

Annex E: TfL's consideration of late responses to the consultation

1 Introduction

1.1 Overview and report structure

The public and stakeholder consultation on the detail of the proposed Low Emission Zone (LEZ) Scheme, as set out in the Scheme Order, ran from 13 November 2006 to 2 February 2007.

Responses from members of the public, businesses and other organisations received up until 23 February 2007 were analysed by Accent Marketing and Research and the results are presented in Accent's consultation analysis report at Annex A.

Stakeholder responses are analysed in the main part of this report. A full list of stakeholders who responded to the consultation up until 20 April is provided in Appendix 2. An analysis of the issues raised in the representations is provided in Chapter 6 and their responses have been grouped into 21 themes in Annex D. A summary of each representation is provided in Annex C.

This Annex analyses the responses to the consultation from businesses, other organisations and members of the public received after 23 February and up until 20 April 2007. Responses were received in the form of questionnaires and written representations in letters and emails. The questionnaire was attached to an information leaflet and distributed to businesses and made available to the members of the public. There was a separate questionnaire for businesses and members of the public, as set out in Appendix 4. Both questionnaires asked the same questions on the detail of the LEZ proposal, such as the boundary, the level of charge and penalty charge, the vehicles to be included and the proposed emission standards. The business questionnaire also asked for details of the business, including the location of the business based on the first part of the post code, the number and type of vehicles operated, the type of vehicle and the number of employees. The public questionnaire also asked for demographic information including gender, age and ethnicity.

The questionnaires were submitted anonymously by mail to Accent Marketing and Research and were forwarded to TfL after the close of the consultation. Accent also forwarded to TfL written submissions submitted via the free business reply address. Some members of the public, businesses and other organisations also emailed submissions to TfL via the LEZ email address. Emails received during the consultation were forwarded to Accent for analysis. Analysis of emails received after 23 February 2007 are included in this Annex. During the consultation, there was also an option to complete the public and business questionnaires anonymously online through TfL's website, and this function closed at the conclusion of the consultation on 2 February 2007. These responses were analysed by Accent in their consultation analysis report.

This report follows the same structure used by Accent in their consultation analysis report. In order to provide the same level of attention to all representations and objections, the responses were analysed by TfL using the same code frame that was used by Accent for the analysis of representations received during the consultation period. There is no analysis of demographic or business information in this consideration due to the small number of responses received during the period covered by this report.

1.2 Response to consultation

During the period covered by this report, TfL received 26 questionnaires and two written submissions from businesses and 13 questionnaires and five written submissions from members of the public.

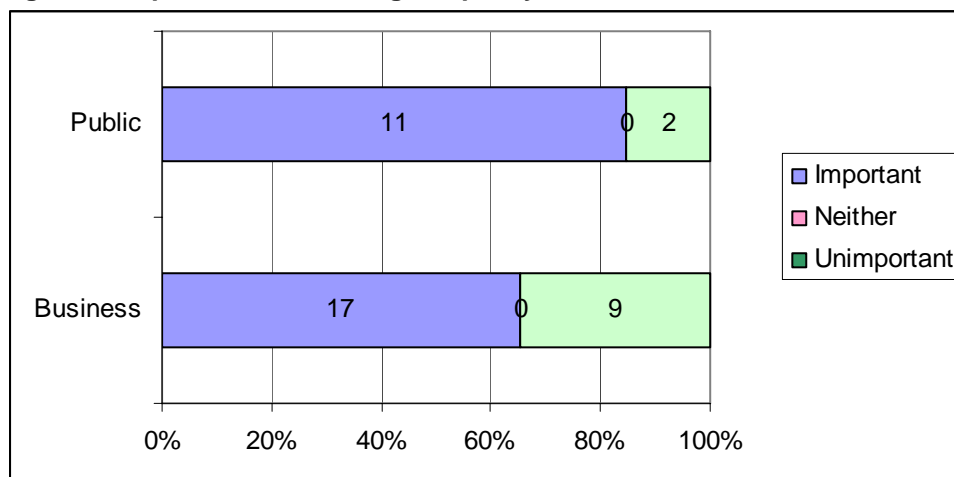
1.3 Analysis of questionnaire responses

This section provides an analysis of the 26 questionnaires received from businesses and the 13 questionnaires received from members of the public.

