

Annex D: Summary of stakeholder and other organisation responses

Introduction

This annex is a précis of all stakeholder and other organisation responses received during the consultation period. The stakeholders and other organisations are listed by organisation category.

The representations received focussed on the:

- Vehicle emission standards
- Impacts on business and public sectors
- The principle of a Low Emission Zone (LEZ)
- Vehicles to be included
- Air quality impacts
- Consultation process and information
- Suggested alternatives
- Boundary
- Enforcement
- Business Case
- Timetable
- Discounts and Exemptions
- Health impacts
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- Level of charge
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1. Aviation Associations

BAA Plc

BAA supports the principle of a LEZ in London but believes that any LEZ from 2010 must include NO_x abatement and that potential NO_x and primary NO₂ impacts from particulate abatement technologies should be fully considered. BAA has some concerns that smaller operators and owners of specialist vehicles, who replace their vehicles less frequently than large operators, may have to bear significant additional costs.

2. Bus/Coach Operators

Arriva

Arriva considers that the current proposal strikes the right balance between making a difference to air quality and costs but does not support the extension of the emission standards to Euro IV for NO_x from 2010 because there is no easy method for adapting Euro II and Euro III engines to meet the NO_x emission standard, and the only option then would be to re-engine the entire fleet, which would be expensive and unrealistic.

DJ Coaches

DJ Coaches has concerns about the timing of the LEZ proposal in that it will not allow small coach operators enough time to invest and purchase new vehicles and that the proposed LEZ will lead to non-compliant coaches losing their value.

Dudleys Coaches

Dudleys Coaches supports the process of a LEZ in principle but is concerned about the impacts of the proposed LEZ on coach operators and would like to see implementation of the proposed LEZ for coach operators delayed by two years to Euro III or equivalent in 2010 and Euro IV or equivalent in 2012.

Centro

Centro are interested to follow the outcome of the consultation on the LEZ proposal.

FirstGroup plc

FirstGroup plc has concerns that the proposed LEZ approach disproportionately singles out buses and lorries and suggests a more equitable system could be based on vehicular emissions, irrespective of the power source of the vehicle and including cars and vans, with enforcement through roadside testing.

Go-Ahead

Go-Ahead supports the LEZ proposals.

Golden Boy Coaches

Golden Boy Coaches supports the process of the LEZ in principle but is concerned about the impacts of the proposed LEZ on coach operators and enforcement of foreign operators. It would like to see implementation of the proposed LEZ for coach operators delayed by two years to Euro III or equivalent in 2010 and Euro IV or equivalent in 2012.

Heyfordian Travel Limited

Heyfordian Travel Limited supports the process of the LEZ in principle but is concerned about the impact of the proposed LEZ on coach operators and enforcement of foreign operators. It would like to see implementation of the proposed LEZ for coach operators delayed by two years to Euro III or equivalent in 2010 and Euro IV or equivalent in 2012.

Johnsons Coach Travel

Johnsons Coach Travel has concerns about how the proposed LEZ will be implemented and enforced, about the costs of meeting the proposed LEZ emission standards and about passing these costs on to their customers, particularly schools and colleges.

Kings Ferry Travel Group

The Kings Ferry Travel Group does not oppose the principle of a LEZ but is concerned that the current proposals do not create a level playing field by not including cars or LGVs; the costs and technical issues involved in converting existing coaches to comply have been underestimated; there is an unfair burden on the private sector; there should be a system of grandfather rights; about enforcement of foreign operators; and that the Government should establish common standards to apply to similar schemes across the UK. It proposes alternative emissions standards for buses and coaches of Euro II from 2008 and Euro III or equivalent from 2010.

MARSHopper Ltd

MARSHopper Ltd is concerned that historic buses and coaches will be charged to enter the proposed LEZ because they cannot be upgraded to comply with the proposed LEZ emission standards.

National Express Limited

National Express Limited supports the Mayor's attempts to improve air quality in London but is concerned that the proposed LEZ should also target cars and LGVs; about the costs to business; and would like to see some form of funding for coach operators to enable them to adopt hybrid vehicles quickly once these become available.

Routemaster Operators and Owners Association

Routemaster Operators and Owners Association has concerns about how the proposed LEZ will affect members' vehicles and proposes that the exemption for historic vehicles is retained but modified to include all vehicles, regardless of taxation classification, over 35 years of age.

Stephensons of Essex Ltd

Stephensons of Essex supports the principles behind the LEZ but has concerns about the timescale for implementing the proposed emission standards and the cost of upgrading coaches to comply with the proposed LEZ. It is concerned that the current proposals could lead to the demise of its Southend to London coach service and significantly increased costs for those London schools that contract their coach service.

Tellings Golden Miller Group Plc

Tellings Golden Miller Group Plc recognises the need to have controls on emissions and therefore considers a LEZ is not unreasonable if implemented with enough time for operators to make necessary and cost effective changes to their fleets. However, while it can comply with the standards relating to PM₁₀, it has concerns about the proposal to extend the 2010 standard to include NO_x.

Timebus Travel

Timebus Travel is concerned that the proposed exemption for heritage vehicles may not apply to heritage vehicles used commercially and suggests a daily exemption for heritage vehicles, to a maximum 40 days per year, and ensuring that vehicles with a RPC are compliant with the proposed LEZ regardless of LEZ emission standards.

3. Business Representative Groups

Association of International Courier and Express Services (AICES)

The AICES supports the underlying principle of the LEZ but has a number of concerns regarding the targeting of vehicles, specifically that cars are not included; the impact on businesses of the timing of the scheme; and the lack of positive measures to encourage reduced emissions.

CBI London

CBI London has concerns about the value for money the proposed LEZ would provide; the inclusion of a NO_x emission standard; the Euro IV emission standard for 2010; the inclusion of LGVs; the need for identification of exempt vehicles; enforcement of foreign vehicles; and the administration of the scheme. It instead proposes an age-based scheme, with an 8 year rolling age basis.

