant.
I1	London Councils	Evidence from Project SPARKS (supported by London Councils) shows that foreign registered vehicles account for more than 5% of all PCNs issued for illegal parking and an LEZ based on HGVs may well therefore exceed this. Project SPARKS has also shown that enforcement against foreign registered vehicles is not currently possible and inter-governmental agreements within the EU (as well as primary legislation) will be needed. TfL do not appear to have addressed concerns from the last consultation in terms of outlining more clearly how foreign-registered vehicles will be included within the enforcement of the LEZ and how the effective exemption of foreign registered vehicles will not result in unfair competition for haulage from European firms who may be at a competitive advantage if they do not have to comply with the LEZ.
I1	London Borough of Barking and Dagenham	Would welcome further assurances from TfL that non-compliant vehicles will not be able to evade the LEZ charge, including non-UK registered vehicles on which the DVLA holds no information.

Sub theme	Stakeholder	Representation
I1	London Borough of Barking and Dagenham	If there is no effective means of enforcing the LEZ on non-UK registered operators, this could undermine the LEZ and give non-UK operators an unfair advantage over UK operators.
I1	London Borough of Hammersmith and Fulham	How will this register work for foreign vehicles? In the 'interpretation' section, reference is made to vehicles 'registered in the records of Great Britain/Northern Ireland', but nothing about vehicles registered in other European countries.
I1	London Borough of Hammersmith and Fulham	The issue of how foreign registered vehicles will take full part in the scheme is still unclear. It appears that all owners of foreign based vehicles need to do to avoid paying any charges is to not register their vehicle. There is also potential for UK based vehicle owners to register their vehicle overseas to avoid charges or enforcement action. These issues need to be assessed and considered for potential impacts.
I1	London Borough of Havering	Concerns about how foreign vehicles will be enforced.
I1	London Borough of Hillingdon	Expresses concern over how foreign vehicles would be effectively controlled through the LEZ scheme. There is also a problem with enforcing a decriminalised offence such as will be the case with the LEZ.
I1	London Borough of Hounslow	The issue of how foreign registered vehicles will take full part in the scheme is still unclear. It appears that all owners of foreign-based vehicles need to do to avoid paying any charges is to not register their vehicle.
I1	London Borough of Merton	How would the final scheme address vehicles registered outside the UK? In particular, how would non-UK operators be notified and pursued for non-payment of the charge? This is already a problem with parking fines. Are any new enforcement powers (EU or GLA) being taken forward for non-UK registered vehicles?
I1	London Borough of Newham	There needs to be further clarification of the registration and enforcement framework for foreign vehicles
I1	Olympic Delivery Authority	Concern that it may be impossible to enforce in an equitable manner - particularly overseas visitors.
I1	London First	Transport for London's debt recovery agency is currently only achieving 30% success in recovering outstanding penalties for foreign registered vehicles. For the LEZ to be most effective it must be enforceable, therefore it is essential that foreign vehicles are subject to the same emission standards and charges for non-compliance.
I1	Park Royal Partnership	The businesses on this estate have national, European and global connections. The enforcement of the LEZ for non-UK registered vehicles must be thoroughly addressed.
I1	Road Haulage Association	Have serious concerns that the reality of the proposed enforcement regime discriminates against UK goods vehicle operators. Finds such a situation unacceptable.

Sub theme	Stakeholder	Representation
I1	Thames Gateway London Partnership	Clear that all non-UK vehicles will need to register with TfL. It is essential that a system is in place to ensure even handed treatment of both British and overseas vehicles.
I1	London Borough of Hounslow	There is also potential for UK based vehicle owners to register their vehicle overseas to avoid charges or enforcement action.
I1	Royal Borough of Kensington and Chelsea	This consultation also still fails adequately to address how foreign vehicles will be dealt with. Is concerned that UK based vehicle owners may be tempted to register their vehicles overseas to avoid charges or enforcement action.
I1	London Councils	There is also the potential for UK-based vehicle owners to register their vehicle overseas to avoid charges or enforcement action.
I1	The Society of Motor Manufacturers and Traders Ltd	Concerned with unreasonable treatment of foreign registered vehicles. Members of SMMT empathise with UK transport operators in that operators of foreign registered vehicles will in reality not be treated in the same way as their UK counterparts. Propensity to pay fines, and or attempt to validate pollution standards, whether by manufacture or retrofit, will not be the same for foreign vehicles as for UK vehicles. The fine processes will be doubtfully applied. This will potentially put UK van, truck bus and coach operators at a disadvantage to foreign operators. Further, it leaves the opportunity for UK-based operators to "flag out" to other states and avoid the implications of the zone.
<i>I2: Concerns regarding database accuracy</i>		
I2	London Borough of Brent	Using a central (Government Agency) database like that of the DVLA makes the most sense and retains a centralized control regime which means that, rather like the Congestion Charging Scheme enforcement cameras, up-to-date information is held and the culprits that try to evade the charges can be held to account.
I2	Freight Transport Association	Is concerned that the proposed scheme will be complex and expensive to enforce as Transport for London (TfL) will be reliant on several different databases to verify vehicle compliance. These will, it is suggested, include the DVLA database, the RPC list, a list of pre-2001 Euro 3 vehicles, a register of sub-RPC modified vehicles, a register of foreign vehicles, a list of PM compliant Euro 1 & 2 vehicles and a list of otherwise-exempt vehicles.
I2	Finance and Leasing Association	Has concerns over the accuracy of the TfL database of LEZ compliant and non-compliant vehicles. Recommends that TfL's database is aligned with DVLA's Vehicle Keeper Database to ensure consistent application of fines, record keeping and to reduce internal inaccuracies.

Sub theme	Stakeholder	Representation
<i>I3: Concerns regarding drivers evading fixed cameras</i>		
I3	London Borough of Barking and Dagenham	Would welcome further assurances from TfL that non-compliant vehicles will not be able to evade the LEZ charge, including UK registered vehicles that could use possible 'rat-runs' to avoid the LEZ.
I3	London Borough of Barnet	The consequences of non-compliant vehicles avoiding penalty charges are that less reputable operators may be willing to take the risk of entering the zone with non-compliant vehicles, possibly making use of residential roads and borough routes to avoid the risk of detection. The potential environmental impact of non-compliant vehicles using residential roads is often far higher than the same vehicles using the main road network.
I3	Surrey County Council	Important that adequate and regular enforcement takes place particularly on any entry point using mobile enforcement. If not the local routes may be developed to avoid detection into and out of the zone.
I3	Finance and Leasing Association	Supports the use of ANPR cameras as the best enforcement tool for the LEZ. However, not enough details on the enforcement procedures and the seizure of vehicles are provided, though the substantial daily charge would act as a deterrent to persistent evaders.
I3	London Borough of Barking and Dagenham	With respect to the possibility of vehicles evading fixed Automatic Number Plate Recognition (ANPR) cameras, welcomes the indication given by TfL that mobile patrol units would also be used.
I3	London Borough of Barnet	Has particular concerns about the proposed enforcement strategy and its effectiveness. Whilst the proposed penalty (£500) is a considerable sum for individuals and small operators to pay (potentially as a result of administrative oversight) it is small in relation to the daily charge. If payment is made within 14 days, the penalty represents only 2.5 times the daily charge. For people willing to persistently evade, the 'breakeven' point is the equivalent of being caught once every two and a half days. Since fixed cameras will be in known positions, mobile enforcement vans will be identifiable and the charge does not have to be paid prior to entering the zone, it will be relatively easy for non-compliant vehicles to be driven in the zone avoiding penalty charges.
I3	London Borough of Hammersmith and Fulham	The permanent cameras to be used for enforcement via Automatic Number Plate Recognition (ANPR) are only going to be installed on the TfL road network. This leaves a large area of borough roads to be covered by the mobile enforcement cameras. Will local authorities be involved in drawing up procedures on camera deployment, for example by suggesting particular hot spots – e.g. around Heathrow distribution centres, industrial parks, hotels, football grounds on match days (buses) etc where relevant vehicles are likely to be in larger numbers. The effectiveness of the mobile

Sub theme	Stakeholder	Representation
		units will need to be kept under review, particularly in the early part of the LEZ scheme as there may be a need to increase their coverage if they become easy to avoid.
I3	London Councils	Boroughs are concerned regarding how effective TfL's proposed approach to LEZ enforcement will be to achieve the desired improvements in air quality. The permanent cameras to be used for enforcement via Automatic Number Plate Recognition are only going to be installed on the TfL road network, leaving a large area of borough roads to be covered by the mobile enforcement cameras. The effectiveness of the mobile units will therefore need to be kept under review, particularly in the early part of the LEZ scheme as there may be a need to increase their coverage if they become easy to avoid.
I3	London Borough of Hillingdon	Assurance is needed that Automatic Number Plate Recognition (ANPR) cameras, which will be used to enforce the LEZ, will only be used for the LEZ scheme.
I4: Persistent evaders		
I4	London Borough of Hammersmith and Fulham	Given that most of the vehicles that could be in line for immobilisation are extremely large and heavy vehicles, much more so than the average vehicle currently subject to similar enforcement actions in London (mostly cars for illegal parking offences), how will such vehicles be immobilised and removed? Also, given that some vehicles (e.g. coaches) may have personal belongings on that belong to people other than the driver or registered keeper (who is responsible for ensuring the proper charge has been paid), are there implications for removing these types of vehicles that have been overlooked? This could be pertinent for day trippers, football fans etc who may find themselves stranded through no fault of their own.
I4	London Borough of Hammersmith and Fulham	How will the authorised person become aware that a particular vehicle is a candidate for immobilisation or removal? Also, who will be carrying out these duties – is there potential for conflict between the London boroughs' parking enforcement duties and the LEZ enforcement procedures? How will liaison be co-ordinated in situations where a vehicle illegally parked and breaching parking regulations could also be liable for enforcement action for avoiding the LEZ charge?
I4	London Borough of Hounslow	Most of the vehicles that could potentially be subjected to immobilisation under the LEZ would be large and heavy vehicles when compared to car-clamping and parking enforcement. How is it proposed that these be immobilised and removed? This is of particular concern to coach vehicles on day trips for London events.
I4	Finance and Leasing Association	Supports the use of ANPR cameras as the best enforcement tool for the LEZ. However, not enough details on the enforcement procedures and the seizure of vehicles are provided, though the substantial daily charge would act as a

Sub theme	Stakeholder	Representation
		deterrent to persistent evaders.
<i>I5: Transfer of liability</i>		
I5	Finance and Leasing Association	Under the Vehicle Excise and Registration Act 1994, the registered keeper of a vehicles is the person or company whose name the vehicle is registered under. Lessors and finance companies are usually listed as the registered keeper of the vehicle on lease agreements. Under the London congestion charging scheme, finance companies can provide TfL with a 'statement of liability' for any charges or penalty charges incurred. FLA urges TfL to extend this to the LEZ.
I5	Finance and Leasing Association	For the sake of consistency, urges that hire-purchase agreements are not excluded from the ability to transfer liability, to prevent significant costs being incurred by finance and leasing companies and to speed up resolution of LEZ enforcement cases.
I5	Finance and Leasing Association	In the absence of a change to the proposed LEZ regulations, an alternative would be to have the ability to transfer liability on the back of LEZ charges or PCNs relating to non-payment of LEZ charges.
I5	Finance and Leasing Association	In its 2006 Simplification Plan, DfT published measures extending the transfer of liability to the customer where the lease or hire period is greater than six months. Current London Road User Charging Regulations only allow the transfer of liability on agreements of less than six months. Asks for this to be rectified.
I5	British Vehicle Rental and Leasing Association (BVRLA)	It should be understood that as a pre-requisite of support for the scheme will be expecting the scheme to allow BVRLA Members to transfer liability for any fines to the user/operator of the vehicle. Appreciates that the detail of who will be responsible for paying a fine will be enshrined in regulation but feel it is important to comment on this area now. As TfL have agreed, Members cannot be held responsible for what happens to their vehicle after an agreement (regardless of its duration) is signed and the vehicle leaves their premises. It is well established in other enforcement regimes that our Members are able to pass fines, for example parking fines bus lane fines, which are incurred by the hirer of the vehicle to that hirer through making a representation to the relevant local authority. Does not see that fines for the LEZ would be any different and expect the legislation to reflect this. Important to note that BVRLA members would not be aware where the hirer is intending to use the vehicles and therefore a lack of knowledge of the emission level by the hirer should not automatically mean that the member is responsible for the fine.

Sub theme	Stakeholder	Representation
I6: Other enforcement issues		
I6	Harry Cohen MP	Is unsure how enforcement would apply.
I6	BAA	Willing to offer use of roads or facilities for necessary enforcement equipment. Is also willing to provide access to data collected by existing ANPR cameras, if used solely in relation to LEZ. In return, BAA would like access to TfL data collected on or around the airport.
I6	BAA	Seeks clarification that enforcement at Heathrow would be TfL's responsibility, though no clamping activity would be allowed at Heathrow due to the risk of increasing congestion and the security hazard it may present.
I6	Thames Gateway London Partnership	Concerned that the technology required to run the scheme could in time become redundant as older, non compliant vehicles reach the end of their working life. Seeks assurance that every effort will be made to minimise the amount of investment in equipment which could in time become redundant whilst still delivering an effective scheme.
I6	London Borough of Hammersmith and Fulham	The registration of non-chargeable vehicles should be monitored to ensure applicable vehicles only are registered and that there are no loopholes that unscrupulous vehicle owners might seek to exploit by registering vehicles that should not qualify for the 100% discount. Will vehicles be subject to any checks?
I6	London Borough of Hammersmith and Fulham	In relation to Article 5 of the Scheme Order, is there a role to play for on-street emissions checks to verify whether or not vehicles that meet the required emissions in theory actually do meet the standard in practice?
I6	London Borough of Hammersmith and Fulham	What about a vehicle which is not registered with TfL but which is compliant and 'non-chargeable' and being driven regularly in the LEZ? What action would be taken in such a situation?
I6	London Borough of Hammersmith and Fulham	TfL needs to ensure that Penalty Charge Notices are issued correctly as soon as the LEZ is introduced, and not in a way that is open to legal challenge (as has been the case recently with parking and Congestion Charging PCNs).
I6	London Councils	There is the issue of whether there is a role to play for on-street emissions checks to verify whether or not vehicles that meet the required emissions in theory actually do meet the standard in practice. Such monitoring would help inform future policy decisions regarding the effectiveness of the LEZ.
I6	British Vehicle Rental and Leasing Association (BVRLA)	In addition, the confirmation that there will be an early warning system for drivers who drive in the zone prior to each go live date with a vehicle which will not meet the soon to be introduced specific standard is very much welcomed.

Sub theme	Stakeholder	Representation
I6	Finance and Leasing Association	TfL's LEZ Scheme Order contains little information on the enforcement protocol for charges and Penalty Charge Notices (PCNs) for non-payment, other than the scale of the financial charges themselves. Assumes that the administrative and enforcement systems of the proposed LEZ would be similar to those introduced under the London Congestion Charging scheme. To the extent that this is the case, the proposals here are welcome.
I6	Finance and Leasing Association	Recommends that TfL carry out a vehicle finance check when PCNs are issued against a vehicle and when a vehicle has been seized and impounded. These would allow TfL to determine if a vehicle is currently subject to an outstanding finance agreement and with which company. Recommends that Congestion Charging protocols, by which companies are contacted 14-21 days after a vehicle has been impounded, alerting finance providers with an interest in recovering the vehicle. This would benefit TfL in freeing up staff, reducing storage costs and cutting administration, whilst leasing providers would benefit from quick recovery of assets and minimising vehicle value depreciation.
I6	Finance and Leasing Association	Would welcome a LEZ protocol between TfL and FLA along the same lines as the Congestion Charging protocol under development, which would resolve matters relating to outstanding PCNs and the storage costs of impounded vehicles.
I6	Guild of British Coach Operators	Concerned about the impact of unexpected road closures on the periphery of London, particularly closures of sections of the M25. In such circumstances, non-compliant vehicles by-passing London may be compelled to enter the fringes of the charging zone. They should be exempt from charging and there should be explicit reference to these circumstances, so that there is clarity of the rules and procedures in such cases.
I6	London Borough of Newham	There is a need to closely monitor the efficiency of the chosen strategy and a preparedness to make changes if the projected targets are not being achieved in regard to enforcement.

Theme J: Level of charge

Sub theme	Stakeholder	Representation
<i>J1: All charges are correct</i>		
J1	Central London Partnership	Feels that the levels of charges are appropriate.
J1	Consortium of Bengali Associations	The proposed level of charge is sufficient to incentivise operators to make their vehicles compliant. The proposed level of penalty charge is a sufficient deterrent

Sub theme	Stakeholder	Representation
J1	Environment Agency	Agrees with the levels of charges.
J1	London Borough of Ealing	Welcomes the proposed level of charge as offering a suitable deterrent to frequent use, and the same applies for the Penalty Charge.
J1	London Borough of Greenwich	The concern raised during the Strategy Revisions consultation about the level of charging for non-compliant vehicles has been met. We agree that a lesser charge than that proposed would potentially erode the air quality benefits of the LEZ. It is essential there is sufficient incentive to encourage operators to modify or replace non-compliant vehicles rather than absorb a daily charge. Supports the proposed charging level.
J1	London Borough of Hillingdon	The level of charge (i.e. £200 for diesel engine Heavy Goods Vehicles (HGVs), buses and coaches and £100 for diesel-engine minibuses and heavier Light Goods Vehicles (LGVs) is sufficient to incentivise operators to make their vehicle compliant. The London Borough of Hillingdon agrees that the proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge (i.e. of £1000 for diesel-engine HGVs, buses and coaches and £500 for diesel-engine minibuses and heavier LGVs) is a sufficient deterrent.
J1	Royal Borough of Kingston upon Thames	In principle supports the imposition of charges to meet the objectives of LEZ, which is likely to influence the fitting of abatement equipment to non-compliant vehicles.
J1	Thames Gateway London Partnership	Welcomes the level of charging and the related penalties to encourage vehicle compliance.
J1	UK local authorities	2 local authorities consider that the proposed level of charge is sufficient to incentivise operators to make their vehicles compliant. 5 local authorities consider that the proposed level of penalty charge was a sufficient deterrent.
J1	West Sussex County Council	Would agree with the need to make charges sufficiently high to ensure operators use cleaner vehicles.
J2: Charges are too low		
J2	London Borough of Hammersmith and Fulham	How have the level of charges been set? They seem quite low compared to the range of charges highlighted in the previous consultations. Will charges at £200/£100 be enough of a disincentive to either keep vehicles out of the LEZ or encourage vehicles to be upgraded and cleaned up. The effectiveness of the LEZ will be compromised if a high number of the most polluting vehicles continue to drive into London and support for the scheme could be lost if it is largely regarded as a money making scheme rather than one intended to reduce pollution and improve air quality.

Sub theme	Stakeholder	Representation
J2	London Borough of Barnet	Concerned about the proposed enforcement strategy and its effectiveness. Whilst the proposed penalty (£500) is a considerable sum for individuals and small operators to pay (potentially as a result of administrative oversight) it is small in relation to the daily charge. If payment is made within 14 days, the penalty represents only 2.5 times the daily charge. For people willing to persistently evade, the 'breakeven' point is the equivalent of being caught once every two and a half days.
J2	UK local authorities	5 local authorities consider that the proposed level of charge is too low.
J2	UK local authorities	2 local authorities consider that the proposed level of Penalty Charge is too low.
J3: Charges are too high		
J3	London Ambulance NHS Trust	Agree proposed level of charge and penalty charge is sufficient to incentivise operators to make their vehicles compliant, but is too high.
J3	Road Haulage Association	Proposed level of charge is too high.
J3	Royal Mail	Believes that the proposed charges for HGVs, LGVs, buses, coaches and minibuses are too high.
J3	UK local authorities	2 local authorities consider that the proposed level of charge is sufficient but too high.
J3	UK local authorities	2 local authorities consider that the proposed level of penalty charge is too high.
J4: Other charge level issues		
J4	City of Westminster	Penalty and daily rate charges need to be maintained at levels that will maximise compliance and reduce to a low level the numbers paying to enter with a vehicle that does not meet the LEZ requirements
J4	London Borough of Hammersmith and Fulham	It is unclear if the charges will be subject to any review. If so, should this need to be notified in the Scheme Order?
J4	Royal Borough of Kensington and Chelsea	It is proposed that the charge for non-compliant HGVs, buses and coaches will be £200 daily, while heavier LGVs and minibuses will be charged £100 daily to enter the zone which TfL considers reflects the relative size and compliance costs for these vehicles. TfL say that modelling suggests a 'gradual erosion of the health and air quality benefits from the LEZ for charges lower than those proposed'. Despite repeated requests, TfL has not provided the exact level of compliance predicted to occur with these charges. In addition, there is no mention as to what benefits would occur should the charges be higher. These should also have been included in a transparent way.

Theme K: Discounts and exemptions

Sub theme	Stakeholder	Representation
<i>K1: General exemptions and clarification</i>		
K1	City of Westminster	We welcome inclusion in the current consultation of a specific list of proposed exempted vehicles (agricultural; military; historic vehicles not used for hire & reward; non-road going vehicles allowed to drive on the highway, such as excavators; and certain types of mobile crane).
K1	City of Westminster	It is inevitable that some vehicle operators will think that the list should be extended. Any further exemption should not be made unless there is an exceptionally strong case that meets pre-defined criteria. Asks for a mechanism to be put in place, with defined criteria, to enable consideration to be given to any clear-cut case for a further exemption ('Non-Chargeable Vehicles' to which a 100% discount would apply). Such a transparent procedure would avert adverse publicity that might flow from a genuine case that had not been anticipated.
K1	Environmental Industries Commission	Welcomes the fact that the number of vehicles which will be entitled to an exemption from the scheme has been kept to a minimum, subject to the practicalities of compliance and enforcement.
K1	London Ambulance NHS Trust	Strongly supports the proposed exemptions.
K1	Consortium of Bengali Associations	Support the proposed exemptions.
K1	London Borough of Hammersmith and Fulham	In terms of the vehicles that will be non-chargeable or exempt from the scheme, it must be clear to owners of these types of vehicles whether or not they have an exempt vehicle. It also states in some of the supporting documents that the LEZ would also apply to some private vehicles that are 'lorry-derived' vehicles, such as some motorised horse boxes and some motor homes. There should be clear information for people in terms of the vehicle definitions so that (i) unsuspecting vehicle owners do not pay unnecessarily and (ii) those with vehicles that may not be immediately obvious as a 'relevant' vehicle do not inadvertently miss the payment charge and be fined.
K1	London Borough of Hillingdon	Clarification is also sought about those vehicles, which would be exempt, by TfL in terms of vehicle types. It would be helpful if TfL could more clearly outline which vehicles currently operating in boroughs will be covered by these exemptions, including horse boxes, as this would greatly assist boroughs with forward planning vehicle replacement requirements
K1	London Borough of Hillingdon	Would like clarity on whether horse boxes, and the Council's road maintenance vehicles such as gritters and loading shovels will be included within the scheme.
K1	London Borough of Ealing	Would like to know more regarding which vehicles currently operating in boroughs would be covered by the exemptions.

