

Proposed London Low Emission Zone

Consultation Analysis Report

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EXECUTIVE SUMMARY

INTRODUCTION AND BACKGROUND

Between 13 November 2006 and 2 February 2007, Transport for London (TfL) consulted with the public and stakeholders on a Scheme Order setting out the detail of a Low Emission Zone (LEZ) for London. Accent was commissioned by TfL to carry out an analysis of consultation representations submitted by the public, businesses and other organisations.

The objectives of the proposed Low Emission Zone (LEZ) are two-fold:

- To move London closer to achieving national and EU Air Quality objectives.
- To improve the health and quality of life of people who live in, work in and visit London, through improving air quality.

The key features of the proposed LEZ are:

- It would target the most individually polluting diesel-engine vehicles by setting strict emissions criteria that vehicles would be required to meet to drive within London without charge.
- It would operate 24 hours a day, 365 days a year and cover the Greater London area.
- The proposed emissions standards are based on Euro standards, which are European standards which define the limits for exhaust emissions for new vehicles sold in European Union member states and which these vehicles must be manufactured to from a certain date.
- From February 2008, heavy goods vehicles (HGVs) over 12 tonnes would be required to comply with a standard of Euro III for particulates (PM) in order to drive within the LEZ without paying the charge.
- From July 2008, a standard of Euro III for PM would apply to all HGVs, buses and coaches.
- From October 2010, a standard of Euro III for PM would apply to heavier diesel-engine vans and minibuses.
- The emission standard would be tightened to Euro IV for PM in January 2012 for HGVs, buses and coaches. The standard for heavier diesel-engine vans and minibuses would not be increased in 2012.
- Operators would have a range of options available to them to make their vehicles compliant with the LEZ. They could fit particulate abatement equipment, replace or re-engine their vehicles, reorganise their fleets so that only compliant vehicles operate within the LEZ or pay the daily charge.
- It is proposed that the daily charge be set at £200 for non-compliant HGVs, buses and coaches and £100 for non-compliant heavier vans and

minibuses. Should the charge not be paid, a penalty charge would apply of £1,000 (reduced to £500 if paid within 14 days) for HGVs, buses and coaches, and £500 (reduced to £250 if paid within 14 days) for heavier vans and minibuses.

Responses to the consultation could be made via a public information leaflet/questionnaire or on TfL's website (both on-line and downloadable versions). The leaflet was direct mailed to some 278,000 vehicle operators and owner drivers. In addition copies were sent to each of the 33 London boroughs to be made available in public venues. The leaflet was also distributed on request through TfL's LEZ call centre. Members of the public, businesses and other organisations could also send in an open response (for example a letter, e-mail or petition) to the consultation.

Accent was asked to analyse the responses both qualitatively and quantitatively.

Responses

Accent analysed all questionnaires and all open responses received from members of the public, businesses and other organisations¹ up to 23 February 2007 (those received after this date were forwarded to TfL for separate analysis).

The data is based on the following responses received in the following formats:

It is important to note that the findings from the public consultation reported in this document are from a consultation and not an opinion poll or referendum. A consultation is seeking information and views relating to the proposal and is not intended to elicit representative samples of opinion.

With consultations there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views. The nature of public consultation is that respondents are self selecting and therefore not necessarily representative of opinion across London.

¹ 'Other Organisations' are those organisations that responded to the public consultation exercise on behalf of the interests of a wider group.

An attitudinal survey was conducted by Ipsos MORI in addition to the consultation. It sought to identify the attitudes and opinions of Londoners, as well as the wider business community, towards the LEZ proposal and to assess how representative the consultation findings were. This is reported on separately.

MAIN FINDINGS – LEVEL OF SUPPORT FOR THE PROPOSED LEZ

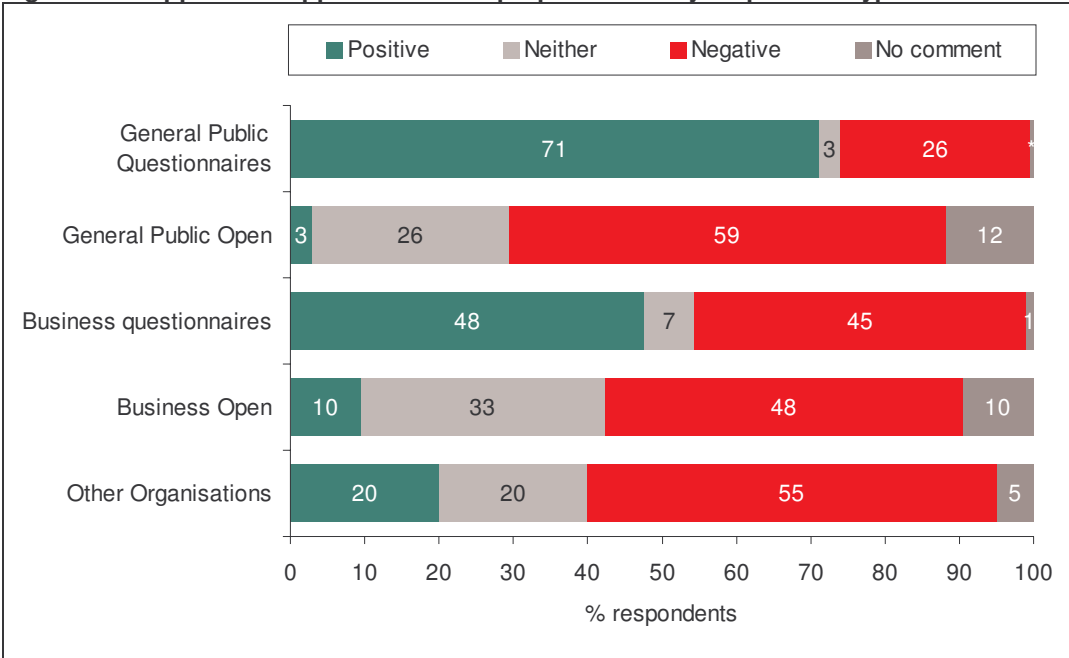
The great majority of the responses from the general public questionnaire were in support of the proposed LEZ with 71% in favour.

The respondents to the business questionnaires were more evenly split with 48% in support and 45% against the proposed LEZ.

The written submissions from the general public and businesses were more likely to be against the proposed LEZ with 59% of general public and 48% of business against and 3% of general public and 10% of business in support.

Other organisation opinion was more likely to be against the proposed LEZ with 55% against and 20% in favour.

Figure E1: Support and opposition to the proposed LEZ by respondent type



Base: 20 other organisations, 52 business written submissions, 5,502 business questionnaires, 34 general public written submissions, 1,869 general public questionnaires.
 Note: the responses from the questionnaires have been amalgamated so that strongly oppose and oppose have been coded as negative and strongly support and support have been coded as positive.

RESPONSES FROM QUESTIONNAIRES

This section summarises the responses from the two public consultation questionnaires – general public and business. The findings from the open

responses from the general public and businesses are summarised on pages v-vi.

Details of the proposed LEZ

Over four fifths (86%) of general public respondents and 74% of business respondents to the questionnaire think that it is important or very important to tackle poor air quality in London.

Forty four per cent of general public respondents and 30% of business respondents think the proposed boundary of the LEZ is appropriate: 19% of general public and 44% of business respondents think it should be a smaller area; 21% of general public and 8% of business respondents think it should be a larger area.

Over half the general public respondents (56%) and 67% of business respondents think that the motorways within London should be included in the LEZ.

Around a third (36%) of general public respondents and 27% of business respondents think the proposed level of charge² is sufficient to incentivise operators to make their vehicles compliant. Over half the business respondents (54%) and 27% of general public respondents think the proposed level of charge is too high; 9% of business respondents and 25% of general public respondents think it is too low.

Around two fifths (43%) of general public respondents and 31% of business respondents think the level of penalty charge³ for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent. Over half the business respondents (53%) and a quarter of general public respondents think the proposed level of penalty charge is too high; 7% of business respondents and 22% of general public respondents think it is too low.

Over two thirds of general public respondents (69%) support the hours of operation⁴, compared with 28% who oppose them. Around half (52%) of business respondents oppose the hours of operation, compared with 43% who support them.

Forty one per cent of general public and 44% of business respondents think the proposed emission standard of Euro III for particulate matter from 2008 for diesel engine HGVs, buses and coaches is appropriate. 22% of the general public think it is too lenient and 38% of business respondents think it is too severe.

Almost half (48%) of general public respondents think the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and

² £200 for diesel-engine Heavy Goods Vehicles, buses and coaches and £100 for diesel-engine minibuses and heavier Light Goods Vehicles

³ £1000 for diesel-engine HGVs, buses and coaches and £500 for diesel-engine minibuses and heavier LGVs

⁴ 24 hours a day, 365 days a year.

coaches is appropriate whereas the same proportion of business respondents think it is not appropriate: 45% think it is too severe and 3% think it is too lenient.

Forty two per cent of general public respondents think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate whereas 44% of business respondents think it is **not** appropriate: 38% think it is too severe and 6% think it is too lenient

Categories with Most Frequent Mentions in Responses

The questionnaire provided respondents with an opportunity to add comments in boxes after two questions. The specific issues raised in these open responses were coded to a detailed code frame. These codes were grouped into categories of responses.

Table E1 ranks the categories of response by respondent type.

Overall, the most commonly raised issue was the principle of a LEZ (e.g. support or opposition for the need for a LEZ). This was the most commonly raised category of issue for both questionnaire samples and general public open responses.

Business sector/micro-economic impacts (e.g. costs of buying new vehicles and the impact on small businesses) was the second most frequently raised issue. This was the most frequently raised category of issue for Other Organisations and business open responses.

Discounts and exemptions to the LEZ (e.g. exemptions for vehicles for which retrofit equipment not possible and discounts/exemptions for community transport vehicles) was the third most frequently raised issue. This was the second most frequently raised category of issue for both questionnaire samples and general public open responses.

Table E1: Ranking analysis by categories and overall response to proposal

Categories		Other organisations	General public questionnaires	General public open responses	Business questionnaires	Business open responses
1	The principle of a Low Emission Zone	2	1	1	1	2
2	Business sector/micro-economic impacts	1	6	2	3	1
3	Discounts and Exemptions	5	2	2	2	4
4	Suggested alternatives	6	4	6	6	7
5	Macro-Economic impacts	9	8	5	4	3
6	Boundary	12	5	8	5	12
7	Consultation process/information	16	7	4	12	5
8	Vehicles to be included	8	3	17	7	15
9	Impacts on public and community sectors	3	16	7	16	9
10	Environmental impacts	4	12	10	13	14
11	Vehicle emission standards	6	17	13	14	6

12	Other	13	9	10	8	16
13	Business Case	13	13	8	11	12
14	Enforcement	18	10	13	9	11
15	Level of charge	18	15	10	15	10
16	Timetable	18	14	21	10	8
17	Impacts on traffic	9	19	13	18	20
18	Health impacts	21	11	13	19	16
19	Olympics	11	20	17	20	18
20	Streetscape issues	13	21	17	21	19
21	Operations	16	18	20	17	20
Base		130	1,069	132	3,114	282

Key: Most frequent 2nd 3rd
Note: Bases are those who made comments

BUSINESS 'OPEN' RESPONSES

There were 52 written submissions received from businesses. Fifty were received as letters/documents and two as emails. The businesses submitting written submissions were largely bus/coach or freight operators.

The overall response was neutral to negative with 25 of the submissions (48%) opposed to the proposed LEZ and five respondents (10%) supportive of it. Seventeen (33%) respondents had neutral views on the proposal and five made no particular statement of support or opposition to the proposed LEZ.

Overall, the most frequently raised concern by these business respondents was the impact of the scheme on small businesses (mentioned by 19 respondents). Sixteen complained about the cost of buying new vehicles. Thirteen made comments that were supportive of the principle of the LEZ.

GENERAL PUBLIC 'OPEN' RESPONSES

There were 34 written submissions received from the general public. Twenty four took the form of letters and ten were emails.

Overall, twenty responses (59%) were negative towards the LEZ proposal, one (3%) was positive, nine (26%) neither supported nor opposed the proposed LEZ and four (12%) made no comments with respect to the proposed LEZ.

OTHER ORGANISATIONS

There were 20 responses from Other Organisations. The primary classification for the responses was:

- Voluntary/Community Groups 9
- Transport/Environment 5
- Society 3
- Trade Union 1
- Other 2

The balance of response was negative with 11 (55%) opposed to the proposed LEZ and four (20%) in support. Four (20%) did not state support or opposition for the proposed LEZ and one did not comment on the proposal.

Overall, the most frequently raised issue by Other Organisations was the principle of the LEZ. This was mentioned in nine Other Organisation responses.

1. INTRODUCTION AND BACKGROUND

1.1 Accent

Accent was commissioned by Transport for London (TfL) to carry out an analysis of consultation representations submitted by the public, businesses and other organisations to the consultation on a Scheme Order setting out the detail of a LEZ for London.