Federation of Small Business (FSB)

The FSB is concerned about the costs to small business of complying with the current proposal; the inclusion of LGVs; enforcement of foreign vehicles; and the inclusion of a NO_x emission standard in 2010. It proposes an aged-based scheme with a staggered introduction.

Brewery Logistics Group

Brewery Logistics Groups considers that the principle of reducing air pollution is of paramount importance but is concerned that the proposed LEZ should include all vehicle types, that TfL has not considered all aspects of the proposed LEZ and that TfL should undertake a cost evaluation to ascertain the amount of benefit will actually be achieved in real terms against the cost to taxpayer and the industry as a whole.

London First

London First strongly supports the need to improve air quality in London but has concerns about the cost effectiveness of the LEZ proposal, the timescale for implementation, and the proposal to extend the Euro IV emission standard to include NO_x emissions.

London Retail Consortium (LRC)

The LRC welcomes the principles driving the proposals for a LEZ in London but has reservations about the cost/benefit ratio and is concerned that the LEZ should apply to all vehicles; that the 2010 emissions standards will force fleet operators to unnecessarily replace vehicles before the end of their life expectancy; that small retailers will be disproportionately affected by the proposed LEZ; that the proposed LEZ will impact on tourism; and that the proposed penalties are prohibitive and should instead be in line with the congestion charge. It has concerns about the boundary and suggest the proposed LEZ be restricted to the congestion charging zone to reduce monitoring and enforcement costs. The LRC favours an age-based standard, suggests the proposed LEZ should have separate requirements for coaches and considers that TfL should work with central government to develop fiscal initiatives to encourage all vehicle operators (regardless of location) to improve vehicle efficiency.

4. Central Government Departments

HM Revenue and Customs

HM Revenue and Customs had no specific comments on the proposal, but support any measures to reduce vehicle emissions.

5. Cycling/pedestrians

City Cyclists

City Cyclists support the proposed LEZ.

London Cycling Campaign

LCC supports the current LEZ proposals, supports the extension to LGVs from 2010 and would urge consideration of the extension of the Mayor's proposals to passenger vehicles.

London Living Streets

London Living Streets supports the current LEZ proposals and the extension to LGVs from 2010 and would like to see consideration of the extension of the proposed LEZ to include passenger vehicles.

Southwark Cyclists

Southwark Cyclists supports the current LEZ proposals and the extension to LGVs from 2010 and would like to see consideration of the extension of the proposed LEZ to include passenger vehicles.

Southwark Living Streets

Southwark Living Streets supports the current LEZ proposals and the extension to LGVs from 2010 and would like to see consideration of the extension of the proposed LEZ to include passenger vehicles.

Sustrans

Sustrans supports the proposed LEZ, as it will cut emissions, albeit modestly, which will help create a positive bicycling and walking environment. This will support other efforts to reach the Mayor's target to increase cycling by 20%.

6. Economic/Regeneration Partnerships

Central London Partnership

The Central London Partnership supports attempts to improve air quality and to bring health and economic improvements to the centre of London but has some concerns about the cost of the proposed LEZ, the size of the proposed LEZ, the proposed extension to cover NO_x emissions, that the proposed LEZ will not meet prescribed targets for NO_x and PM₁₀ and the advantages of using Euro emission standards criteria over an age based standard. It would like to see more information about including LGVs.

Thames Gateway London Partnership

Thames Gateway London Partnership supports the proposed LEZ and welcomes the expected benefits to the environment and health but is keen that every effort is made to encourage operators to meet the 2010 standards at the earliest opportunity and has some concerns regarding the effectiveness of particulate filters, enforcement of foreign vehicles and the financial implications for business.

7. Emergency Services

London Ambulance Service NHS Trust

The London Ambulance Service supports the underlying principle of air quality improvement in London but, having just acquired a large number of Euro III vehicles, has concerns about the impact of the proposed Euro IV emission standard for 2010.

London Fire and Emergency Planning Authority (London Fire Brigade)

The London Fire Brigade has concerns about the proposed Euro IV emission standard for 2010 and about the costs of replacing or retrofitting vehicles to comply.

8. English Local Authorities

Dartford Borough Council

Dartford Borough Council supports the proposed LEZ but emphasises that its success is dependent on the effectiveness of enforcement and recommends the sharing of information gained from the proposed LEZ with other local authorities considering the use of such zones.

Hampshire County Council

Hampshire County Council supports the introduction of the proposed LEZ, which it considers will also benefit air quality in Hampshire. It considers that the benefits will outweigh the additional marginal costs that will be imposed on local transport operators and that there will be little diversion of non-compliant vehicles onto its roads. However, it is concerned that the proposed LEZ may impact on small and medium sized enterprises and hope that TfL will work with other local authorities to monitor these impacts and that TfL will also make impact monitoring results available to other local authorities to help them learn from how the proposed LEZ operates.

Hertfordshire County Council

Hertfordshire County Council recognises that air quality is an increasing problem, with one of the larger contributors being road traffic, but has concerns about the effect of the proposed LEZ on cross boundary bus services and on small businesses who cannot afford to replace their vehicles or fit pollution abatement equipment. In addition, It is concerned about an increase in HGVs changing their route to avoid London and thereby increasing congestion and reducing air quality in Hertfordshire.

Kent County Council

Kent County Council in principle is supportive of the action to improve air quality but has concerns about the impact on small business, how the proposed LEZ would be enforced on foreign vehicles, and the potential increase in pollution outside of London. It would like to see more modelling work undertaken on the air quality impacts outside of London, suggests that the proposed LEZ could extended to include the M25, and also proposes restricting the types of vehicles entering Greater London rather than implementing a LEZ.

Melton Borough Council

Melton Borough Council has no comment.