Sub theme	Stakeholder	Representation
K1	Construction Plant-hire Association	It is not clear from the consultation documentation which Non Road Mobile Machinery (NRMM) vehicles would be exempted from the scheme.
K1	London Ambulance NHS Trust	The system of identifying vehicles appears to be very complicated and the exemption classes as used in the congestion zone system would be much simpler to apply.
K1	The Society of Motor Manufacturers and Traders Ltd	Inconsistency between exemptions for LEZ and Congestion Charging. Support the principles of the Congestion Charge zone being mirrored in the principles for the LEZ, simple effective and easy to understand with a few notable exceptions.
K1	Healthcare Commission	Exemption is not an option. Agrees that striving to keep transport 'clean' is a top priority.
K1	UK local authorities	Any vehicle for which there is no proven retrofit technology should be exempt.
K1	Central Council of Physical Recreation (CCPR)	At the very least, owners of vehicles which cannot be retrofitted should be given grant aid to fund the purchase of compliant vehicles or re-engine, or a longer period in which to become compliant.
K1	West Sussex County Council	West Sussex asks whether it is practical to allow heavy vehicle operators with 5 older vehicles or fewer more time to modify or buy new vehicles by temporarily registering one or more of their vehicles for use in the LEZ without charge.
K1	The Caravan Club	For 12% of our motor caravan-owning members, their motor caravan is their only vehicle. Such members living within the Congestion Zone would get a large reduction in the normal cost, but those living within the LEZ (likely to be a far greater number) would get no reduction whatsoever, since there is no provision for a residents' exemption.
K1	London Borough of Hillingdon	Supports proposal to exempt military vehicles.
K1	London Borough of Hillingdon	Need to consider whether horseboxes are included in the list of exemptions.
K1	Royal Mail	Agrees with the list of vehicles proposed for exemption.
K1	UK local authorities	6 local authorities support the proposed exemptions and 1 opposes the exemptions.
K1	Ministry of Defence	Sought clarification of whether the definition 'Military Vehicles' would be identical to the definitions used for the Congestion Charging exemption. It also asked TfL to explore the possibility of a full exemption for all vehicles under the control of the MoD."
K2: Not for profit/community organisations		
K2	Central Council of Physical Recreation (CCPR)	It is vital that Transport for London makes a distinction between commercial vehicles run for profit and community activities that enhance the health and well-being of Londoners. 12-16 seat mini-buses are primarily used by community groups and voluntary/ charitable/not-for-profit

Sub theme	Stakeholder	Representation
		organisations, and constitute only a small part of the overall dangerous particle emissions compared to commercial companies.
K2	West Sussex County Council	West Sussex asks whether an exemption for minibuses owned by non-governmental organisations, particularly charities for disadvantaged groups, has been considered. West Sussex states that although these groups should not have to travel in poorer quality and more polluting vehicles, voluntary organisations may well not be able to buy new vehicles or clean up existing ones. Exemptions could be granted to minibuses that perhaps fit a certain criteria.
K2	Central Council of Physical Recreation (CCPR)	First preference would be a full exemption for voluntarily run not-for-profit sports clubs/organisations/groups. In the absence of exemptions, grant aid to convert vehicles or discounts, there should be a delay in implementing the scheme to minibuses and LGVs used by voluntarily run not-for-profit sports clubs/organisations/groups
K2	Olympic Delivery Authority	In view of our wider sustainability objectives of social inclusion, hope that a sympathetic view could be taken, in worthy cases, for a reduction of charge
K2	London Borough of Hillingdon	Need to consider whether horseboxes are included in the list of exemptions.
K2	GLA Conservative Group	The Scheme Order states that horseboxes will be subject to the new regulations. Many motorised horseboxes are owned by individuals, and are not used for hire and reward, or by small clubs who only just survive on very little income from shows and competitions. The cost of compliance for these people will be too much to bear and we would urge an exemption for these vehicles.
K2	Confederation of Passenger Transport (CPT)	TfL should not exempt "not for profit" operators.
K3: Vehicles used for public service		
K3	London Ambulance NHS Trust	Has a small number of very specialist vehicles which are used for incident support, They travel low annual mileages and are playing an important role in terrorist incidents. Because of their specialist nature they are expensive vehicles and are worthy of exemption on the basis of the important role they play. A short exemption for the duration of incidents would not be sufficient as they need to travel for vehicle and equipment maintenance as well as staff training. If an exemption class of less than 5,00 miles per year was introduced these vehicles would fall below that whilst making very small contributions to air pollution.
K3	St John Ambulance, London (Prince of Wales) District	Requests that serious consideration be given to allowing an exemption for St John's on identified vehicles so that work with the people of London and statutory services can continue without interruption. Believes there is a strong and special case for exemption.

Sub theme	Stakeholder	Representation
K3	London Borough of Barnet	<p>Although Barnet, and we believe all other boroughs, strive to operate the cleanest vehicles possible, there are some specialist vehicles used in the provision of public services for which it is uneconomic to ensure regular replacement. These vehicles may also have limited residual value making disposal or retrofitting unattractive options. Examples include dedicated winter maintenance vehicles which perform a vital function, yet have a very low annual mileage and an insignificant impact on total emissions. Believes TfL should carry out further consultation with London Councils and the Highways Agency on the exemption of certain public sector vehicles, particularly those used for highway maintenance and emergency response (including, for example, the London Underground emergency response vehicle). The use of public sector funding to replace non-compliant vehicles needs to be carefully considered to ensure it represents best value to the taxpayer and maximises environmental benefits.</p>
K3	South East Coast Ambulance Service NHS Trust (SECAMB)	<p>Aware that the government is committed to driving forward the use of fuel efficient and environmentally friendly engines, but feel that vehicles used by the Fire, Police and Ambulance Services should be exempt from the charge. Continuing to ensure that, where possible, we procure low emission diesel engines for the future.</p>
K3	South East Coast Ambulance Service NHS Trust (SECAMB)	<p>Category N2 ambulance vehicles should be exempted the LEZ scheme charges under the same terms and conditions as the Congestion Charge. In July 2008 non compliant vehicles will be nearing the end of their useful lives. Levying the LEZ charge at the proposed rate, will hinder the procurement of new compliant ambulances and only encourage the use of older vehicles.</p>
K3	St John Ambulance (Kent)	<p>Newest ambulance is now 5 years old but have other vehicles that are quite old. Although based in Kent, regularly run casualties from Brands Hatch into Queen Mary's Hospital Sidcup and Kent's mobile treatment unit (registered in 1984) covers most of its annual mileage when taken to Erith for its annual service & MOT, it did less than 30 miles during 2006.</p>
K3	Ambulance Service Association	<p>Although understands that short-term exemptions would be given for major incident response vehicles at the time of any emergency, the vehicles need to be moved for training and maintenance purposes.</p>
K3	Ambulance Service Association	<p>NHS ambulance vehicles, licensed for use by NHS Ambulance Service Trusts should be exempted from these regulations. A similar system of exemption applies for the Congestion Charge and it would be easy to extend this arrangement to all NHS ambulances. The extension of the LEZ regulations to include these vehicles would add a considerable financial burden to the NHS and make it more difficult for the service to provide appropriate and timely healthcare to patients.</p>

Sub theme	Stakeholder	Representation
K3	London Borough of Barnet	The issue of vehicles used to respond to 'emergencies' is important as decisions to use a particular vehicle to respond should be based on achieving a rapid response to the situation rather than compliance with emission standards. A further example is for rail replacement services where large numbers of buses may need to be found in a very short period of time.
K3	London Borough of Bexley	Considers that the small list of exemptions should be extended to include low use emergency vehicles such as council gritting lorries. These are only used for a small proportion of the year and their replacement could involve significant additional costs.
K3	London Borough of Bromley	Sought a system of either exemption or derogation to allow fleet replacement or modification to take place within normal budget cycles, or a guarantee from TfL to meet any additional fleet costs incurred. These guarantees have not been forthcoming.
K3	London Borough of Bromley	<p>Expressed the view that other councils might well be in a similar situation with some of their operational vehicles, and, in the event, a number of councils did indeed make similar points. TfL responded to this in the Report to the Mayor on the Strategy Revisions consultation and asserted that:</p> <ul style="list-style-type: none"> • the intention of the LEZ was to discourage the most polluting older vehicles; • vehicles under eight years old would be compliant; and • it was considered that “the LEZ would have no significant effect on London boroughs ... in terms of ... operational costs”. <p>At a meeting for boroughs, to report back on the outcome of the consultation, TfL stated explicitly that it was not intended that the Scheme Order would offer any concessions to borough specialist vehicles, although TfL did correctly refer to the (statutory) right of objection to the Order when it was published.</p>
K3	London Borough of Bromley	Thus, despite its support in principle for a LEZ, the Council objects to the Scheme Order on the grounds that the absence of a derogation or exemption for specialist Council vehicles will impose an unreasonable and unjustifiable burden on Bromley council tax payers in return for a minimal air quality benefit.
K3	London Borough of Hillingdon	The costs involved in ensuring that the Hillingdon borough fleet vehicles will be compliant with the LEZ criteria as outlined in the consultation is expected to be in the region of £660,000 to £960,000 depending on whether gritters are exempt or included under the scheme. Would like TfL or central government to consider seriously the provision of grants, particularly for specialised vehicles, to assist boroughs, community transport operators and small businesses in achieving compliance.

Sub theme	Stakeholder	Representation
K3	London Borough of Islington	Gritters are currently not exempt from the LEZ. These vehicles are high cost and due to their extremely low and seasonal usage, will last possibly three times longer than a vehicle used for the majority of the day. As such, feels that the exemption register should be reviewed to include these vehicles or have a lower limit for particulate matter allowing for an older vehicle.
K3	London Councils	There is also a case for an exemption for some borough-owned vehicles that provide significant public benefit and that are not necessarily used frequently (e.g., gritters). Do not believe that this creates an uneven playing field compared with the private sector, due to the public good provided by such vehicles.
K3	UK local authorities	Winter gritting vehicles should be exempt.
K3	London Borough of Wandsworth	Suggests that If the LEZ proceeds, the exemptions proposed should include essential specialist Council vehicles such as gritters and any others with a design life of below 16 years. Councils should however be put under a duty to demonstrate that replacements for vehicles in this category are fully compliant with European regulations, thereby delivering lower emissions as required.
K3	London Borough of Bexley	Considers that there are also high value specialist vehicles such as mobile libraries where abatement retrofit options may not be practical, and these should also be included in the list of exemptions.
K3	Royal Borough of Kensington and Chelsea	Would like to recommend that TfL consider an alternative policy proposal to mandate London authorities and other operators to replace specialist vehicles when they reach a certain age, say 16 years, with Euro IV compliant vehicles. Further modelling would need to be undertaken, but it might result in an overall improvement in emissions and obviate the waste of considerable levels of resources (financial, energy and material).
K4: Historic vehicles		
K4	Confederation of Passenger Transport (CPT)	Historic vehicles (pre-1973) should be exempt from the charge regardless of whether they have been hired for profit or driven in by a non-commercial owner. This is a tiny segment and there is no risk of significant numbers of pre-1973 vehicles being resuscitated for bread-and-butter work. Some preservationists are not averse to informal commercial arrangements and enforcement would be very difficult. There is a risk that the current, small, sector offers old buses and coaches for hire would be driven towards ostensible private operation, which involves less demanding testing and driving standards. This would be a risk to public safety.

Sub theme	Stakeholder	Representation
K4	Federation of British Historic Vehicle Clubs	Argues for the definition of heritage vehicles to be amended so that it covers any vehicle constructed before 1 January 1973 and any vehicle which on the occasion of being driven was manufactured more than 25 years ago and which is not used on a road for commercial purposes. The current definition is too restrictive and detrimental to the future preservation of retired commercial vehicles in London. Most of these vehicles are privately owned, preserved and used infrequently.
K4	Federation of British Historic Vehicle Clubs	The consultation documents suggest that where fitting abatement equipment is not an option, or where usage is slow, an exemption would be considered. The Economic and Business Impact Assessment estimates that retrofitting a pre-Euro II vehicle would cost over £6000. Even if retrofitting were an option for heritage vehicles (which it is not, as it would negate the purpose of preservation), the costs involved would be far larger. It would be impossible to make vehicles over 25 years conform to Euro IV even if twice these sums spent.
K4	Federation of British Historic Vehicle Clubs	The use of a fixed date is detrimental to vehicle preservation, as no-one will preserve a heritage vehicle if they have to pay to use it. Government statistics show that virtually all 'commercial vehicles' are taken out of service before reaching 20 years. Restored, retired commercial vehicles manufactured after 1973 are just as much heritage vehicles as those build before 1973. 1973 is therefore an artificial date. Excluding heritage vehicles built after 1973 would also adversely affect a number of heritage events. Therefore proposes that vehicles over 25 years old operated on a non-commercial basis should be exempt.
K4	Federation of British Historic Vehicle Clubs	A small number of "Heritage Public Service Vehicles" should be exempt. These are generally low-profit enterprises, and the imposition of the LEZ daily charge would deny the public the opportunity to enjoy occasional rides on these vehicles. Since most of the vehicles involved are over 40 years old, a different age criterion is appropriate, therefore propose that commercially operated heritage PSVs be exempt if they were constructed before 1973.
K4	Guild of British Coach Operators	Provision should be made for the commercial operation of heritage buses/coaches without payment of the daily fee. The latest proposal only covers vehicles which are not licensed as PSVs and is likely to lead to some of the legitimate, PSV-licensed operations going "underground" by being taxed and operated as private vehicles, outside of the legal protections imposed by the operator licensing system. The total number of vehicles likely to be affected is minute by comparison to the overall scheme but the impact on individual businesses could be devastating.

Sub theme	Stakeholder	Representation
K4	Historic Commercial Vehicle Society	Concerned with the proposal to only allow vehicles constructed before 1973 to be exempted from paying the LEZ charge. Heritage vehicles do not automatically cease at 1973. The recent Tachographs proposals issued by the government have a date limit of a rolling 25 years for their exemptions. Could legislation not be harmonised to that of a rolling 25 years old exemption for preserved historic vehicles? 1973 has never been recognised as a universal definition of "heritage" either by museums, historic clubs, or government departments. The London Transport Museum, has five vehicles post-1973 and the exemption proposal would not allow natural movement of these exhibits between the Acton Depot and Covent Garden Museum without major expenditure. The fact that London Transport Museum continues to acquire London Buses vehicles of later decades proves that history is ongoing.
K4	Historic Commercial Vehicle Society	The Society excludes commercial vehicles under 20 years old which illustrates that very few, if any, lorries, buses or vans even reach that age before scrapping. However recognises the intent of the proposals and would be prepared to move the date criterion to 25 years for entries to our annual London to Brighton run. If the 25 year rolling age limit is not adopted our London to Brighton run, which celebrates 47 years in May 2007, it would no longer be able to commence in London. The Annual Cart Making Ceremony organised by the Carmen Livery Company and held at Guildhall in London every July embraces vehicles of all types and this would again be affected by an artificial cut off date of 1973 for historic vehicles. We are aware of many other rallies in the Greater London area some of which are for charitable purposes.
K4	Historic Commercial Vehicle Society	Another concern with the 1973 exemption is the clause which specifies that the vehicle must not be used on the road for commercial use. There are a number of historic buses kept by operators in PCV Class 6 condition used for occasional duties such as weddings, special events and even on special TfL routes in London for celebrations. the proposal is too restrictive to allow no such occasional use of a historic vehicle in commercial use. The total mileage of these operations would only be negligible in the scope of total PCV operations in London.
K4	Historic Commercial Vehicle Society	In regard to historic vehicles with occasional commercial use, it would be uneconomic to re-engine these vehicles and indeed it would destroy the very historic value for which they are preserved. There is even at least one lorry used commercially to carry a coffin to a funeral but again this would obviously not be an everyday occurrence.
K4	Historic Commercial Vehicle Society	Understands the need to prevent operators from using 26 year old plus vehicles on a regular basis. If these commercially used vehicles could not be exempted under a 25 year old rule, then would suggest a 30 year old rule.

Sub theme	Stakeholder	Representation
K4	London Borough of Brent	<p>The Scheme Order for the proposed Low Emission Zone. Article 4(5)(c) exempts "any vehicles constructed before 1st January 1973 provided that the vehicle is not used on a road for any commercial use" from the emission charge. Vehicles with more than eight seats can be taxed as a Class 5 or a Class 6 vehicle. A Class 6 vehicle is a Public Commercial Vehicle. This means that with the appropriate Operator's Licence the vehicle can be used for 'Hire or Reward', i.e. that fares can be charged on it. This Tax Disc costs £450. A Class 5 vehicle on the other hand is, in effect, a large car. It can only be used for private purposes and fares or hire fee is not permitted to be charged. The Tax Disc is the normal PLG rate. However, if the vehicle is more than 30 years old then it is class as an historic vehicle and so has a £Nil charge. [A valid MOT and insurance are still required.] Many people undertake (illegal) private hires using this type of vehicle solely to avoid having to pay the higher Tax Disc charge (and the various regulatory requirements of having an Operator's Licence).</p>
K4	London Borough of Brent	<p>It is important to remember that the same vehicle with no modifications can be Taxed as a Class 5 one day and then swapped to a Class 6 the next day (or vice versa). Article 4(5)(c) means, therefore, that that a Class 6 bus is not exempt and would have to pay the £200 per day charge just to move within the Greater London Area. However, a Class 5 bus is exempt and so pays nothing. Obviously this will further encourage people not only to tax their buses as Class 5 Historic vehicles but to use them for (illegal) private hires within Greater London.</p>
K4	London Borough of Brent	<ol style="list-style-type: none"> 1) Charge appears unfair since a vehicle could be a Class 6 vehicle on Monday (and so pay £200). Yet on Tuesday it could be a Class 5 vehicle and so enter London for free without any sort of change to its emissions. 2) This sends all the wrong signals to owners of historic vehicles since it (further) encourages them to not to become operators and so not operate Class 6 vehicles but still operate private hires. In effect this is the opposite way that the Mayor has gone to Private Hire Cars (i.e. they are now licensed). 3) Since Class 6 vehicles fall under the regulatory operator regime they are likely to be better maintained than Class 5 vehicles and emit fewer particulates. 4) The number of (further) vehicles that would need to be exempted (by the exemption of Class 6 vehicles) is very low (probably around 50 vehicles) and they operate relatively few days per year, unlike a normal coach. So the overall effect on the air quality will be very small. 5) It is impossible to change the engines since no suitable new replacement engines are manufactured.

Sub theme	Stakeholder	Representation
K4	London Borough of Brent	The GLA Member for Croydon and Sutton (Andrew Pelling) asked the Mayor a very relevant question this year (0748/2006). The answer that he received stated "The consultation documents propose that 'heritage' vehicles powered by diesel and heavier than 3.5 tonnes, would be exempt from the LEZ. This is because such vehicles cannot be readily replaced, re-engined or retrofitted, are used very infrequently and their contribution to air pollution is minimal." The answer did not say anything about commercial use, which is now in the Scheme Order.
K4	London Borough of Brent	There is an issue of fairness here because exactly the same vehicle could fall inside or outside of the exemption just on the vehicle taxation class. The vehicle will produce the same amount of pollution whichever class it is taxed as. The Order does not state how the Order would be enforced. Would you be able to register the vehicle for non-commercial use even though it has a commercial (Class 6) disc?
K4	London Borough of Hillingdon	Supports proposal to exempt historic vehicles not used for hire and reward.
K4	London Transport Museum	An exemption for the DVLA class of heritage vehicles licensed before 1 January 1973. provided not plying for hire or reward, as proposed would allow the Museum to operate freely the majority of vehicles in its ownership. However, if the 'plying for hire' clause was applied, guest vehicles on the heritage routes (9 and 15) would not be able to operate.
K4	London Transport Museum	Similarly, the Museum's vehicles or those owned by London bus companies are occasionally used for corporate events associated with the Museum. A specific exemption for these vehicles would be required, as this would come under the definition of commercial hire.
K4	London Transport Museum	With the passage of time, the cut-off date of 1973 would need to be brought forward. The Museum has several vehicles registered after this date, and inevitably the number will increase.
K4	West Sussex County Council	Asks whether there is an intended exemption for classic vehicles, including lorries, over 25 years old. There are a range of events, including London to Brighton runs and classic shows, by a number of different classic vehicle groups, which could be affected.
K5: Specialist vehicles		
K5	The Showmen's Guild of Great Britain	The Guild is serving to preserve older and more specialised goods vehicles. Many of them can be up to 25 years old, including many commercial vehicles no longer in daily use such as ERF, Fosden, AEC and Scammels, all being maintained in full working order and preserved in immaculate condition. These vehicles can be equated to heritage vehicles.

Sub theme	Stakeholder	Representation
K5	The Showmen's Guild of Great Britain	The low speeds and low mileage of at which vehicles operate create less pollution whilst the combination of low speed and short journeys means that the engines do not become hot enough for particulate abatement equipment to work efficiently. Because of their age this equipment is not widely available and if available can only be fitted at considerable expense. Where the opportunity exists to re-engine such a vehicle, again the cost is disproportionate to the overall cost of the chassis plus engine component of the equipment. To rebuild the equipment which would normally have a 25 year life would constitute a penalty upon the operator.
K5	The Showmen's Guild of Great Britain	TfL will have under the proposed order the discretion to categorise showmen's vehicles as non-chargeable vehicles in this category [not a vehicle constructed or adapted for general use on roads] without any requirement to amend the legislation.
K5	The Showmen's Guild of Great Britain	The Guild and the Society of Independent Roundabout Operators submit that their vehicles should be categorised as non-chargeable and therefore granted a 100% discount in respect of payment of any charges which Members shall register with TfL. If not, requests that a substantial discount be given of not less than 90% of vehicles operated by members.
K5	The Showmen's Guild of Great Britain	Discounts should be made available to Members operating N1, N2 and N3 vehicles.
K5	The Showmen's Guild of Great Britain	Traditionally, fairground rides and side shows are built onto bare chassis and the vehicles are specially adapted to carry the rides and ancillary equipment. Guild vehicles cover very low mileage and as such have an extended life which justifies the construction costs. The lifespan of many of the vehicles is often around 25 years. Vehicles cannot be easily replaced as to do so would mean effectively rebuilding the entire ride or sideshow.
K5	The Showmen's Guild of Great Britain	It is understood that charges are unlikely to be recovered from the operators of foreign registered vehicles, since it has been concluded that those vehicles represent less than 4% of commercial vehicle movements. The movement of Members' vehicles in some cases only once per annum where vehicles travel from distant parts of the country to attend major fairs, is even less than 4% of commercial vehicle movements, and it is therefore disproportionate to apply the charge to the movement of the Members' vehicles.