Accent is an independent full service Market Research Quality Standards Association (MRQSA) accredited research agency, with offices in London, Bristol and Edinburgh.

1.2 Background

The Mayor has a statutory duty to take steps towards achieving the objectives for seven locally managed pollutants. London is expected to meet the objectives for five of these seven pollutants, namely, benzene, 1,3-butadiene, carbon monoxide, lead and sulphur dioxide. However, on current trends and without further action, it is predicted that London will exceed its 2010 targets for PM₁₀ (particulate matter) and NO₂ (nitrogen dioxide), which are two of the most harmful pollutants to human health.

In 2001, a Feasibility Study undertaken on behalf of the GLA, TfL, the Association of London Government (now London Councils), the Department for Transport (DfT) and the Department for the Environment, Food and Rural Affairs (Defra) concluded that a LEZ was the best approach to help achieve air quality objectives in London. By encouraging certain high-polluting vehicles to meet emissions standards to drive within London, the LEZ would reduce the concentration of PM₁₀ and NO₂ in the air and thereby improve the health of people living in, working in and visiting the capital. In early 2005, TfL completed a review of the findings of the Feasibility Study, and concluded that in the absence of national initiatives, there were no alternatives to the LEZ likely to achieve the same levels of benefit in the same or shorter timeframe.

A LEZ in London must be in conformity with the Mayor's Transport and Air Quality Strategies. In June 2005, the Mayor delegated to TfL responsibility for preparing appropriate revisions to his Transport and Air Quality Strategies. In early 2006 a public consultation took place on the strategy revisions regarding the principle of introducing a LEZ in London.

Following the Mayor's decision in July 2006 to confirm the revisions to his Transport and Air Quality Strategies with modifications, TfL prepared detailed proposals for a LEZ scheme and an associated Scheme Order, the legal framework chosen for implementing the London LEZ. TfL consulted the public, businesses and stakeholders on the Scheme Order from 13 November 2006 to 2 February 2007.

The LEZ would discourage the use of the most individually polluting vehicles in London by specifying strict emissions criteria which vehicles would have to

comply with to drive in London without paying a significant charge. Both UK registered and non-UK registered vehicles would need to comply with the LEZ.

In order to maximise the health and air quality benefits of the LEZ it is intended that the zone would operate 24 hours a day, 365 days a year and would cover the Greater London area. The proposed boundary has been designed to allow vehicles to divert away from the zone should they wish. Vehicles that did not meet the LEZ emission standards would be able to use the M25 to bypass Greater London without entering the zone.

The emissions standards for the LEZ scheme would be based on 'Euro standards'. These are European standards which define the limits for exhaust emissions for new vehicles sold in European Union member states and which these vehicles must comply with when manufactured from a certain date.

The consultation documents set out that from February 2008, HGVs over 12 tonnes would be required to comply with a standard of Euro III for PM in order to drive within the LEZ without paying the charge. From July 2008 a standard of Euro III for PM would apply to all diesel-engine HGVs (goods vehicles over 3.5 tonnes), buses and coaches (passenger carrying vehicles over five tonnes with more than eight seats plus the driver's seat). From October 2010 a standard of Euro III for PM would apply to heavier diesel-engine vans (goods vehicles between 1.205 and 3.5 tonnes) and minibuses (passenger vehicles below five tonnes with more than eight seats plus the driver's seat).

The consultation documents set out that from January 2012, all diesel-engine HGVs, buses and coaches would be required to meet a standard of Euro IV for PM in order to drive within London without paying the charge. The standard for heavier vans and minibuses would not be increased in 2012.

The consultation documents made clear that the majority of operators from the UK would not have to register their vehicles with TfL as they would already be listed in a database of compliant and non-compliant vehicles based on information held by the Driver and Vehicle Licensing Agency (DVLA). Operators of vehicles that TfL could not readily identify emissions for, such as vehicles with new engines or non-UK registered vehicles, would be required to submit documentation to TfL to demonstrate that their vehicle complied with the LEZ emissions standards. Should the Mayor decide to proceed with the LEZ, TfL would provide operators with information about the registration processes.

The daily charge would be set at £200 for non-compliant HGVs, buses and coaches to drive in the LEZ and £100 for non-compliant heavier vans and minibuses. The consultation documents set out that the levels of charge are designed to encourage operators driving frequently within the zone to ensure their vehicles are compliant. Should the charge not be paid for a non-compliant vehicle, a penalty charge would apply of £1,000 (reduced to £500 if paid within 14 days) for HGVs, buses and coaches and £500 (reduced to £250 if paid within 14 days) for heavier vans and minibuses.

The consultation documents set out the range of options available to operators to make their vehicles compliant with the LEZ. Operators could choose to fit

particulate abatement equipment, replace or re-engine their vehicles, reorganise their fleet so that only compliant vehicles operate within the LEZ or pay the daily charge.

Information Leaflet and Questionnaire

TfL produced an information leaflet which included a questionnaire inviting businesses and the public to comment on the proposed LEZ. The leaflet set out the reasons for proposing a LEZ, which vehicles would be affected, the proposed boundary, details of the proposed emission standards, details of vehicles that would have to register, the charge, details of how operators could comply, the proposed implementation dates, how the LEZ would operate and the potential impacts of the LEZ. There were two separate questionnaires for businesses and for the public which sought views on air quality in London and on the LEZ proposal.

1.2.1. Businesses, Vehicle Operators and Other Organisations

To ensure that businesses, vehicle operators and other organisations were aware of the proposals, TfL mailed the information leaflet and questionnaire (see Appendix B) to some 278,000 HGV, bus, coach, van and minibuss operators and owner drivers across the UK with a covering letter explaining the detail of the LEZ proposals, including to which vehicles it applied. TfL wrote to commercial vehicle operators, non-commercial vehicle operators, such as voluntary organisations, and private operators, such as horsebox owners. Businesses, vehicle operators and other organisations were invited to comment on the LEZ proposal through a questionnaire attached to the information leaflet. In addition to the mail out, TfL distributed the information leaflet and questionnaire and advertised the consultation at freight ports, the Eurotunnel, motorway service stations, transport cafes to target drivers of road transport and at DIY stores to target van drivers.

TfL also ran full page colour advertisements in a number of national and European transport operator trade publications. The advertisements invited transport operators to visit the TfL website to view the information leaflet and fill the questionnaire in online. They also gave a local rate phone number for an operator helpline which mailed out the information leaflet and questionnaire and could provide more information on the LEZ proposal.

1.2.2. The Public

TfL also sought the views of the London public on the LEZ proposal, as many people would be indirectly affected by the proposed LEZ. To this end advertisements were placed in some of the major London newspapers (including the London Paper and Metro), ethnic press publications and in national papers (including the Times, Guardian, Independent, Daily Mail, the Sun and Mirror) alerting the public to the consultation process. TfL also ran radio advertisements during the consultation period on a number of London radio stations alerting listeners to the consultation on the LEZ proposal, inviting them to visit the TfL website to access the information leaflet (see Appendix A)

and to fill in the online questionnaire, or to contact TfL's helpline which could mail out the information leaflet and questionnaire. In addition to the radio advertisements, TfL placed advertisements on buses and bus shelters which again alerted the public to the consultation, TfL's website and helpline telephone number.

The information leaflet and questionnaire was also made available to each of the 33 London boroughs for distribution at libraries and one-stop-shops.

Downloadable versions of the Scheme Order, Statement of Reasons for making the Scheme Order, Explanatory Notes for the Scheme Order, Scheme Description and Supplementary Information, Sustainable Development Impact Assessment, Environment Report, Health Impact Assessment, Economic and Business Impact Assessment and Equalities Impact Assessment along with the information leaflet and the two questionnaires for businesses and the public, were posted on TfL's website (www.tfl.gov.uk).

Copies of the information leaflet and questionnaire were also made available on TfL's website in 18 languages (Arabic, Bengali, Chinese, Czech, Danish, Dutch, French, German, Greek, Gujarati, Hindi, Italian, Polish, Punjabi, Spanish, Turkish, Urdu, and Vietnamese) and in audio, Braille and large size formats. Copies of the information leaflet and questionnaire in these formats as well as in all other official EU languages were available on request from TfL's helpline telephone number.

1.2.3. Stakeholders

Some 845 stakeholders received a letter from TfL explaining the purpose of the consultation and a comprehensive information pack containing the Scheme Order, Explanatory Notes, a map of the proposed boundary, the Statement of Reasons, the Scheme Description and Supplementary Information and the impact assessments relevant to each stakeholder group. Stakeholders included:

- Central government, local authorities and politicians
- Business representative groups
- Organisations representing groups such as voluntary and community organisations, disabled people, Black, Asian and Ethnic Minority people and walking and cycling
- Freight and haulage representative organisations
- Bus and coach representative organisations
- Organisations representing vehicle manufacturers and pollution abatement equipment manufacturers
- Health organisations, NHS trusts and emergency service providers

Stakeholders were invited to respond to the consultation in writing to TfL. TfL then undertook the analysis of these responses.

Any representation received by TfL from an 'other organisation', those organisations that responded on behalf of the interests of a wider group of

people or businesses who were not on TfL's list of stakeholders was analysed by Accent.

1.3 Objectives

The key objectives of the Accent consultation analysis were:

- to provide analysis of the responses to the two questionnaires (one for the public and one for businesses and transport operators) used as part of the formal consultation on detailed proposals of a LEZ in London as set out in the Scheme Order.
- to analyse the email and letter responses to the consultation on detailed proposals of a LEZ in London as set out in the Scheme Order from the public businesses and other organisations quantitatively (ie quantification of the responses and reporting based on data tables produced) and qualitatively (ie producing a summary of the content of the responses with reference to tone, extremity of the opinions given. etc).

2. CONSULTATION METHODOLOGY

2.1 Introduction

This section describes the methodology of the processing and analysis of the responses to the consultation.

2.2 Nature of Responses to the Consultation

The following types of submissions were received:

- Business paper questionnaires:
 - direct mailed to businesses
 - printed from TfL website (link available from GLA website)
- General public paper questionnaires:
 - printed from TfL website (link available from GLA website)
 - picked up at sites such as libraries
- On-line questionnaires:
 - from the general public
 - from businesses
- Open responses from:
 - other organisations
 - the general public
 - businesses.

2.3 Other Organisations Responses

'Other Organisations' are those organisations that responded to the public consultation exercise on behalf of the interests of an individual business, such as a coach operator, or a wider group; for example, Transport and Environment Representative Organisations or residents' associations.

2.4 Return of Responses

The general public and business questionnaires included a freepost address (Freepost RLUA-CUHG-JGKL, Low Emission Zone Consultation, Chiswick Gate, 598-608 Chiswick High Road, London W4 5RT). The consultation leaflet, the TfL website and downloaded questionnaires from the Greater London Authority and TfL websites also included the freepost address. Therefore, all paper questionnaires and many other paper responses from the general public and business were posted direct to Accent through the freepost address:

- Some other organisation responses were sent direct to TfL and then copied to Accent;
- Some other organisation responses were sent direct to Accent using the freepost address;

- Web survey responses were collated by TfL and sent to Accent on a weekly basis;
- The data from questionnaires which were downloaded from the TfL website and posted were copied onto a new questionnaire before coding and scanning;
- Responses were received throughout the consultation period – 13 November 2006 to 2 February 2007 – and up to 23 February 2007 for questionnaires from the general public and businesses. Those received after this date were sent by Accent to TfL and are not included in this analysis. Accent considered other organisation responses up to 23 February 2007.

2.4.1. Logging

All responses were logged prior to processing and analysis.

- On receipt the responses were numbered and batched ready for coding and analysis;
- All responses were assigned a unique record number so that they could be identified in the data set;
- A different series of record numbers was assigned according to the source of the response: general public questionnaires, business questionnaires, stakeholders, other organisations, business and public open responses;
- Business and general public open responses were also numbered sequentially.

2.4.2. Freedom of Information Act

All responses were opened within nine days of receipt and initially checked to see if there were any requests for information under the terms of the Freedom of Information Act. The Freedom of Information Act gives people a general right of access to information held by or on behalf of public authorities, promoting a culture of openness and accountability across the public sector. If there were such requests these would have been immediately forwarded to TfL. There were no such requests.

2.5 Coding

2.5.1. Closed Responses from Questionnaires

For the paper questionnaires, the closed responses to questions 1-3, 5-14 and 17-20 of the general public and questions 1-3, 5-14 and 17-21 of the business questionnaires were checked to ensure that the appropriate tick box was properly ticked and that the postcode (question 17) was in the correct format.

Errors were corrected. A copy of the public questionnaire is available at Appendix A and a copy of the business questionnaire is available at Appendix B.

2.5.2. Open Responses from Questionnaires

The responses to questions 4, 15 and 16 (the free form text boxes) of the general public and business questionnaires (both paper and Internet) were individually analysed.