Slough Borough Council

Slough Borough Council welcomes any measures that will improve air quality in the region and the associated health benefits but has some concerns about the impact of vehicles at the LEZ boundary, particularly in relation to the diversion of HGVs into the area, and the location and visual impact of signage and ANPR cameras. Slough Borough Council is also concerned about the economic impact on HGV operators and businesses in Slough, a possible increase in non-compliant vehicles in Slough, the lack of impact monitoring on areas outside London and about any future extension to the LEZ.

Surrey County Council

Surrey County Council supports in principle the concept of the London LEZ and suggests that consideration is given to extending the LEZ boundary to incorporate parts of Surrey where there are problems of air quality but has concerns about 'rat running' by commercial vehicles and coaches avoiding the proposed LEZ, signage and costs to local bus operators of the Euro IV standard for 2010.

Tandridge District Council

Tandridge District Council supports the concept of the LEZ in principle but has concerns that transport operators may consider using polluting vehicles outside the proposed LEZ in areas such as Tandridge District.

9. Environmental Technology and Services Industries

Calor Gas Ltd

Calor Gas Ltd supports the 2008 emission standards for the proposed LEZ but has concerns about the impact on business of the proposed Euro IV emission standard for 2010 and the NO_x emission standard and proposes a Euro IV emission standard for PM₁₀ from 2014.

Cleanaway

Cleanaway has concerns that the proposed LEZ is too expensive and cannot be justified in terms of cost/benefit, that cars should also be included in the proposed LEZ, about enforcement of foreign vehicles, that the 2010 emission standard is unacceptable and the 2010 NO_x emission standard option is premature as abatement technology is not yet available. It suggests a rolling age-based standard would be cheaper.

Clean Diesel Technologies

Clean Diesel Technologies is concerned that, without an NO₂ emission standard, the proposed LEZ could lead to increased NO₂ levels particularly in the inner city where low exhaust temperatures may not be sufficient to reduce the NO₂.

Eminox Ltd

Eminox supports the development of the proposed LEZ and feels that the initial focus should be on heavy duty diesel vehicles but that in due course, the range of vehicles could include LGVs and other vehicles. Retrofit equipment is already available that will allow older vehicles to meet the proposed standards for PM₁₀. In many cases, retrofitted vehicles emit less PM₁₀ than newer vehicles of a higher Euro class, so the focus of the proposed LEZ should be to encourage retrofitting. NO_x abatement technology is currently being

developed and should be available by 2010. The RPC scheme is suitable for the approval and certification process of retrofit equipment.

Environmental Industries Commission (EIC)

The EIC welcomes the LEZ proposal as an important measure to help achieve air quality objectives in London and agrees with the proposed emission standards for 2008 and 2010. The EIC believes that the retrofit technology currently available will allow all targeted vehicles to meet the proposed LEZ emission standards in all circumstances if correctly selected for the vehicle, correctly installed and maintained. The EIC expect a compliance methodology will be available in the field by 2010 to measure NO_x emissions.

Johnson Matthey

Johnson Matthey believes that the LEZ will be good for London's air quality, for that of the UK as a whole, and also for the UK economy. Johnson Matthey supports the fitting of particulate emission abatement devices and supports option of a Euro IV NO_x emission standard in 2010, but points out that the after-treatment technology available is unlikely to be as mature as diesel particulate filter technology will be in 2008. It would also like to see the scheme extended to non-road machinery (marine, rail and construction) and in the longer term to the use of fuel cell or conventional hydrogen vehicles.

Liquefied Petroleum Gas Association

The Liquefied Petroleum Gas Association supports the introduction of the proposed LEZ but would propose that LGVs are included from the outset and believes consideration should be given to incentivising the use of LPG and alternatively fuelled vehicles.

Volvo Truck and Bus Ltd

Volvo note that the latest DEFRA consultation on air quality strategy favours the introduction of incentives for modern fleet replacement rather than the introduction of a LEZ. If a LEZ is implemented, it considers that it should be based on simple rules, be cost effective for operators and society and be introduced with sensible lead times. Volvo is concerned about enforcement of foreign vehicles, that the LEZ proposals only give a four year life for a Euro III truck purchased in 2006 and that it will incur costs if it is obliged to relocate dealer locations outside of London. It is also concerned about the effectiveness of retrofitted abatement equipment, as well as the costs of maintaining such equipment and therefore favour an eight-year rolling age based limit.

10. Freight/Haulage Representative Organisations
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Freight Transport Association (FTA)

The FTA does not support the current LEZ proposal but seeks to engage with TfL to develop an alternative and less expensive air quality control regime and proposes instead a rolling age-based scheme with an 8 year limit for HGVs and higher age limits for vans, buses and coaches. The FTA has concerns that the current LEZ proposal excludes cars, will not bring about a reduction in other harmful emissions such as volatile organic compounds and about enforcement of foreign vehicles.

Road Haulage Association (RHA)

The Road Haulage Association is concerned that the proposed LEZ exclusively targets HGVs, buses and coaches and not diesel-engined private cars, thereby targeting those who carry out deliveries and services throughout the capital, and about the costs of the scheme and the costs to industry.

11. GLA Functional Bodies and GLA Commissions

London Development Agency

The LDA broadly welcomes the proposals as an important step in improving air quality in London but would want to see that the outcome of the proposed LEZ is sustainable in economic terms as well as delivering on environmental and social outcomes and is concerned about the impact on small and medium enterprises, that businesses may move outside London rather than adapting or changing their vehicles and that services in the community sector may be lost.

London Assembly Environment Committee

The Environment Committee supports action to improve London's air quality but would wish to ensure that it is carefully planned, practicable and sustainable and would like to see action at the national level to support the Mayor's initiative; a clear target date set for when London might expect to meet the European Union objectives; greater clarity on the costs of implementing the proposed LEZ; and evidence of greater consultation with businesses.