Sub theme	Stakeholder	Representation
K5	Association of Circus Proprietors of Great Britain	Urges TfL to create a non-chargeable category for vehicles operated by travelling showmen which would apply only to bona fide travelling showmen. There has been in existence, for several years, a scheme operated by DEFRA under the Caravan Sites And Control Development Act 1960. Caravan sites require not only planning permission but also a site licence under the provisions of this Act. Showman's winter quarters are, in part, caravan sites, because travelling showmen still occupy their caravans during the winter months. The Act provides that DEFRA may grant an exemption to bona fide showmen provided that they are members of an approved organisation. As far as it is known, the only organisations that have been granted exemption in respect of their members are The Association of Circus Proprietors of Great Britain and The Showman's Guild of Great Britain. A similar scheme would meet any concern that any form of self-certification by operators who claim to be showmen is not sufficient.
K5	Freight Transport Association	Vehicles with expensive equipment or those that are specially altered for specific purposes such as removals vehicles, construction plant and vehicles adapted for the disabled tend to have a longer replacement cycle. A good example of this are the vehicles operated by the Showman's Guild which tend to be expensive to adapt and do relatively low mileages. The £200 access permit is not proportionate to the number of miles travelled within the zone. In such circumstances where it would become economically unviable for a sector to operate within the Low Emission Zone, such categories of vehicles should be exempted from the scheme.
K5	David Drew MP	Would like to register support for a time-limited exemption for members of the Showmen's Guild to enable them to update their fleet of vehicles to meet the proposed emissions standard.
K5	Royal Mail	The security equipment required for vehicles carrying out cash in transit operations is a substantial capital investment and as a result these vehicles are typically kept in operation for longer than the proposed European standards as outlined in the consultation document. Therefore asks that these vehicles be considered for a dispensation, without which the 2012 targets are unworkable.
K6: Non-road going vehicles		
K6	Construction Plant-hire Association	Agrees that Non Road Mobile Machinery (NRMM) vehicles are unsuitable for retrofitting pollution abatement equipment. Suggests that the criteria used for this exemption is the same as the criteria used for exempting plant from using white diesel on the roads, as per the Finance Act 2006. These categories are listed in an "Excepted Vehicles List" which has been established since the 1970s (with amendments in 1995 and 2006) and is well understood by

Sub theme	Stakeholder	Representation
		industry and the public sector. Suggests that all vehicles on this list should be exempted from the requirement to retro-fit DPFs. This would keep things simple for all to understand.
K6	The Society of Motor Manufacturers and Traders Ltd	Supports the provisions 3.15 on page 20 of the Scheme Description and Supplementary Information. However, this type of machinery will occasionally be used on roads, and some such as mobile cranes have two engines, one for road another for crane operation. Will these vehicles have to register for the 100% discount, and where a road engine is provided as well as an equipment engine will they still receive the 100% discount?
K6	London Borough of Hillingdon	Supports proposal to exempt non-road going vehicles including those not allowed to drive on the highway.
K7: Diplomatic vehicles		
K7	Foreign and Commonwealth Office	Is considering impact 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 assesses 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.
K8: Breakdown and recovery vehicles		
K8	Freight Transport Association	There are also a couple of exemptions from the Congestion Charge which should be extended to the LEZ, these are roadside recovery vehicles and accredited breakdown organisations. Special access exemptions should replace the proposed charges whereby a vehicle operator can 'pay to pollute'.
K8	The Society of Motor Manufacturers and Traders Ltd	Under the Congestion Charging Scheme, exemption is given for: drivers of roadside recovery vehicles; and accredited breakdown organisations. Breakdowns in and around London, on the M25 for example, if not quickly removed result in congestion, accidents, increased CO2 emissions and poorer air quality. Breakdowns may well be from older vehicles. It will not be cost effective to recover these into the zone, and the recovery vehicle itself may not be compliant. This could cause delays in vehicle recovery.
K8	The Society of Motor Manufacturers and Traders Ltd	Proposes that non-compliant vehicles, not operating for hire or reward at the time, entering the zone in the case of breakdown, maintenance or testing are exempt from the charge. Operators of recovery vehicles themselves should

Sub theme	Stakeholder	Representation
		also be given consideration as is currently the case for the Congestion Charge.
K9: VOSA testing		
K9	Freight Transport Association	Will be problems for vehicles going to VOSA test stations within the zone. An exemption for vehicles specifically going for repair, maintenance or testing and not operating for hire or reward at the time would ensure that businesses providing maintenance and repair do not lose out. This could be provided for by a temporary free permit. However, it is essential that this is kept as simple as possible, with online applications being accepted and without the requirement for long notice periods as repair bookings may be made the same day

Theme L: Business impacts

Sub theme	Stakeholder	Representation
L1: Impacts on businesses		
L1	Association of Circus Proprietors of Great Britain	Circus, like other forms of light entertainment, is struggling for economic survival in the present climate. Circuses are already expensive businesses to run, but there is a limit to the costs which can be passed on in terms of entrance costs before the events become unattractive to customers. If the emission charge is introduced the cost of moving a circus, once a week, within Greater London will be prohibitive when in excess of twenty vehicles will be involved. The costs of the LEZ proposals in terms of the loss of a cultural activity and art form in this case outweigh the environmental benefits.
L1	Association of Circus Proprietors of Great Britain	The circus industry relies largely on vehicles which have been either specially constructed or specially adapted for use in a circus. All of these vehicles are custom made and not available on a commercial market and can cost at least £50,000 per vehicle. Due to the close proximity of sites in London, circus vehicles probably travel less than the national average of between 60 and 80 miles per week when based in the capital. Circuses also enjoy the benefit of the travelling showman's excise licensing fee together with the exemption from many statutory requirements, recognising the limited use of those vehicles. The circus industry would expect these vehicles to have a life of between twenty and twenty-five years. These vehicles cannot be easily replaced as a fleet because this would involve the construction of new specialist bodywork with the resultant cost. The imposition of the LEZ, involving either vehicle replacement or the payment of the daily charge,

Sub theme	Stakeholder	Representation
		could lead to some circuses ceasing to operate and several people losing the security of what to them is a permanent home.
L1	Central London Freight Quality Partnership	Should consider exempting or aiding vehicle replacement for smaller companies from the courier or removal industry, as in many cases, their vehicles are expensive to replace. If this does not happen, there could be an obstacle to competition between companies and there would be an increased risk of knock-ons for these services.
L1	City of Westminster	Concerned that some organisations will need assistance in communicating positive solutions to those they work with. For example, we are aware that Royal Horticultural Society event managers are concerned that small businesses that provide displays at major flower shows – as well as other events at their horticultural halls in Westminster – may find it difficult to comply with the LEZ requirements. Also thinks that such businesses could be deterred by the daily charges.
L1	Covent Garden Market Authority	Local growers and small niche suppliers will also be affected, at a time when we are trying to ease their route into London.
L1	Covent Garden Market Authority	The urgent need to reduce emissions and improve air quality needs to be balanced with the need for London to be supplied on a daily basis with quality fresh produce. The Mayor has identified within his London Food Strategy the importance of the capital's 12,000 restaurants to London's vibrant food economy. New Covent Garden Market plays a key role in this supply chain.
L1	David Drew MP	Supports the need to reduce emissions and meet the EU air quality objectives for 2010, but this should not be unreasonably restrictive to small businesses.
L1	Essex County Council	Some freight companies and small businesses may also suffer economic impacts from needing to upgrade their vehicles to comply with the LEZ.
L1	Federation of Small Businesses	Supports the principle of improving air quality and removing from the roads those vehicles which contribute disproportionately to air pollution. No responsible business organisation can condone the use of excessively "filthy" engines. However, is concerned about the need to ensure that any improvements in air quality are not achieved at a disproportionately high cost to business – with damaging consequences for jobs, business viability and the economy as a whole.
L1	GLA Conservative Group	One principal concern is the potential impact that this will have on small/medium sized businesses, who may own only one or two vehicles that fall under the prohibitive definitions in the LEZ. Whilst large hauliers have broadly accepted the rationale of the LEZ, and accepted the financial consequences, smaller businesses may struggle to absorb the costs, particularly self-employed traders and tradesmen. A large number of small/medium businesses may not be able to afford to replace or upgrade their vehicles, and may

Sub theme	Stakeholder	Representation
		be forced out of business in attempting to do so. Several smaller firms have already contacted our members expressing understandable concern that their businesses will be forced to close as a result of the current proposals.
L1	Healthcare Commission	The financial burden that the charges might place on small 'corner shop' retailers will be passed onto the customer, with financial and health impacts. Similarly, businesses might cease to trade should the burden be considered too great.
L1	London Borough of Barking and Dagenham	Concerned at the costs that operators, in particular smaller operators of HGVs, LGVs and minibuses in Barking and Dagenham, will have to bear in order to comply with the LEZ. There are many smaller operators in Barking and Dagenham, including operators working in the construction industry. These operators are more likely to be adversely affected because they are likely to have small profit margins and they are likely to have older vehicles.
L1	London Borough of Barking and Dagenham	Some smaller operators are owner-operators where the management of the vehicle fleet may be only one small aspect of running the business. Many of these operators may not have the awareness, skills or funding to respond to the LEZ.
L1	London Borough of Barking and Dagenham	Would like TfL to carry out further work, prior to a decision on a Scheme Order confirmation, in order to gain a better understanding of impacts to smaller operators and put forward measures to reduce these impacts.
L1	London Borough of Bexley	There has not been a full assessment on the financial and practical impacts on the business sector for Heavier Light Goods Vehicles (1.2 to 3.5 tonnes) and minibuses (8 plus passengers).
L1	London Borough of Harrow	Have the cost implications of the operators of heavier LGVs and minibuses been calculated in relation to the October 2010 implementation date? It has not been made clear why these have been brought into the scheme or why the increased time-step.
L1	London Borough of Havering	Concerns about the impact on the construction industry and small businesses, particularly in the waste sector and mineral operators. Costs could be passed onto the customer, which could result in negative impacts on some initiatives such as the Thames Gateway. TfL should consider grants to assist small businesses in fitting abatement equipment.
L1	London Borough of Hackney	The main concern regarding the Scheme Order of the LEZ relates to highway contractors and their sub contractors. Whilst expect contractors to use vehicles that comply with the legislation it may be something that has slipped under their radar in terms of fleet replacement. The issue of the added costs may also arise in the use of subcontractors by the main contractor, as the extra costs may not have been factored into the price.

Sub theme	Stakeholder	Representation
L1	London Borough of Southwark	Maintains its concern about the impact of the LEZ on small, voluntary sector and specialist operators whom may be unable to bear the cost of upgrading vehicles
L1	Park Royal Partnership	Industry stakeholders have raised concerns about the financial impact on operators, particularly those with small and/or specialist fleets, and the extent to which business fleet planning requirements have been taken in to account.
L1	Park Royal Partnership	The proposals are such that larger businesses and operators are in a better position to meet the costs of compliance. There are approximately 4,000 Small and Medium Enterprises (SMEs) on the Park Royal Estate and a high proportion of these are also Black and Minority Ethnic (BAME) businesses. The costs of compliance through fleet upgrade, retrofitting and payment of daily charges of £200 per day for occasional use could seriously impact on the viability of a considerable number of our small businesses.
L1	Road Haulage Association	In initial response emphasised that the original Feasibility Study and TfL's later reviews stated that the impact on small businesses would need to be investigated further, but TfL have nevertheless failed to show that any independent investigations have been carried out or even considered.
L1	Royal Borough of Kensington and Chelsea	Shares the concern of SDG that smaller vehicle operators may find it difficult to meet the costs of complying with the LEZ and may potentially choose to exit the London market, or reduce the scale or scope of their operations.
L1	Slough Borough Council	The council is concerned about the potential negative local impact of the LEZ on HGV operators and businesses based in Slough.
L1	The British Association of Removers Limited (BAR)	The proposals in their present format bring about a real threat to the livelihood of many of our members from both outside London and those with operational depots inside the M25 boundary. This, in turn, will bring about a loss of jobs for a number of very loyal, long serving employees, an end to a number of Small and Medium sized Enterprises, often family owned and having passed from generation to generation. Not least will be a loss of valuable service to nearby communities and businesses.

Sub theme	Stakeholder	Representation
L1	The British Association of Removers Limited (BAR)	<p>Undoubtedly the UK transport industry has made immense improvement strides over recent years and professional operators realise that efforts for further improvement must continue - but, forcing the pace unrealistically or without taking due consideration of the implications upon certain sections of the industry, their needs and how they operate is a recipe for 'commercial' disaster and will only be seen to be encouraging 'shadow economy' operations and/or driving business into the hands of the lucky few who can hold out through such a 'financial strain' period - to the detriment of many respected and long established companies. Asks that TfL/the Mayor recognize the importance of freight/passenger activity to 'city-commerce' and help us towards meeting your aims by;</p> <ul style="list-style-type: none"> • encouraging positive exchange of dialogue, 'best practice' in a productive and cooperative manner • recognition of the different uses vehicles (and the fact that some – like removal vans, actually spend very little time travelling and a lot of time parked which carrying out lengthy loading/unloading operations).
L1	The Showmen's Guild of Great Britain	<p>The combined costs of compliance in relation to 6,350 vehicles is a staggering £211,481,450 spread amongst 2,540 operators of which not less than 600 members operate within the zone. The Society of Independent Roundabout Proprietors estimate that the replacement/rebuild costs would be approximately £60,000 per vehicle.</p>
L1	The Showmen's Guild of Great Britain	<p>Members of the Guild and Society would be totally incapable of passing any portion of these costs to their customers as although events which they support are well attended, there are many other leisure alternatives available to customers.</p>
L1	The Showmen's Guild of Great Britain	<p>Successive governments have stressed the importance of the financial wellbeing of small businesses to the economic wellbeing of the UK. The application of the Order to the Guild will result in many businesses having to close and many families and employees being left without employment.</p>
L1	The Showmen's Guild of Great Britain	<p>There are many major events in London each year which the Guild attends, many of these fairs are held under Royal Charter and have been in existence for many centuries. They provide leisure and relaxation not only to the local population but also attract UK and foreign visitors. The likely effect of the proposed charges will force smaller Members out of business, which in turn will reduce the attractiveness of the fairs and in the medium to long term will erode the profits of other operators and the fairs will wither and disappear.</p>
L1	The Showmen's Guild of Great Britain	<p>The route to be taken by showmen's vehicles when refuelling is restricted and where members are located within the proposed zone they would unreasonably attract a charge whenever refuelling their vehicles.</p>

Sub theme	Stakeholder	Representation
L1	West Sussex County Council	There may be a particular impact on small local companies with a fleet of older heavy vehicles/buses/coaches who will effectively be denied economically viable access within most of the area within the M25 if they have no compliant vehicles. These companies, including haulage companies, could suffer unless they can clean up older vehicles.
L2: Support for small businesses		
L2	GLA Conservative Group	Main concern is with the absence of any measures to help small businesses absorb the cost of LEZ. The consultation notes that retrofitting grants were considered as part of the alternatives, but ruled out on the grounds that EU rules meant that any subsidy was capped at 30%. We would urge the Mayor and TfL to consider this as a means of providing relief for small businesses, so they could continue to grow and contribute to London's economy, and successfully integrate into the scheme. A 30% grant may make the difference for many small firms, and mean they could replace their vehicles without going out of business.
L2	GLA Labour Group	Have been advised that an incentive-based approach towards mitigating some of the substantial expenses commercial operators are likely to incur is needed. Would recommend that TfL examines ways in which to incentivise businesses, particularly smaller coach tour operators.
L2	Healthcare Commission	Might there be a way of offering free or reduced cost schemes to small retail businesses to upgrade the vehicles, ensuring continuity of service?
L2	London Borough of Barking and Dagenham	Measures to mitigate the impacts on smaller operators could include financial incentives to retrofit vehicles with pollution abatement equipment or replace vehicles.
L2	London Borough of Havering	TfL should consider grants to assist small businesses in fitting abatement equipment.
L2	London Borough of Hillingdon	Would like TfL or central government to consider seriously the provision of grants, particularly for specialised vehicles, to assist boroughs, community transport operators and small businesses in achieving compliance.
L2	Thames Gateway London Partnership	Would like to see further evidence what the financial impacts will be on operators and whether financial assistance will be introduced to mitigate such adverse impacts. The costs to local authorities may be high if whole fleets need to be changed. Similarly, impacts may be particularly felt by smaller operators, the voluntary sector and operators of school minibuses.
L2	The British Association of Removers Limited (BAR)	Have asked for further consideration, due to the different 'markets' and different 'uses' such vehicles are involved in and have furthermore suggested that incentives/funding should be part of any such reconsideration.
L2	West Sussex County Council	States that although non-governmental organisations should not have to travel in poorer quality and more polluting vehicles, voluntary organisations may well not be able to buy

Sub theme	Stakeholder	Representation
		new vehicles or clean up existing ones unless as part of the LEZ process grants to cover this are made available.
L2	Central London Partnership	Has concerns on the impact on small businesses in the coach and removal industries. Companies would struggle to change their vehicles as they have high costs and long replacement cycles. Some support is needed for these sectors. Not taking small businesses into account could lead to work being limited only to larger operators and prices being increased
L2	London Borough of Hillingdon	Would like TfL or central government to consider seriously the provision of grants, particularly for specialised vehicles, to assist boroughs, community transport operators and small businesses in achieving compliance.
L2	London Borough of Hillingdon	Small businesses are often users of second-hand vehicles purchased from larger businesses. There is a case for arguing for a longer lead time for business below a certain threshold, to give them time to benefit from the introduction of lower emission new vehicles.
L2	London Borough of Hillingdon	The inclusion of minibuses in the LEZ scheme needs further investigation in regard to the financial implications for small businesses, community transport providers and schools. Financial support would need to be offered to help with retrofitting and compliance
L2	London Borough of Southwark	Maintains its concern about the impact of the LEZ on small, voluntary sector and specialist operators whom may be unable to bear the cost of upgrading vehicles. Southwark has approximately 10,800 small and medium size enterprises (SMEs) operating within the borough. 95% of the total business stock in Southwark are SMEs employing less than 50 people and 83% of these are micro businesses employing 10 people or less and the impact on these businesses should be considered.
L2	The British Association of Removers Limited (BAR)	Still very much concerned about the potential impact upon our 'specialized sector' of the transport industry and the apparent generalization of the proposals for all 'heavy' commercial goods and passenger vehicles.
L2	Healthcare Commission	Might the revenue from fines be used to support community-based organisations and small businesses to be upgraded, if they meet defined criteria? Funding the upgrades could be structured in such a way that those larger organisations with bigger fleets carry the burden of the cost.
L2	London Borough of Bexley	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.
L2	The British Association of Removers Limited (BAR)	On the 7 December 2006 the European Commission approved aid to alleviate the cost of retrofitting Italian passenger buses with particulate filters to reduce the pollution level of older as well as of new buses to contribute to the protection of human health and the environment, in particular in bigger cities.

Sub theme	Stakeholder	Representation
L2	The British Association of Removers Limited (BAR)	On 20 December 2006, the European Commission approved aid to alleviate the cost of retrofitting Danish lorries and passenger buses with particulate filters during the period 2007-2008 to allow for funding up to 30% of the additional costs of retrofitting relevant vehicles with particulate filters.
L2	The British Association of Removers Limited (BAR)	On 24 January 2007 the European Commission decided not to raise any objections to a German State aid scheme (approved for 6 years with an annual budget of Euro 100 million!) to help transport operators acquire heavy vehicles with better emission performance including measures of investment grants or investment interest allowances granted to transport operators investing in lorries that comply with stricter environmental standards than those already in force
L2	The British Association of Removers Limited (BAR)	As if to add salt to the wound we now hear that yet another EU country is about to extend millions of euros in aid to its transport sector to assist operators to comply with improved environmental standards.
L2	The British Association of Removers Limited (BAR)	If funding is forthcoming in countries such as Denmark, Germany and Italy it would seem only right that the UK should at least have equal access to funding of any scheme similarly aimed at reduction of pollution levels.
L2	West Sussex County Council	Are small hire companies (outside but near London) that hire out older minibuses and medium sized goods vehicles going to be prepared to rent suitable vehicles to customers wishing to enter the LEZ when such vehicles are [not] covered by the LEZ regulations?
L3: Costs of compliance with the proposed LEZ standards		
L3	Road Haulage Association	It is estimated that 40% of commercial goods vehicles expected to travel into and around Greater London once the proposed LEZ is implemented will not comply with the requirements of the Mayor's scheme. However, the European regime for emissions reductions has resulted in greatly reduced pollution from commercial vehicles and this trend is continuing at a rapid pace. Our case is that the cost of additional measures is not justified by the environmental gain. A high proportion of the 40% mentioned above are low mileage compared with newer vehicles. They often have expensive specialised bodywork and equipment and are therefore expensive to replace.
L3	UK local authorities	At the present time there are no proven effective means of reducing PM ₁₀ on many vehicles having light duty cycles. The absence of suitable technology will force this authority to bring forward expenditure in excess of £1m in order to prematurely replace non compliant vehicles.
L3	London Borough of Barking and Dagenham	Smaller operators may not be able to finance the cash flow requirements of the vehicle replacement process, i.e. buying a compliant vehicle and selling an older vehicle.

Sub theme	Stakeholder	Representation
L3	Covent Garden Market Authority	The cost of retro-fitting has a disproportional impact on SMEs who may not have the capital for replacing vehicles that otherwise would have a longer useful life.
L3	Guild of British Coach Operators	TfL underestimates the costs and technical issues involved in converting vehicles to comply with the standards. TfL has failed to engage properly on costs and technical options with the three companies with which the Guild put them in touch, and TfL seems to have no accurate idea of the costs of retrofitting, associated technical issues and whether manufacturers and installers have the required capacity to meet the potential demand.
L3	London Borough of Newham	Urges that every effort be made to minimise the investment in equipment which could in time become redundant.
L3	Freight Transport Association	Concerned that where vehicle has been fitted with retrofit equipment but the operator does not hold an RPC, there will be additional administration costs for operators in obtaining fitting certificates.
L3	London Borough of Barking and Dagenham	Smaller operators may not be able to finance the cash flow requirements of the vehicle replacement process, i.e. buying a compliant vehicle and selling an older vehicle.
L3	Royal Mail	The timescale proposed is problematic for commercial operators. The average life span of a truck is between 5 and 8 years, and under the scheme vehicles just over 6 years old in 2012 will not be acceptable. This places a high cost burden on operators.
<i>L4: Impact on the residual value of vehicles</i>		
L4	London Borough of Wandsworth	Achieving compliance may not be possible for all vehicles and this would result in substantial replacement costs (coupled with a dramatic fall in residual values of second-hand non-compliant vehicles in London and likely early scrapping of these vehicles).
L4	Royal Mail	The proposed timescale means that operators will have to replace vehicles earlier than planned, and distort vehicle sale and re-sale prices.
L4	West Sussex County Council	As a result of the LEZ, operators in and outside London may sell vehicles rather than upgrade them, which may reduce the value of pre-October 2001 larger vehicles more than would otherwise have happened.
<i>L5: Other business impact issues</i>		
L5	London Borough of Barnet	Believes that the scheme should not result in unfair advantages being created. The scheme will clearly disadvantage businesses located within the scheme boundary area over those located outside.