Most of these responses were written within the box provided in the questionnaire. Some respondents also attached a note with additional comments. These were included in the analysis and separately typed or scanned and appended to the appropriate questionnaire in the database.

They were coded with up to four codes using a code frame. The code frame was developed after coding the first 500 questionnaires. A copy of the final code frame is included as Appendix C.

Obscene comments were coded 'rude/irrelevant'. Comments such as abusive comments towards the Mayor and general comments not relevant to the proposal were coded as irrelevant.

As a check on the consistency of coding staff and to ensure that all elements of responses were correctly coded and included, rigorous quality checks were applied. This included:

- a 10% back check of all coding undertaken
- a 10% back check of all scanning undertaken
- checking of the first 50 questionnaires coded for each coder.

Any errors identified as a result of miscoding were corrected.

2.5.3. Coding of Open Submissions

Open submissions from other organisations, the general public and businesses were received as letters (both handwritten and typed), emails and documents, some of substantial length.

All typed responses were scanned using optical character recognition (OCR) software and the responses proofed before being entered into the appropriate Microsoft Excel spreadsheet (i.e., stakeholder, other organisation etc.).

Many of the responses were very lengthy and detailed and dealt with a wide variety of issues.

All responses were read and an assessment was made of whether the respondent was in support of the proposal, against the proposal, undecided or if there was no comment.

The open text was then individually analysed to a detailed code frame (a copy of this is included as Appendix D). This was based on the code frame used for the questionnaire responses, but as the nature of the submissions was typically much longer and more detailed, the code frame was amended to reflect additional detailed issues.

2.6 Data Processing

All open responses from the paper questionnaires were typed into a Microsoft Access database along with a code used to identify the questionnaire.

Open responses were then spell checked. To ensure that the integrity of the response was maintained, no changes were made to the grammar or content of submissions.

The paper questionnaires were then scanned using high speed scanners with dedicated software.

The data was then exported into SPSS. Range and logic error checks and data edits were undertaken. The scanners' OCR software interpreted the handwritten codes and the scanner operator corrected 'errors' highlighted by the software, but some erroneous codes were accepted and these were flagged up in the edit checks and manually corrected. Similarly, edit checks covered multiple responses to single code questions.

Analysis was undertaken using SPSS and output was in the form of tables (SPSS for Windows analysis files and Excel).

2.7 Context to the Analysis

It is important to note that the findings from the public consultation reported in this document are from a consultation and not an opinion poll or referendum. A consultation is seeking information and views relating to the proposal and is not intended to elicit representative samples of opinion.

With consultations there can be a tendency for responses to come from those more likely to consider themselves affected and more motivated to express their views. The nature of public consultation is that respondents are self selecting and therefore not necessarily representative of opinion across London.

An attitudinal survey was conducted by Ipsos MORI in addition to the consultation. It sought to identify the attitudes and opinions of Londoners, as well as the wider business community, towards the LEZ proposal and to assess how representative the consultation findings were. This is reported on separately.

3. OVERALL REACTIONS TO THE LEZ PROPOSAL

3.1 Introduction

This chapter summarises the overall reactions to the proposal.

The data is based on the following responses received in the following formats:

3.2 Level of Support for Proposal

The great majority of the responses from the general public questionnaire were in support of the proposed LEZ with 71% in favour.

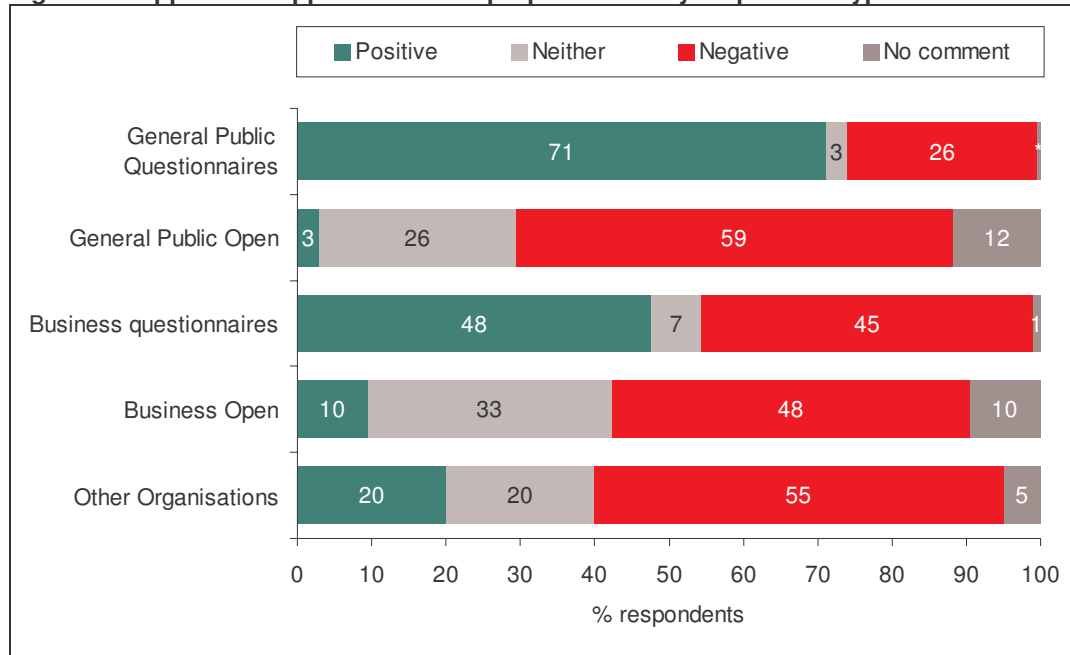
The respondents to the business questionnaires were more evenly split with 48% in support and 45% against the proposed LEZ.

The open responses from the general public and businesses were predominantly against the proposed LEZ with 59% of general public and 48% of business against and 3% of general public and 10% of business in support.

Other organisation opinion was also predominantly against the proposed LEZ with 55% against and 20% in favour.

⁵ 'Other Organisations' are those organisations that responded to the public consultation exercise on behalf of the interests of a wider group.

Figure 1: Support and opposition to the proposed LEZ by respondent type



Base: 20 other organisations, 52 business open, 5,502 business questionnaires, 34 general public open, 1,869 general public questionnaires

Note: the responses from the questionnaires have been amalgamated so that strongly oppose and oppose have been coded as negative and strongly support and support have been coded as positive

3.3 Attitudes to Air Quality

Over four fifths (86%) of general public respondents and 74% of business respondents to the questionnaire think that it is important or very important to tackle poor air quality in London.

3.4 Categories of Response

Open responses were received from Other Organisations, the general public and businesses.

In addition, the consultation questionnaires included three boxes inviting respondents to make comments. Respondents were advised in the information leaflet (see Appendix A and B) that they could also submit additional comments to those provided in the questionnaire.

The specific issues raised in the open responses were coded to a detailed code frame. These codes were grouped into categories of responses.

Table 1 ranks the categories of response by respondent type. The ordering of the categories in the table (left hand column) is by the average of the ranks, not the number of responses.

Overall, the most commonly raised issue was the principle of a LEZ (e.g. support or opposition for the need for a LEZ). This was the most commonly raised category of issue for both questionnaire samples and general public open responses.

Business sector/micro-economic impacts (e.g. costs of buying new vehicles and the impact on small businesses) was the second most frequently raised issue. This was the most frequently raised category of issue for Other Organisations and business open responses.

Discounts and exemptions to the LEZ (e.g. exemptions for vehicles for which retrofit equipment is not possible and discounts/exemptions for community transport vehicles) was the third most frequently raised issue. This was the second most frequently raised category of issue for both questionnaire samples and general public open responses.

Table 1: Ranking analysis by categories and overall response to proposal

Categories		Other organisations	General public questionnaires	General public open responses	Business questionnaires	Business open responses
1	The principle of a Low Emission Zone	2	1	1	1	2
2	Business sector/micro-economic impacts	1	6	2	3	1
3	Discounts and Exemptions	5	2	2	2	4
4	Suggested alternatives	6	4	6	6	7
5	Macro-Economic impacts	9	8	5	4	3
6	Boundary	12	5	8	5	12
7	Consultation process/information	16	7	4	12	5
8	Vehicles to be included	8	3	17	7	15
9	Impacts on public and community sectors	3	16	7	16	9
10	Environmental impacts	4	12	10	13	14
11	Vehicle emission standards	6	17	13	14	6
12	Other	13	9	10	8	16
13	Business Case	13	13	8	11	12
14	Enforcement	18	10	13	9	11
15	Level of charge	18	15	10	15	10
16	Timetable	18	14	21	10	8
17	Impacts on traffic	9	19	13	18	20
18	Health impacts	21	11	13	19	16
19	Olympics	11	20	17	20	18
20	Streetscape issues	13	21	17	21	19
21	Operations	16	18	20	17	20
Base		130	1,069	132	3,114	282

Key: ■ Most frequent ■ 2nd ■ 3rd

Note: Bases are those who made comments

4. OTHER ORGANISATIONS

4.1 Introduction

This section presents an analysis of the responses from the twenty Other Organisations who responded to the consultation.

Other Organisations are those organisations that responded to the public consultation exercise on behalf of the interests of a wider group, for example, transport and environment representative organisations or residents' associations, but were not included in TfL's list of stakeholders.

This section provides a summary of the Other Organisation responses, then sets out the nature of the responses, before providing a detailed analysis of the most frequently mentioned concerns.

4.2 Sample

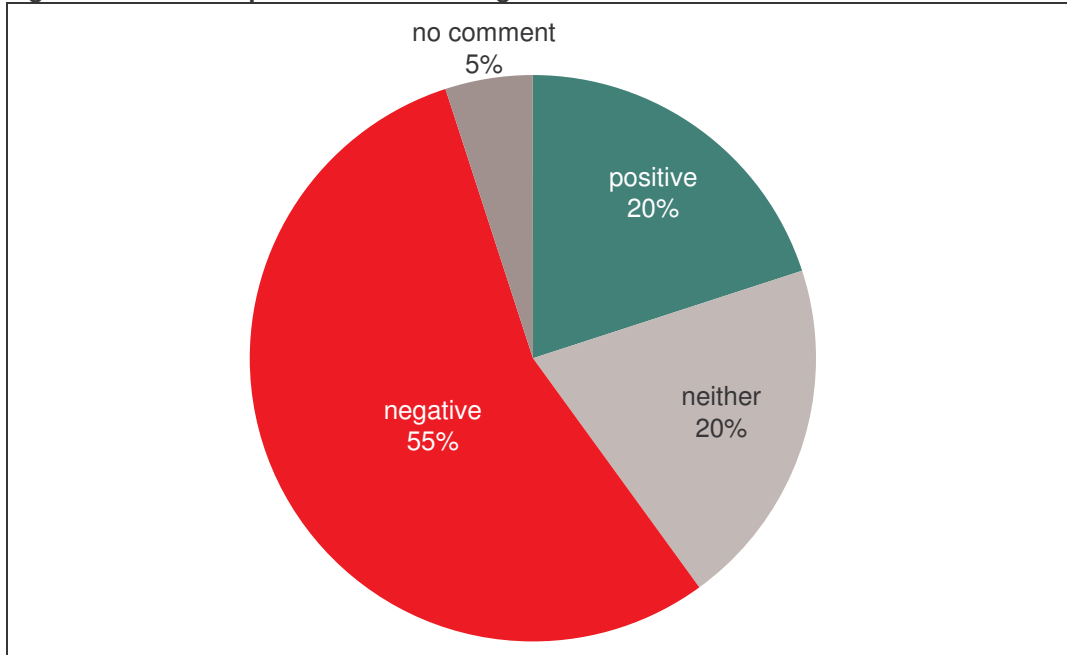
There were 20 responses from Other Organisations. The primary classification for the responses was:

- Voluntary/Community Groups 9
- Transport/Environment 5
- Society 3
- Trade Union 1
- Other 2

4.3 Response to the Consultation

The balance of response was negative with 11 (55%) opposed to the proposed LEZ and four (20%) in support. Four (20%) did not state support or opposition for the proposed LEZ and one did not comment on the proposal, see Figure 2.

Figure 2: Overall response from Other Organisations



Base: 20

Analysis by primary classification is shown in Table 2 below.

Table 2: Overall response by Other Organisation primary classification

	Voluntary/ Community Groups	Transport/ Environment	Society	Trade Union	Other
Positive		1	1	1	1
Neither		3	1		
Negative	8	1	1		1
No comment	1				
Base	9	5	3	1	2

4.4 Support and Opposition to the Proposal

For the Other Organisations sample Table 3 shows the comments grouped into the main categories and by whether the overall response was positive, neutral or negative towards the proposed LEZ for the 19 respondents that made comments that could be coded.

For the overall sample the most frequently raised category of issue was business sector/micro-economic impacts (e.g. costs of buying new vehicles, ongoing costs of retrofitting abatement equipment and the impact on small businesses) mentioned by 19 respondents.