1.3.1 Importance of tackling air quality in London

Respondents were asked to indicate how important they considered it is to tackle poor air quality in London. The majority of respondents (85% of public respondents and 65% of business respondents) considered that it was important to tackle air quality in London, although relatively more business respondents (35%) considered it was unimportant.

Figure 1: Importance of tackling air quality in London



Base: 26 business questionnaires, 13 public questionnaires

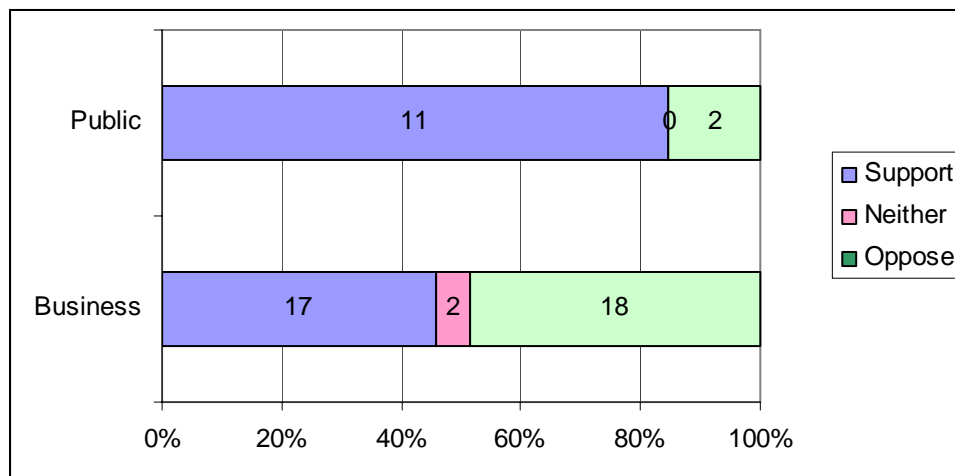
1.3.2 Support for LEZ proposal

Respondents were asked if they supported or opposed the proposal to introduce a LEZ in Greater London, as set out in the information leaflet. As can be seen in figure 2 below, slightly more business respondents opposed

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(69%) the LEZ proposal than supported it (65%). The majority of public respondents supported the LEZ proposal (85%).

Figure 2: Support for the LEZ proposal

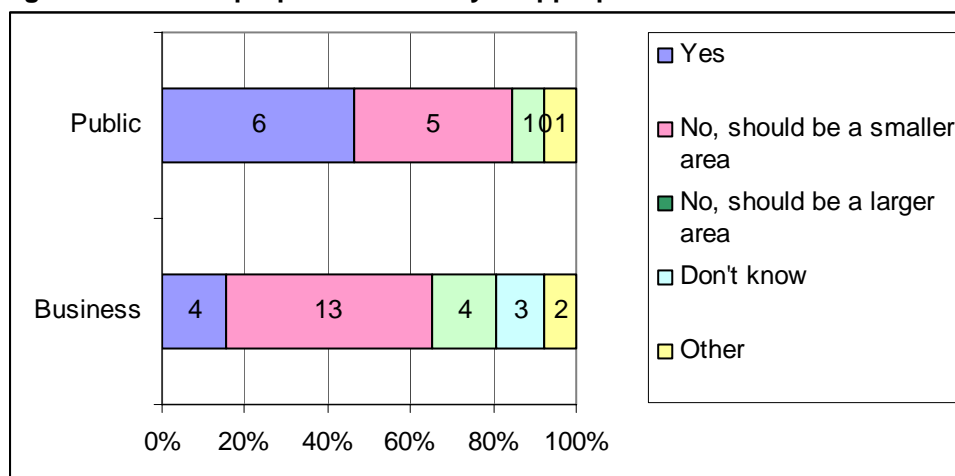


Base: 26 business questionnaires, 13 public questionnaires

1.3.3 Agreement with proposed boundary

Respondents were asked if they thought the proposed boundary of the LEZ, as shown in the information leaflet, was appropriate. Half of business respondents and nearly two fifths (38%) of public respondents considered that the proposed LEZ should be a smaller area. Around half of public respondents (46%) considered that the boundary was appropriate compared with only 15% of business respondents and the same number of business respondents considered that the proposed LEZ should be a larger area.