Brimsdown Freight Quality Partnership

In principle the BFQP supports the introduction of a LEZ in London however would recommend that changes to the detail of the scheme be incorporated to reduce the cost and impact on small businesses in line with the consultation response from the FTA.

12. Health Organisations

Asthma UK

Asthma UK fully supports the implementation of the LEZ proposed in the consultation including the extension of the LEZ to include a NO_x emission standard and LGVs but is concerned that TfL take into account related initiatives to tackle hospital admissions for asthma and works with voluntary organisations to ensure the validity of monitoring data.

British Lung Foundation

The British Lung Foundation agree with the LEZ proposals but have concerns about using the measurement of hospital admissions for respiratory disease as an indicator of the effectiveness of the proposed LEZ in improving air quality because current health policy is to avoid hospital admissions for respiratory disease. It suggests instead looking at the incidence of asthma and chronic obstructive pulmonary disease as a measure of quality of life.

Chartered Society of Physiotherapy

The Chartered Society of Physiotherapy welcomes the Mayor's consideration of a LEZ for London and believes the zone's implementation could bring major benefits for people living and working in London.

Regional Public Health Group (Department of Health)

The Regional Public Health Group supports the proposed LEZ but suggest that morbidity outcomes for asthma would be a better measure of the effect of the scheme than those proposed in the SEA. It notes that the Committee on the Medical Effects of Air Pollutants suggests that the effects of particles on life expectancy are greater than previously thought; this would improve the cost benefit of the scheme. It also feels that the economic impact of the proposed LEZ on the health sector should be modelled, to make informed decisions about its impact.

UCL Institute for Human Health and Performance

UCL Institute for Human Health and Performance supports very strongly any clean air initiative so long as it is serious and far reaching in its intent, and integrative in approach.

13. Individual Businesses

AAH Pharmaceuticals Limited

AAH Pharmaceuticals Limited has concerns about the high cost of the proposed LEZ, that cars are not included, the timescale for implementation, the inclusion of LGVs and a NO_x emission standard, the enforcement of foreign vehicles and displacement of non-compliant vehicles outside of London and proposes instead an 8-year rolling age-based scheme over Euro standards.

Constant Consultancy

Constant Consultancy has concerns about the cost of the proposed LEZ; the vehicles the proposed LEZ targets; the pollutants the proposed LEZ targets; and that the proposed LEZ does not include a rail freight strategy or exemptions for historic and special vehicles to enter London for shows and emergencies. It suggests the proposed LEZ would be less complicated to administer and enforce if it was based on a rolling age-based criteria rather than Euro standards and abatement technology.

London Recycling Ltd

London Recycling Ltd has concerns that the proposed LEZ will increase emissions across the UK and the world through increased production of new vehicles, about the timescale for introduction, particularly of the Euro IV emission standard in 2010, that the views of small business may not be adequately captured by this consultation and that there should be grants to assist small business to retrofit particulate traps to meet the emission standards.

Masterlease

Masterlease supports the proposed LEZ as the reduction in health-related costs and improvements in air quality should provide both financial benefits and economic benefit and agrees with the proposed emission standards, but feels that cars should also be included to ensure the proposed LEZ is consistent for all vehicles and has some concerns about future resale values.

Musgrave Budgens - Londis

Musgrave Budgens - Londis has concerns about the high cost of the proposed LEZ, that cars are not included, the timescale for implementation, the inclusion of LGVs and a NO_x emission standard, the enforcement of foreign vehicles and displacement of non-compliant vehicles outside of London and proposes instead an 8-year rolling age based scheme over Euro standards.

Pickfords

Pickfords has concerns about the costs that complying with the proposed 2008 and 2010 LEZ emission standards would impose on London businesses and felt that the timescale would not give sufficient time for operators to modify their fleets. Pickfords is also concerned that since retrofitting vehicles is not as effective at reducing emissions, and since cars are not included, the environmental benefits would not be as great as claimed.

River Tram Transit Initiatives Limited

River Tram Transit Initiatives Limited would like to see River Tram Ferries developed to carry HGVs and lighter goods vehicles across and along the Thames, thereby reducing congestion and emissions.

Sadler Consultants

Sadler Consultants has provided comment on the LEZ proposals, particularly noting that mini-cabs should be included and that linkages should be made with the Mayor's proposed Code of Construction Practice.

TH Bird and Sons Haulage Ltd

TH Bird and Sons Haulage Ltd is concerned that the proposed LEZ targets HGVs because haulage companies have to enter London to make deliveries and they already face difficulties from high diesel costs, and that the proposed LEZ does not include cars.

TM Logistics

TM Logistics has concerns about the high cost of the proposed LEZ, the timescale for implementation, the inclusion of LGVs and a NO_x emission standard, the enforcement of foreign vehicles, displacement of non-compliant vehicles outside of London and that cars are not included. Instead it proposes an 8-year rolling age based scheme over Euro standards.

Train of Events

Train of Events welcomes the proposed LEZ but is concerned that should heritage and museum vehicles not be allowed to use the proposed LEZ without penalty, vintage vehicle operators would stop operating in London.

14. Local Government Associations

Association of London Government

The ALG support in principle the concept of a LEZ to help improve London's air quality and meet the EU's Directive on reducing pollutants. However, due to time slippages, the cost/benefit analysis of the proposals put forward most recently by TfL, and the lack of cost/benefit analysis for the alternatives, it does not appear good value for money, especially considering that similar standards to those proposed in the LEZ are to be introduced across Europe in the coming years. Whilst accepting that 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 at best marginal. Many facets of the scheme are still to be worked through, including NO_x abatement feasibility, whether to include LGVs, the establishment of adequate certification processes, the adequacy of enforcement proposals, and the ability to capture foreign vehicles. Whilst realizing that no scheme is perfect, and that all such proposals will have operational issues to work through, all of these facets have the capacity to significantly reduce the already marginal cost/benefit ratios put forward in support of the proposed LEZ, especially when considering that the air quality improvements offered by the proposed LEZ over and above what would happen anyway, are likely to be slight.