Fifteen of the responses were concerned with the principle of a LEZ (e.g. support or opposition to the need for a LEZ).

Eleven of the responses were concerned with the impacts of the LEZ on public and community sectors (e.g. cost impacts on public and community fleets and the impact on voluntary services).

Eleven of the responses raised concerns about environmental impacts (e.g. the LEZ will fail to make adequate progress towards air quality targets and impacts on NO₂ levels).

Nine of the responses were concerned with discounts and exemptions to the LEZ (e.g. exemptions for vehicles for which retrofit equipment is not possible and discounts/exemptions for community transport vehicles).

Other frequently raised categories (each mentioned by between eight and nine of Other Organisation respondents) were:

- Suggested alternatives (e.g. complementary measures);
- Vehicle emission standards (e.g. derogation)
- Vehicles to be included (e.g. buses and taxis).

Table 3: Analysis of Other Organisation responses by categories and overall response to proposed LEZ

	Total n	Positive n	Neither n	Negative n
Business sector/micro-economic impacts	19	0	17	2
The principle of a Low Emission Zone	15	5	8	2
Impacts on public and community sectors	11	0	10	1
Environmental impacts	11	4	5	2
Discounts and Exemptions	9	0	9	0
Suggested alternatives	9	5	1	3
Vehicle emission standards	9	2	7	0
Vehicles to be included	8	4	3	1
Impacts on traffic	7	0	7	0
Macro-Economic impacts	7	2	5	0
Boundary	4	3	0	1
Business Case	3	2	1	0
Health impacts	3	0	3	0
Olympics	3	1	2	0
Operations	2	1	1	0
Consultation process/information	2	1	1	0
Timetable	1	1	0	0
Enforcement	1	0	1	0
Level of charge	1	0	0	1
Other	5	0	4	1
Base (responses)	130	31	85	14

Note: Totals add up to more than base as more than one response could be given.

4.5 Most Frequently Raised Issues

Overall, the most frequently raised issue by Other Organisations was the principle of the LEZ. This was mentioned in nine Other Organisation responses.

Six were concerned with the costs of buying new vehicles. Five discussed other⁶ air quality impacts.

Table 4 shows all detailed responses.

⁶ Other than the specific categories within the code frame

Table 4: Overall – all Other Organisation responses

	n
Support a LEZ	9
Costs of buying new vehicles	6
Other air quality impacts	5
Other public and community sector issues	4
Ongoing costs of retrofitting abatement equipment	4
Impact on small businesses	4
Modal shift	4
Other discount and exemptions	3
Oppose a LEZ	3
Other principle issues	3
Other alternatives	3
Derogation	3
Other vehicle emission issues	3
Discounts/exemptions for community transport vehicles	3
Cost impacts on public and community fleets	3
Impact on voluntary services	3
Economic and social impacts	3
Impact on London's economy	3
Issues relating to 2012 Olympics	3
Complementary measures	2
Other central government initiatives	2
Poor benefit/cost ratio	2
Buses should be included	2
Taxis and mini-cabs should be included	2
Include motorways and trunk roads	2
Exemptions for vehicles for which retrofit equipment not possible	2
Should be tax incentives & loans to help convert vehicles	2
Will fail to make adequate progress towards air quality targets	2
Impacts on NO2 levels	2
Increased traffic through move to smaller vehicles	2
Broader UK economy issues	2
Cost impacts on customers/businesses	2
More research/modelling work needed	2
Other Issues	30
Base (responses)	130

4.6 Detailed Analysis of Most Frequently Raised Issues

This section discusses the Other Organisation responses by the most frequently raised concerns. Below we provide details of specific responses under each of the concerns.

4.6.1. Support need for a LEZ

Nine Other Organisations made comments which expressed support for the need for a LEZ.

Three Other Organisations (Putney Labour Party, West London Friends of the Earth and the GMB London Region) expressed unreserved support for the proposal.

“Putney Labour Party supports the Mayor of London's proposals for a London wide Low Emission Zone following the boundaries outlined in the consultation document.”

Putney Labour Party

“West London Friends of the Earth strongly supports the introduction of a Low Emission Zone (LEZ) as proposed.”

West London Friends of the Earth

The Association of Transport Co-ordinating Officers (ATCO), broadly welcomed the proposal and said that while there would be implications for cross-boundary services, they believed

“...these will largely be outweighed by benefits to the quality of vehicles used on services outside London, as vehicles currently used in the capital that do not meet the new emission standards will be cascaded down to other areas at a younger age than would otherwise be the case.”

ATCO

The other five Other Organisations who showed broad support for the principle of the LEZ also voiced some concerns.

For example, whilst the Royal Yachting Association and The British Horse Society both voiced support for the LEZ they both raised concerns about the potential negative impacts of the LEZ on their members or on other particular sectors:

“We believe that particular attention and consideration should be paid to the financial implications for the not-for-profit/recreation sector, which includes the majority of the RYA's members, affiliated clubs and organisations.”

Royal Yachting Association

“The Society recognises the need to improve air quality within London and fully supports this aim. Improvements in air quality will benefit horse riders in London. However it considers that proposals to achieve this aim should be introduced in a manner which does not have a disproportionate effect on any particular sector of the public or any particular sector of industry.”

British Horse Society

The Knightsbridge Association and the Marylebone Association both said they strongly support road pricing and emission schemes in general but wanted them to be *“ambitious, effective and well thought through.”* The Knightsbridge Association amplified this concern by saying they were concerned about ongoing PM₁₀ problems and mentioned that NO₂ air pollution in London over the next few years *“is expected now to be more than twice as bad as TfL had thought only last January and with no end now in sight.”*

The Westminster Society welcomed the principles behind the creation of the zone although they were concerned with the *“disparities between the zone boundary and the GLA boundary.”*

4.6.2. Costs of buying new vehicles

Six Other Organisations were concerned about the cost of buying new vehicles needed to meet the LEZ emissions standards.

The 3rd Hayes (St Mary's) Scout Group Transport Division said that they would not be able to afford the new vehicles required:

“Even if we wanted to purchase newer vehicles, we would not be able to do this for the foreseeable future as funds are simply not available.”

3rd Hayes (St Mary's) Scout Group Transport Division

The other five responses said that their members or other sectors would not be able to afford new vehicles:

“There is also No Way that individual units would be able to afford to replace minibuses with those that comply to Euro III standards (manufactured after 2002) - even by Oct 2010.”

Marine Society & Sea Cadets

“Many of the vehicles will have been registered more than seven years ago, and thus will be deemed to be non-compliant, and many companies and individuals will not be able to either upgrade the vehicles or purchase new ones.”

Earls Court and Olympia Group

The ATCO said that the greatest impact of the LEZ may be felt by cross-boundary education contracts since their vehicles were likely to be relatively old and therefore relatively expensive to replace.

The Royal Yachting Association said it was unfair to believe that vehicles should be replaced every 8 to 10 years and that the not-for-profit sector would ideally wish a minibus, for example, to last for up to 20 years.

The British Horse Society said that many of the people they represent use lorries which have been converted to horse boxes which, because of their age, will not meet the Euro III standard. They then complained about the cost of modification or renewal:

“TfL's estimate of the cost of modification for a non compliant lorry, at £3,000 is often more than the lorry is worth itself. Even if horse owners were able to afford to replace their lorry, their old lorry would be worthless as it would not comply with the Euro III standard.”

The British Horse Society

The British Horse Society response included representations from some of their members, for example Wimbledon Village Stables who said *“The cost of purchasing a new lorry is prohibitive.”*

4.6.3. Other air quality impacts

Five Other Organisations cited air quality impacts which were not included within the code frame.

"In my view the London LEZ, as currently proposed, is a seriously wasted opportunity to address air pollutant emissions from road traffic. Moreover it does nothing whatsoever to address the emissions of carbon-dioxide from road transport which continue to climb!"

Automotive Green Developments

Both the Knightsbridge Association and The Marylebone Association say that the LEZ proposal does *"not address adequately the major changes that have taken place in the external environment since the first LEZ consultation in January 2006"* by which they mean that climate change issues have become more important (citing, amongst other things, the Stern Report and the Friends of the Earth "Big Ask" campaign) whilst the proposed emissions standards have become less ambitious.

3rd Hayes (St Mary's) Scout Group Transport Division mentioned that the LEZ encourages purchase of new vehicles rather than:

"...conserving resources by using the ones currently in our possession. It takes far more energy and causes more damage making a new vehicle than it does to continue using one that is already manufactured."

3rd Hayes (St Mary's) Scout Group Transport Division

4.6.4. Other public and community sector issues

Four Other Organisations raised other public and community sector issues which were not listed in the code frame.

The Marine Society & Sea Cadets said that most of the Sea Cadet units run their own minibuses and because of lack of funds they tend to be older and hence won't be compliant with the LEZ.

"These minibuses are used to transport Cadets to a large number of their activities and events both in London and Nationwide, these buses are often used 6-7 days a week, and afford parents peace of mind about the wellbeing and security of their children. Without the access to this mode of transport, Cadets would be forced to rely on individual parent's cars or non-participation in sporting, recreational and Sea Cadet activities."

Marine Society & Sea Cadets

Similarly, The Royal Yachting Association and the British Universities Sports Association complained about the knock on impact of the LEZ on access to sports:

“The benefits that our sport, and others like it, can offer young people, especially those who do not engage in the mainstream sports or those that require Real Challenges to support their personal and social development has been proved to be substantial and this additional cost will only help to lessen its accessibility. It is important to bear in mind that our sport is one of a very few that offer the opportunity for people with disabilities to take part and compete on an equal basis and again increased costs will only decrease their access to facilities and opportunities.”

Royal Yachting Association

The British Universities Sports Association said that although they recognised the importance of the LEZ and improving air quality, they thought it would have a detrimental impact on participation levels in sports and physical activity within higher education as:

“...around 5,000 higher education 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; the cost to the higher education sector of implementing the current proposals would seriously jeopardise the viability of competitive University sport, and seriously affect this grass-roots participation in the run-up to London 2012.”

British Universities Sports Association

The British Horse Society was concerned that the LEZ might affect the “23 Riding for the Disabled Groups in Greater London” as well as other equine leisure users and establishments.

4.6.5. Ongoing costs of retrofitting abatement equipment

Four Other Organisations were concerned about the costs of retrofitting abatement equipment.

“Many companies and individuals will not be able to either upgrade the vehicles or purchase new ones.”

Earls Court and Olympia Group

“The costs in converting older vehicles would also unfairly penalise mainly smaller companies.”

London Association of Recovery Operators

The Royal Yachting Association complained about the costs of retrofitting abatement equipment and the ongoing costs:

“Many clubs/organisations will just not be able to afford the huge cost of upgrading their vehicles. We understand the cost to be somewhere in the region of £2,000 for a particulate filter; there will no doubt be further costs associated with fitting and other work that needs to be carried on the vehicle in order to support the

filter. This is an unrealistic cost to expect clubs/organisations to be able to meet.”
Royal Yachting Association

4.6.6. Impact on small businesses

Four Other Organisations were concerned that the LEZ would have a negative impact on small businesses.

Earls Court and Olympia Group said that because of the very nature of some of their shows (e.g. antique shows, jewellery shows, design and build shows, the International Horse Show) the vehicles that serve them will not comply with the LEZ.

The London Association of Recovery Operators think that the LEZ is wrongly targeted towards commercial vehicles which they say that current statistics show only account for about 5% of all traffic within London. They went on to say that the costs in converting older vehicles *“would also unfairly penalise mainly smaller companies.”*

The British Horse Society said that the LEZ would have a disproportionate effect on the equine industry and leisure riders within Greater London:

“If equine leisure users and establishments cannot afford to replace their lorries, within the very short timescale that is proposed, or pay £200 every time they drive it within the proposed LEZ, businesses will close.”
The British Horse Society

4.6.7. Modal shift

Four Other Organisations were concerned that the LEZ would lead to modal shift.

“If we did not use the bus there could be 4 or 5 cars travelling.”
Edmonton Canoe Group

The Marine Society & Sea Cadets said that the LEZ would force their members' minibuses off the road and the trips would be replaced by car trips from parents.

The British Universities Sports Association suggested that the LEZ represented a policy conflict:

“I would also suggest that the LEZ represents a policy conflict for TfL with a general trend to legislate individuals away from smaller vehicles and into larger passenger carrying vehicles - then, conversely, the LEZ legislating against this.”
The British Universities Sports Association

5. GENERAL PUBLIC QUESTIONNAIRE

5.1 Response to the Consultation

There were 1,993 public questionnaires received by 23 February 2007:

- 493 paper questionnaires
- 1,466 Internet questionnaires.

Public questionnaires received after this date were passed to TfL for analysis.

5.1.1. Characteristics of Respondents

Seventy two per cent of public respondents were male. The gender split of these respondents was more male oriented than the London population. According to the 2001 Census the London adult population (aged over 16) is 48% male and 52% female.