Figure 3: Whether proposed boundary is appropriate



Base: 26 business questionnaires, 13 public questionnaires

The respondents who indicated they would like to see an 'other' boundary were invited to make further comments in a text box below the question the detail of their consideration. One member of the public and three business respondents made comments. The responses were coded as follows:

- objective to raise revenues/another tax (2 business respondents)

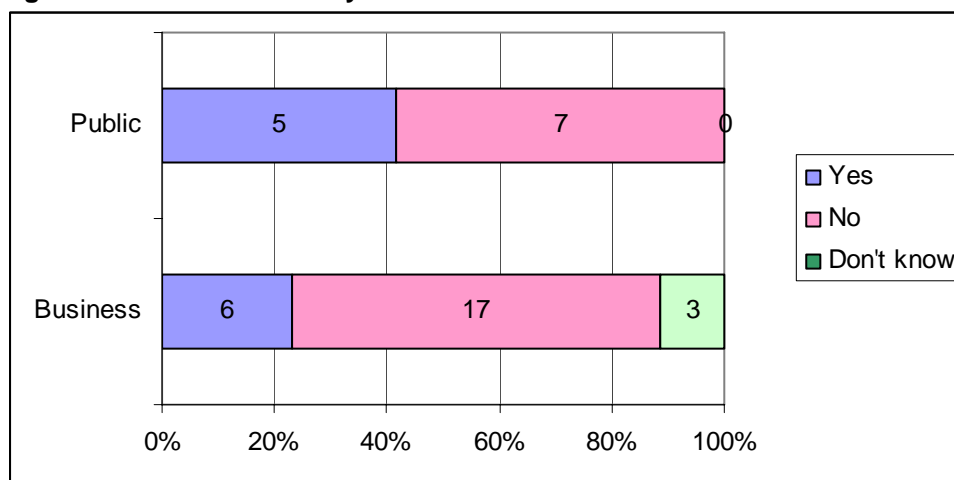
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- LEZ should cover a larger area (1 public respondent)
- inclusion of motorways/trunk roads (1 business respondent)
- poor benefit/cost ratio
- Other vehicle emission issues.

1.3.4 Whether motorways should be included

Respondents were asked to consider whether the motorways in London should be included in the proposed LEZ. As can be seen in figure 4 below, the majority of both business (68%) and public (54%) respondents considered that motorways should not be included in the LEZ. Nearly four out of ten public respondents (38%) and a quarter (25%) of business respondents considered that motorways should be included.

Figure 4: Whether motorways within London should be included in the LEZ



Base: 25 business questionnaires, 13 public questionnaires

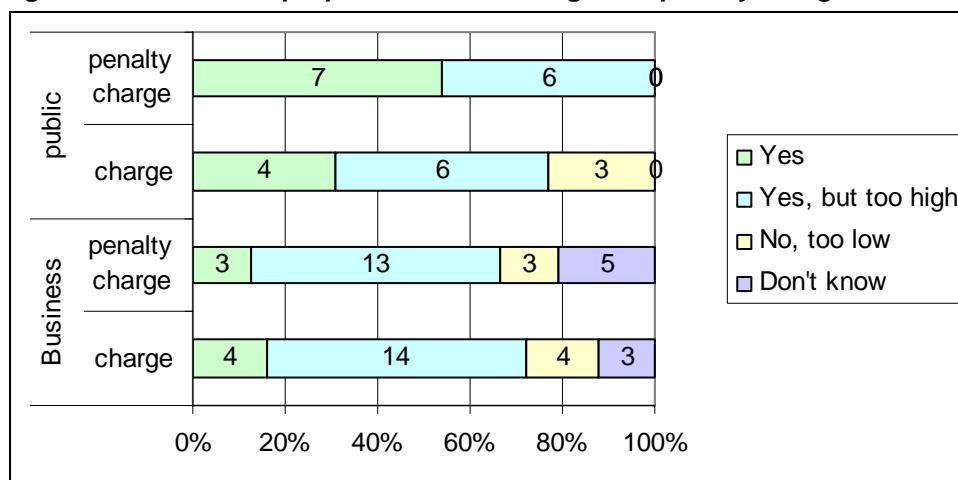
1.3.5 Agreement with level of charge and penalty charge

Respondents were asked to consider whether the proposed charge of £200 for diesel-engine heavy goods vehicles (HGVs), buses and coaches, and £100 for diesel-engine minibuses and heavier vans was sufficient to incentivise operators to make their vehicles compliant. Respondents were also asked to consider whether the proposed level of penalty charge for non-compliant vehicles which do not pay the daily charge of £1,000 for HGVs, buses and coaches and £500 for minibuses and heavier vans was a sufficient deterrent.