15. London Boroughs

City of Westminster

The City of Westminster supports the principle of a LEZ for London but considers that an age-based system is preferable to one based on Euro standards and has concerns that taxis and minicabs are not included, about the cost to businesses, signage and enforcement.

Corporation of London

The City of London supports the proposed LEZ as a way of moving London towards achieving air quality objectives for PM₁₀ but has concerns about the Euro IV standard for 2010, the effectiveness of particulate traps on refuse vehicles, increasing NO₂ concentrations and consideration of alternative ways of reducing PM₁₀ concentrations across London.

London Borough of Barking and Dagenham

The London Borough of Barking and Dagenham would like to endorse the adoption of a LEZ but is concerned that the wider economic impact is analysed, signage is kept to a minimum, there is a reliable enforcement mechanism, there are financial incentives for affected small businesses, there is a commitment to retain emissions testing checks across London and that the issues of vehicle displacement have been taken into account.

London Borough of Barnet

The London Borough of Barnet objects the proposals in their current form. It is concerned about the financial impact the LEZ would have on the Council and on businesses. It also considers that the LEZ would have an adverse effect on the Council's statutory powers and duties in terms of increased road maintenance costs. There is a risk that the LEZ would simply displace pollution outside London and that school coach services in the borough would be cut. Barnet feels that issues relating to the LEZ boundary and signage have not been properly considered. Overall, Barnet would prefer to see the LEZ implemented via a scheme similar to the London Lorry Control Scheme (LLCS), or even included as part of the LLCS.

London Borough of Bexley

Bexley Council supports the overall proposal to establish a London wide LEZ but has concerns about the level of consultation with local haulage operators and considers that the consultation period should be extended to enable the costs to local businesses and local authorities to be fully considered. Bexley considers that there should be a grants scheme to assist businesses and local authorities in complying with the proposed LEZ and that there should be an exemption for low use emergency vehicles, such as council gritters.

London Borough of Brent

The London Borough of Brent is generally supportive of the LEZ proposals but has concerns about the cost effectiveness of the scheme and the socio-economic impacts on small businesses of including LGVs. In addition, the Council would like further clarification of what TfL will require from boroughs and about what other initiatives will be implemented to help London meet its NO_x and PM₁₀ objectives.

London Borough of Bromley

In principle, the London Borough of Bromley has no objections to the principle of a London LEZ but would have some difficulty bringing its fleet up to the required standard through replacement or retrofitting and is concerned that some contractors may seek to pass on any additional replacement or retrofitting costs or that new contracts may have a higher cost as a result of the proposed LEZ. The Council would wish to see either a system of 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 and would also wish TfL to bear all costs of infrastructure installed on borough roads. The Council is also concerned about street furniture and delivery arrangements should businesses move to using smaller vehicles.

London Borough of Camden

Camden welcomes the stated objectives of the proposed LEZ but have concerns that the 2010 air quality objectives will not be met despite the cost of the scheme. Camden also has concerns regarding the enforceability of the scheme, the cost to business and smaller operators and the potential for modal shift to cars, and the inability of the scheme to tackle NO₂ levels.

London Borough of Croydon

Croydon Council is a strong advocate for, and supporter of, the principle of a LEZ for London and has incorporated LEZ planning into its air quality action plan considering this the single most effective step that London can take to reduce air pollution and its impacts on the health and quality of life of Londoners. Supports extending the proposed LEZ to cover NO_x emissions in 2010 should cost-effective abatement technology be widely commercially available. It supports extending the proposed LEZ to cover LGVs if this option can be demonstrated to be cost-effective and proportionate but agrees that further analysis of the implications of the LGV option for small business is required.

London Borough of Ealing

Ealing Council welcomes the proposal to introduce a LEZ for London and agrees that it is probably the most effective option available for achieving reductions in the emissions of PM₁₀ and NO_x in the short to medium term. It would support extending the scheme to include LGVs and a NO_x emission standard, however, has concerns about the cost effectiveness of the scheme, possible resource implications for local authorities in relation to implementation or enforcement and costs of ensuring fleet compliance.

London Borough of Enfield

The London Borough of Enfield supports the 2008 emission standards for the proposed LEZ but has concerns about the impact on the freight industry, the level of charges, signage and placement of cameras and the implementation of the 2010 emission standards for PM₁₀.

London Borough of Greenwich

Greenwich Council supports the proposed LEZ and suggests that focus on Euro IV standards for 2010 is made a priority, that consideration is given for an exemption for low-use borough vehicles, like gritters, and that boroughs could be allowed to offset some non-compliant vehicles against other similar vehicles that surpass the standards.

London Borough of Hammersmith and Fulham

The London Borough of Hammersmith and Fulham supports the inclusion of LGVs and a NO_x emission standard in the proposed LEZ in 2010 and is concerned that notification is given as early as possible if these are to be included. Would like more detail enforcement of foreign vehicles, signage, cost-effectiveness of grants for retro-fitting particulate filters, consideration of socio-economic impacts in the environmental assessment and exemptions.

London Borough of Harrow

The London Borough of Harrow supports the LEZ in principle as a way of bringing air quality improvements by tackling PM₁₀ and NO_x, even through the improvements to the air quality of Harrow would likely be less than in other more central London boroughs. However, the it has concerns about signage and additional cameras detracting from the streetscape, monitoring, publicity for operators and additional costs which could be incurred by the need for further road engineering to prevent non-compliant vehicles attempting to avoid the zone and enforcement cameras.

London Borough of Havering

The London Borough of Havering supports in principle the draft revision of the Mayor's Transport and Air Quality Strategies to allow for a London Low Emission Zone.

London Borough of Hillingdon

The London Borough of Hillingdon supports the need to tackle emissions from road transport in order to improve local air quality and supports the extension of the LEZ proposals to include a NO_x emission standard and LGVs. However, it has concerns about the financial impact on borough fleets and signage issues.