Fifty two per cent of respondents were aged between 25 and 44 years and 35% were aged between 45 and 64 years.

The respondents' ethnic background was predominantly white: 89%. Three per cent were Asian and 2% Black. According to the 2001 Census, 71% of the London population is white. The questionnaire sample over represents whites and under represents Asian and Black respondents.

5.2 Summary of Most Frequently Raised Issues

Over four fifths (86%) of respondents using the public questionnaire think that it is important or very important to tackle poor air quality in London with almost two thirds (65%) saying it is very important.

Seventy one per cent of general public respondents using the questionnaire support the proposed LEZ (56% strongly support it) and 26% oppose it (18% strongly oppose).

Women are more supportive of the proposed LEZ than men: 76% of women support the proposed LEZ compared to 70% of men.

The youngest age groups are more supportive of the LEZ. Those aged between 45 and 64 years old are the least supportive.

5.2.1. Details of the proposed LEZ

Less than half the general public respondents (44%) think the proposed boundary of the LEZ is appropriate. Over a fifth (21%) think it should be a larger area and just under a fifth (19%) think it should be a smaller area.

Over half the respondents (56%) think that the motorways within London should be included in the LEZ.

Over a third (36%) think the proposed level of charge⁷ is sufficient to incentivise operators to make their vehicles compliant, 27% think it is too high and 25% think it is too low.

Forty three per cent think the proposed level of Penalty Charge⁸ for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent, 25% think it is too high and 22% think it is too low.

Over two thirds (69%) support the hours of operation⁹, 54% strongly support them. Just over a quarter (28%) oppose the proposed hours of operation, 21% strongly oppose them.

Forty one per cent think that the proposed emission standard of Euro III for Particulate Matter from 2008 for diesel engine HGVs, buses and coaches is appropriate although a slightly larger proportion (42%) think it is not appropriate: 22% think it is too lenient and 20% think it is too severe. Over a sixth (17%) say they don't know.

Almost half (48%) think the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate. A fifth think it is too severe and 16% think it is too lenient. Over a sixth (16%) say they don't know.

Forty two per cent think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate. Just over a fifth (21%) think it is too lenient and a fifth think it is too severe. Over a sixth (17%) say they don't know.

Four fifths of respondents (80%) think the LEZ should apply to HGVs, 75% to coaches and 74% to buses. A similar proportion think it should apply to SUVs (4X4s) and all LGVs: 67%. Just over half the sample (51%) thinks diesel cars should be included and 46% think petrol cars should be included.

Respondents were asked if they supported the proposals to exempt certain vehicles from the LEZ¹⁰. Almost half the sample (49%) supports the proposed exemptions and just over a fifth (21%) oppose them. Sixteen per cent neither support nor oppose the proposed exemptions and 14% do not know.

⁷ £200 for diesel-engine Heavy Goods Vehicles, buses and coaches and £100 for diesel-engine minibuses and heavier Light Goods Vehicles

⁸ £1000 for diesel-engine HGVs, buses and coaches and £500 for diesel-engine minibuses and heavier LGVs

⁹ 24 hours a day, 365 days a year.

¹⁰ agricultural vehicles, military vehicles, historic vehicles not used for hire or reward, non-road going vehicles which are allowed to drive on the highway (for example excavators) and certain types of mobile crane.

5.2.2. Comments about the Proposal

There were three free text boxes in the questionnaire. All the responses were grouped together.

The main category of comment is on the principle of a LEZ, with 53% of responses in this category (with 29% opposing the LEZ, 14% saying the objective is to raise revenues or that it is another tax and 12% supporting the LEZ).

Forty per cent of comments are on discounts and exemptions to the scheme (with 7% mentioning exemptions for heritage vehicles and 4% saying there should be no exemptions).

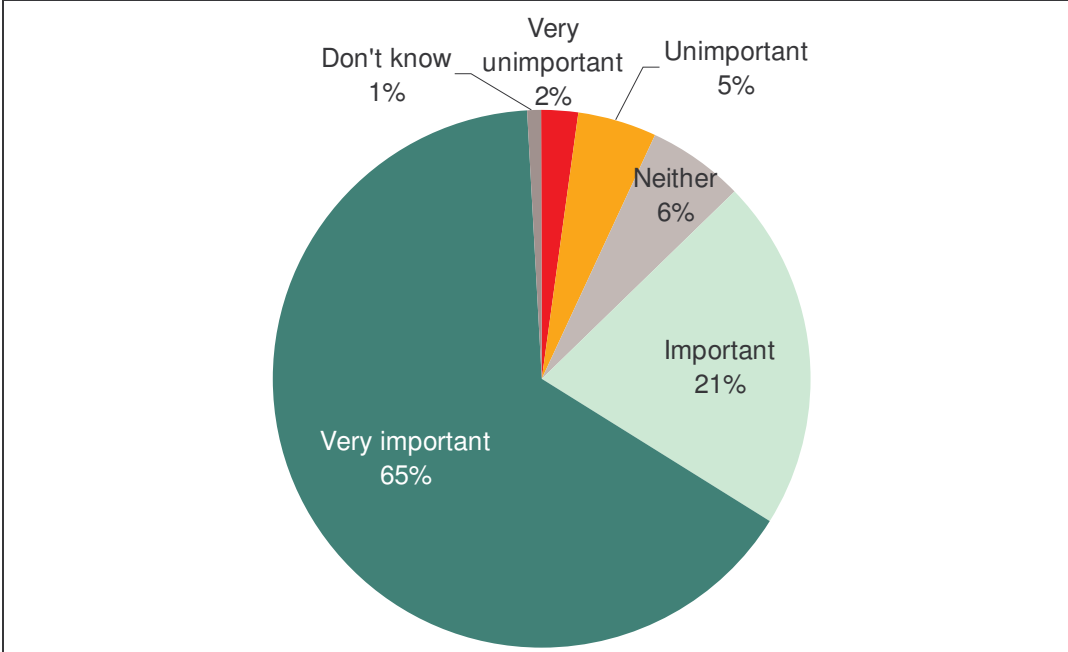
Twenty four per cent made comments under the category of vehicles to be included with taxis (6%) the main suggestion.

Twenty three per cent of comments are suggestions for alternatives (with 7% suggesting complementary measures and 4% suggesting that there should be other central government initiatives).

5.3 Importance of Tackling Poor Air Quality in London

Over four fifths (86%) of respondents using the public questionnaire think that it is important or very important to tackle poor air quality in London with almost two thirds (65%) saying it is very important.

Figure 3: Importance of tackling poor air quality in London from public questionnaires

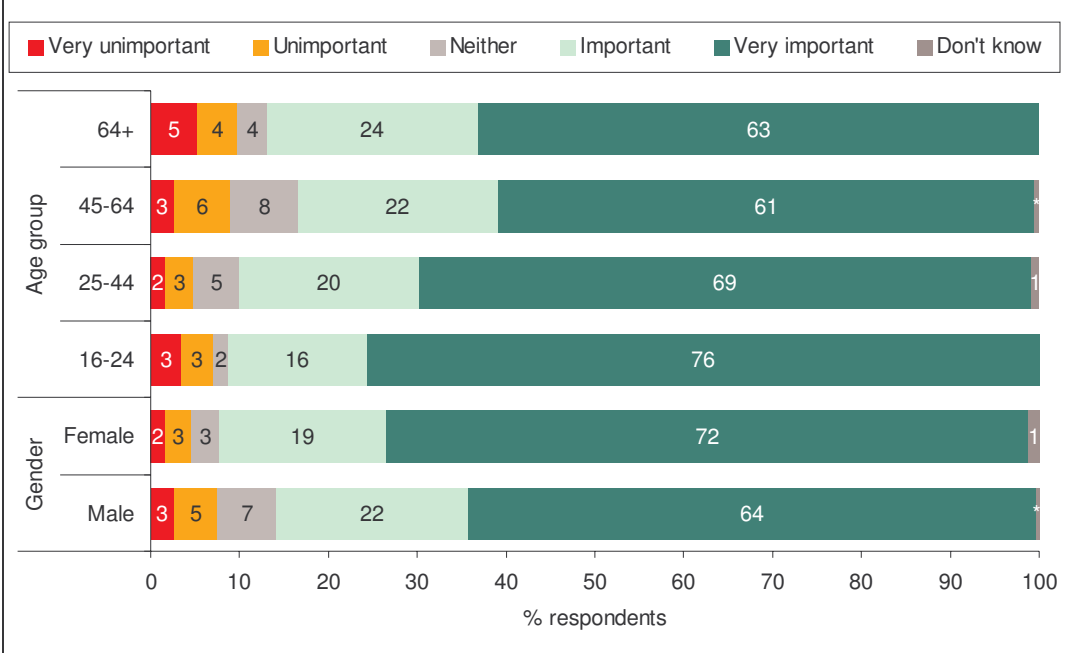


Base: 1,878

Women are much more likely than men to think that it is important or very important to tackle poor air quality in London: 72% compared to 64% saying it is very important.

The youngest age groups are more likely to think it is important to tackle poor air quality in London, with over three quarters (76%) of 16 to 24 year olds saying it is very important. Respondents aged between 45 and 64 years old are least likely to think that it is important or very important to tackle poor air quality in London.

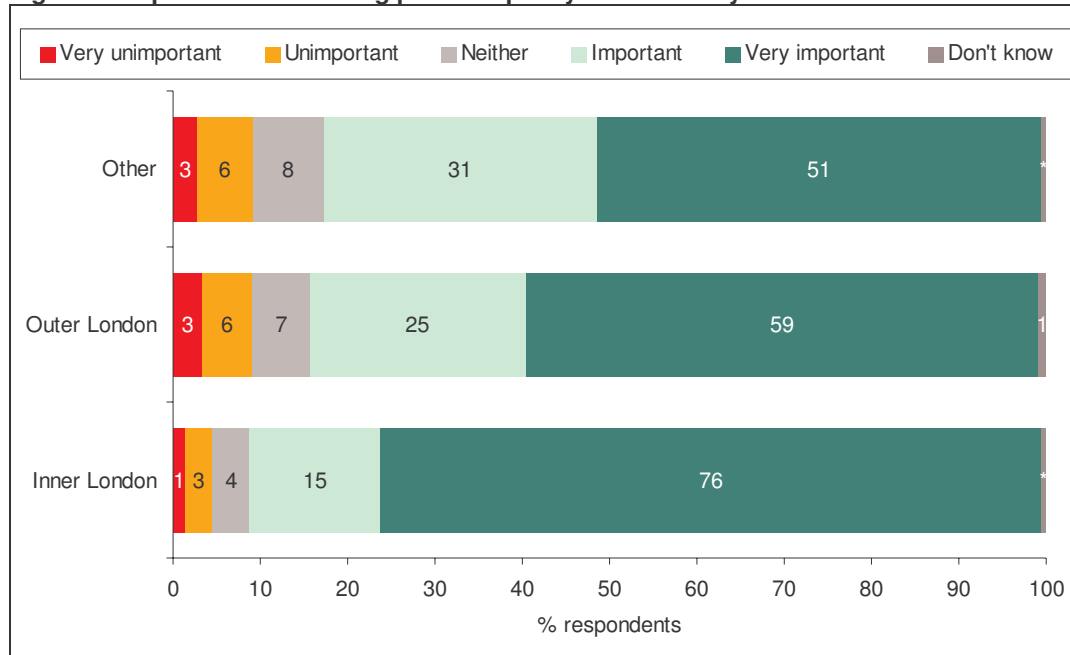
Figure 4: Importance of tackling poor air quality in London by age and gender



Base: 1,297 men, 505 women; 115 16-24, 936 25-44, 628 45-64, 114 65+
 * = less than 0.5%

Just over three quarters (76%) of residents of Inner London think it is very important to tackle poor air quality in London compared to 59% of those resident in Outer London and 51% of residents outside London.