Sub theme	Stakeholder	Representation
L5	The Society of Motor Manufacturers and Traders Ltd	Manufacturers cannot be responsible for the ongoing cost of addressing detailed technical queries; they do not consider such costs have been fully or correctly considered in the cost of establishing the zone. The issuing of high cost Penalty Charge Notices (PCNs) in this complex situation may mean manufacturers are wrapped up in lengthy and detailed questions from operators, placing undue pressure on manufacturers to provide data accordingly.
L5	Royal Mail	Opposes the proposed hours of operation as they will place a disproportionate burden on business like Royal Mail who are required to operate around the clock.

Theme M: Impacts on the public and community sectors

Sub theme	Stakeholder	Representation
<i>M1: Cost impacts on public and community fleets</i>		
M1	Healthy Southwark Partnership	The fleet of vehicles used by the Primary Care Trust already meets emissions requirements, and will not need replacing.
M1	Essex County Council	The introduction of the LEZ will give an incentive to passenger transport operators and freight companies to upgrade their vehicles. Whilst this may have a positive impact on the age profile of the bus and coach fleet in Essex it could lead to increases in costs of providing transport, in particular for home to school transport funded by the County Council. There is evidence to suggest that for some operators, priority will be given to replacing coaches rather than buses in order to comply with the LEZ. Section 19 permit operators are a particular concern. Harlow, Epping and Brentwood Community Transport schemes are most likely to travel into London and they have approximately 12 vehicles between them. However, other Community Transport schemes in Essex do undertake occasional London trips. The council has its own in-house fleet, Community Link, operating 70 minibuses, of which 30 are most likely to undertake cross boundary work into London.
M1	Haverling PCT	Unclear whether special dispensation will be made for core services, such as care homes and health centres. If not, Department of Health may need to provide alternative provisions to update their fleets.
M1	Hertfordshire County Council	The LEZ could impact on a number of the council's own services, which could put pressure on the budget to make vehicles compliant.
M1	London Ambulance NHS Trust	The proposed changes will cost the London Ambulance Service a lot of money which is needed for patient care.

Sub theme	Stakeholder	Representation
M1	London Borough of Bexley	Community and voluntary organisations tend to have older fleets, have a lack of alternatives and will find it difficult to fund retrofit equipment. There has not been a full assessment on the financial and practical impacts on the public sector for Heavier Light Goods Vehicles (1.2 to 3.5 tonnes) and minibuses (8 plus passengers).
M1	London Borough of Harrow	TfL has stated that the proposed LEZ would be cost neutral to the boroughs. How was this calculated? Cost neutrality for the boroughs would only be true if there are no cost implications to up-grading the council fleet vehicles that would be affected in 2008, 2010 and 2012. It is currently difficult to predict the fleet for the later dates and so is unclear how cost neutral figures can be calculated.
M1	London Fire & Emergency Planning Authority (LFEPA)	The proposal to tighten the emission standards from Euro III to Euro IV in 2012 will have a severe impact on the LFEPA fleet unless there is a phased introduction of those standards over a number of years. Our fleet of heavy diesel engine vehicles will be predominantly Euro III and these vehicles will only be between four and eight years old in 2012. The oldest of those vehicles will not be scheduled to be replaced until 2016 the youngest not until 2020. The current vehicle replacement programme represents an investment of £5m+ of Authority money to help address the environmental and health and safety issues identified in 2003/2004. Any further changes to the fleet or modifications to the power units or exhaust systems to comply with 2012 proposed standards will come at additional cost and funding for this type of work will have to be sought.
M1	St John Ambulance, London (Prince of Wales) District	Estimates that, with current average cover for each 7 day week at £200 per day charge per vehicle, would face a weekly bill of £16,000, equivalent to £832,000 per year. A significant number of events covered are community or charitable events and it would be impossible to pass these charges on to the organisers.
M1	St John Ambulance, London (Prince of Wales) District	The consequences of paying the charge will impact directly on all of the services provided with an ultimate effect on the statutory services and the people of, and visitors to, London.
M1	Surrey County Council	Note that the compliance date for Euro IV has now been put back to 2012 but this will not lift the pressures in the short term and, as pressure to upgrade falls on the smaller operators, costs to services contracted by Surrey County Council are expected to increase.
M1	Thames Gateway London Partnership	Would like to see further evidence what the financial impacts will be on operators and whether financial assistance will be introduced to mitigate such adverse impacts. The costs to local authorities may be high if whole fleets need to be changed. Similarly, impacts may be particularly felt by smaller operators, the voluntary sector and operators of school minibuses.

Sub theme	Stakeholder	Representation
M1	Ambulance Service Association	NHS ambulance services have programmes to renew their fleets and the current vehicles being put into use comply with the latest emission standards. Replacement cycles, which are governed by the availability of resources to the NHS, mean that older vehicles, which although well maintained, do not meet the standards of newer vehicles have to be kept in service until they are perhaps six to eight years old. Although the financial burden on the NHS on ensuring that all ambulance vehicles entering the LEZ are compliant with the emission standards will be substantial, these are a very small group of vehicles compared with the total number, and distance travelled, on the roads of London.
M1	Ambulance Service Association	Specialist vehicles used by ambulance services are a further problem. These cover a variety of uses, including responding to major incidents, as well as transporting patients with special needs such as paediatrics and bariatrics. The use of these vehicles is limited and consequently they are low mileage and tend to have lengthy replacement cycles. Although ASA understands that short-term exemptions would be given for major incident response vehicles at the time of any emergency, the vehicles need to be moved for training and maintenance purposes.
M1	South East Coast Ambulance Service NHS Trust (SECAMB)	The exigencies of the Emergency Services, demand that all operational vehicles, be available at any location and at any time, in the area of dependency, and it would not be practical to attempt to confine older non compliant vehicles to areas that would not attract the LEZ charge. It is not good transport management practice to have all the old vehicles located together, and all the new vehicles together. Charges at the proposed level, for the constant use of a non compliant vehicle within the LEZ would hinder the Trust's ability to replace that vehicle with one of a "cleaner" marque, thus prolonging the use of older non compliant ambulances.
M1	South East Coast Ambulance Service NHS Trust (SECAMB)	Commercial freight operators plan their routes and can if possible avoid polluting the zone and by default, avoid the payment. This is not an option open to the Accident and Emergency and Patient Transport Ambulance Services. As SECAMB has limited budgets and is not a profit making organisation, these charges would have to be met from current funding. Ambulances go to the patient, and then to a treatment centre, irrespective of locations, usually by the shortest, quickest route. Ambulances operating around the southern fringes of the proposed LEZ could by cutting across, a peripheral fragment of the zone (e.g. Sevenoaks and Biggin Hill) incur costs which are vastly disproportionate to the miles travelled within the zone.

Sub theme	Stakeholder	Representation
M2: Impact on the provision of public and community services		
M2	Healthy Southwark Partnership	Is concerned that older minibuses not meeting emission standards may be used by the voluntary sector and schools. These groups would be unlikely to have the funding to replace their fleet or pay LEZ charges. This may discourage some activities from taking place, including participation in sporting events and other physical activity.
M2	London Borough of Barking and Dagenham	Concerned about the impact that complying with the LEZ might have on community organisations that provide transport services, including transport services for people who cannot use public transport. Some community organisations could incur additional costs or lose their 'workhorse' vehicle sooner than expected.
M2	London Borough of Barnet	Has concerns regarding the inclusion of minibuses in the proposed scheme. Many minibuses are operated by schools, charitable organisations or the voluntary sector and provide invaluable transport for vulnerable or disadvantaged groups. The use of minibuses should be seen as desirable where the alternative would be for larger numbers of private cars to be in use. Requiring these vehicles to comply with the emission standard, or be subject to a significant daily use charge, may have a particularly harmful effect on these groups. The Council notes that petrol engined minibuses will not be included in the scheme resulting in a relatively random impact on minibus owners.
M2	London Borough of Brent	Welcomes the proposal to consider diesel-engine minibuses for inclusion within the LEZ at the same time as the heavier LGVs. It is vital that the potential economic impacts of their inclusion do not significantly disadvantage sectors of the community. Further investigation must be undertaken to ensure that this is conducted prior to implementation of the Scheme Order.
M2	London Borough of Ealing	Concerned that the inclusion of minibuses in the scheme would seriously affect community services. Supports TFL or central government considering the provision of grants, particularly for specialized vehicles, to assist local voluntary, not-for-profit, charity and community groups in achieving compliance with the LEZ.
M2	London Borough of Hillingdon	The inclusion of minibuses in the LEZ scheme needs further investigation in regard to the financial implications for small businesses, community transport providers and schools. Financial support would need to be offered to help with retrofitting and compliance
M2	London Borough of Southwark	Southwark maintains its concern about the impact of the LEZ on small, voluntary sector and specialist operators whom may be unable to bear the cost of upgrading vehicles. Southwark has approximately 10,800 small and medium size enterprises (SMEs) operating within the borough. 95% of the total business stock in Southwark are SMEs employing less than 50 people and 83% of these are micro

Sub theme	Stakeholder	Representation
		businesses employing 10 people or less and the impact on these businesses should be considered.
M2	Essex County Council	The introduction of the LEZ will give an incentive to passenger transport operators and freight companies to upgrade their vehicles. Whilst this may have a positive impact on the age profile of the bus and coach fleet in Essex it could lead to increases in costs of providing transport, in particular for home to school transport funded by the County Council. There is evidence to suggest that for some operators, priority will be given to replacing coaches rather than buses in order to comply with the LEZ. Section 19 permit operators are a particular concern. Harlow, Epping and Brentwood Community Transport schemes are most likely to travel into London and they have approximately 12 vehicles between them. However, other Community Transport schemes in Essex do undertake occasional London trips. The council has its own in-house fleet, Community Link, operating 70 minibuses, of which 30 are most likely to undertake cross boundary work into London.
M2	Hertfordshire County Council	The inclusion of minibuses could impact on community transport schemes in Hertfordshire that travel into London. Many charitable organisations can only purchase older vehicles and will not be able to afford to upgrade their vehicles.
M2	Healthcare Commission	The measures might prevent numerous small, community-based organisations that use mini buses and similar vehicles to provide 'dial-a-ride'-type services, ferrying people back and forth, from providing this service.
M2	Greater London Assembly Labour Group	Would request that TfL engage in active consultation with the voluntary sector and community transport operators in London that may use older minibuses and coaches. These groups may struggle to finance either the daily charge, the abatement equipment, or new compliant vehicles. Would be grateful for further clarification as to whether TfL may make community grants available for such groups.
M2	Royal College of Nursing	Recognises that these proposals are, in the first instance, aimed at vehicles which do not meet certain emissions standards, however seeks reassurance that these proposed restrictions will not have a direct impact on patients, children and their families who expect regular deliveries of essential equipment or essential transport to hospitals and other NHS facilities to receive treatment.
M2	St John Ambulance, London (Prince of Wales) District	London St John Ambulance are frequently supported by colleagues from across the country to provide cover at the larger events or on particularly demanding periods of work. All such vehicles would have the same limitations. If obliged to pay the charge would have to seriously review ability to provide the vital support currently given.

Sub theme	Stakeholder	Representation
M2	Ambulance Service Association	Although the LEZ proposals will mainly affect the London Ambulance Service, the surrounding services regularly take emergency patients to hospitals in outer London. For example South East Coast Ambulance taking patients to Queen Mary's Hospital in Sidcup or East of England Ambulance to Whipps Cross Hospital. Less often, but still on a fairly frequent basis the regional services from outside of London are taking patients to central London hospitals for specialist treatment. These journeys can cover all parts of England. From an operational point of view to many the service in such a way as to ensure that only LEZ compliant ambulances are used for these journeys, especially for unscheduled emergencies would cause very substantial logistical problems and cause delay patients receiving the urgent care they need.
M2	Central Council of Physical Recreation (CCPR)	Volunteers and participants in sport already face considerable fiscal and regulatory burdens. Already trailer drivers have to take an additional driving test, at considerable cost, and the high standards of safety adhered to by many clubs and organisations also requires minibus drivers to take regular assessment tests and medicals. The LEZ is going to add yet another burden to those volunteers based in London.
M2	Central Council of Physical Recreation (CCPR)	There are approximately 63 Boat Clubs and 33 Canoe Clubs operating in the Greater London area, all of which will use a transit van or equivalent for towing boat trailers.
M2	Central Council of Physical Recreation (CCPR)	There are fifty Sea Cadet Units within the LEZ zone, all of which use mini-buses to transport cadets to events and activities within the region on a daily basis. All of the Units are run as charities and care is taken to ensure the maximum length of usage for vehicles. It is highly likely that in 2010 many Units will be operating vehicles older than nine years and, even with prior warning, few will be able to afford to replace or alter the vehicles without considerable financial assistance. If that is not found, (and it will not be possible via the MoD), the activities of an important organisation, which contributes to the success of the Royal Navy and potentially the 2012 GB Shooting Team, will be curtailed or stopped in the London region.
M2	Central Council of Physical Recreation (CCPR)	There are 30 British Horse Society Approved Establishments within London, and many more within the M25. Each of those establishments provides recreational and outdoor opportunities for Londoners, including the very popular Riding for the Disabled Scheme. Horseboxes are extremely expensive, a 1989 two horse model will cost approximately £2,500 and a similar model bought new will cost approximately £30,000. It is therefore understandable that very few equestrian facilities own horseboxes that will comply with the Euro III and IV Standards. The LEZ will place an additional financial burden on London's riding schools, all of which are already struggling with high

Sub theme	Stakeholder	Representation
		insurance premiums and running costs, it could also dissuade individuals from owning horseboxes and competing in what has traditionally been one of our most successful Olympic sports.
M2	Central Council of Physical Recreation (CCPR)	The Pony Club is one of the largest youth membership organisation in the UK with 43,000 members. The entire medal winning GB Three Day Event Team in Athens started competing as children with the Pony Club. There are 22 Pony Club Branches in the South East and over half will either be inside or on the borders of the LEZ. The activities of those Branches will be greatly affected by the LEZ, and as many members don't own their own ponies but are loaned them for lessons and camps, increased costs of transporting ponies will discourage owners and result in declining participation.
M2	Olympic Delivery Authority	Although formally we support the initiative, we do have some minor informal reservations around the implementation of the LEZ and the potential for consequential impacts on small businesses, local sports clubs and other who historically have not afforded vehicles which meet prescribed standards - sports charities for example.
M3: Impact on London boroughs		
M3	London Borough of Bromley	Would experience high costs and difficulties in bringing some of the fleet to the required Euro standard through replacement and/or retrofitting. These vehicles are largely of a specialist nature (many used for winter servicing), they get very little use in mileage terms and their replacement cycles are very long (17 to 24 years in the case of some of our winter vehicles). Sought a system of either exemption or derogation to allow fleet replacement or modification to take place within normal budget cycles, or a guarantee from TfL to meet any additional fleet costs incurred. These guarantees have not been forthcoming.
M3	London Borough of Bromley	The issue was not considered important enough to be included in TfL's Sustainable Development Impact Assessment. Local authorities and their operations were not specifically included in the negative economic impacts identified in the 'mitigation issues' at section 4.2, and it is clear in table 4.1 that an exemption is only contemplated for military and a small range of other vehicles.

Sub theme	Stakeholder	Representation
M3	London Borough of Bromley	<p>The statutory duty to clear snow and ice from the network requires the Council operate gritters and, when required, a snow clearing vehicle within the LEZ. Without being aware that TfL would seek to promote a LEZ in the way now proposed, has invested heavily in purchasing new bodies for use on existing chassis. Engines on winter maintenance fleets are scheduled for replacement over the next 6 years. This service is an important safety-related service, and the level of provision in any year depends primarily on the severity of the winter. An examination of winter servicing over an average of recent (mild) winters indicates that each of 9 gritting vehicles (a tenth is held in reserve) was run on 45 days, with an average route length of 55km. Hence each vehicle travels approximately 2,300km (1,430 miles) per annum. To illustrate the impact of the LEZ on this operation, should the Council not seek (or be unable to) bring forward its replacement programme, would have to pay £81,000 per season in charges to TfL. A severe winter could result in a substantially higher cost.</p>
M3	London Borough of Bromley	<p>Would cost £783,000 in 2007/08 and £948,000 in the period up to 2011/12 to ensure immediate compliance with LEZ requirements. This compares with former plans for a phased modification and replacement programme up to 2012/13. Feel compelled to point out that the specialist nature of these vehicles, and the high additional demand generated within the industry by operators seeking to comply with the LEZ, means that it would almost certainly be impossible to guarantee the timely acquisition of compliant vehicles, even if the Council could afford this. Has not budgeted for these sums because do not believe that could reasonably have foreseen that TfL would seek to penalise an important public service in this way.</p>
M3	London Borough of Bromley	<p>Remains a supporter of the concept of a LEZ. Remain anxious to establish common ground over the implementation of a LEZ in Bromley. However, this cannot be at the very substantial and immediate cost which TfL currently proposes. If TfL and the Mayor are of the view that this matter is of such a high priority that immediate mandatory blanket compliance is essential, would be willing to withdraw objection subject to:</p> <ul style="list-style-type: none"> • TfL guaranteeing to fund any additional capital costs over and above existing budgets, or providing revenue support in respect of daily charges for winter maintenance operations. Would remind TfL of the requirement under LIP Guidance to set out our standards for gritting on bus routes; and • An additional guarantee that the Council would not suffer a financial penalty should the industry be unable to respond in time, on capacity grounds, to an order for new specialised vehicles.

Sub theme	Stakeholder	Representation
M3	London Borough of Islington	Achieving compliance with the LEZ is likely to cost a huge amount for borough contractors and in turn for Islington and its residents.
M3	London Borough of Redbridge	Already adopted a Green Fleet Policy which sets out measures for operating or commissioning vehicle use. The fleet of 382 vehicles runs on ultra low sulphur diesel; 18 of the vehicles use catalysts to minimise particulate emissions and a small number run on liquid petroleum gas. Currently piloting an initiative to increase fuel efficiency and tyre life - 30 welfare buses have had the air in their tyres replaced by nitrogen which should make them last longer and increase fuel efficiency. However, a proportion of the fleet will not meet the Euro III standard and the council will need to take more rigorous approaches, with an estimated cost to Redbridge of £600,000.
M3	London Borough of Wandsworth	It is likely that some council-owned vehicles would not comply with the emissions standards required for vehicles to operate without charge in the LEZ (indeed there would be no benefit in the scheme if they all did). Achieving compliance may not be possible for all vehicles and this would result in substantial replacement costs.
M3	London Councils	Some boroughs face significant costs upgrading their vehicles. This varies depending on where boroughs are in terms of fleet replacement, what sorts of vehicles boroughs have, and whether boroughs contract out their vehicle services. Boroughs would like TfL or central government to consider seriously the provision of grants, particularly for specialised vehicles, to assist boroughs in achieving compliance. Some boroughs are facing 'real' replacement costs in the hundreds of thousands of pounds, and even millions in some instances. The London Borough of Islington have informed us that their 'real' early replacement costs are over £5 million, whilst other boroughs have also reported significant early replacement costs- examples include: Lewisham £750,000; Bromley £832,000; Redbridge £280,000; and the City of London £1,322,000.
M3	Road Haulage Association (RHA)	Already it is clear that there will be hardship to undertakings providing services within the proposed LEZ. To take one example, boroughs are realising that they would have to replace some of their gritting lorries and would want an exemption because of the severe impact on their costs and budget. Have many other examples of organisations which put forward good cases for exemptions. Should not underestimate the hardships imposed on many of these organisations by the proposals as they stand.
M3	London Borough of Hackney	Whilst could expect contractors to use vehicles that comply with the legislation it may be something that has slipped under their radar in terms of fleet replacement.

Sub theme	Stakeholder	Representation
M3	Surrey County Council	Concludes that operators are aware of the proposals and, where necessary, will be taking action. Most vehicles used for transporting waste from Surrey are likely to comply with the emissions standards by the dates set out in the Order.
M3	The Society of Motor Manufacturers and Traders Ltd	Considers that TfL should be aware of the implication of the LEZ on fleets of specialist transport for disadvantaged persons, frequently operated by local authorities for example.
M4: Impact on cross-border bus services		
M4	Essex County Council	Cross boundary services will be affected as operators may choose to withdraw services rather than upgrade vehicles. This has happened with First Essex service 351 between Chelmsford and Romford.
M4	Guild of British Coach Operators	The proposals place an unfair burden on bus operators operating cross-boundary services. Whilst TfL operators are heavily subsidised, these companies would have to bear the full economic cost of operations and fleet replacement.
M4	Hertfordshire County Council	Concerned that the provision of some home to school services across the boundary will not be sustainable. These journeys are very short, and take place only in the morning and the evening. The additional costs could therefore not be borne either by parents or by the local authority. These routes are primarily run by smaller operators with less ability to bear compliance costs. To allow operators and local authorities to adapt, the LEZ should be introduced at the end of the academic year, not the end of July.
M5: Grants or assistance for the public and community sector		
M5	Central Council of Physical Recreation (CCPR)	Voluntarily run not-for-profit sports clubs/organisations/groups should get 100% grant aid to enable them to convert vehicles (particularly minibuses) in order to comply with the LEZ, if they cannot be made exempt.
M5	Central Council of Physical Recreation (CCPR)	Consideration should also be given to vehicles that are not capable of upgrading or which have already undergone conversions or refits from one type of vehicle to another and therefore are not recognisable from their serial number. An example of this is a horsebox which has been converted from a road sweeper. At the very least, owners of such vehicles should be given grant aid to fund the purchase of compliant vehicles or re-engine, or a longer period in which to become compliant.
M5	Havering PCT	Suggests that money raised by the LEZ be used as a community chest to help community groups purchase newer, less-polluting vehicles.

Sub theme	Stakeholder	Representation
M5	Healthcare Commission	Might there be a way of offering free or reduced cost schemes to such organisations and businesses to upgrade the vehicles, ensuring continuity of service? Might funding the upgrades be structured in such a way that those larger organisations with bigger fleets carry the burden of the cost? Might the revenue from fines be used to support community-based organisations and small businesses to be upgraded, if they meet defined criteria? The societal cost of ignoring this issue will be great.
M5	Healthy Southwark Partnership	Recommends that some funding be provided by Transport for London for community groups and schools to replace vehicles if necessary, in order that activities should not be prevented by high vehicle charges.
M5	London Borough of Barnet	Remains concerned that buses and coaches used for school transport are generally more likely to be non-compliant than other groups of vehicles. The benefits in terms of reduced overall emissions and reduced congestion which school transport by coach has over transport by car may be lost if school transport operators are unable to maintain economically viable services. Consider that the loss of privately operated school transport services would be a severely retrograde step and TfL should work closely with these operators to ensure that this does not happen.
M5	London Borough of Bexley	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.