London Borough of Hounslow

The London Borough of Hounslow agrees that there is a need to tackle emissions from road transport in order to improve local air quality but has concerns about enforcement of foreign vehicles, TfL's cost/benefit analysis and signage. Hounslow supports the inclusion of LGVs from 2010 provided that this would not have adverse social/economic impacts and supports a NO_x emission standard for 2010 provided that a suitable method of assessing compliance is available. It would like clearer guidance and more information about which vehicles are to be exempted, any financial implications for boroughs, any additional actions required by boroughs, impact monitoring and whether boroughs will be able impose road user charges if the LEZ is implemented by a Scheme Order.

London Borough of Islington

Islington Council supports the introduction of a LEZ for London to provide much needed air quality improvements and is pleased that the LEZ proposals are flexible and can evolve over time to attain more air quality improvements. It has concerns about the outcomes of air quality modelling TfL has undertaken; that TfL is solely focusing on PM₁₀ emissions; that more polluting cars are not included; the costs of ensuring fleet compliance; and the difficulties in ordering and receiving specialised vehicles in time. In addition it has concerns about the proposed LEZ boundary, signage, and emissions from early scrapping and additional manufacturing of new vehicles.

London Borough of Lambeth

The London Borough of Lambeth is supportive of the LEZ proposal and Lambeth's fleet of vehicles will comply with the proposed LEZ emission standards. In order for London to better meet its targets for NO_x and PM₁₀ emissions, Lambeth would prefer that the scheme included LGVs from 2008 and that consideration is given to the progressive application of the LEZ to private diesel vehicles. In addition, Lambeth would hope to see a range of complimentary measures taken to target other emissions in conformity with the London Air Quality Policy.

London Borough of Lewisham

The London Borough of Lewisham is fully supportive of the principle of the introduction of a LEZ but would like greater clarity on the potential effects on transport services and on the timing of introduction. It is also concerned that improvements in air quality are balanced against the cost of the proposed LEZ, about vehicles running along inappropriate roads to avoid London, the functionality of retrofit equipment, the reduced lifespan of some borough vehicles, the effect on private operators and business, and enforcement of foreign vehicles.

London Borough of Merton

The London Borough of Merton welcomes and supports any initiative aimed at tackling congestion and/or air pollution but has concerns that only a small percentage of the fleet in London is targeted and, in particular that LGVs are not included. It considers that the M25 represents a more simple boundary than the GLA administrative boundary. In addition, it has concerns about possible displacement of non-compliant vehicles outside of London, about enforcement in terms of vehicles registered outside the UK and that the London will not achieve its air quality objectives with the proposed LEZ.

London Borough of Newham

The London Borough of Newham supports both the principal of a LEZ and the general approach being taken to implement the scheme but has concerns that the proposed standards for 2010 could prove difficult for vehicle fleets to meet even with a vehicle replacement scheme of 6 years and that roadside emissions testing should continue to identify defective vehicles which meet the proposed LEZ emissions standards.

London Borough of Richmond upon Thames

The London Borough of Richmond upon Thames supports the air quality benefits for Greater London that will result from the introduction of the LEZ and supports the use of the LEZ as one of the mechanisms for improving air quality across Richmond but has a number of concerns about the cost and effectiveness of retrofitting abatement equipment, the economic impacts on Richmond and Greater London, the effectiveness of the proposed enforcement, signage, and about restrictions on any future local road user charging schemes. It also notes that further work will be undertaken on the inclusion of LGVs and would like to know more about how the LEZ fits in the context of other schemes to reduce pollution from other sources.

London Borough of Southwark

Southwark Council recognises the need to improve air quality across London and the implementation of a London wide LEZ is supported within Southwark's air quality improvement plan. However, it is concerned that the proposed LEZ will not enable London to meet EU objectives for PM₁₀ and NO₂, that LGVs and taxis should be included and about the impact of signage on Southwark's streetscape. In addition, it is concerned about

the impact of the proposed LEZ on small business and about enforcement for non-UK registered vehicles.

London Borough of Tower Hamlets

London Borough of Tower Hamlets supports the LEZ proposal and will be glad to assist in the implementation of the proposed LEZ but has concerns about the impact of LEZ signage on the streetscape, the potential impacts on business costs and about Euro IV compliance in 2010. In addition, it would like to see more polluting cars, such as 4x4s and SUVs, included in the proposed LEZ.

London Borough of Wandsworth

The London Borough of Wandsworth has some concerns about the LEZ proposal, in particular that whilst some air quality benefits would result from a LEZ there would not be sufficient gains to meet National Air Quality Standards and that the high cost of the proposed LEZ cannot be justified against disappointing air quality benefits.

Royal Borough of Kensington and Chelsea

Royal Borough of Kensington and Chelsea consider that while there will be an improvement in air quality there will also be an improvement without the proposed LEZ, and therefore TfL needs to be clear about the size of the difference in outcomes. It has concerns that the predictions for reduction in emissions from the LEZ are very optimistic, with the ability of the LEZ to reduce NO_x and with the number of enforcement cameras required. It recommends starting the proposed LEZ in 2010 with Euro IV and suggests using the congestion charging zone for as an alternative.

16. Motoring Organisations

Couldson Old Vehicle and Engineering Society

Couldson Old Vehicle and Engineering Society fully supports the aims of the proposed LEZ but has concerns that without exemptions for historic vehicles and privately owned HGVs, such as those used by members to transport historic vehicles, members will not be able to afford to maintain and run historic vehicles within London.

Federation of British Historic Vehicle Clubs

The Federation of British Historic Vehicle Clubs welcomes the exemption for heritage commercial vehicles but has concerns about how this exemption might best be achieved, particularly in relation to the use of tax classes to identify heritage vehicles.