As can be seen in figure 5 below, just under a third of public respondents (31%) and 16% of business respondents considered that the proposed charge was sufficient to incentivise operators to make their vehicles compliant compared with over half of business respondents (56%) and just under half of public respondents (46%) who considered that the charge was too high. Around half of business (54%) respondents considered that the penalty charge was too high compared with one eighth who considered the penalty charge was sufficient and one eighth who considered the penalty charge was too low to be a sufficient deterrent. All the public respondents considered that

the penalty charge was a sufficient deterrent with just under half (46%) considering it was also too high.

Figure 5: Whether the proposed level of charge and penalty charge is sufficient

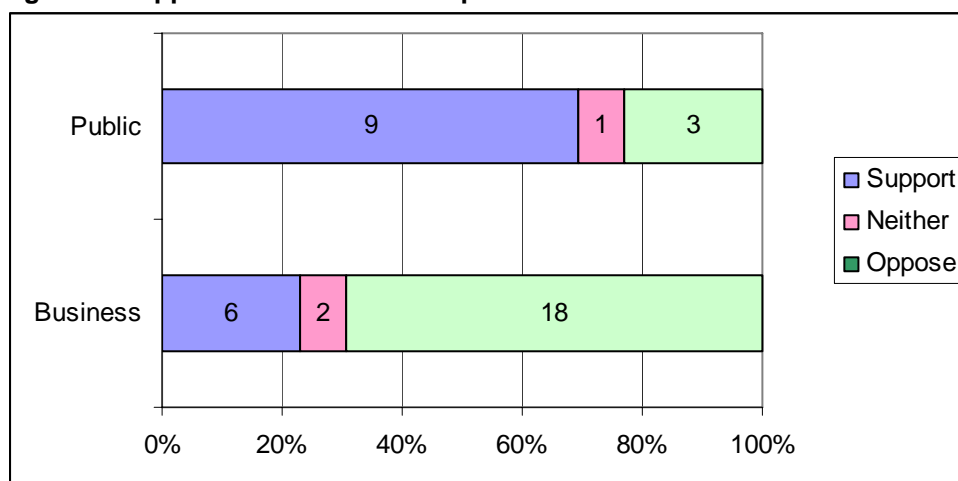


Base: business questionnaires (25 for question on charge, 24 for question on penalty charge), public questionnaires (13 for question on charge and question on penalty charge).

1.3.6 Agreement with hours of operation

Respondents were asked whether they supported or opposed the proposals for the LEZ to operate 24 hours a day, 365 days a year. The majority of public respondents (69%, compared with 23% of business respondents) supported the hours of operation while the majority of business respondents (69%, compared with 39% of public respondents) opposed the hours of operation.

Figure 6: Support for LEZ hours of operation



Base: 26 business questionnaires, 13 public questionnaires

1.3.7 Agreement with proposed emission standards

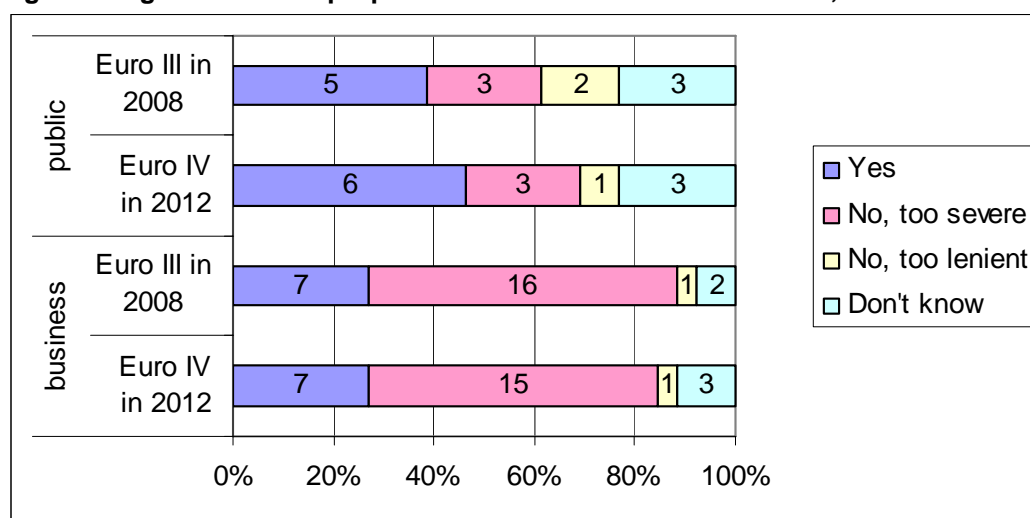
Respondents were asked to consider whether they thought the emission standard of Euro III for PM from 2008 and Euro IV for PM from 2012 was appropriate for HGVs, buses and coaches. Respondents were advised that