Figure 5: Importance of tackling poor air quality in London by location

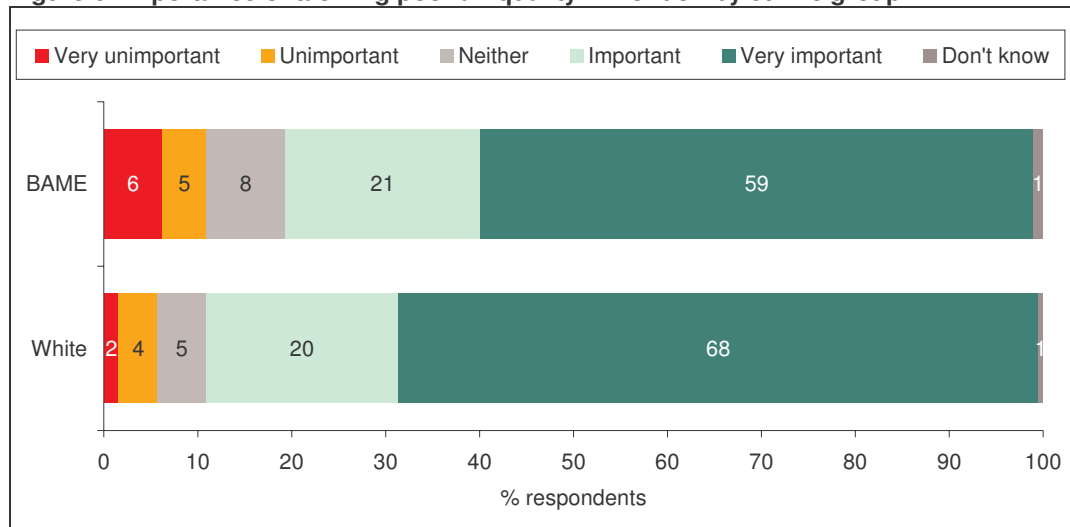


Base: 852 Inner London; 703 Outer London; 220 other

* = less than 0.5%

White respondents think it is more important to tackle poor air quality than respondents from other ethnic groups: 6% of BAME¹¹ respondents think it is very unimportant to tackle poor air quality in London compared to 2% of white respondents. However, this masks large differences within the different ethnic groups with Asian, Mixed and Chinese respondents more likely than white respondents to say it is important to tackle poor air quality and Black and 'other' less likely¹².

Figure 6: Importance of tackling poor air quality in London by ethnic group



Base: 1,563 White; 192 BAME

¹¹ Black, Asian and Minority Ethnic groups

¹² Mean scores where 1 = very unimportant and 5 = very important: White 4.55, Asian 4.56, Black 3.61, Mixed 4.67, Chinese 4.58 and Other 3.92

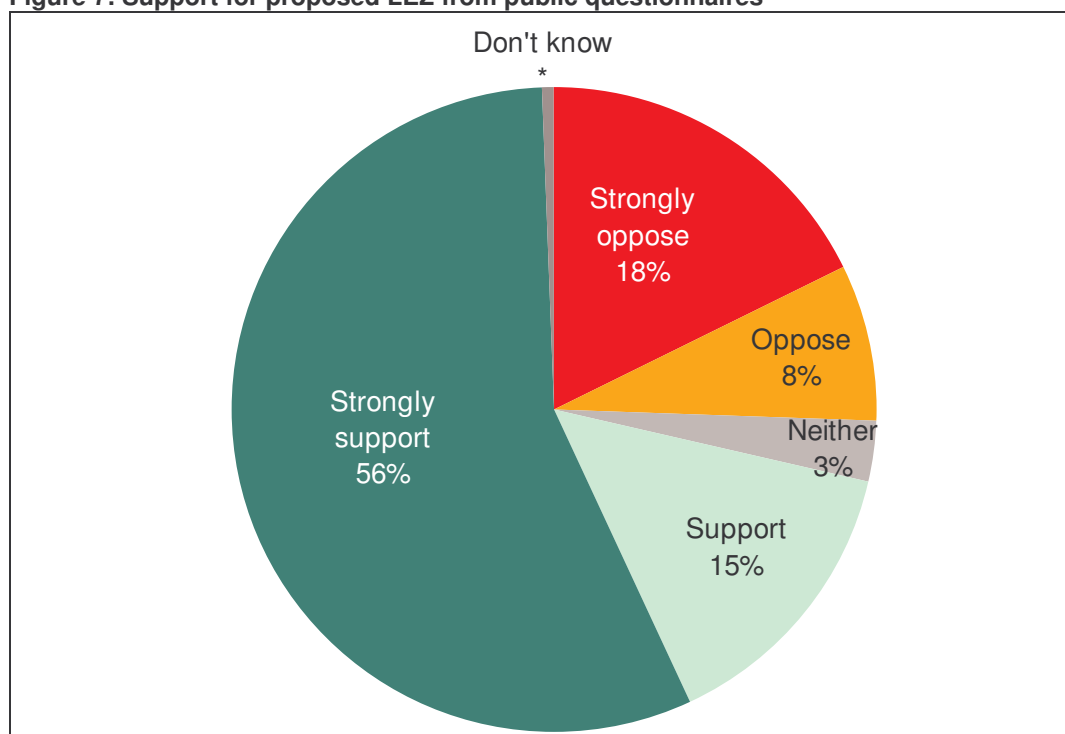
5.4 Support for the LEZ Proposal

Question 2 of the questionnaire sought the views of respondents on the proposed LEZ as described in the consultation leaflet. The question asked was:

“Do you support or oppose the proposal to introduce a Low Emission Zone (LEZ) in Greater London as described in the leaflet?”

Seventy one per cent of general public respondents using the questionnaire support the proposed LEZ (56% strongly support it) and 26% oppose it (18% strongly oppose). See Figure 7.

Figure 7: Support for proposed LEZ from public questionnaires



Base: 1, 869

* = less than 0.5%

There is little difference in the views of respondents who used the paper or Internet questionnaires although those responding by Internet have stronger views (larger proportions strongly opposing or supporting the proposal).

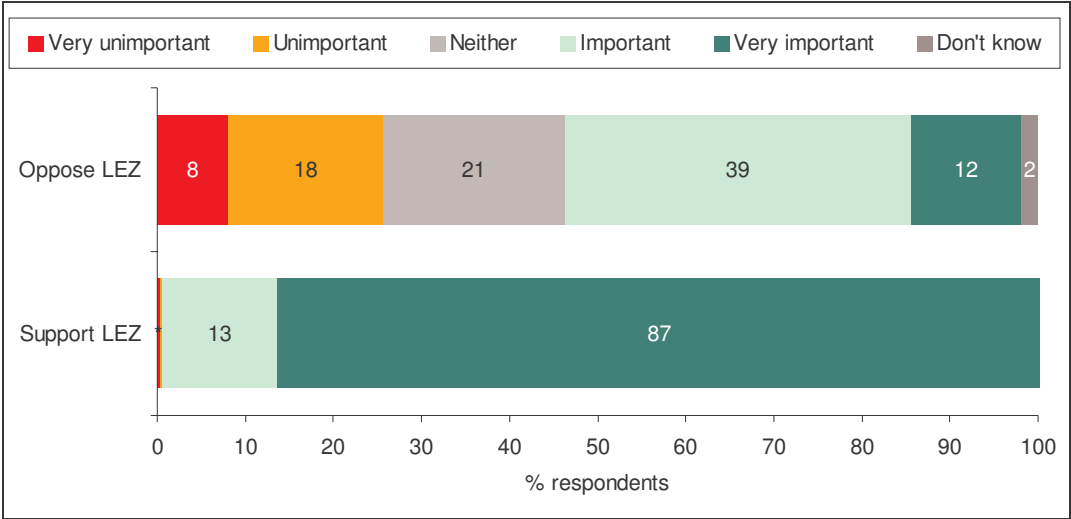
Table 5: Support for proposed LEZ from public questionnaires

	Total %	Paper %	Internet %
Strongly oppose	18	13	20
Oppose	8	12	6
Neither support nor oppose	3	3	3
Support	15	18	13
Strongly support	56	54	57
Don't know	*	1	*
Base	1,869	480	1,389

* = less than 0.5%

There is a very strong correlation between support for the LEZ and views about the importance of tackling air pollution in London.

Figure 8: Importance of tackling poor air quality in London by whether support or oppose the LEZ



Base: support LEZ 1,325; oppose LEZ 475

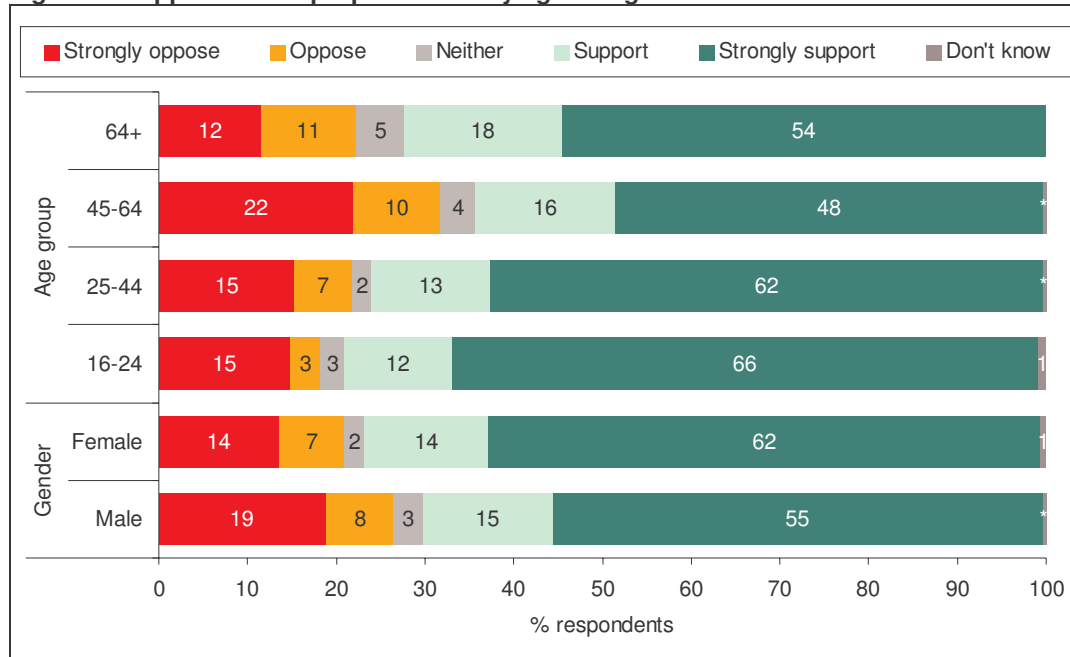
* = less than 0.5%

5.4.1. Age and Gender

Women are more supportive of the proposed LEZ than men: 76% of women support the proposed LEZ compared to 70% of men.

The youngest age groups are more supportive of the LEZ. Those aged between 45 and 64 years old are the least supportive.

Figure 9: Support for the proposed LEZ by age and gender

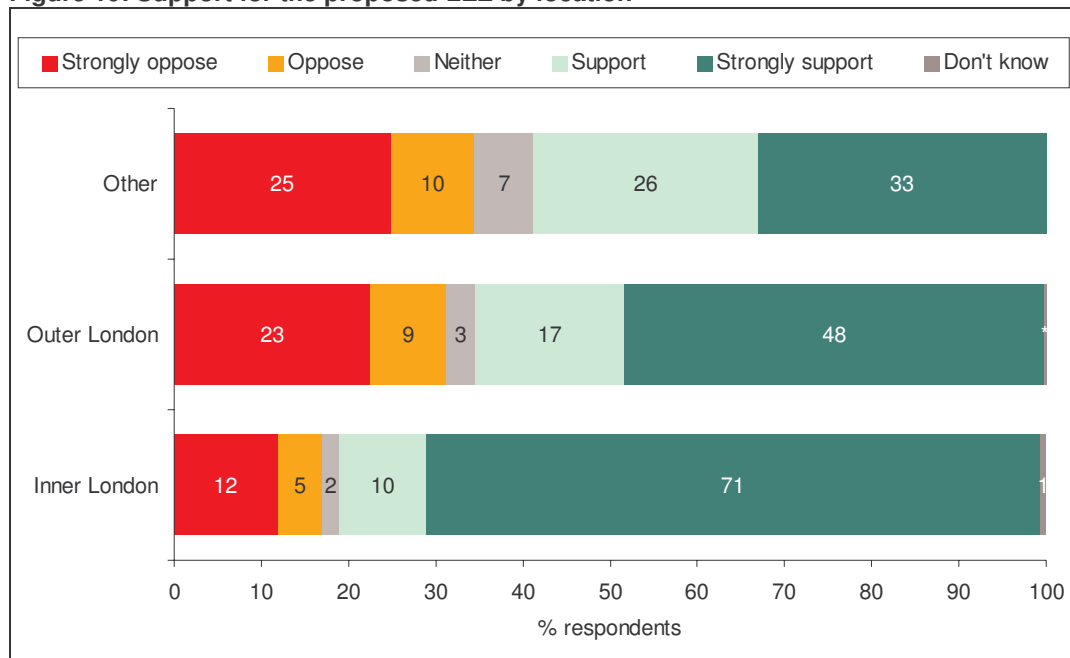


Base: 1,292 men, 503 women; 115 16-24, 934 25-44, 625 45-64, 112 65+
 * = less than 0.5%

5.4.2. Location

Residents in Inner London are most likely to support the proposed LEZ and those outside London are least likely to support it.