Theme N: Environmental impacts

Sub theme	Stakeholder	Representation
<i>N1: Failure to make progress towards air quality targets</i>		
N1	Brewery Logistics Group	Fully supports any scheme that will reduce pollution however to play around the "edges" as these proposals do is not the solution that residents of London are looking for, and the costs involved are not justified. TfL estimate that there will be a 1.5% reduction in NO _x and a 9% reduction in particulates, not the best results for such an expensive scheme.
N1	Friends of the Earth	Based on the information provided, the LEZ proposals would only lead to some relatively small percentage reductions in areas of London exceeding various UK and EU limits, and TfL admits that some areas will still not meet objectives and limit values

Sub theme	Stakeholder	Representation
N1	Friends of the Earth	Will expect the Mayor and TfL to consider whether the proposals constitute adequate and sufficient measures, such that it could be considered that significant action had been taken to deal with London's air quality exceedences
N1	Friends of the Earth	Will expect the Mayor and TfL to strengthen the LEZ in all ways possible at the earliest opportunity, and to bring forward a package of other measures and policies complementary to the LEZ as needed, as a matter of urgency, to set out how the whole of London and all Londoners can be brought within UK and EU legal limits.
N1	London Borough of Brent	The data submitted also suggests that the London fleet is cleaner than initially estimated. Since this data will have been used to derive the models used to estimate the impacts of the scheme it is likely that the effectiveness of the LEZ in reducing air pollution may have been overestimated, (The Health Impact Assessment estimates an 18% exposure reduction for annual PM ₁₀ and a 25% reduction in the annual NO ₂ limit value).
N1	London Borough of Ealing	TfL suggest in 4.11 that with regards to concentrations of PM ₁₀ the LEZ will effectively bring forward air quality standards by up to 3 or 4 years, in comparison to doing nothing and relying on the natural vehicle replacement cycle. This appears to be less optimistic than previous figures released during the consultation on the draft Transport and Air Quality Strategy Revisions in 2006. In fact whilst the predicted air quality benefits appear to have decreased with the new modelling carried out, the costs of the scheme appear to have actually risen. Also, the range of figures supplied in terms of estimated health benefits (using DEFRA and CAFE methodologies) seems very broad and suggests that making decisions on such benefit-cost ratios is little better than guess work.
N1	London Borough of Greenwich	The Council notes that the LEZ would not bring London's air quality into full compliance with objectives and limit values prescribed by the National Air Quality Strategy and the European Directive. Future full compliance remains as a major, possibly insurmountable, problem for London. However, the predicted reductions in pollutants and their concentrations coupled to the reduction in the numbers of people exposed to excessive levels are worthwhile.
N1	London Borough of Hammersmith and Fulham	TfL are already using cameras to track vehicles in London, using number plate data to classify the vehicle fleet according to its age and therefore emissions standards. Whilst it is understood that this is an on-going process, the figures released to date appear to show differences between the actual fleet of vehicles in use in London and the fleet data assumptions that have been used in modelling the impacts of the LEZ – namely the assumptions appear to be more pessimistic about the penetration of cleaner vehicles into the London fleet. If this is the case across all vehicle types, including those heavy vehicles targeted by the LEZ,

Sub theme	Stakeholder	Representation
		then this could affect the modelled air quality outputs being used in part to justify the LEZ so that the benefits could be even less than projected.
N1	London Borough of Harrow	Even if the LEZ is implemented this will not bring all areas of London into compliance and there is still potential for fines from the EU. Would it be more economical not to introduce the LEZ at all and use the monies from the scheme to pay any fines instead?
N1	London Borough of Harrow	Would any reductions in NO _x predicted from the introduction of the LEZ be so small as to be similar to the 'do nothing' predictions?
N1	London Borough of Harrow	The air quality improvements predicted by TfL for this scheme would appear only to bring forward the improvements in PM ₁₀ by between 2 and 4 years depending on when the scheme would be finally implemented. This would be in comparison with the 'do nothing' situation of allowing the freight fleet to be up-graded naturally. Therefore is the scheme cost effective and offering best value?
N1	London Borough of Southwark	Whilst the LEZ represents a key initiative to improving air quality it does not represent a clear package of measures to enable London to meet the European Union objectives for particulate matter or nitrogen dioxide.
N1	London Councils	It is clear that the introduction of the LEZ would not result in London fully complying with the air quality strategy objectives or the EU Directive. However, it is predicted to: reduce the tonnage of pollutants emitted by the vehicles targeted by the LEZ; reduce concentrations of air pollutants present in the atmosphere; and reduce the areas that exceed air quality objectives and consequently the number of people exposed to excessive levels of NO ₂ and PM ₁₀ . It would therefore deliver progress towards improving air quality in London and the health of people who live, work and visit London.
N1	London First	While the LEZ will reduce the area of London exceeding the PM ₁₀ annual mean objective, the EU objective for 2010 will still not be met in some areas. LEZ will bring forward reductions in PM ₁₀ emissions by only three to four years compared with the 'natural' vehicle replacement cycle
N1	London Liberal Democrats	The rationale behind the LEZ is that it should target the most polluting traffic, and accelerate the introduction of cleaner vehicles. In its current form, however, the LEZ does not go far enough to bring London's air quality in line with existing standards. According to TfL's own assessment 'the introduction of the LEZ would not bring London's air quality into full compliance with the objectives and limit values prescribed by NAQS and the EU Directive'.

Sub theme	Stakeholder	Representation
N1	Mark Field MP	The consultation documents state that a serious problem with particulate matter air pollution (PM ₁₀) is still expected in 2010 and that the Base Case for nitrogen dioxide (NO ₂) air pollution in London over the next few years is expected now to be more than twice as bad as TfL had assumed in their calculations only last January. The problem is therefore worsening yet the consultation documents make clear that the proposed LEZ will have no “significant impacts on traffic levels or congestion”.
N1	National Institute for Clinical Excellence	Thinks the consultation document makes a strong case for the effectiveness of a low emission zone (LEZ) in meeting statutory air quality objectives and thereby reducing the direct harm caused by poor air quality to people suffering from respiratory or cardiovascular disease.
N1	Park Royal Partnership	There are about 420,000 lorries on the road in the UK, and it is estimated that 40 per cent of the fleet enter London at some time in the year. Therefore the number of vehicles being targeted is relatively low and consequently the projected level of improvements in Air Quality to be achieved is questionable, until all sources of emissions are considered, including private cars.
N1	Road Haulage Association	Acknowledges that, under the Greater London Authority Act, the Mayor is required to produce an air quality strategy, which contains policies and proposals for implementing the National Air Quality Strategy within Greater London. However, their position has not changed since their response to the initial TfL consultation regarding the Mayors proposed LEZ, still does not accept that sufficient scientifically based and proven evidence has been made available, by TfL, or any of its representatives, to show that the implementation of the proposed London LEZ scheme, solely targeted at the commercial road user, would produce quantifiable improvements to the existing levels of air quality before the 2015 deadline. Notes that the Mayor’s decision to amend the original proposals, so that Euro IV compliance is not mandatory until 2012, reduces the environmental benefits.
N1	Royal Borough of Kensington and Chelsea	In concentration terms, in 2008 the average reduction will be between 0.1µg/m ³ in most places. This reduction is extremely small in absolute terms, though in terms of impact on health, it may provide some benefit. In 2012 it increases to 0.3µg/m ³ . No figures have been provided for the 2010 scheme, which might lead one to think that the improvement in concentrations is barely noticeable.
N1	Royal Borough of Kensington and Chelsea	It is clear that introducing a LEZ across London will result in some improvements to air quality. However, it is also apparent that there will be an improvement (though slightly smaller) in air quality without the LEZ. The 2010 scheme where LGVs must comply with Euro III standards appears to be the least effective and the modest benefit/cost ratios that exist would improve if LGVs were not included. The 2012

Sub theme	Stakeholder	Representation
		scheme where HGVs must comply with Euro IV standards appears to be the most effective, in air quality terms.
N1	Transport 2000	Notes that the Scheme Description acknowledges that despite the LEZ, some areas of London will still not meet the PM ₁₀ annual mean objective and that exceedences in NO ₂ levels would still occur in some areas.
<i>N2: Air quality projections are different from those in the Transport and Air Quality Strategy Revisions consultation</i>		
N2	City of Westminster	Changes to the proposed scheme, such as delayed introduction of the Euro IV/4 requirement, have contributed to producing predicted reductions in air pollution that are not as good as those forecast at the time of the previous LEZ consultation. However, recognises that the scheme as now proposed will have benefits in accelerating improvements in air quality in London, beyond improvements that would take place for other reasons.
N2	London Borough of Brent	Further assessment of the potential air quality impacts of the scheme propose significant changes in air quality improvements when compared with those outlined in the previous consultation, for example: this consultation identifies an 8% reduction in PM ₁₀ annual mean target for 2010 (a reduction of 11% since the last consultation). Clarification is sought regarding the proposed 6% decrease in NO _x emissions stated. How will this be achieved since the scheme proposals are less strict with respect to emissions and vehicle types than the previous submission?
N2	London Borough of Hammersmith and Fulham	Assessments from last year's public consultation process calculated that the LEZ core scheme (HGVs, buses and coaches) would reduce population exposure by just over 11% by 2010 in terms of the NO ₂ annual mean target. Assessments in the current consultation show that "By 2010, there would be a reduction of about 5% in the number of people exposed to annual mean NO ₂ levels above the UK objective" suggesting that the new study is estimating almost a 50% cut in the effectiveness of the LEZ in reducing exposure to NO ₂ by 2010.
N2	London Borough of Hammersmith and Fulham	Similarly, for PM ₁₀ , the previous 2010 calculation for population reduction to the annual mean target was almost 19%. The new calculations show that the scheme would deliver an 8% reduction. Making comparisons beyond 2010 is difficult as the previous proposals for the introduction of a NO _x standard and LGVs into the scheme in 2010 have been modified so that the NO _x standard is no longer included and the introduction of LGVs into the scheme will only apply to heavier LGVs. However, For NO _x , it appears that the new calculations suggest a wider benefit by 2010 than previously calculated (17% compared to 11%) even though the scheme is less strict on emissions and types of vehicles included. For PM ₁₀ , the new figures show a slightly smaller benefit than previously calculated for 2010 (18% instead of 22%).

Sub theme	Stakeholder	Representation
N2	London Borough of Hammersmith and Fulham	Why are these differences so marked and what impact does this have on the viability of the scheme? The issue of increased costs does not appear to have been highlighted or discussed in the documents.
N2	London Borough of Islington	Concerned that the computer modelling undertaken recently by Transport for London does not show that the air quality improvements with the LEZ in place are as great as previously believed. Our conditional support for a LEZ for London was included as a high priority action in our Air Quality Action Plan of 2003 in line with the Mayor's Air Quality Strategy. Our concern is that if such an important action cannot be shown to have a bigger effect on air quality, then we will find it difficult to defend the high priority status of the action
N2	London Councils	Analysis of TfL's figures provided to us by boroughs shows what appear to be less than adequate gains from the LEZ over the gains that would still be seen from not introducing it. For example, the proposed LEZ is predicted to reduce the emissions of PM ₁₀ by 2.6% in 2008, 2.9% in 2010, 6.6% in 2012 and 2.3% in 2015 when compared with their respective baseline years. These figures are not as good as those predicted in the earlier consultation.
N2	London Councils	<p>Figures provided by TfL, show the following:</p> <ul style="list-style-type: none"> • between 2005 and 2008 emissions will fall 10% with no LEZ in 2008 (though as mentioned above, emissions will be reduced by a further 2.6% with the LEZ); • Between 2008 and 2010, if no LEZ were introduced, there is predicted to be an 11.3% reduction in emissions in 2010. With the LEZ, the reduction between 2008 and 2010 is predicted to be 11.6%. This suggests that the 2010 scheme is having virtually no impact at all on the reduction in emissions of PM₁₀. Although it is stated that in 2010 the LEZ will bring about an additional 2.9% reduction in emissions, this percentage reduction can not be attributed to the 2010 scheme itself, this additional reduction would occur anyway; • The 2012 scheme, where Euro standards are tightened, appears to have the most significant impact; • In 2015, the LEZ will only have reduced tonnes of PM₁₀ emitted by 2.3% (compared with no LEZ). Between 2005 and 2015, the LEZ will have brought forward improvements in air quality by a few years – particularly with the 2012 scheme, but some of these improvements are lost by 2015.
N2	Road Haulage Association	The claimed benefits of the LEZ are now less than they were in 2006.

Sub theme	Stakeholder	Representation
N2	Royal Borough of Kensington and Chelsea	The improvements predicted for air quality are even smaller than those predicted in the April 2006 consultation. Between 2005 and 2010, there is virtually no difference in the reduction of PM ₁₀ and NO ₂ emissions with and without the LEZ. The 2010 scheme appears to have the most significant impact. In 2015, the LEZ will only have reduced tonnes of PM ₁₀ emitted by 2.3% (compared with no LEZ). Between 2005 and 2015, the LEZ will have brought forward improvements in air quality by a few years, mainly through the 2012 scheme, but most of these improvements will have been lost by 2015.
N3: Impact on NO_x and NO₂		
N3	London Borough of Islington	Concerned that the LEZ primarily reduces exposure to particulates, with some evidence suggesting that this may be at the expense of nitrogen oxide emissions. The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, which forms the basis of our work to improve air quality, does not give priority to one pollutant species over any other and therefore TfL's actions could lead to inconsistencies with the work of the London boroughs through their Air Quality Action Plans.
N3	London Borough of Hackney	Concerned that NO _x emissions appear to be ignored or "downgraded" in favour of particulates.
N3	Royal Borough of Windsor and Maidenhead	Not enough consideration has been given to the fact that levels of primary NO ₂ are rising especially in London. The AQEQ draft report on Trends in Primary NO ₂ in the UK clearly states that NO ₂ emissions generally increase for vehicles conforming to newer emission standard. Monitoring data in London over the period 2000 - 2005 show a non anticipated increase in NO ₂ even at background sites. This increase could be due to an increased number of Euro III diesel vehicles fitted with oxidation and/or particle traps. The report concluded recommending further work to understand the extent to which emission standards for diesel engines are contributing to the increase in NO ₂ /NO _x ratio. Due to these facts and the uncertainty that the report outlines it would be sensible not to go ahead with a LEZ that imposes disputable emission standards.
N3	Royal Borough of Windsor and Maidenhead	The vast majority of Air Quality Management Areas (AQMAs) including those of the authority have been declared because of the potential exceedences of NO ₂ therefore implementing a LEZ that covers only PM is not fully justifiable, especially when it could contribute to an increase in NO ₂ emissions.
N3	London Councils	TfL have stated in the consultation that NO _x technology is still being developed and that there are difficulties with implementing a NO _x -based approach. As stated in our previous submission, boroughs have raised the issue that the LEZ primarily reduces exposure to particulates, with some evidence suggesting that this may be to the expense

Sub theme	Stakeholder	Representation
		of NO _x emissions.
N3	London Borough of Wandsworth	The effects of the Mayor's proposals are likely to be an increase in emissions of nitrogen oxides for vehicles with projected operating lifetimes below 16 years when compared to an alternative policy of mandating local authorities and other operators of specialist vehicles (ideally 16 years if NO _x is to be the focus).
N4: Impacts on greenhouse gases		
N4	City of Westminster	Recognises that the LEZ scheme has been designed to address local air pollutants that are damaging to human health, and not to cover the other pressing issue of reducing direct and indirect emissions of climate change gases, particularly CO ₂ . Notes that the LEZ scheme is likely to have small benefits in reducing CO ₂ . Considers that future reviews of the LEZ scheme should include consideration of how best to address both climate change gases and the statutory local air quality standards, without compromising local air quality. This would ensure that the LEZ would complement other initiatives designed to decrease the climate change impacts of traffic.
N4	London Liberal Democrats	Whilst welcomes the air quality impacts for LEZ it is disappointing that it has no climate change mechanism, and will make little impact on carbon emissions from road transport. In the long term, as alternative fuels become more readily available TfL should investigate how the LEZ might be adapted to reduce carbon emissions and to incentivise the use of non-fossil fuels.
N4	London Climate Change Agency	In addition to the reduction of toxic pollutant emissions that this scheme will achieve, the reduction in Nitrous Oxide (N ₂ O) emissions will also contribute towards reducing greenhouse gas of CO ₂ equivalent emissions. N ₂ O is a very powerful greenhouse gas having a Global Warming Potential (GWP) of 310, ie., 1 tonne of N ₂ O emissions into the atmosphere is equivalent to 310 tonnes of CO ₂ emissions.
N4	London Climate Change Agency	There will be a general reduction of CO ₂ emissions where the scheme stimulates more efficient transport, hybrid vehicles and alternative low carbon fuels.
N4	Freight Transport Association	A rolling age scheme of 8 years for goods vehicles (with potentially a 12-year limit for coaches and 10-year limit for vans) would facilitate the reduction of the freight industry carbon footprint – including that of public sector operators
N4	Friends of Capital Transport	Worried that some means of reducing NO _x can result in higher levels of CO ₂ .

Sub theme	Stakeholder	Representation
N4	London Borough of Brent	It is important to note that the assessment proposes that the impact of the LEZ on climate change is negligible and the impacts of traffic levels of congestion not significant. What is the potential impact of this, and the estimated increase in the cost of implementing the scheme, on the feasibility of the scheme and the sustainability of the scheme in the long term? This is particularly important in respect of climate change and the potential for the impact of this on future climate changes policies implemented by the Mayor.
N4	Mark Field MP	There must therefore also be doubts that the proposed scheme will have any significant impact on climate change which should be underpinning any future proposals in line with the recent Stern report.
N4	Royal Institution of Chartered Surveyors	Believes 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.
N5: Impacts on other pollutants		
N5	Central London Freight Quality Partnership	TfL should consider how to best restrict emissions of other pollutants such as oxides of nitrogen and finer particulates.
N5	Freight Transport Association	The current proposal would allow in some Euro I & II vehicles which comply with Euro III PM standards. However these vehicles are unlikely to meet current Euro standards on other pollutants such as Oxides of Nitrogen (NO _x) and Carbon Monoxide (CO). With global warming at the top of the current political agenda, the scheme misses out on the opportunity to also tackle carbon emissions.
N5	London Councils	The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, which forms the basis of boroughs' work to improve air quality, does not give priority to one pollutant over any other, and therefore TfL's actions could lead to inconsistencies with the work of the boroughs through their Air Quality Action Plans. Pleased to see that TfL are clearer in that they have stated NO _x standards will not be used in the roll-out phases described, but due to its equal importance with PM ₁₀ , would like to see further work done on introducing this, as this has a significant effect on the cost:benefit ratio for the scheme as a whole.
N5	The Society of Motor Manufacturers and Traders Ltd	As a result of focusing on PM standards only the LEZ risks eroding the other air quality benefits. For the zone that, according to Defra air quality analysis, did not stack up in air quality cost benefits, any further eroding of standards and increases in cost of compliance and enforcement makes this matter worse still.

Sub theme	Stakeholder	Representation
N6: Need for a PM_{2.5} standard		
N6	London Liberal Democrats	The consultation documents state that 'should the European Commission set a new standard covering ultra-fine particles or PM _{2.5} TfL will consider including such a standard within the LEZ'. Given that EU legislation which does indeed include a new standard for PM _{2.5} will in all likelihood be in force by the beginning of 2008, it seems short-sighted of the Mayor not to include a PM _{2.5} standard within the LEZ from the outset, particularly as PM _{2.5} will be included in TfL's monitoring programme. We urge the Mayor to revise the Scheme Order to contain standards on PM _{2.5} .
N6	London Liberal Democrats	<p>The European Commission's proposal for amended air quality legislation, currently going through the co-decision procedure, will introduce limit values for PM_{2.5} in line with recommendations from the World Health Organisation. This will require member states to reduce, over the next decade, people's exposure to ultra fine particulates, including in pollution 'hotspots'.</p> <p>The consultation documents state that 'should the European Commission set a new standard covering ultra-fine particles or PM_{2.5} TfL will consider including such a standard within the LEZ'. Given that EU legislation which does indeed include a new standard for PM_{2.5} will in all likelihood be in force by the beginning of 2008, it seems short-sighted of the Mayor not to include a PM_{2.5} standard within the LEZ from the outset, particularly as PM_{2.5} will be included in TfL's monitoring programme. We urge the Mayor to revise the Scheme Order to contain standards on PM_{2.5}.</p>
N6	London Liberal Democrats	By introducing a Euro IV standard for PM _{2.5} from 2010, for HGVs, buses and coaches, TfL could avoid future disruption and confusion and would give London a head start in meeting forthcoming EU environmental standards.
N6	City of Westminster	Notes references in the current consultation to projected benefits of the LEZ from reductions in PM _{2.5} , for which there may well be air quality objectives and limit levels during the life of the LEZ. Therefore supports the proposed approach to reducing PM _{2.5} , so long as the matter is kept under active review for formal incorporation of a requirement in the scheme at the earliest possible date.
N7: Impact of the LEZ on vehicle construction and scrappage		
N7	London Borough of Hillingdon	LEZ will encourage vehicle operators to purchase new vehicles to meet the new higher emissions standards. The purchase of new vehicles is not good for the environment as this will increase the use of scarce resources and will also increase pollution during the manufacture of the vehicle.

Sub theme	Stakeholder	Representation
N7	London Borough of Wandsworth	The effects of the Mayor's proposals are likely to be an increase in pollution caused by necessitating the manufacture of new vehicles and scrapping older ones before the end of their economic operating lifetimes for vehicles with a relatively short (less than 16 years) operating life. Wandsworth states specifically that there are likely to be an increase in emissions of nitrogen oxides for vehicles with projected operating lifetimes below 16 years and increases in emissions of fine particulate matter (PM ₁₀) for vehicles with projected operating lifetimes below 40 years, when compared to an alternative policy of mandating local authorities and other operators of specialist vehicles to replace their fleet at a fixed age (ideally 16 years if NO _x is to be the focus, longer for PM ₁₀).
N7	London Borough of Wandsworth	There would be an unintended increase in pollution caused by necessitating the manufacture of new vehicles and scrapping older ones before the end of their economic operating lifetimes for vehicles with a relatively short (less than 16 years) operating life. Though some of these increased levels of emission would be incurred outside London, the export of environmental problems is currently regarded as a highly questionable practice. Furthermore, emissions of greenhouse gases will increase.
N7	London Councils	The introduction of the LEZ will inevitably encourage or require vehicle operators to purchase new vehicles to meet the new higher emissions standards. The purchase of new vehicles is not good for the environment as this will increase the use of non-renewable resources and will also increase pollution due to the manufacturing process. This increase might even wipe out all predicted benefits from the LEZ. Some form of incentives should therefore be given to retrofit vehicles with abatement equipment, as this is a more environmentally sustainable option.
N7	London Borough of Wandsworth	There would be an unintended increase in pollution caused by necessitating the manufacture of new vehicles and scrapping older ones before the end of their economic operating lifetimes for vehicles with a relatively short (less than 16 years) operating life. Though some of these increased levels of emission would be incurred outside London, the export of environmental problems is currently regarded as a highly questionable practice.
N7	Thames Gateway London Partnership	Whilst some operators could use non-compliant vehicles outside London, one implication of the LEZ could be the premature scrapping of older vehicles which could otherwise have continued in useful service. This presents a potential waste of resources, including energy.
N8: Increase in abandoned vehicles as a result of the LEZ		
N8	London Borough of Barking and Dagenham	The introduction of the LEZ could lead to a rise in the number of abandoned vehicles.