Hertfordshire Steam Engine Preservation Society

The Hertfordshire Steam Engine Preservation Society would like to see an exemption for historic vehicles and for HGVs operating on a private basis to transport historic vehicles.

London Bus Preservation Trust Limited Cobham Bus Museum

The London Bus Preservation Trust Limited Cobham Bus Museum is concerned that historic vehicles be exempted from the LEZ.

Purley Transport Preservation Group

The Purley Transport Preservation Group is concerned that heritage vehicles are exempted from the proposed LEZ.

17. NHS Trusts and Health Authorities

Bedford Primary Care Trust

Bedford PCT has no comment.

Camden Primary Care Trust

Camden PCT welcomes the LEZ proposals and supports the proposed LEZ because of the predicted health benefits and because it should help reduce emission levels from construction traffic and on those roads which already experience high levels of PM₁₀.

Chelsea and Westminster Healthcare NHS Trust

Chelsea and Westminster Healthcare NHS Trust fully supports making London a LEZ.

Royal Marsden NHS Foundation Trust

The Royal Marsden NHS Foundation Trust is in broad agreement with the principles of the proposed LEZ. It anticipates that any additional costs incurred by its contractors would be passed on to it and would find it helpful if the arrangements for the proposed LEZ took account of the impact on healthcare organisations, as do those for the London Congestion Charging Zone.

Hillingdon Primary Care Trust

Hillingdon PCT welcomes measures to reduce the levels of air pollution from NO_x and PM₁₀ in the London Borough of Hillingdon and in London and acknowledges that reductions in air pollution would lead to improvements in the health of the population however, is concerned that the proposed LEZ should take into account any possible reductions in profit margins, income and employment from HGV, bus coach and potentially LGV operators.

North East London Strategic Health Authority

The North East London Strategic Health Authority supports the LEZ in principle as it is likely to have a positive impact on the health and well-being of residents but has concerns about the use of ANPR cameras for enforcement, that the inclusion of LGVs from 2010 could have an adverse affect on the local economy, and that abatement equipment could have an adverse impact on the weight of ambulances. It proposes a national approach based on a DVLA default system (as used for VED monitoring) for UK registered vehicles and ANPR or paper checks for vehicles registered abroad.

Tower Hamlets Primary Care Trust

Tower Hamlets PCT broadly welcomes the LEZ proposal, including the option to extend the proposed LEZ to LGVs and the inclusion of a NO_x emission standard, but is concerned that the proposed LEZ may not effectively achieve 2010 annual mean objectives for PM₁₀ and NO_x and that the research regarding possible lives saved is conservative.

18. Non Departmental Government Bodies/Executive Agencies/Public Trusts

Commission for Racial Equality (CRE)

The CRE felt unable to respond to the consultation but commented that TfL should have arrangements in place for assessing and consulting on the likely impact of the proposed policies on the promotion of race equality.

Covent Garden Market Authority

The Covent Garden Market Authority welcomes additional analysis and consultation into the detail of the proposed LEZ taking into account transport movements between London's wholesale markets, particularly the New Covent Garden Market, and London's hospitality sector.

Countryside Agency

The Countryside Agency feels that it is unlikely that the proposed LEZ would have a significant impact on the landscape but that if the proposals resulted in a marked improvement in air quality, then there would be likely to be positive impacts on the enjoyment of the landscape and amenity, together with the potential for a general increase in the health of London residents, which are to be welcomed.

Disability Rights Commission

The Disability Rights Commission has no comment.

Driving Standards Agency

The Driving Standards Agency fully supports the proposed LEZ and has been carrying out work to reduce emissions.

English Heritage

English Heritage supports in principle the introduction of a LEZ as it will lead to significant improvements in air quality in the capital with related benefits for historic built environment.

Port of London Authority

The Port of London Authority considers the role of the river as a sustainable means of transport will have a key role to play in relation to the proposed LEZ, and that the LEZ charge should be set at a level that encourages operators to investigate other modes of transport such as the water for the transport of freight.

Royal Parks Agency

The Royal Parks Agency supports the focus of the proposed LEZ on those vehicles causing the greatest level of pollution. It acknowledges that an improvement in air quality will benefit human health, bio-diversity and wildlife and would like to see, as a priority, vehicles encouraged to make use of alternative fuels.

19. Residents' Associations

Knightsbridge Association

The Knightsbridge Association is concerned that the proposed LEZ will not go far enough to meet PM₁₀ and NO₂ objectives in the Knightsbridge area.

Marylebone Association

The Marylebone Association welcomes action being taken to help address poor air quality in London but notes that the LEZ proposals are inadequate to bring air quality within EU limits across London and favours further action being taken to improve air quality.

20. Trade Associations

British Association of Removers (BAR)

The BAR supports economic and practical arrangements to improve air quality in London but has a number of concerns about the LEZ proposal including the costs of setting up the proposed LEZ, that the scheme only targets commercial vehicles, enforcement, the costs of modifying vehicles and enforcement of foreign vehicles. BAR suggests that the proposed LEZ should apply to all vehicles, should be introduced on a 10-15 year rolling age-based period, be confined to the congestion charge area and include incentives for vehicle upgrades.

British Vehicle Rental and Leasing Association (BVRLA)

The BVRLA proposes an age-based scheme initially covering central London and has concerns about the costs and timeline for the introduction of the current proposal, enforcement of foreign vehicles and the inclusion of a NO_x emission standard.

Community Transport Association

The Community Transport Association supports the objectives of the proposed LEZ but has concerns about financial and social impacts should the definition of buses change to include minibuses.

Confederation of Passenger Transport (CPT)

The CPT supports the proposal of the LEZ in principle but has concerns about the costs of the scheme to the coach transport industry, the timing of implementation, enforcement of foreign vehicles and the effect on tourism in London.