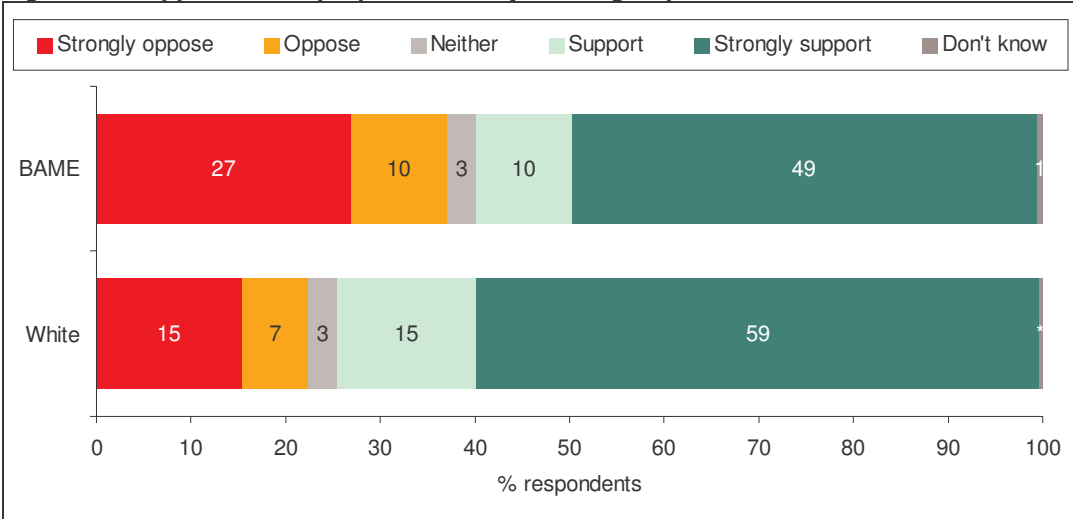
Figure 10: Support for the proposed LEZ by location



Base: 849 Inner London; 697 Outer London; 221 other
 * = less than 0.5%

White residents are more likely to support the LEZ than BAME¹³ residents: 74% of white residents support the LEZ compared to 59% of BAME residents.

Figure 11: Support for the proposed LEZ by ethnic group



Base: 1,559 White; 189 BAME
 * = less than 0.5%

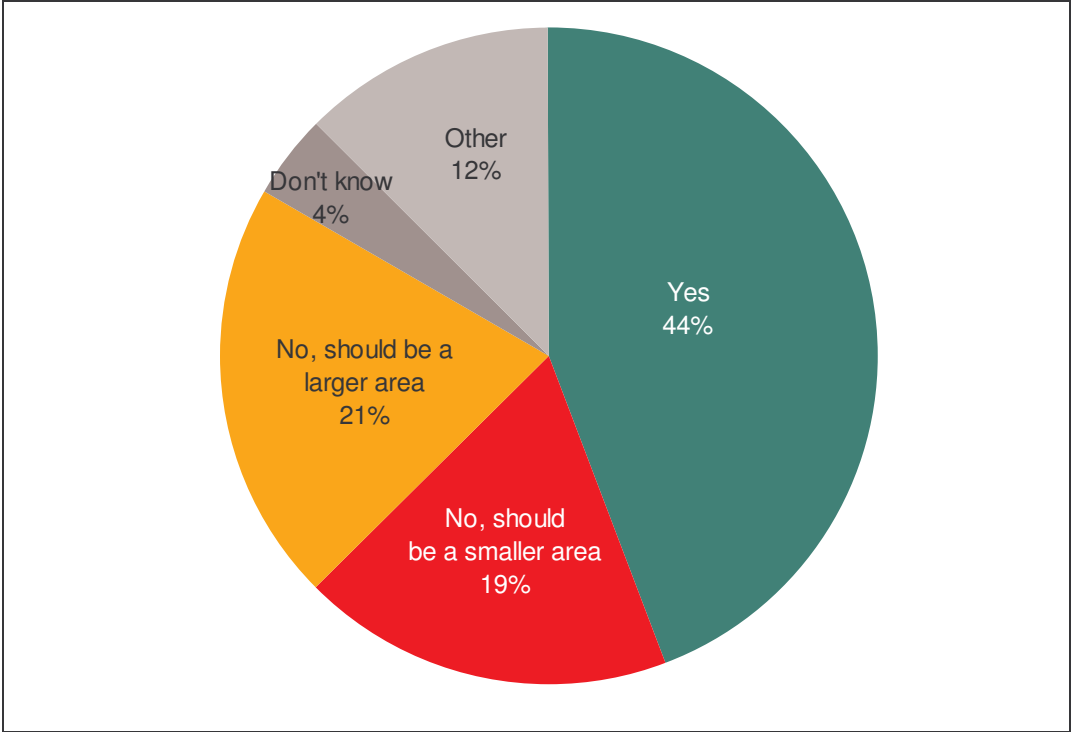
5.5 Agreement with Proposed Boundary

Less than half the general public respondents (44%) think the proposed boundary of the LEZ is appropriate. Over a fifth (21%) think it should be a larger area and just under a fifth (19%) think it should be a smaller area.

Twelve per cent ticked the 'other' box. These respondents were invited to write in their comment in a free text box. An analysis of their responses is at the end of this section.

¹³ Black, Asian and Minority Ethnic groups

Figure 12: Whether proposed boundary of the LEZ is appropriate



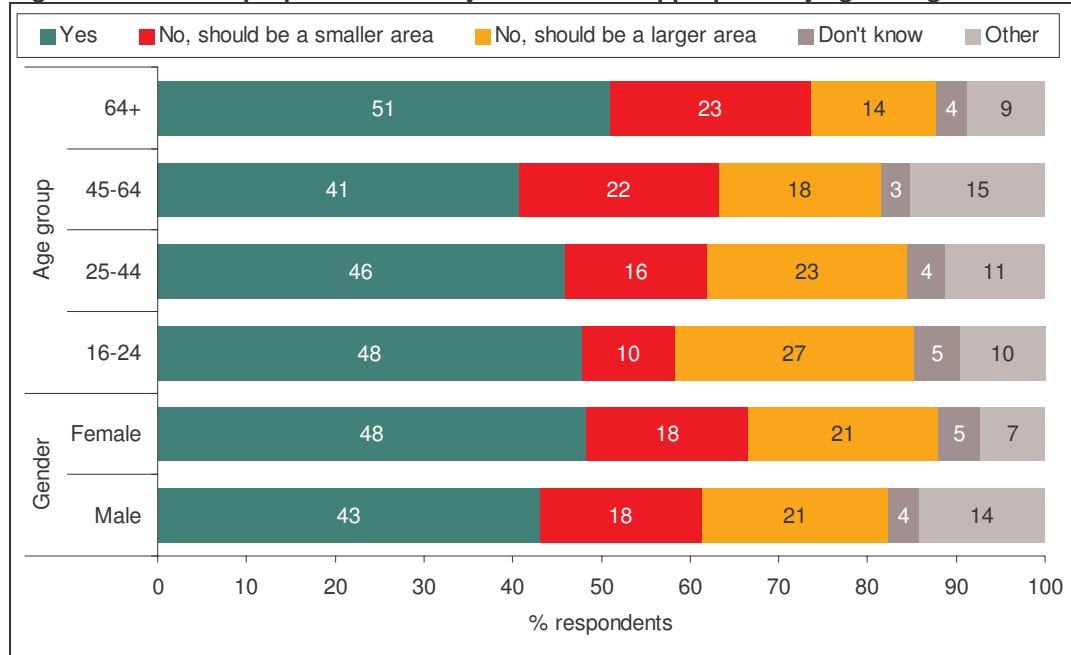
Base: 1,860

Women are more likely than men to think the proposed boundary of the LEZ is appropriate: 48% of women compared to 43% of men.

The youngest and oldest age groups are more likely to think that the proposed boundary of the LEZ is appropriate. Those aged between 45 and 64 years old are the least likely to think that the proposed boundary of the LEZ is appropriate.

The younger the age group the more likely they are to say the area should be larger and the older the age group the more likely they are to say the area should be smaller.

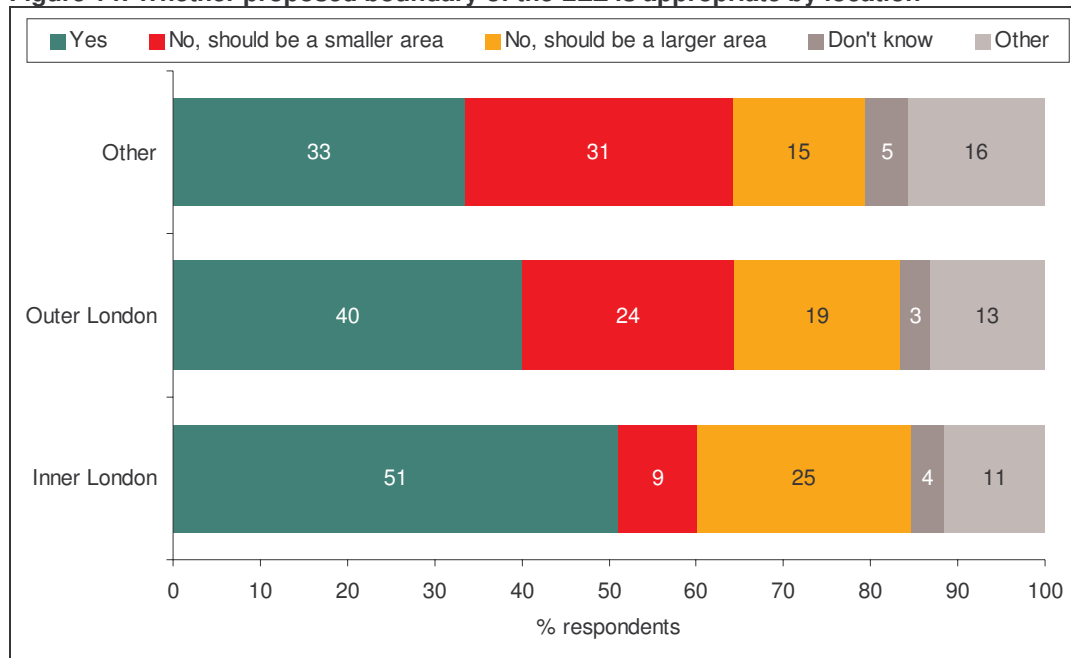
Figure 13: Whether proposed boundary of the LEZ is appropriate by age and gender



Base: 1,291 men, 500 women; 115 16-24, 934 25-44, 619 45-64, 114 65+

Residents in Inner London are most likely to think that the proposed boundary of the LEZ is appropriate or that the area should be larger and those outside London are least likely to think that the proposed boundary of the LEZ is appropriate or that the area should be larger.

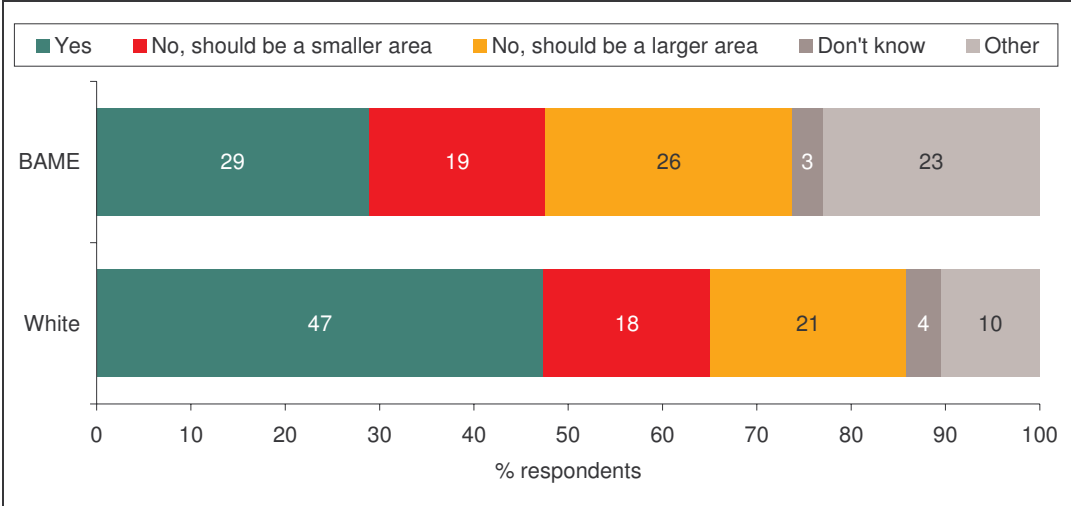
Figure 14: Whether proposed boundary of the LEZ is appropriate by location



Base: 846 Inner London; 699 Outer London; 218 other

White residents are much more likely than BAME¹⁴ residents to think that the proposed boundary of the LEZ is appropriate although less likely to think that the boundary should be larger.

Figure 15: Whether proposed boundary of the LEZ is appropriate by ethnic group



Base: 1,558 White; 187 BAME

5.5.1. Comments

The questionnaire asked those who said ‘other’ (12%) to write down their response in an open text box. Seventeen per cent of this sample made comments.