Sub theme	Stakeholder	Representation
N8	London Borough of Barking and Dagenham	Would like to receive assurances that extra funding will be made available to help boroughs deal with any increase in abandoned vehicles resulting from the LEZ
N9: Air Quality impacts outside London		
N9	Healthy Southwark Partnership	There may be damaging health effects for those living around the M25 if many high polluting vehicles are diverted outside London. Although the Environmental Report conducted for the Scheme predicts the effects on the health of those living around the M25 to be 'negligible', the potential health consequences should still be taken into consideration.
N9	London Borough of Barnet	A key justification for the LEZ is claimed to be the need to implement it to help the UK achieve lower pollution levels required by EU legislation. The costs of retrofitting vehicles to make them compliant remains relatively high, and since the scheme will apply to London only, vehicles that are not compliant are more likely to be relocated to other parts of the UK. Although this may help improve London's air quality, it is unrealistic to believe that many so-called 'polluting' vehicles will be removed from operation (or retrofitted) in the UK as a whole.
N9	London Borough of Islington	The cost of upgrading vehicles can be recovered to an extent by selling outside of London, but morally we would just be transferring vehicles and their higher emissions into another environment.
N9	Royal Borough of Windsor and Maidenhead	No assessment has been undertaken on the possible negative impacts in the areas immediately outside the LEZ. Added pressure on air quality problems within the borough and the neighbouring authorities could arise from implementing the LEZ.
N9	Royal Borough of Windsor and Maidenhead	Added pressure on air quality problems within the borough and the neighbouring authorities could arise from implementing the LEZ. For instance operators could rearrange their fleets so that non-compliant vehicles will concentrate outside the LEZ, alternative routes and diversions could give rise to traffic problems.
N9	Slough Borough Council	Has declared two Air Quality Management Areas (AQMA) in June 2005. The annual average levels of NO ₂ in both areas exceeded the UK objective. Any improvements in the annual mean concentrations of NO ₂ in the region should help address air quality problems in Slough's AQMA.
N9	Slough Borough Council	Anxious to ensure that including the M4 within the LEZ does not have a detrimental impact on the A4 AQMA in Slough by diverting traffic into that area.
N9	Slough Borough Council	Has particular fears about the potential traffic and environmental impacts in the Colnbrook area of the A4. HGVs diverting away from the proposed LEZ in this area could impact on Slough BC's AQMA at Brands Hill. HGVs are significant contributors to the air quality exceedences

Sub theme	Stakeholder	Representation
		within this AQMA.
N9	Slough Borough Council	Operators may change their vehicle management practices and simply switch and operate older vehicles outside the LEZ and utilise all newer vehicles in London. This could have a significant negative local environmental impact.
N9	Surrey County Council	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 Surrey) is likely to improve.
N9	Tandridge District Council	There could be a negative impact on the air quality in Tandridge if, as a consequence of the Greater London LEZ, the more polluting diesel vehicles were used more outside London. We would be opposed to such an effect.
N9	Thames Gateway London Partnership	Whilst the LEZ could be good news for those within the Greater London boundary, giving operators the choice to divert non-compliant vehicles around the M25 may simply similarly divert the health problem elsewhere.
N9	Watford Borough Council	As Watford is situated close to London, being totally within the M25 and close to the M1, concerned that the introduction of the LEZ will have a detrimental effect on the air quality within our borough, due to the re-routing of non-compliant vehicles. Have declared six Air Quality Management Areas (AQMAs). These AQMAs were declared on the basis of vehicle related emissions and are working with Hertfordshire County Council to formulate Air Quality Action Plans that aim to improve air quality in these areas. We are concerned that non-compliant vehicles that do not wish to pay the Penalty Charge will choose to reroute through Watford and that as a result any local initiatives designed to improve air quality will be cancelled out by the arrival of non-compliant vehicles. It is also possible that if non-compliant vehicles choose to reroute then this might have an effect on those areas in which air quality only just falls below target levels and accordingly we may have to declare more AQMAs.
N9	Watford Borough Council	If motorways are not excluded from the LEZ, we anticipate that non-compliant vehicles may use this as another reason to reroute through Watford, affecting air quality in the borough.
N9	Watford Borough Council	The LEZ should include mitigation measures to address worsening air quality and traffic in areas outside the LEZ boundary, if this occurs. This needs to be in the context of actions taken by local authorities to improve air quality and reduce volumes.

Sub theme	Stakeholder	Representation
N9	West Sussex County Council	As a result of the LEZ, operators in and outside London may sell vehicles rather than upgrade them, which may reduce the value of pre October 2001 larger vehicles more than would otherwise have happened. Some operators outside London, including West Sussex, might be encouraged to buy these second hand vehicles rather than upgrade their fleets. This could slow down the normal cleaning up of the local fleet and reduce the benefit to local air quality. The LEZ may also not improve air quality outside London where operators use compliant vehicles to access London but older vehicles for local/non-London trips.
N10: Monitoring issues		
N10	CBI London	Urges the regular and independent monitoring and reporting of the impact of the LEZ on air quality.
N10	London Borough of Barking and Dagenham	Monitoring arrangements should be in place to determine whether or not the LEZ has unintended adverse consequences (such as abandoned vehicles), with a commitment to develop and implement at the scheme's cost any necessary strategies to rectify if such were to occur.
N10	London Borough of Newham	There is a need to closely monitor the efficiency of the chosen strategy and a preparedness to make changes if the projected targets are not being achieved.
N10	Royal Borough of Windsor and Maidenhead	Given the size and strategic importance of the area that the LEZ covers a buffer zone should be created in which the GLA should monitor, and, where needed, mitigate the possible negative outcomes.
N10	Slough Borough Council	There should be monitoring of local air quality impacts, in areas neighbouring the LEZ boundary.
N10	Watford Borough Council	Urges TfL to ensure that its monitoring of traffic levels and air quality extend to the M25, to include Watford, to monitor whether the introduction of the LEZ makes the situation in those areas between the Greater London boundary and the M25 worse, in terms of air quality and traffic volumes.
N11: Other environmental impacts issues		
N11	Freight Transport Association	Retrofit equipment will not achieve the same standards and therefore not provide the same air quality benefits as new vehicles.
N11	London Borough of Barnet	The consequences of non-compliant vehicles avoiding penalty charges are that less reputable operators may be willing to take the risk of entering the zone with non-compliant vehicles, possibly making use of residential roads and borough routes to avoid the risk of detection. The potential environmental impact of non-compliant vehicles using residential roads is often far higher than the same vehicles using the main road network.
N11	London Borough of Hillingdon	New technologies need to be investigated regarding air quality.

Sub theme	Stakeholder	Representation
N11	London First	It is imperative that all the Mayor's current initiatives aimed at improving air quality are implemented in a holistic manner to ensure maximum benefits. For example, the highest vehicle emission rates for all pollutants occur at the lowest speed of 5km/hr and lowest emission rates occur above 40km/hr. It is therefore essential to reduce congestion to ensure that emissions levels are kept to a minimum.
N11	Royal Borough of Kingston Upon Thames	It is already known that the area surrounding the A3 has the worst air quality in the borough and these proposals do not address this.
N11	The Society of Motor Manufacturers and Traders Ltd	Air quality work by the Department for Environment Food and Rural Affairs (Defra) in the UK demonstrates the benefits of the uptake of new technology as being the most cost effective method of improving air quality (Defra 2006).

Theme O: Streetscape

Sub theme	Stakeholder	Representation
O1: General signage issues		
O1	Essex County Council	Inadequate advanced signing and turning facilities along minor routes could prevent heavy vehicles from being able to divert away from the LEZ.
O1	Federation of Small Businesses	The LEZ will result in more and complicated signage on the roads, at a time when there is concern about proliferation of signs and when TfL among others is attempting to reduce signage levels.
O1	London Borough of Barnet	As previously expressed, has concerns that a precedent has been set that a 'charging zone' requires repeater signage within the zone to remind drivers of the need to pay the daily charge. Repeater signage will have a direct visual impact on the local environment. In addition, the manufacture and installation of these signs will itself have a wider environmental impact. This impact doesn't appear to have been included in the overall assessment of the scheme. Notwithstanding the need to ensure drivers are aware of the operation of the scheme, consider it essential to minimise sign clutter and will resist signage proposals which it considers to be excessive.
O1	London Borough of Croydon	Has concerns that the way in which the boundary for the LEZ has been developed to follow the borough boundary, that the proliferation of signs that will be required to make the zone enforceable and allow vehicles that have reached the boundary to turn without infringing the zone, will be unacceptable.

Sub theme	Stakeholder	Representation
O1	London Borough of Croydon	There will be many existing side roads where there are already a significant number of signs for things such as waiting restrictions, traffic calming, 20mph zones etc, where the introduction of more signs will not be possible or will have an unacceptable impact on street clutter.
O1	London Borough of Croydon	Has concerns with the way in which the boundary for the LEZ has been developed to follow the borough boundary, and that the proliferation of signs that will be required to make the zone enforceable and allow vehicles that have reached the boundary to turn without infringing the zone, will be unacceptable.
O1	Hertfordshire County Council	Is open to further advanced signing sites in the county in addition to the one already planned.
O1	London Borough of Hackney	Concerned with additional street clutter associated with signs, as are working towards harmonising street furniture and signage provision, and reducing all unnecessary clutter from streets.
O1	London Borough of Merton	The GLA boundary will be difficult for people to visualise so it will be essential that good signage is provided at all entry points and that publicity targets those companies just outside the boundary.
O1	London Borough of Newham	TfL needs to work with individual boroughs in respect to the design, location and number of signs.
O1	London Borough of Richmond upon Thames	Broadly supportive of the LEZ and welcomes modifications made since the consultation on the TAQS revision in early 2006, but has concerns about signage.
O1	London Borough of Southwark	Seeks assurance on how the introduction of the LEZ would further impact upon Southwark's streetscape, albeit to a lesser extent than that of the Congestion Charging zone, for which the borough is in part subject to.
O1	London Councils	Several boroughs have raised concerns over the issue of signage, and the likelihood of adding further to street clutter and the affect this has on amenity. This is particularly so in areas of high heritage value and those areas on the boundaries of the LEZ. Whilst TfL officers have previously stated that the signage will be limited to the boundary areas, Congestion Charging signs are repeated inside that zone to remind drivers they are driving inside it and that they shouldn't forget to pay. Boroughs are therefore concerned about a proliferation of signage across the whole of Greater London. Therefore request that TfL work closely with individual boroughs to ensure that any concerns (such as those regarding design, location, and sign numbers) can be addressed whilst allowing the LEZ to still be appropriately signed where necessary.
O1	Royal Borough of Kingston upon Thames	Instead of installing the zone "gateways" at the London boundary only, it seems it will be necessary to sign all of the adjoining roads on these "escape routes", even the cul-de-sacs. This approach is resisted as it will result in a far greater amount of signage/street clutter, which will have a

Sub theme	Stakeholder	Representation
		detrimental impact on the local environment and is bound to increase the implementation costs significantly.
O1	Royal Borough of Kingston upon Thames	Where the boundary of the LEZ coincides with the London-wide Lorry ban zone, consideration should be given to coordinate the signs so as to reduce clutter and confusion.
O1	Royal Borough of Kingston upon Thames	Need for TfL to consult the boroughs about the location of signs and cameras to reduce impact on local amenity.
O1	Slough Borough Council	While supports the inclusion of the M4 in the LEZ, would want to see and comment on the revised scheme signage if it were to be included.
O1	Slough Borough Council	Concerned about the impact of vehicles diverting away from the LEZ at key zone entry points and would like more information about scheme signing at, and in advance of, the boundary.
O1	Slough Borough Council	Concerned about the visual impact on the landscape and townscape of roadside signage at the boundary of the proposed LEZ, particularly in the Colnbrook area.
O1	Surrey County Council	Require installation of advance signs to advise drivers of the charge due if they continue along routes leading into the LEZ.
O1	Surrey County Council	At a meeting on 20th November to discuss the specific issues of the boundary and signing, understood that TfL will cover costs for signing.
O1	Surrey County Council	Pleased to discuss the details of the action required, the funding available from TfL and the timescale for implementation.
O1	Surrey County Council	The entry to the zone should be well signed on all approaches. Further work will be done in February and March to identify and cost specific locations for advanced signs and any other required works. It is suggested that the Highways Agency be asked to ensure that adequate signing on the M25 exists to encourage vehicles to stay on the motorway.
O2: Borough-specific signage issues		
O2	London Borough of Richmond upon Thames	Has considerable concerns relating to the impact of signage required along the route, and the associated visual clutter and impact that this can have. In conjunction with Lorry Weight Restriction Signage that already exists along Hampton Court Road, Thames Street, and Upper Sunbury Road, it is considered that new signage could have a detrimental impact on the appearance of the adjacent neighbourhood and understanding and compliance in general. Signage associated with the lorry weight restriction would need to be retained and any new signage would need to be compatible both visually and in terms of the message contained within existing signage. Avoidance of excessive signage is desirable.
O2	London Borough of Croydon	Before any scheme is approved an extensive survey of existing signage is required as well as detailed designs of

Sub theme	Stakeholder	Representation
		the new signs and locations.
O2	Royal Borough of Kensington and Chelsea	Believes there will be no need for LEZ-related signage within the borough.
O2	Royal Borough of Kingston upon Thames	The location of the large entry signs must take account of residential amenity. Malden Rushett is a case in point.
O2	Royal Borough of Kingston upon Thames	Where there are more than one safe and adequate turning area along a stretch of road, signs should be installed at the first possible turning point to encourage non-compliant vehicles to turn back to reduce pollution along that road. For instance the roundabout at the junction of Bridge Road and Moor Lane must be used rather than Bridge Road/Hook Road/Leatherhead Road/Mansfield roundabout.
O2	Surrey County Council	A309 Kingston By Pass, U Turn provided at Ace of Spades roundabout. It is assumed that the A3 will be well signed.
O2	Surrey County Council	B284 Chessington Road, U Turn provided at the roundabout Bridge Road j/w Leatherhead Road and Hook Road. Advanced signing needed.
O2	Surrey County Council	A240 Kingston Road, Tolworth Towers roundabout needs to be well signed. Advanced signing needed on approach to Tolworth Towers (A3).
O2	Surrey County Council	A24 London Road, no U Turn provided at the junction. Clear signing of the zone needed.
O2	Surrey County Council	A232 Ewell Road, no U Turn provided at the junction. Clear signing of the zone needed.
O2	Surrey County Council	A217 Brighton Road, roundabout provides U Turns. Advanced signing required ahead of roundabout - additional advanced signing needed near to junction 8 of M25.
O2	Surrey County Council	B2218 Sutton Lane, signs needed to avoid confusion. Advanced signing required.
O2	Surrey County Council	A3044 Stanwell Moor Road - Map 108. No problems envisaged as zone commences on Southern Perimeter Road and access can be gained north of roundabout along the A3044 Stanwell Moor Road (LB Hillingdon) - Map 108, advanced signing at A3044/Airport Way roundabout.
O2	Surrey County Council	D3323 Northumberland Close - Map 107. Court Farm and Blackburn Trading Estates located in Northumberland Close. Advanced signing needed at Northumberland Close/Bedfont Road junction.
O2	Surrey County Council	A308 Staines Road East - Map 101. Zone v boundary along north side of A308 within GLA boundary. Turning available at Hampton Court. Advanced signing to be located at A308/M3 junction 1.

Sub theme	Stakeholder	Representation
O3: Camera and monitoring site issues		
O3	City of Westminster	Welcomes confirmation that cameras to be used to enforce the LEZ "... would include those used to enforce the central London Congestion Charge Scheme and the Western Extension...", thus avoiding duplication of 'street clutter'. Notes that additional fixed cameras will be required at some other locations (complemented by mobile patrol units); and again asks that careful consideration be given to the number, siting and appearance of these cameras and signage, to minimise unattractive 'street clutter' which would be detrimental to the visual quality of the city
O3	London Borough of Brent	Cameras to identify registration numbers of vehicles driving in London are the most practical and effective way of enforcement, reducing a local need for 'human resourcing' at street level. Would want to work closely with TfL as to the location of such cameras, mitigating the need for additional columns wherever possible - in line with aspirations and objectives of emerging Council documents such as the Streetscape and Road Danger Reduction Design Manual. Agrees that 24hr/day, year-round operation would be paramount to the effectiveness of such a scheme.
O3	London Borough of Southwark	The council is concerned that monitoring sites will also be established in the borough. Whilst acknowledging the need for demonstrating the benefits of the zone we would seek to ensure that such street furniture will not negatively impact upon the public realm and is appropriate to its location.
O3	Royal Borough of Kensington and Chelsea	Vehicles driving within the LEZ would be detected using an extended network of fixed and mobile Automatic Number Plate Recognition cameras (incorporating the existing cameras used for the Congestion Charging scheme). It is still not clear whether TfL proposes to add additional cameras in Kensington and Chelsea, but in any case can see no reason why any more cameras would be needed.
O3	Royal Borough of Kingston upon Thames	Need for TfL to consult the boroughs about the location of signs and cameras to reduce impact on local amenity.
O3	Slough Borough Council	Concerned about the visual impact on the landscape and townscape of ANPR camera infrastructure at the boundary of the proposed LEZ, particularly in the Colnbrook area.

Theme P: Health Impacts

Sub theme	Stakeholder	Representation
P1: Impact on general health		
P1	Asthma UK	Welcomes the fact that the LEZ will have the most significant health impacts on deprived communities.

Sub theme	Stakeholder	Representation
P1	Friends of Capital Transport	The LEZ would have double health benefits: walking in unpolluted air is more healthy and the removal of large freight vehicles would make walking less intimidating and encourage more of it.
P1	Haringey PCT	Haringey is sandwiched between three major roads, the A10, A1, and A406 North Circular and the most deprived parts of the borough back on to these routes. There is an eight-year gap in male life expectancy between the more affluent and deprived wards in Haringey, and marked inequalities across a range of other health outcomes for our population. Improving air quality will make an important contribution to improving health and reducing health inequalities.
P1	Healthcare Commission	It is likely that the LEZ will stimulate numerous immediate positive health impacts in terms of improvements in respiratory health, and other related issues that affect communities' health and well being, which is welcome.
P1	Healthy Southwark Partnership	Recognises the direct negative health effects of PM ₁₀ , as noted in the Health Impact Assessment produced for the LEZ, including respiratory and cardiovascular complications. Particulate matter can carry carcinogens that may contribute to lung cancer and aggravate existing sensitivity to allergens among people with hay fever and asthma.
P1	Healthy Southwark Partnership	The proposed LEZ may assist in achieving some of Healthy Southwark's performance targets including: a reduction in rates of coronary heart disease and cancer; a reduction in the proportion of general practitioner patients classified as obese; an improvement in the wellbeing of children, young people and their families; an improvement in the mental health and wellbeing of our population.
P1	Healthy Southwark Partnership	Indirect health benefits may include an increase in walking and cycling due to cleaner air, which in turn would increase physical activity levels, and comply with Healthy Southwark targets for health improvement. An increase in physical activity in the borough would serve as a protective factor to prevent or improve such conditions as obesity, diabetes, coronary heart disease and mental ill-health.
P1	National Institute for Clinical Excellence	Thinks the consultation document makes a strong case for the effectiveness of a LEZ in meeting statutory air quality objectives and thereby reducing the direct harm caused by poor air quality to people suffering from respiratory or cardiovascular disease.
P1	Royal College of Nursing	Reducing the levels of air pollution will have a positive impact on the many patients with whom our members have contact, especially those who suffer from respiratory and other conditions. These patients and families will include those who are amongst the most vulnerable in the community, especially those with long term conditions, children with asthma, other respiratory conditions and older people.