HGVs, buses and coaches manufactured after October 2001 would comply with Euro III and those manufactured after October 2006 would comply with Euro IV.

Respondents were also asked to consider whether they thought the emission standard of Euro III for PM for diesel-engine minibuses and heavier vans was appropriate. Respondents were advised that these vehicles manufactured after January 2002 would comply with this standard. If respondents agreed that the Euro III standard was appropriate for heavier vans and minibuses, they were asked whether it was appropriate for this standard to be introduced in autumn 2010.

As shown in figure 7, more of the public respondents considered the proposed emission standards were appropriate (38% for the Euro III standard in 2008 and 46% for the Euro IV standard in 2012) than indicated they were too severe (23%) or indicated they were unsure (23%). In contrast, the majority of business respondents considered the proposed emission standards were too severe (62% for the Euro III standard in 2008 and 58% for the Euro IV standard in 2012) with only around a quarter (27%) considering they were appropriate.

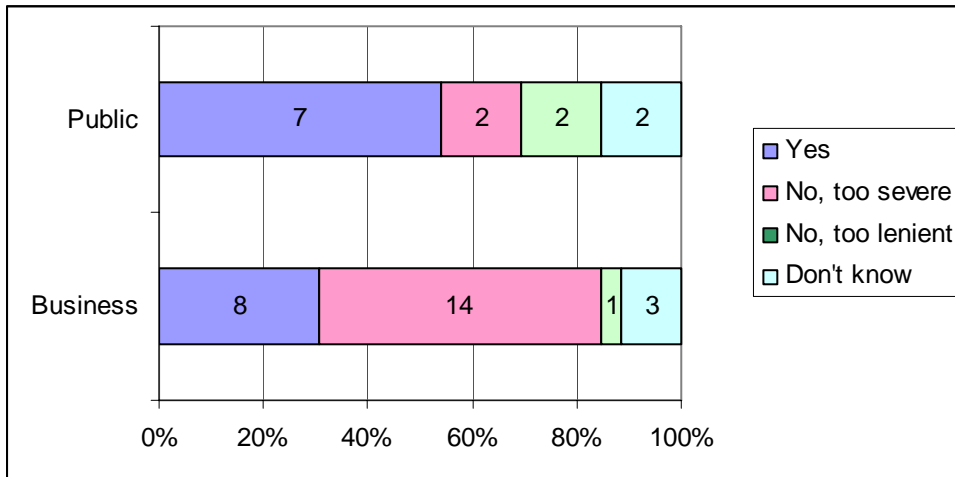
Figure 7: Agreement with proposed emission standards for HGVs, buses and coaches



Base: 26 business questionnaires, 13 public questionnaires.

In relation to the emission standard for heavier vans and minibuses, as shown in figure 8, over half (54%) of public respondents considered this was appropriate compared with around a third (31%) of business respondents. Over half of business respondents (54%) considered the emission standard of Euro III for PM for heavier vans and minibuses was too severe. Equal numbers of public respondents (15%) considered that the proposed emission standards were too severe, too lenient or did not know.