Environmental Services Association

The Environmental Services Association supports initiatives that improve air quality by adopting new technologies, but feels that the LEZ proposals represent very poor value for money. The requirement for Euro III engines by 2008 and Euro IV by 2010 would have an adverse effect on current engine replacement cycles, especially since Euro IV engines are not yet available. The ESA would prefer a rolling 8-year age-based standard which would deliver improvements in air quality but at a much lower cost to both TfL and industry. The ESA is also concerned that the LEZ would lead to displacement of polluting vehicles outside London. Finally, the ESA feels that since the proposed LEZ would be reliant on age of registration data, it will fail to take into account the actual emission level of a vehicle.

Guild of British Coach Operators

The Guild of British Coach Operators is concerned that the LEZ proposals are unfair to the coach industry as there is not a level playing field if cars and LGVs are not included. It does not consider that the costs and technical issues involved in upgrading coaches to comply with the proposed LEZ have been taken into account, given the long replacement cycles for coaches and buses. It proposes instead alternative emission standards for buses and coaches with a minimum of Euro II from 2008 and a minimum of Euro III, or equivalent, from 2010. It does not support extending the emission standards in 2010 to include NO_x. In addition it has concerns about the enforcement of foreign registered vehicles.

Society of Motor Manufacturers and Traders Limited (SMMT)

The SMMT believes that the cost benefit of a LEZ is questionable in the context of other strategies. For this, and a number of practical reasons, and age based criterion is a preferred simple, manageable and cost effective solution as opposed to one based on a Euro standard. This would vary according to vehicle type. SMMT propose a limit of 8 years for HGVs, and 14 years for coaches from 2008, reducing to 13 years in 2009. An alternative would be a limit of 8 years for scheduled coach services, which would link with disability legislation. Should LGVs be included from the second stage of the LEZ, a 10 year limit would be appropriate.

21. Transport and Environment Representative Organisations
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Bromley Borough Roads Action Group (BBRAG)

The BBRAG has concerns about the cost of the proposed LEZ, that there is no substantiation of the monetised health benefits claimed in the consultation documents and that the proposed LEZ is too complicated.

Energy Saving Trust (EST)

EST supports the proposed LEZ and would urge TfL to launch the scheme as soon as possible. The proposed standards are appropriate, but the 2010 standards should be confirmed as soon as possible to ensure market certainty. The LEZ charge should be set at a high rate to encourage vehicle retrofit and replacement. The high operating costs are justified by the air quality benefits. TfL should begin work as soon as possible on including LGVs in the LEZ.

Friends of Capital Transport Campaign

Friends of Capital Transport Campaign welcome the LEZ proposals.

Friends of the Earth

Friends of the Earth welcomes the proposed LEZ but considers that it is not sufficient as a measure on its own and suggests instead that a package of measures is brought forward to bring air quality to within EU limits across London.

Kensington Red Route Action Group

The Kensington Red Route Action Group are very supportive of the LEZ proposals.

London TravelWatch

London TravelWatch supports in principle measures to improve air quality and travelling environment in London. London TravelWatch has concerns that some marginal cross-boundary bus services may cease to operate as a result of increased operating costs associated with the proposed LEZ, and asks TfL to consider measures to safeguard these services. In addition, it asks the Mayor to work with the rail industry to reduce emissions from diesel train engines or to extend electrification for services operating to and from London.

NSCA (National Society for Clean Air)

NSCA support the proposed scheme and welcomes the Mayor's commitment to cleaner air in London. It has expressed concern that the daily charge is high enough to encourage operators to upgrade their vehicles; that LGVs should be included in the proposed LEZ; that the mini-cab fleet should be cleaned up; that there are fiscal incentives to clean up the passenger car fleet; and that there are uniform standards for LEZs across the UK.

Transport 2000

Transport 2000 supports the earliest possible introduction of the proposed LEZ and would like to see LGVs and cars covered by the proposed LEZ but are concerned that the proposals do not go far enough because various emissions will still be exceeded, including carbon.

Surrey County Council's Passenger Transport Liaison Group

Surrey County Council's Passenger Transport Liaison Group is concerned about the impact of the proposed LEZ on small bus operators in Surrey, about higher costs for local authorities in engaging bus services and about the timelines for implementation.

Sutton Transport and Air Quality Working Group

Sutton Transport and Air Quality Working Group welcomes a London wide LEZ in principle and appreciates that for the health of residents it is important to take action. However, have concerns about the financial impact on small businesses and Sutton Council and about the timescales for meeting the Euro standards and consider that grants should be considered for operators to help with compliance.

22. Utilities

EDF Energy

EDF Energy supports the principle of the LEZ and agrees that the proposed LEZ could play an important role in improving the quality of life for Londoners but has concerns about costs of replacing specialist vehicles and propose an exemption for their vehicles.

National Grid

National Grid supports the principle of measures to reduce emissions, but is concerned about exemptions for emergency vehicles and that the measures should be balanced against Government's/Mayor's other objectives e.g. fuel poverty.

Royal Mail Plc

Royal Mail does not support the LEZ proposal, considering the proposals too expensive for the benefits they offer. It raises concerns about the targeted vehicles and, particularly that cars not included; the timescale for implementation; the use of Euro standards rather than an age-based scheme; and the boundary. It suggests waiving the London lorry ban for compliant vehicles and reducing or removing the congestion charge.

23. Voluntary/Community Groups

London Forum of Amenity and Civic Societies

The London Forum of Amenity and Civic Societies agrees with the use of Euro standards for emissions to allow operators to achieve compliance by both vehicle replacement and retrofitting and does not appose the LGV option and would like to see measures taken to encourage a switch to smaller vehicles for making deliveries in the more congested areas of London.

London Sustainability Exchange

London Sustainability Exchange supports the introduction of a LEZ for London, the proposed emission standards as appropriate targets, the inclusion of a NO_x standard, the application of the proposed LEZ to HGVs, buses, coaches and vans and that vehicles which do not comply should be obliged to pay a substantial charge to drive in Greater London.