Sub theme	Stakeholder	Representation
P1	Royal College of Nursing	Welcomes any attempts to reduce pollution and improve the quality of life for Londoners.
P1	London Borough of Greenwich	Supports the conclusion of the equalities impact assessment that the improvements in air quality achieved for whole population would be greater for those living in areas subject to increased exposure or more vulnerable due to existing poor health. This addresses the research that Black, Asian and ethnic minorities were found to experience higher levels of air pollution than the average for the whole population.
P1	London Liberal Democrats	London's record on air quality is unacceptable given its position as a world city. Whilst quality of life considerations are important in terms of London's reputation, concerned about the implications of this for London's most disadvantaged groups. As the equalities impact assessment found, there is significant evidence of a link between economic deprivation, exposure to air pollution and poor health. London's poorest communities, whilst less likely to drive in London, are disproportionately affected by the poor air quality caused by road transport emissions.
P2: Economic and social impacts		
P2	Central Council of Physical Recreation (CCPR)	12-16 seat minibuses are primarily used by community groups and voluntary/ charitable/not-for-profit organisations, and constitute only a small part of the overall dangerous particle emissions compared to commercial companies. Furthermore, whilst it is hoped that commercial fleets will be able to absorb the additional costs, including minibuses in the scheme will affect the most vulnerable groups in the Capital.
P2	Central Council of Physical Recreation (CCPR)	Minibuses are widely used to transport those without access to public transport or private cars, particularly children and people with disabilities. Minibuses/LGVs are often required to accommodate a number of wheelchairs at once or to conveniently and safely transport large groups of children. Instead, those groups will either be forced to use private cars, often requiring the goodwill of a parent or friend, or pay the additional cost of travelling by public or hired transport.
P2	Central Council of Physical Recreation (CCPR)	Removing the safe and free use of minibuses may discourage parents from allowing their children to participate and will hit those from lower socio-economic groups the hardest as they will not be able to pay for transportation. At a time when the GLA is trying to encourage young Londoners to become involved in activities which teach social values and keep them from petty crime associated with boredom, enforcing the LEZ may actually prevent participation.
P2	Central Council of Physical Recreation (CCPR)	As many University Sports Clubs will not have the resources to buy new mini-buses, some Universities may choose not to enter competitions. That in turn will have a detrimental affect on the health of the student population in London and run

Sub theme	Stakeholder	Representation
		counter to the legacy of activity participation that the 2012 Olympic and Paralympic Games is striving for.
P2	Central Council of Physical Recreation (CCPR)	Whilst recognising the importance of the LEZ and improving air quality, we feel that in its current guise the scheme would detrimentally impact upon people's ability to take part in sport and recreation in the capital and could therefore cause as many health and social problems as it is trying to alleviate.
P2	Healthcare Commission	Maintaining social networks is crucial in improving health, especially for isolated individuals, including people with mental illness and older people. In addition, accessing health services can be a struggle. There are numerous small, community-based organisations that use mini buses and similar vehicles to provide 'dial-a-ride' type services, ferrying people back and forth. Concerned that the measures will prevent those organisations from providing the service and that there will be significant effects on the health of local people.
P2	Healthcare Commission	Good nutrition is crucial in maintaining the health of vulnerable people. There are numerous small, community-based organisations that use vans and similar vehicles to provide 'meals on wheels' type services. Concerned that the measures will prevent those organisations from providing the service and that there will be significant negative effects on the health of local people.
P2	Healthcare Commission	People with mobility problems often buy their food from local 'corner shop' retailers. Getting to supermarkets is often not an option – the so-called 'food desert' hypothesis. Food from such outlets is often more expensive and of poorer quality. The financial burden that the charges might place on small retailers will be passed onto the customer, with financial and health impacts. Similarly, businesses might cease to trade should the burden be considered too great. The health impacts on the local vulnerable population might be considerable.
P2	Healthcare Commission	Keen to maintain a focus on reducing inequalities in health, and ensuring that the positive benefits are felt by residents in disadvantaged neighbourhoods.
P2	Healthy Southwark Partnership	The voluntary sector and schools would be unlikely to have the funding to replace their fleet or pay LEZ charges for older minibuses. This may discourage some activities from taking place, including participation in sporting events and other physical activity. This, in turn, may hamper the ability of some organisation members to stay healthy.
P2	Healthy Southwark Partnership	Loss of employment in small businesses due to an inability to replace vehicles may damage mental health.
P2	Healthy Southwark Partnership	Minibuses not meeting emissions requirements may be used by schools or youth clubs in the borough to transport children and young people to and from activities in order to ensure young people's safety. While Healthy Southwark

Sub theme	Stakeholder	Representation
		encourages the use of alternative forms of transport including walking, cycling and public transport, understand that if children were unable to use minibuses, parents or carers may prevent children or young people from taking part in extra-curricular activities. The potential health benefits, of these activities, such as sport, may then be lost.
P2	Healthy Southwark Partnership	An improvement in air quality is likely to reduce health problems associated with transport pollution and the subsequent primary care costs involved in treating those conditions.
P2	Healthy Southwark Partnership	Other vulnerable groups may rely on minibuses to access community-based services. Such groups may include the elderly and those with mental health problems. Lack of opportunity to attend community-based services may increase social isolation and thus have an adverse effect on the health and wellbeing of some individuals.
P3: Monitoring of health impacts		
P3	Asthma UK	Would like to see a monitoring programme that investigates non-monetary, quality of life impacts. Details could be published in annual progress reports. Pleased that monitoring will be ongoing.
P3	City of Westminster	Future modelling of population exposure to local air pollution should take full account of the range of people subject to such exposure. In places such as much of Westminster, those working in the city, shopping here or visiting, are exposed to air pollution, often in areas of high pollution levels. Account needs to be taken of pollution exposure of these wider sections of the population, as well as that of residents.
P3	Haringey PCT	Would be interested in the outcomes of future evaluation of the impacts of the scheme on health, well-being and quality of life for Londoners.
P3	Healthcare Commission	It would be powerful to see the health effects of transport measures in their totality. For example, might there be a way of understanding what the cumulative effect of the Congestion Charge and the LEZ will be on the health of all Londoners, including those with low incomes? Focussing on small parts of the bigger whole fails to expose the benefits of a whole system approach to understanding the relationship between transport and health and improving the health of local people through transport-related measures.
P3	National Institute for Clinical Excellence	Regards the evidence that the LEZ would particularly benefit the groups in the population most exposed to air pollution – Black, Asian and minority ethnic people, older people, and young people – as particularly important.

Sub theme	Stakeholder	Representation
P3	National Institute for Clinical Excellence	Is at an early stage of developing public health guidance on interventions in the built or natural environment that encourage and support physical activity in the population. Although there is research evidence that the environment – broadly defined – can influence people’s ability to be active, NICE’s guidance will be the first authoritative appraisal of the effectiveness and cost effectiveness of changes to the environment aimed specifically at raising levels of participation in physical activity. Is interested, therefore, in the comments in the health impact assessment on the possible influence of perceptions of the environment on people’s sense of well-being and, perhaps, behavioural choices. Agrees with the authors on the difficulty of measuring such factors. Suggests that it would be valuable if the work package on improving understanding of health impacts in the monitoring programme for the LEZ included an exploration of links between people’s perceptions of their environment and health-related attitudes and behaviour.
P4: Consultation information		
P4	London Borough of Hounslow	Clarification is needed in the Scheme Description and Supplementary Information where it appears that using the Defra method of projection of monetised health and non-health benefits gives the same benefit for both London and outside London. This is misleading and warrants clarification.
P4	National Institute for Clinical Excellence	Welcomes the thoroughness of the health impact assessment supporting the proposals and its careful consideration of a wide range of potential costs and benefits, including less direct and broader impacts on communities, lifestyle and behaviour generally
P4	Royal Borough of Kensington and Chelsea	The Health Impact Assessment gives the total monetised health benefits for London for the scheme using the Defra methodology at between £80-£120 million, calculated in the modelling exercise carried out earlier this year. This is significantly less than the £130 -£180 million calculated in the modelling exercise carried out earlier this year.
P4	Thames Gateway London Partnership	It is understood that the benefits of the scheme could be greater than stated in the LEZ documents; recent research has suggested that particulates are a greater risk to health than previously thought. This heightens the case for the LEZ, and keen to see the benefits delivered at the earliest opportunity. Note that there is no consideration of the impacts of Nitrogen Oxides in the latest proposals, would like to see that future regulation phasing takes this pollutant into consideration, once technology allows for it.

Sub theme	Stakeholder	Representation
P5: Other health impacts		
P5	Healthy Southwark Partnership	Effective communication of the Scheme to local people in Southwark and throughout Greater London should be combined with related health promotion messages. For example, it could be noted that the increase in air quality will make walking and cycling more pleasant. The health benefits of these activities should also be mentioned.

Theme Q: Traffic impacts

Sub theme	Stakeholder	Representation
Q1: Increased traffic due to move to smaller vehicles		
Q1	Central Council of Physical Recreation (CCPR)	5,000 HE students travel for organised sports fixtures within the M25 on a weekly basis, and minibuses are the primary mode of transport due to the inaccessibility of many sports grounds by public transport (National Active Student Survey). As many University Sports Clubs will not have the resources to buy new mini-buses, students will either be forced to travel by car – adding to the congestion within the capital.
Q1	Central Council of Physical Recreation (CCPR)	Preventing sports clubs and organisations from using non-compliant minibuses will result in more cars being used in the London area and therefore runs counter to the TfL's policy to decrease congestion in the city.
Q1	Hertfordshire County Council	Concerned that the provision of some home to school services across the boundary will not be sustainable. These journeys are very short, and take place only in the morning and the evening. The additional costs could therefore not be borne either by parents or by the local authority. These routes are primarily run by smaller operators with less ability to bear compliance costs. If these services are discontinued, it could result in more congestion as parents take their children to school in cars.
Q1	London Borough of Bromley	Previously said that the LEZ could lead to an increase in traffic volumes in the borough should businesses seek to use a larger number of smaller vehicles to operate within the LEZ. Identified a possibility that delivery patterns in local centres could change, and sought guarantees that TfL would fund any reasonable mitigation measures, such as changes to local direction signing or waiting and loading restrictions, identified by boroughs. In TfL's report to the Mayor, TfL states that it is unlikely that freight operators are planning to switch from HGVs to LGVs. However, TfL's own consultation on the proposed London Freight Plan says that the introduction of a LEZ may lead to an increase in the use of vans. This issue alone would not be enough to prompt

Sub theme	Stakeholder	Representation
		the Council to object to the Scheme Order. Asks that TfL recognise this judgment made from elsewhere in TfL and keep open the possibility of funding any minor borough mitigation measures which might prove necessary.
Q1	London Borough of Ealing	Considers that there are a larger number of heavier LGV vehicles serving retail and other outlets in London and suppliers may look to the use of these vehicles in place of HGVs when the HGV requirements come into force from February 2008. Would welcome the requirements for heavier LGVs to be introduced earlier than the planned October 2010.
Q1	Covent Garden Market Authority	NCGM has a key role as a distribution hub for quality fresh produce into London's hospitality sector. An important aspect of this role is as a valuable consolidation point for the distribution of local produce which would otherwise struggle to reach London's hospitality sector. By bringing local produce into New Covent Garden Market for consolidation by the catering distribution companies the need for additional journeys by the producers' own vehicles can be eliminated.
Q2: Traffic diverting around London		
Q2	BAA	The scheme will have little impact on congestion in the vicinity of Heathrow.
Q2	London Borough of Merton	How does TfL intend to deal with boundary/congestion impacts that the LEZ may have? For instance, would vehicles not willing to pay the charge choose to drive around the boundaries to avoid being 'penalised' and how is this problem going to be addressed?
Q2	Royal Borough of Windsor and Maidenhead	Added pressure on air quality problems within the borough and the neighbouring authorities could arise from implementing the LEZ. For instance operators could rearrange their fleets so that non-compliant vehicles will concentrate outside the LEZ, alternative routes and diversions could give rise to traffic problems.
Q2	Slough Borough Council	Slough BC borders the proposed LEZ and remains concerned about the potential impact of vehicles diverting away from the proposed LEZ at key zone entry points. Would like more information about parking provision for vehicles diverting away from the LEZ.
Q2	Slough Borough Council	Would like more information about the management of vehicles diverting away from the LEZ.
Q2	Surrey County Council	C217 Old Farleight Road, HGVs avoiding zone may increase use of A2022 Teddington Road and Limsfield Lane - no U Turn at junction.
Q2	Surrey County Council	D447 Rag Hill Road runs into Tatsfield lane which forms the boundary of the zone - vehicles coming from the South may turn into Rag Hill Road to avoid zone from A233.

Sub theme	Stakeholder	Representation
Q2	Surrey County Council	A30 London Road/Staines Road - Map 105. B3003 Clockhouse lane is not within the zone, including the section north within LB Hounslow. The A30 Great South West Road and A315 Staines Road and Bedfont Road are within the zone. Traffic may use Clockhouse Lane. Advanced signing needed.
Q2	Surrey County Council	B3003 Clockhouse Lane - Map 105. Not within the zone. Lockhouse Lane has a 7.5 tonne environmental weight restriction (northbound only). This site is very sensitive and any increase will lead to an adverse reaction from residents. Advance signing at B3003.
Q2	Surrey County Council	B377 Feltham Road - Map 103. Additional traffic may use A244 Chertsey Road/Cadbury Road as diversion away from zone.
Q2	Surrey County Council	A244 Cadbury Road - Map 103. Additional traffic may use B377 Feltham Road as diversion away from zone. Advanced signing located on A308 at Cadbury Road junction.
Q2	Watford Borough Council	Watford is the most congested town in Hertfordshire, with many of its roads and junctions operating at or over capacity. Even a slight increase in traffic due to re-routing will worsen this situation. This also goes against the Local Transport Plan target of reducing traffic levels in Watford.
Q2	London Borough of Harrow	The effect of freight deciding not to enter the scheme, close to or at the boundary, could be to increase congestion by turning in the road or pulling up at the roadside. Will extra money be allocated to cover additional costs to mitigate these problems? Some areas have been assessed as moderate for these concerns, where are these areas?
Q2	London Borough of Harrow	Supports the LEZ in principle as it is a way of bringing forward predicted air quality improvements in the two pollutants that Harrow has declared in its Air Quality Action Plan to tackle; PM ₁₀ and NO ₂ . However, the improvements to the air quality of Harrow, as predicted by the TfL modelling, would be less than in other more central London boroughs. However, have the modelled predictions included potential congestion at the boundary with lorries turning in the road.
Q2	London Borough of Harrow	With Wembley close to the borough of Harrow has provision been considered for congestion of coaches parking at the edge of the LEZ and have the passengers travel in by tube or train?
Q3: Use of unsuitable roads ('rat-running') to avoid enforcement cameras		
Q3	Essex County Council	If minor routes are not fitted with enforcement cameras, it is possible that this may encourage unwanted through-traffic. This is of particular concern to Essex with regards to a number of towns in close proximity to the boundary, such as Brentwood, Loughton and Epping.

Sub theme	Stakeholder	Representation
Q3	Surrey County Council	Concerned at the impact on Surrey highways of additional HGV movements that may arise from vehicles derived from routes through the LEZ or manoeuvring to avoid charges.
Q3	Surrey County Council	D2311 Northey Avenue, could lead to rat running vehicles in the area?
Q3	Surrey County Council	A2022 Croydon Lane, may encourage use of Carshalton Road. Advance signing required.
Q3	Surrey County Council	B278 Rectory Lane/Carshalton Road, may encourage use of Croydon Lane
Q4: Modal shift		
Q4	Central Council of Physical Recreation (CCPR)	Believes it is far better to occasionally drive a horsebox that can not be converted, than to purchase a 4x4 and trailer, which would result in daily use of the 4x4 as the family vehicle and equate to more fuel consumption and pollution.
Q4	Friends of Capital Transport	The removal of freight from the roads would greatly improve the environment for walking.
Q5: Monitoring and mitigation of traffic impacts		
Q5	Slough Borough Council	There should be monitoring of the levels of HGV traffic diversion at the LEZ boundary.
Q5	Surrey County Council	Requires monitoring of traffic along Surrey's roads just outside the LEZ boundary to establish is there is any growth in HGV traffic.
Q5	Surrey County Council	At a meeting at TfL on 17th January, asked if the monitoring will extend outside the Greater London area and request clarification. If the TfL monitoring programme will provide this data, will cooperate with the planning and installation of appropriate equipment. If, however, the TfL programme will not provide the data then are able to proceed independently but expect TfL to bear the cost. Considered a number of methods but conclude that the most appropriate way is to install 12-20 Automatic Traffic Counters (ATC) to provide real time classified counts. Data collection needs to start soon in order to establish baseline conditions.
Q5	Watford Borough Council	We urge TfL to ensure that its monitoring of traffic levels and air quality extend to the M25, to include Watford, to monitor whether the introduction of the LEZ makes the situation in those areas between the Greater London boundary and the M25 worse, in terms of air quality and traffic volumes.
Q5	Slough Borough Council	There should be monitoring of the change in vehicle numbers and type and fleet composition; for example, changes in the 'Euro' profile of vehicles operating in areas just beyond the London boundary.
Q5	Watford Borough Council	The LEZ should include mitigation measures to address worsening air quality and traffic in areas outside the LEZ boundary, if this occurs. This needs to be in the context of actions taken by local authorities to improve air quality and reduce volumes.

Theme R: Impacts on the London economy

Sub theme	Stakeholder	Representation
R1: LEZ would have a negative impact on London's economy		
R1	Brewery Logistics Group	TfL are penalising the one group of operators who are vital to the future prosperity of London as a commercial and vibrant city in which to live, work and play. If commercial vehicle operators decide it is uneconomical to visit London due to PCN "confetti", Congestion Charges and now LEZ, there will only be one casualty.
R1	Park Royal Partnership	Royal Park is a designated Opportunity Zone in the London Plan with substantial job growth projections. We urge further consideration of the implementation of the LEZ in this part of the Park Royal estate, in particular assessing its impact on businesses and their employees.
R1	Road Haulage Association	Enterprises based within Greater London would need to increase their charges for customers by a significant amount, or they will simply cease trading.
R1	Healthcare Commission	The financial burden that the charges might place on small 'corner-shop' retailers will be passed onto the customer, with financial and health impacts. Similarly, businesses might cease to trade should the burden be considered too great.
R1	London Borough of Havering	The LEZ may have a negative impact on retailing in borough town centres, especially Romford. Increased costs on coach operators may be passed onto customers, reducing number of visitors to the borough.
R1	London Climate Change Agency	The move towards cleaner vehicles and fuels that this scheme will stimulate will also contribute towards economic development in London.
R2: Impact on London events		
R2	Central Council of Physical Recreation (CCPR)	There are upwards of seven major rowing races held on the Thames each year involving tens of thousands of rowers and volunteers. The largest is the men's Head of the River Race which regularly attracts over 400 entries, including members of the GB squad. Competitors come from all over the world, with the majority trailering their own boats into the city. Those clubs with vans over 9 years old will either have to hire a different vehicle for the day or pay the penalty charge. Due to the additional expense many may simply choose not to compete and that will have a detrimental affect on both the sport and its financial revenue, in addition to the loss revenue amongst local businesses.

Sub theme	Stakeholder	Representation
R2	Central Council of Physical Recreation (CCPR)	In addition to the financial burden of buying new vehicles or fitting a particle filter, the LEZ will also threaten the income of many sports, through its impact on large sporting events in the capital. The possible impact on rowing is mentioned above; however there are thousands of other sporting events and competitions in Greater London which bring vital income to small community clubs. Furthermore, the large events, such as the Olympia Horse Show and the Boat Show at Excel, bring huge numbers of visitors into the capital all of whom spend money in the cities shops, hotels and restaurants. The Horse of the Year Show has already moved to Birmingham, and the LEZ is likely to make other large sports events follow suit, as competitors and traders will be disinclined to pay the LEZ penalty charge.
R2	Central Council of Physical Recreation (CCPR)	Due to the additional expense many rowers may simply choose not to compete in London events and that will have a detrimental affect on both the sport and its financial revenue, in addition to the loss revenue amongst local businesses.
R2	Federation of British Historic Vehicle Clubs	Many "heritage" events (usually for charitable purposes) in the GLA area will be adversely affected and the future of the London to Brighton Run for Historic Commercials will be compromised.
R2	The Showmen's Guild of Great Britain	Financial constraints imposed by the proposed order would render attendance at fairs unviable and the fairs themselves would inevitably fail. Showmen cannot readily and economically transfer the carriage of the equipment and ancillary items to other vehicles as would be the case with commercial hauliers and as own account operators do not have customers who can transfer business to other operators.
R2	The Showmen's Guild of Great Britain	It is a matter of public record that the Guild gives considerable financial support to Great Ormond Street Hospital for Children and to such other charities as Save the Children. Funfairs and circuses and other events generate considerable rental income to individual London boroughs for example one major operator pays more than £235,000 to London Boroughs each year with more than £135,000 being paid to one particular borough. When one takes into account that this is only one operator out of 508, the financial consequences to London boroughs should not be underestimated.
R2	The Showmen's Guild of Great Britain	There are many major events in London each year which the Guild attends, many of these fairs are held under Royal Charter and have been in existence for many centuries. They provide leisure and relaxation not only to the local population but also attract UK and foreign visitors. The likely effect of the proposed charges will force smaller Members out of business, which in turn will reduce the attractiveness of the fairs and in the medium to long term will erode the profits of other operators and the fairs will wither and

Sub theme	Stakeholder	Representation
		disappear.
R2	The Showmen's Guild of Great Britain	Members of the Guild and Society would be totally incapable of passing any portion of these costs to their customers as although events which they support are well attended, there are many other leisure alternatives available to customers.
R2	Association of Circus Proprietors of Great Britain	The circus industry relies largely on vehicles which have been either specially constructed or specially adapted for use in a circus. All of these vehicles are custom made and not available on a commercial market and can cost at least £50,000 per vehicle. Due to the close proximity of sites in London, circus vehicles probably travel less than the national average of between 60 and 80 miles per week when based in the capital. Circuses also enjoy the benefit of the travelling showman's excise licensing fee together with the exemption from many statutory requirements, recognising the limited use of those vehicles. The circus industry would expect these vehicles to have a life of between twenty and twenty-five years. These vehicles cannot be easily replaced as a fleet because this would involve the construction of new specialist bodywork with the resultant cost. The imposition of the LEZ could lead to some circuses ceasing to operate and several people losing the security of what to them is a permanent home, as well as constituting an important cultural loss to London.
R3: Impacts on other projects		
R3	London Borough of Havering	Costs could be passed onto the customer, which could result in negative impacts on some initiatives such as the Thames Gateway.
R3	Thames Gateway London Partnership	Keen to encourage businesses and organisations across the Thames Gateway London sub region to adapt and implement more sustainable travel strategies and the proposed LEZ scheme will contribute towards this. Benefits offered by such strategies include reducing the effect of the transport on the surrounding environment and contributing to a healthier and more efficient workforce. These benefits are consistent with the aspirations of the LEZ.
R3	Olympic Delivery Authority	Olympic delivery partner CLM raises no significant objection apart from potential cost impact down the supply chain for construction vehicles.
R4: Links with other freight policies		
R4	Freight Transport Association	FTA enjoys a very good working relationship with TfL's Freight Unit and the LEZ team. We support and assist them in achieving their objectives. However, have concerns that TfL is not joined up internally and that it is delivering policies that affect the freight industry in a piecemeal and inconsistent way. FTA is committed to working with TfL to deliver societal, environmental and industry benefits and

Sub theme	Stakeholder	Representation
		would welcome the creation of a joint industry group to take this forward. Would also welcome an improved dialogue at a higher level across TfL and with its external partners.
R4	Thames Gateway London Partnership	Should the LEZ generate a surplus then would like to see this funding ringfenced for relevant freight projects in London which promote greater efficiency of movements (such as the TGLP Freight Quality Partnership).
R4	Brewery Logistics Group	It is time that the night time/weekend lorry ban is removed if the Mayor is genuinely looking to reduce pollution in London, or is it once again a "negative" to the voters?
R5: Monitoring of economic impacts		
R5	Association of International Courier and Express Services (AICES)	The scheme needs to be closely monitored to ensure it does not have an adverse impact on the economy.
R5	CBI London	Urges the regular and independent monitoring and reporting of the impact of the LEZ on business and the economy, taking into account all direct and indirect costs to business, including downtime costs and costs of maintaining pollution abatement equipment..
R5	Slough Borough Council	There should be monitoring of local economic impacts, in areas neighbouring the LEZ boundary.
R6: Impact on tourism		
R6	The Caravan Club	Concerned that the procedures put in place to administer and enforce the zone may have a significant deterrent effect on potential visitors to London. So much so that rather than tackling onerous form filling, tourists from overseas and elsewhere in the UK will simply seek alternative destinations for their tourism spend. Caravanners make a positive contribution to local communities, with Club member families currently spending on average at least £40 per day on local purchases, amounting to over £270 million per annum.
R6	The Caravan Club	The difficulties facing vehicle users in understanding/complying with this proposal are magnified when the leisure use (ie motor caravan) sector is considered, as opposed to the commercial vehicle sector. An infrequent leisure visitor is very unlikely to be willing to make such efforts for what might be their only leisure trip into the zone during their ownership of the vehicle. They are likely, therefore, to avoid travelling to London entirely, even if their vehicle might actually be compliant with the zone requirements. By doing so, they will not, therefore, support the many tourist destinations within the LEZ, nor the large number of businesses which support tourist trips.