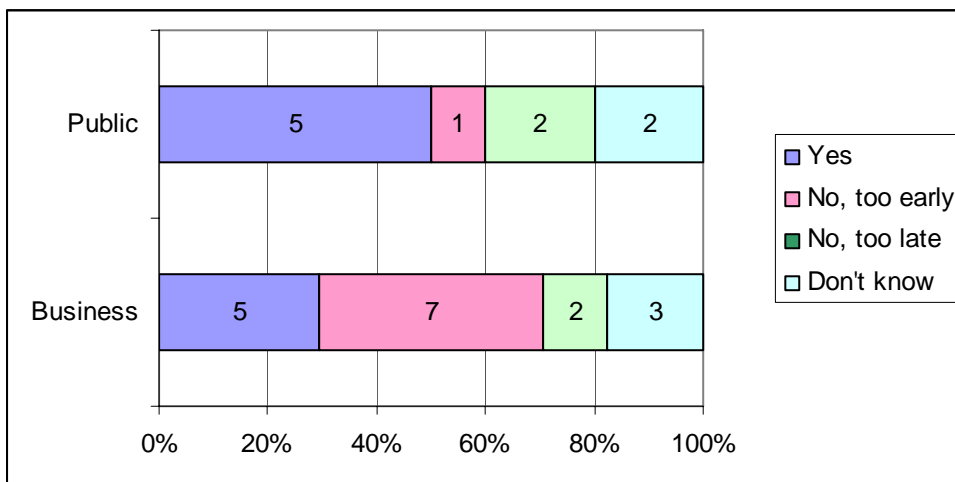
Figure 8: Agreement with proposed emission standards for heavier vans and minibuses



Base: 26 business questionnaires, 13 public questionnaires.

As shown in figure 9, half of public respondents considered that it would be appropriate to introduce the emission standard of Euro III for heavier vans and minibuses in autumn 2010 compared with 29% of business respondents. More business respondents (41%) considered that autumn 2010 was too early.

Figure 9: Appropriate to introduce Euro III standard for heavier vans and minibuses in 2010?



Base: 17 business questionnaires, 10 public questionnaires.

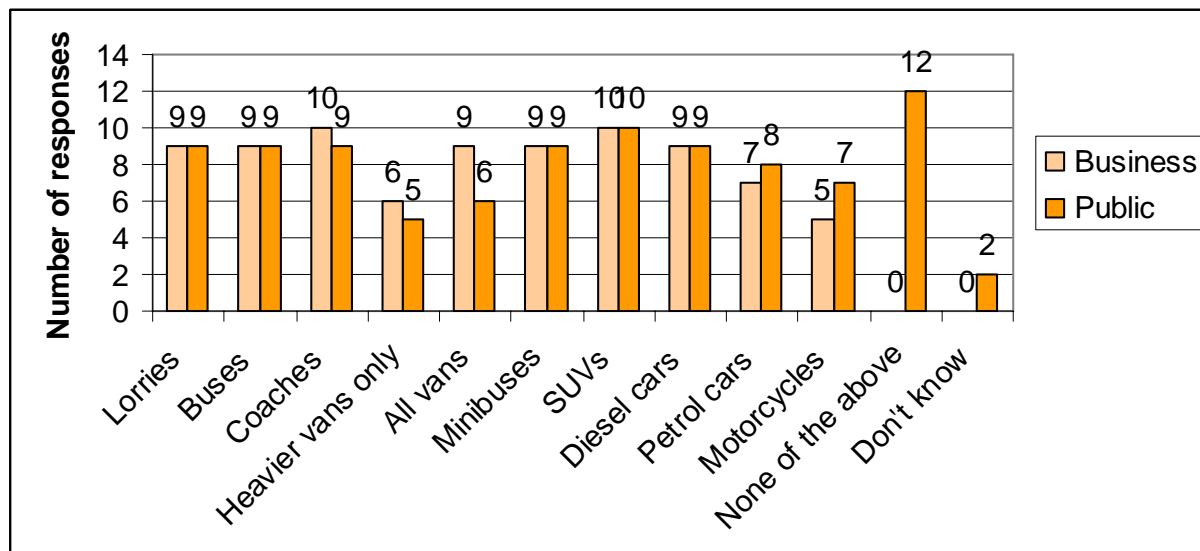
1.3.8 Which vehicles should the LEZ apply to?

Respondents were asked which vehicles they thought the LEZ should apply to. As can be seen in figure 10 below, nearly half of business respondents (46%) considered that the LEZ should not apply to any vehicles. Around three quarters of public respondents (77%) considered the LEZ should apply to SUVs and the majority of public respondents (69%) considered that the LEZ should apply to lorries, buses, coaches, minibuses and diesel cars. Nearly two fifths of business respondents (38%) considered that the LEZ should apply to coaches and sports utility vehicles (SUVs or 4x4s) and just

over a third of business respondents (35%) considered the LEZ should apply to lorries, buses, all vans and diesel cars.

Figure 10 below shows the number of respondents who indicated that each of the vehicle types provided in the questionnaire should be included in the LEZ.

Figure 10: Which vehicles the LEZ should apply to

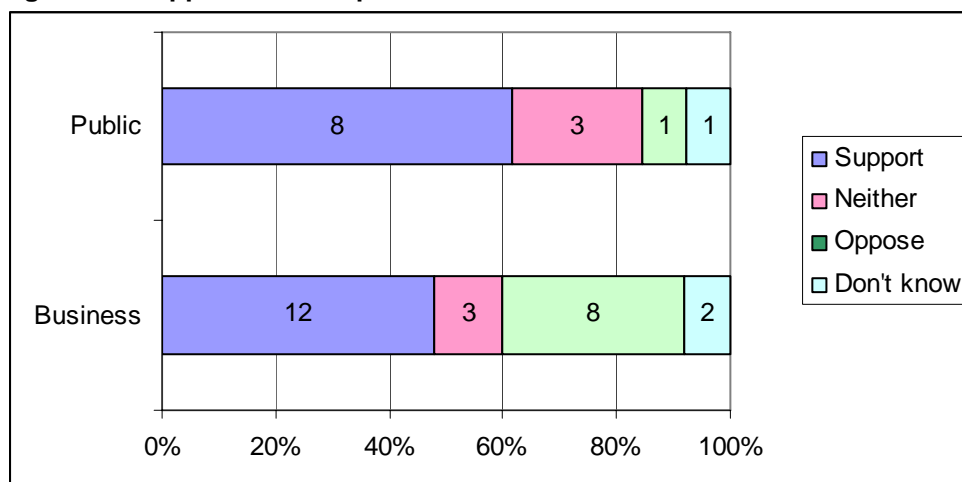


Base: 26 business questionnaires, 13 public questionnaires

1.3.9 Agreement on exempt vehicles

Respondents were asked if they supported the proposals, as set out in the information leaflet, to exempt agricultural vehicles, military vehicles, historic vehicles not used for hire or reward and non-road going vehicles from the LEZ. The majority of public respondents (62%) and around half of business respondents (46%) supported the proposed exemptions while around a third of business respondents (31%) opposed the proposed exemptions.

Figure 11: Support for exemptions



Base: 25 business questionnaires, 13 public questionnaires

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Respondents were also asked if they had any other views on vehicle exemptions. Three businesses and three members of the public included comments on the proposed exemptions, including:

- other discounts and exemptions, namely horseboxes, planes and Showmen
- not for profit/community organisations
- vehicles used for public service
- charges are too low.

1.3.10 Comments about the proposal

Respondents were invited to write any other comments about the proposed LEZ or to expand on any of the points raised in a free text box. Other environmental impacts were raised by 2 public representations. The most frequently raised issues by businesses were:

- objective to raise revenue/just another tax (8 representations)
- costs of compliance with the proposed LEZ standard (4 representations)
- impacts on business (3 representations).

Other issues raised included:

- need for central government action
- grants for retrofitting vehicles
- alternative fuel vehicles
- proposed timetable is premature
- other vehicles to be included issues
- other vehicle emission standards issues
- costs/impacts on customers/businesses

1.4 Analysis of written responses

This section provides an analysis of the most frequently raised themes in the two written submissions received from businesses and the five written submissions received from members of the public.

The most frequently raised issue in the written submissions received from members of the public were 'other vehicles to be included issues' in four submissions and that the 'objective was to raise revenues/just another tax' in two of the submissions. Other issues raised by the public included alternatives to the LEZ proposal and that the LEZ should focus on additional emissions.

A number of issues were raised in the representations from businesses, including the timetable of implementation, inclusion of other vehicles, the proposed area of the LEZ, inclusion of motorways and trunk roads, the impact on business and that the consultation was inadequate.