Sub theme	Stakeholder	Representation
R6	The Caravan Club	<p>Nine of out the top ten most visited attractions in the UK during 2006 would fall within the LEZ. To visit such attractions without the risk of incurring an LEZ charge, motor caravan-based visitors would have to base themselves outside the LEZ, thus deterring them from accessing locations such as The Club's sites at Crystal Palace, Abbey Wood and possibly Alderstead Heath, all of which have effective public transport links into Greater and Central London. Such issues will become increasing significant in 2012. The experience on the World Cup in Germany during 2006 was that vast numbers of national and international visitors choose to make their trips by motor caravan, and there is every reason to think that the Olympics, with its even greater multi-venue characteristic will generate similar visitor patterns.</p>
R6	Society of Motor Manufacturers and Traders' Motorhome Forum	<p>The LEZ could deter tourism: many users of motorhomes do come to visit the capital, often basing themselves on sites within the Greater London boundary, but then using public transport to reach the centre. The charge would be a deterrent to tourism by motorhomes. Motorhomes are more popular on mainland Europe than they are here. It is very likely these will be used to visit the Olympics and the charge would be a deterrent to tourism at a peak time for London and the UK.</p>
R7: Other London economy impacts		
R7	Road Haulage Association	<p>Within the zone anticipate a specific threat to employment at the Vehicle and Operator Services Agency (VOSA) Vehicle Testing Station at Edmonton and at commercial vehicle dealerships based within the LEZ boundaries. Operators with non-compliant vehicles who currently come into Greater London will clearly want to go elsewhere for annual testing and maintenance services.</p>
R7	The Society of Motor Manufacturers and Traders Ltd	<p>Within the LEZ there is a significant commercial vehicle maintenance network. The network within the LEZ will inevitable service, maintain and test vehicles from outside the zone and will now be servicing non-compliant vehicles. The same is true of VOSA testing networks. No consideration of this is made within the proposal for the LEZ. In the event that a vehicle, based outside the LEZ requires a scheduled service, breaks down or requires a VOSA test at a location within the LEZ, and is non- LEZ compliant, the implications is the charge will have to be paid. This will impact on the maintenance, servicing and testing network inside the LEZ.</p>

Sub theme	Stakeholder	Representation
R7	Freight Transport Association	Concerned that under the current proposals, lorry operators seeking to deliver vehicles from outside the M25 into franchised dealerships or other locations within the M25 for repair or maintenance work will have to pay £200 in order to reach the appropriate workshop, a further £200 for a road test and, possibly, a further £200 to leave the workshop. This could lead many to seek maintenance and repair at other locations elsewhere in the country and have serious financial impacts on the maintenance and repair providers. Indeed there will also be similar problems for vehicles going to VOSA test stations within the zone.
R7	Havering PCT	Until all London buses are low-polluting, the £200 daily charge could impact disproportionately on users of public transport, who are generally those in lower socio-economic groups.

Theme S: Consultation

Sub theme	Stakeholder	Representation
<i>S1: Previously expressed views not taken into account</i>		
S1	London Borough of Barnet	Believes that the proposal to implement a LEZ by Scheme Order has been given undue preference, with the possibility that alternative options and views expressed during the consultation processes have been given insufficient consideration.
S1	London Borough of Bromley	Implementing an appropriate LEZ is part of the council's strategy for improving air quality in Bromley and in our response to the proposal to amend the Mayor's Air Quality and Transport Strategies to enable the implementation of a LEZ, the council made plain its support in principle for the concept of a LEZ. However, also raised a number of points of concern. Does not believe that all these points have been properly addressed in the current proposal.
S1	London Councils	TfL does not appear to have addressed concerns from the last consultation in terms of outlining more clearly how foreign-registered vehicles will be included within the enforcement of the LEZ and how the effective exemption of foreign registered vehicles will not result in unfair competition for haulage from European firms who may be at a competitive advantage if they do not have to comply with the LEZ.
<i>S2: Insufficient information provided</i>		
S2	Friends of the Earth	TfL must make available clear information that shows the geographical distribution of areas that would still exceed UK and EU limits with the LEZ in place (as a map), together with the numbers of people for each area (by borough or ward).

Sub theme	Stakeholder	Representation
S2	Transport 2000	It is essential that TfL should supply readily accessible information about the extent to which EU and WHO air quality standards will not be met in London.
S2	The Showmen's Guild of Great Britain	The Environmental Report should have covered a far broader definition of cultural heritage. The cultural heritage of Greater London also embraces the entertainment and leisure facilities which contribute substantially to the enjoyment and quality of life of those living within the vicinity together with those who travel from further afield to enjoy them.
S2	London Borough of Hammersmith and Fulham	Referring to an area other than that where charges are payable for entry of non-complying vehicles into the LEZ as the 'charging area' is confusing, despite the clarification in the explanatory notes. Consideration should be given to clearer definitions of the 'charging area', the LEZ and Greater London as they all relate to very similar geographical areas. The map provided is also unclear as it is difficult to discern the differences when only shown in black and white.
S2	London Borough of Wandsworth	Found the supporting documentation voluminous but not particularly substantial in key areas. Would have found it helpful to have had data on the health benefits of the scheme to aid 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. Not mentioning the costs in the public leaflet made it difficult for the public to make an informed decision.
S2	London Borough of Southwark	The council supports the use of the 2002 model, as a baseline however would request that TfL carry additional work using a 2003 baseline as well as undertaking a cost benefit analysis to better understand the various circumstances in which the LEZ could operate.
S2	Royal Borough of Kensington and Chelsea	The results contained within Annex A of the Scheme Description and Supplementary Information are poorly presented and in places are rounded up to the extent that there appears to be no difference in air quality improvements between certain scenarios. To understand the true implications of the impact of the LEZ had to write to TfL to request the raw data. Assuming that this raw data was not subsequently sent to all consultees, this raises questions about the validity of the consultation process.
S2	City of Westminster	Information on the assumptions on which the air quality modelling was based has still not been provided by TfL. This has prevented as full an appraisal as we consider necessary, and represents a significant weakness in the consultation process, which has been effective in other respects.

Sub theme	Stakeholder	Representation
S2	London Borough of Southwark	Has previously requested further information on the air quality modelling work undertaken which has not been forthcoming and this raises concerns about the transparency of work carried out.
S2	Kent County Council	Concerned at the lack of information available on the impact of the scheme on neighbouring authorities. The Scheme Description and Supplementary Information only briefly refers to benefits outside London, therefore it is difficult to assess the impact on Kent. Expect that the effect on bus and coach operators in terms of either complying with the zone or ceasing/downsizing operations may have wider implications for the county council in terms of the money it spends and duties under the 1985 Transport Act to promote competition for local bus services. Would therefore be grateful for any further information you may have on any wider impacts outside the LEZ.
S2	London Borough of Richmond upon Thames	Specific detail of proposed signage does not appear to have been included with this round of consultation and as a result the borough would like to see details on the design, proposed locations and number of signs that would be needed in the borough as a result of the LEZ being adopted. It is not enough for the consultation documents to refer to the DfT guidance alone, as with non-specific signage such as that required for the LEZ, it is not clear what the specific details would be. It is our view that if the concerns about signage cannot be addressed, then the LEZ boundary must be relocated to the borough boundary.
S2	The Society of Motor Manufacturers and Traders Ltd	Members do not consider that the requirement of operators to provide a fitting certificate approved by TfL is sufficiently robust as it does not give details of the certificate requirement, does not identify the approval method by TfL, does not make any reference to testing requirements to prove compliance and does not refer to subsequent test or registration to indicate ongoing compliance
S2	The Society of Motor Manufacturers and Traders Ltd	Concerned over the way in which the consultation exercise has been predicated. Note that the consultation does not refer to any other sources of transport pollution, such as rail, marine, or aviation. Road transport emissions are declining, emissions from other sectors are not. Road transport is not the sole source of emissions in London, they this is the only focus of the consultation. Heating and power account for 41% of NO _x emissions in London; they are not referred to in this consultation yet fall under the remit of the Greater London Authority.
S2	Central London Partnership	Not enough information on the impacts of including LGVs within the scheme is provided.
S2	Essex County Council	The consultation documentation does not provide detailed information as to the likely impact of the scheme or how many vehicles will be affected. This makes it difficult to judge how the scheme will influence operators and hence the impact on roads in the county.

Sub theme	Stakeholder	Representation
S2	London Borough of Bexley	There is a lack of cost/benefit analysis of alternative options. Without this information it is not possible to give informed approval to this particular scheme and this needs to be included in any report seeking approval by the Mayor.
S2	London Borough of Bexley	TfL's own impact assessment refers to a lack of data in the Heavier Light Goods Vehicles and Minibus sector. We object to their inclusion until a full assessment on the impact of including this vehicle type has been completed.
S2	London Borough of Hammersmith and Fulham	Referring to an area other than that where charges are payable for entry of non-complying vehicles into the LEZ as the 'charging area' is confusing, despite the clarification in the explanatory notes. Consideration should be given to clearer definitions of the 'charging area', the LEZ and Greater London as they all relate to very similar geographical areas. The map provided is also unclear as it is difficult to discern the differences when only shown in black and white.
S2	London Borough of Wandsworth	Found the supporting documentation voluminous but not particularly substantial in key areas. Would have found it helpful to have had data on the health benefits of the scheme to aid 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. Not mentioning the costs in the public leaflet made it difficult for the public to make an informed decision.
S2	Royal Borough of Windsor and Maidenhead	It is unclear how many vehicles, as targeted in the proposed LEZ will, and will not be compliant. This is an important aspect in understanding how the benefits will outweigh the costs and the possible wider negative impacts.
S3: Inadequate consultation		
S3	London Borough of Hillingdon	Council Members were concerned over the response rate to the consultation and whether responses are representative of the public and have been interpreted correctly. Also concerned as to whether the right questions have been asked.
S3	Federation of Small Businesses	The London LEZ will have a negative economic impact on small businesses that rely on lorries, vans, buses and coaches to carry out business within the zone. The TfL economic assessment found that many Transport and Storage and Construction sector small businesses may be forced to exit the market as the LEZ costs erode their operating margins. The potential closure of businesses signifies the importance of a comprehensive consultation with the business community.

Sub theme	Stakeholder	Representation
S3	Federation of Small Businesses	<p>The single implementation date of 1st July 2008 will make it easier for businesses to comply and not get confused by a plethora of dates. A single date will enable businesses to have more time to understand the monitoring and enforcement aspect of the scheme. The failure to fully consult with business obliges Transport for London to spend the period from February 2008 to July 2008 to:</p> <ul style="list-style-type: none"> • use better marketing tools to inform the public of the scheme • win back business support by issuing a pilot period with no penalties. Letters can be distributed to those operators who would have been fined if the scheme was live.
S3	Federation of Small Businesses	<p>Critical of TfL's level of engagement with the business community. Unfortunately, TfL inform that fewer than 6,000 responses were received in the week preceding the consultation deadline date. Only a half of those responses have been received from businesses. A lack of awareness of the consultation has led to a worryingly low response rate. Strongly believe that TfL has not consulted with enough businesses to clearly state that the level of engagement demonstrates evidence-based policy making.</p>
S3	Federation of Small Businesses	<p>Small businesses will be adversely affected due to a lack of awareness regarding the costs of the scheme. There were 103,000 holders of Operator Licenses and 408,000 vehicles operating in the UK in 2004. Only 3,000 business owners have responded to the LEZ consultation. TfL has had nearly two years to consult with business and yet a meagre 3% have responded.</p>
S3	Federation of Small Businesses	<p>Concerned about the small level of response from the business community to the Transport and Air Quality Strategy Revisions consultation. TfL have only scratched the surface in engaging with the business community. This may mean that many businesses will be unaware of the scheme by the time of the launch in February 2008. TfL needs to take into account the large number of operators from other areas of the country outside London.</p>
S3	The Society of Motor Manufacturers and Traders Ltd	<p>As an example of the quality of the consultative process, cites the question in the public consultation: "how important is it to tackle poor air quality in London". This question does not refer to this issues vis a vis any other important issues in London such as personal safety, security, public transport quality and climate change for example. This restricts the answer to a simple yes or no, with no mention of costs, most people will answer "it is important" giving a highly skewed response. The questionnaire then goes from this to some very technical issues; doubt the validity of this approach to the public.</p>

Sub theme	Stakeholder	Representation
S4: Need for further operator information and ongoing support		
S4	City of Westminster	TfL needs to give serious consideration to how fleet operators and vehicle operators can be provided with advice on how to bring their fleets up to date. Without advisory support from TfL, there is a risk that smaller operators, in particular, may not make the most beneficial decisions. For example, they will need objective sources of advice and information to enable them to weigh the benefits of retrofitting abatement equipment against those from procuring a new vehicle. TfL could operate and publicise a website with signposts to sources of information about vehicle retrofit and replacement options. Better than that would be a proactive information campaign that goes beyond the regulatory requirements. Small businesses that make infrequent visits to London, need good quality advice on the most effective and economical option to take.
S4	London Borough of Barking and Dagenham	TfL should look to introduce communications strategies with business and community operators and their representative organisations & associations, in order to raise awareness of the LEZ and its implications for them; and to initiate a dialogue such that impacts can be managed (e.g. through introducing training schemes in fleet management strategies). This could also have a broader spin off benefit of generally raising performance standards amongst vehicle/fleet operators.
S4	London Borough of Harrow	As a borough on the edge of the zone it is felt important that a national advertising campaign is needed to alert all haulage and fleet companies that potentially affected by the LEZ of when and where the scheme starts to minimise and congestion at the northern boundary of the borough.
S4	CBI London	Vital to ensure that there is adequate awareness of the scheme not only in London but also across other regions.
S4	GLA Labour Group	Would request that TfL engage in active consultation with the voluntary sector and community transport operators in London that may use older minibuses and coaches. These groups may struggle to finance either the daily charge, the abatement equipment, or new compliant vehicles. Would be grateful for further clarification as to whether TfL may make community grants available for such groups.
S4	Federation of Small Businesses	Industry sources suggest that 50% of all lorries come into London at least once a year. Concerned that members from across the UK will drive up to London in February 2008 and will be alarmed to see a sign alerting them to a charge of £200 for entering a zone, for which they had no prior knowledge. 57% of operators have a one vehicle fleet and so many will not be a member of a big trade association such as the Road Haulage Association, therefore the majority of small operators, who will be hit hardest by the scheme order, will lack any knowledge or understanding of the scheme. TfL has a responsibility to organise a national

Sub theme	Stakeholder	Representation
		campaign to better inform Operators as to the potential costs of the LEZ scheme. Strongly urge TfL to shift the date of implementation back by 6 months to enable business time to prepare.
S4	British Vehicle Rental and Leasing Association (BVRLA)	As a key stakeholder, BVRLA would work closely with TfL to assist with making Members and their customers aware of the LEZ and its standards.
S4	Park Royal Partnership	Information about the LEZ needs to be disseminated in the widest possible way to allow businesses to understand the full impacts on their business, their suppliers and their wider network.
S4	West Sussex County Council	It is felt that small operators from West Sussex may be very concerned if they are not already aware of the LEZ proposals via, for example, the specialist press. West Sussex suggests that TfL widely publicise the proposals as soon as possible in order to make small operators outside London, including bus and coach, and haulage companies, aware that they may be affected and to give them time to modify vehicles or obtain newer vehicles before the regulations come into force.
S4	Environmental Industries Commission	Concerned that the Scheme Order does not spell out how retrofit products would meet the requirements, and how retrofit devices would be certified as meeting the requirements. Would wish to have further dialogue on this issue over the coming months. Once clarified, would request the earliest possible announcement of the test and certification procedure for the LEZ retrofit technologies in order that systems can be supplied to all affected operators in good time prior to the implementation of the order.
S4	Royal Borough of Kingston upon Thames	Consultation and coordination of the signage of the LEZ in Outer London boroughs should not be confined to relevant county councils and the Highways Agency alone. All the Outer London boroughs should also be consulted on every detail of it.
S4	Slough Borough Council	Would like more information about the publicity and information to be provided to transport operators about the LEZ.
S4	Thames Gateway London Partnership	Seek reassurance that every effort will be made to encourage operators to meet the 2012 standards at the earliest opportunity. Would like to be assured that a mechanism will be in place to encourage this.
S4	The British Association of Removers Limited (BAR)	Freight/passenger activity is important to 'city-commerce'. Would encourage positive exchange of dialogue 'best practice' in a productive and cooperative manner, recognition of the different uses of vehicles (and the fact that some – like removal vans, actually spend very little time travelling and a lot of time parked which carrying out lengthy loading/unloading operations).

Sub theme	Stakeholder	Representation
S5: Further research and modelling work required		
S5	London Borough of Barking and Dagenham	Would like TfL to carry out further work, prior to a decision on a Scheme Order confirmation, in order to gain a better understanding of impacts to smaller operators and put forward measures to reduce these impacts.
S5	London Borough of Brent	Welcome the proposal to consider diesel-engine minibuses for inclusion within the LEZ at the same time as the heavier LGVs. It is vital that the potential economic impacts of their inclusion do not significantly disadvantage sectors of the community. Further investigation must be undertaken to ensure that this is conducted prior to implementation of the Scheme Order.
S5	London Borough of Harrow	The effects on the businesses of larger goods vehicle operators have been considered by TfL. With natural turnover of fleet operators the 2008 conditions will be met. However, it is important that further consultation for LGVs in 2010 would be carried out before the scheme is implemented.
S5	Road Haulage Association	In initial response emphasised that the original Feasibility Study and TfL's later reviews stated that the impact on small businesses would need to be investigated further, but TfL has nevertheless failed to show that any independent investigations have been carried out or even considered.
S5	Royal Borough of Kensington and Chelsea	The SDG study recommends that TfL should find out more information about the sectors that would be most affected by the proposed LEZ prior to a decision being taken on the Scheme Order. Strongly support this recommendation and trust that TfL will do this before presenting recommendations to the Mayor of London.
S6: Other consultation issues		
S6	London Borough of Barnet	Notes that TfL has been asked to give consideration to extending the LEZ to encompass cars and smaller LGVs in the future. Since the consultation to date has concentrated on larger vehicles primarily (though not exclusively) those operated commercially, believe that a far more extensive consultation should be carried out before any proposals to include cars and smaller LGVs are pursued beyond the most basic feasibility stage.
S6	London Liberal Democrats	Though convinced by the case for action on road transport emissions, considers the Scheme Order is short-sighted and insufficient in strength to bring forward the dramatic changes in air quality that London needs. This is not necessary only to ensure that London meets its national and EU air quality commitments, but also to bring about significant improvements in health outcomes of some of London's most deprived communities. Given the serious concerns that groups working to improve London's air quality share, believe the Mayor should ask TfL to re-consult on an

Sub theme	Stakeholder	Representation
		amended and strengthened Scheme Order.
S6	Covent Garden Market Authority	A separate study into transport movements between London's wholesale markets is currently being carried out and I would suggest that the findings of this study should be taken into account. However, the proposed timetable for implementation of the Low Emission Zone in February 2008 may not allow for this.

Theme T: Issues relating to the 2012 Olympics

Sub theme	Stakeholder	Representation
T	London Borough of Newham	The revised 2012 target for Euro IV compliance is welcomed as giving operators more time to adapt as compared with the original target of 2010. The borough will be particularly affected by the preparation for the London Olympics which is likely to create a high level of demand for contractor vehicles including from outside London that may create a compliance problem.
T	Thames Gateway London Partnership	In the run up to the London 2012 Olympics there will be major demands for construction vehicles. This may impact on local businesses and residents if there is a shortage of contractors within London to undertake work. Contractors based outside London may be reluctant to bring vehicles in or if they do so may pass the additional cost onto the customer. The same issue might exist with bus operators passing additional costs onto passengers.
T	Central Council of Physical Recreation (CCPR)	As many University Sports Clubs will not have the resources to buy new minibuses, some Universities may choose not to enter competitions. That in turn will have a detrimental affect on the health of the student population in London and run counter to the legacy of activity participation that the 2012 Olympic and Paralympic Games is striving for.
T	Central Council of Physical Recreation (CCPR)	The activities of the Sea Cadets, the British Horse Society and the Pony Club have all contributed to Britain's Olympic success in the past and may be prevented from doing so in the future because of the cost burden of the LEZ.
T	Society of Motor Manufacturers and Traders' Motorhome Forum	It could deter tourism: many users of motorhomes do come to visit the capital, often basing themselves on sites within the Greater London boundary, but then using public transport to reach the centre. The charge would be a deterrent to tourism by motorhomes. Motorhomes are more popular on mainland Europe than they are here. It is very likely these will be used to visit the Olympics and the charge would be a deterrent to tourism at a peak time for London and the UK.

Sub theme	Stakeholder	Representation
T	The Caravan Club	The experience of the World Cup in Germany during 2006 was that vast numbers of national and international visitors choose to make their trips by motor caravan, and there is every reason to think that the Olympics, with its even greater multi-venue characteristic will generate similar visitor patterns.
T	Olympic Delivery Authority	To complement the LEZ, during the bid a commitment was made to designate the Olympic Park as an LEZ in its own right during the Games. Separate targets are being established re CO ₂ emissions from transport

Theme U: Other issues

Sub theme	Stakeholder	Representation
U	The Society of Motor Manufacturers and Traders Ltd	Requests regulation providing for simple signage, information for operators, ease of checking and enforcement, one that is more likely to ensure a cost effective, successful zone, with compliance across the whole range of pollutants, vehicles types and countries of registration.
U	The Society of Motor Manufacturers and Traders Ltd	Remains concerned that databases, standards and procedures adopted for London could be shared by other UK cities in the future should the need arise, and that standards and procedures are consistent.
U	The Society of Motor Manufacturers and Traders Ltd	Would like to see a commitment from TfL to make information and databases on LEZ compliant vehicles publicly available.
U	UK local authorities	If London leads, others will follow, as per the energy efficiency standards for buildings.
U	London Borough of Hammersmith and Fulham	There are a number of recommendations made in the supporting documents such as the health impact assessment, environment report and economic impact assessment, but it is unclear if TfL intends to implement these recommendations prior to the introduction of the Scheme.
U	London Borough of Hillingdon	If the LEZ were implemented and was effective will this justify the third runway at Heathrow Airport?
U	Royal Institution of Chartered Surveyors	The relationship between land use and transport is imperative in reducing the level of carbon emission generated by transport modes. RICS has long advocated the implementation of Transport Development Areas (TDAs) to encourage a more integrated approach to transport and built environment infrastructures. High density developments of mixed use and mixed tenure should be centred around a well serviced variety of transport nodes to increase the seamlessness of journeys and therefore encourage individuals to make greater use of public transport. Higher levels of road space correspond with

Sub theme	Stakeholder	Representation
		higher levels of traffic and in turn carbon dioxide emissions. RICS would advocate the careful use of effective design to reduce road space and establish communities around well-serviced public transport hubs alongside the provision of incentives to reduce the dependence on private cars.
U	Royal Institution of Chartered Surveyors	Believes all transport modes are legitimate options of travel but advocate a modal shift to public transport, cycling and walking where this is a realistic option and welcome moves to match the price paid for the use of each transport option with the true cost of its provision. We do not support invisible tax subsidies on high carbon transport.
U	The Caravan Club	Supports any credible attempts to reduce emissions and improve air quality at local, national and global levels. For the proposed London LEZ it is important to ensure that any charging system imposed is fair, equitable and with A2 directed to promote the effectiveness of the initiative and reinvested in improvements to alternative transport provision.
U	UK local authorities	Who will pay for the infrastructure to set this LEZ up?