The main comment, mentioned by 35%, was opposing a LEZ. Ten per cent said the LEZ should be extended to the M25, 9% said that the objective of the LEZ was to raise revenues or that it was just another tax, 7% said it should apply to the whole of the UK and a further 7% made other detailed comments about the boundary. The table below shows all comments made by 1% or more of respondents.

¹⁴ Black, Asian and Minority Ethnic groups

Table 6: Other comments from public questionnaire (boundary)

	%
Oppose a LEZ	35
Extend to M25	10
Objective to raise revenues/another tax	9
Should apply across the whole of UK	7
Detailed boundary issues	7
Other discount and exemptions	6
LEZ should cover Congestion Charging area only	4
Other alternatives	3
Other boundary issues	3
Cost impacts on customers/businesses	3
Support a LEZ	2
Other reduced area of LEZ	2
Include motorways and trunk roads	2
Impact on small businesses	2
Other consultation issues	2
Other principle issues	2
Complementary measures	2
Waste of money/better spent elsewhere	2
Will fail to make adequate progress towards air quality targets	2
Political motivation	1
Other central government initiatives	1
Displacement will increase pollution outside London	1
Ban instead of a charging system	1
Costs too high	1
Costs of buying new vehicles	1
Impact on London's economy	1
Previous views expressed not taken into account	1
Will increase bureaucracy/red tape	1
Proposed boundary is correct	1
Will lead to job losses	1
Other incentives for cleaner vehicles	1
Non transport-related alternatives	1
Proposal commences too late	1
Other vehicles to be included issues	1
Other operations issues	1
Use MOT test	1
Other charge level issues	1
Exemption for heritage vehicles	1
Yet another charge on transport industry	1
Should be tax incentives & loans to help convert vehicles	1
Should include other emissions	1
Impact on tourism	1
Insufficient information provided	1
Other	7
Respondents	355

The comments have been grouped into category of response in Table 7 below. Although the other comments asked for responses from those who ticked the other box with respect to a question on the boundary of the LEZ only 37% made comments directly to do with boundary issues. The majority made comments on the principle of the LEZ, for example opposing or supporting the LEZ.

Nine per cent suggested alternatives to the LEZ and 7% made comments concerning discounts and/or exemptions.

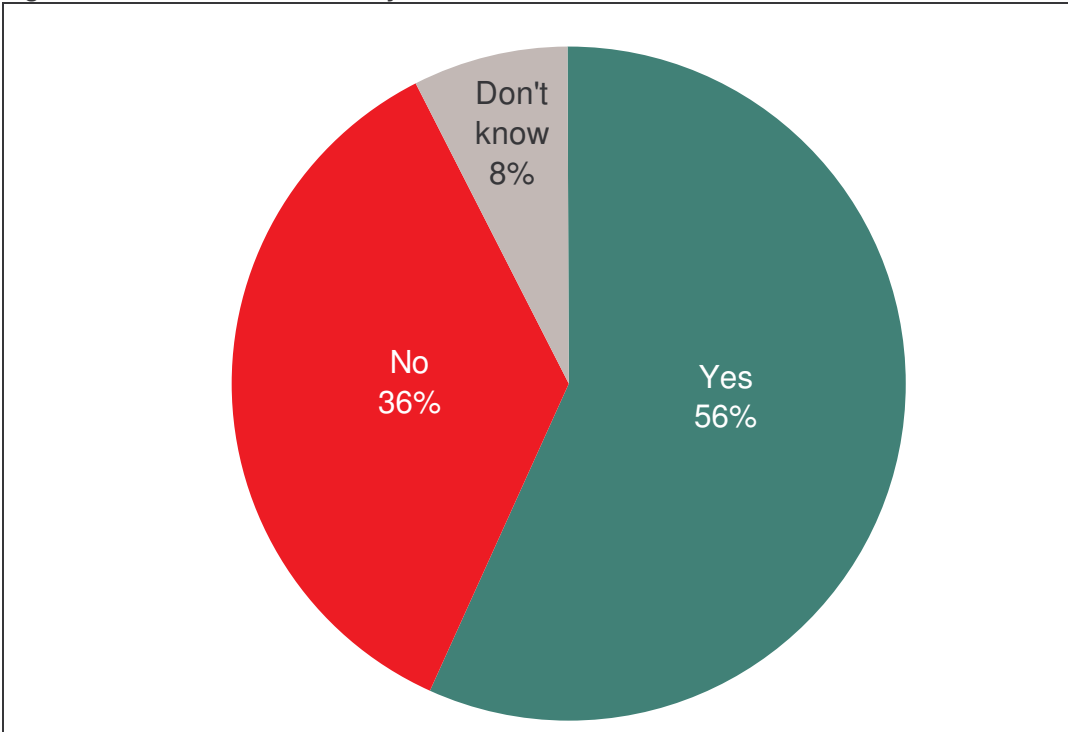
Table 7: Other comments by category of comments (boundary)

	%
The principle of a Low Emission Zone	51
Boundary	37
Suggested alternatives	9
Discounts and Exemptions	7
Macro-Economic impacts	5
Business sector /micro-economic impacts	5
Environmental impacts	5
Consultation process/information	5
Business Case	3
Vehicles to be included	2
Timetable	1
Enforcement	1
Level of charge	1
Vehicle emission standards	1
Operations	1
Impacts on public and community sectors	1
Impacts on traffic	1
Other	5
Respondents	355

5.6 Whether Motorways Should be Included

Over half the public respondents (56%) think that the motorways within London should be included in the LEZ.

Figure 16: Whether the motorways within London should be included in the LEZ

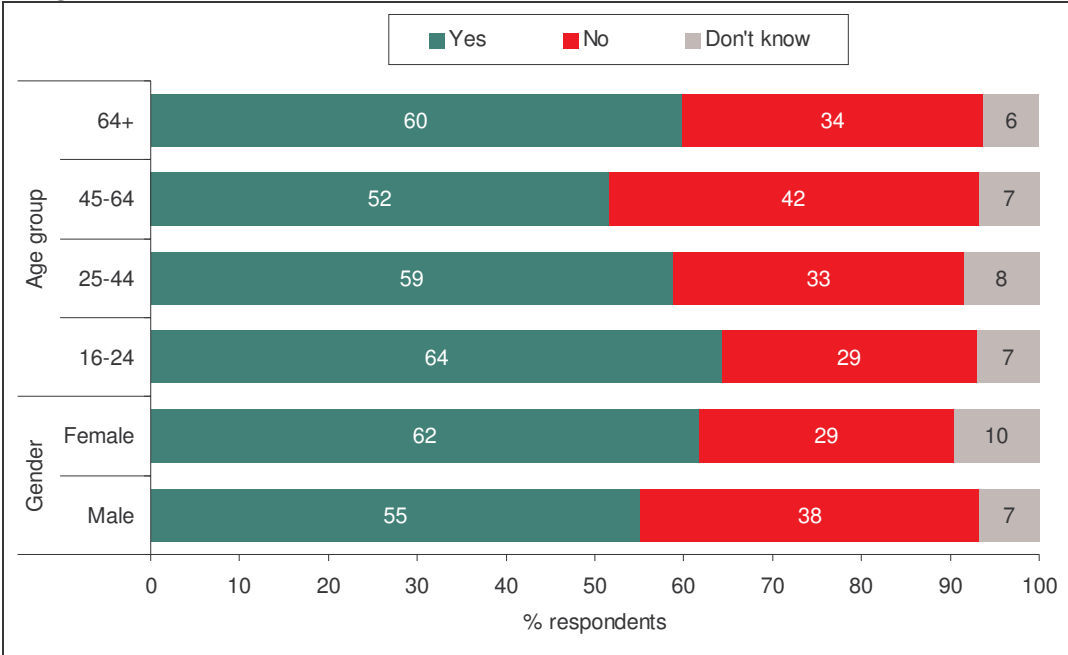


Base: 1,859

Women are more likely than men to think that the motorways within London should be included in the LEZ: 62% women compared to 55% men.

The youngest and oldest age groups are more likely to think that the motorways within London should be included in the LEZ. Those aged between 45 and 64 years old are the least likely to think that the motorways within London should be included in the LEZ.

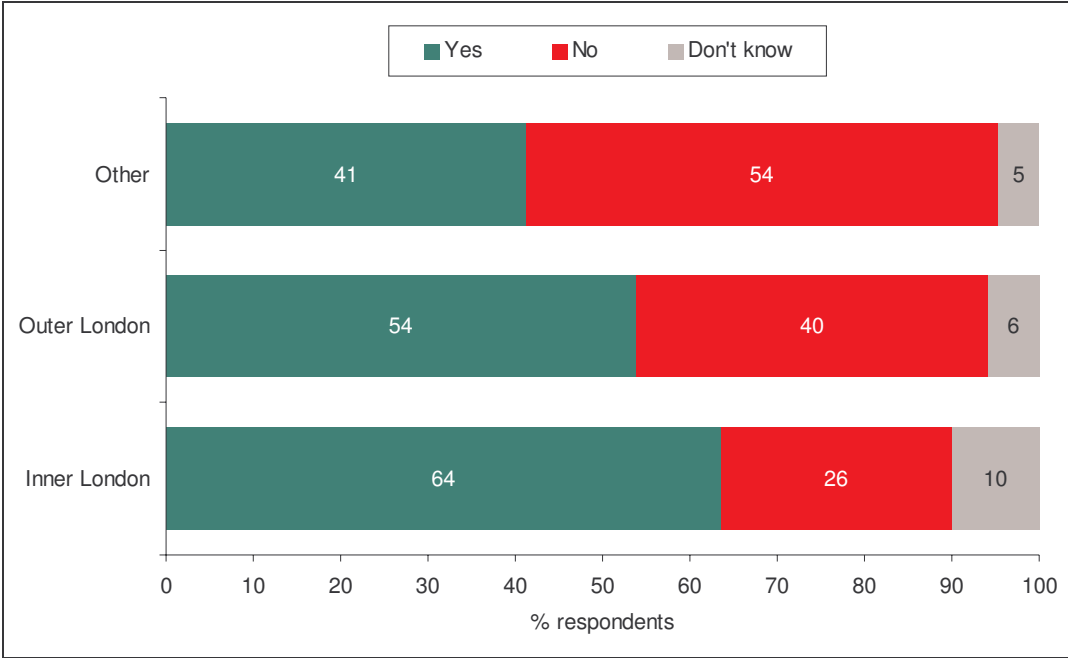
Figure 17: Whether the motorways within London should be included in the LEZ by age and gender



Base: 1,293 men, 489 women; 115 16-24, 935 25-44, 620 45-64, 112 65+

Residents in Inner London are most likely to think that the motorways within London should be included in the LEZ and those outside London are least likely to think that the motorways within London should be included in the LEZ.

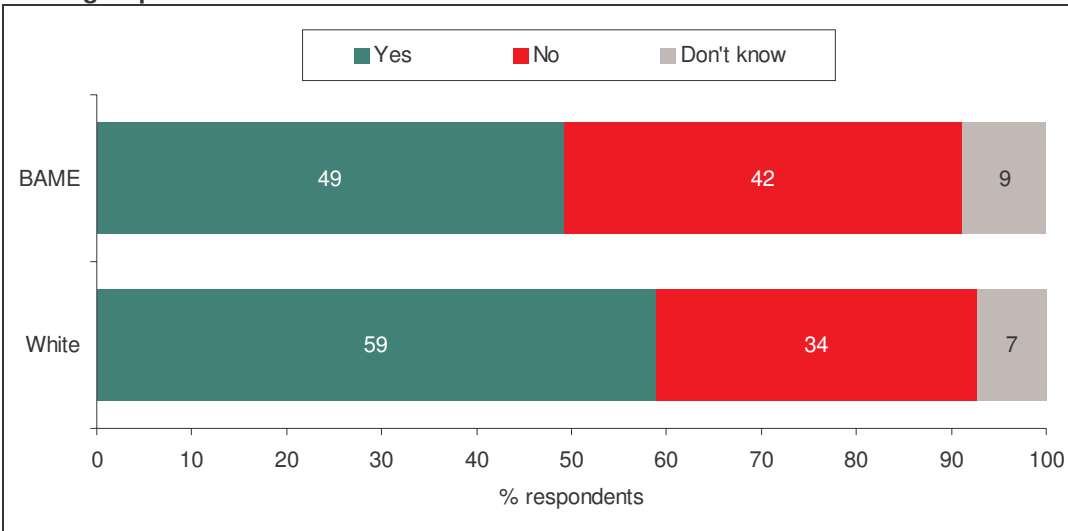
Figure 18: Whether the motorways within London should be included in the LEZ by location



Base: 846 Inner London; 700 Outer London; 218 other

White residents are more likely than BAME¹⁵ residents to think that the motorways within London should be included in the LEZ.

Figure 19: Whether the motorways within London should be included in the LEZ by ethnic group



Base: 1,552 White; 193 BAME

¹⁵ Black, Asian and Minority Ethnic groups

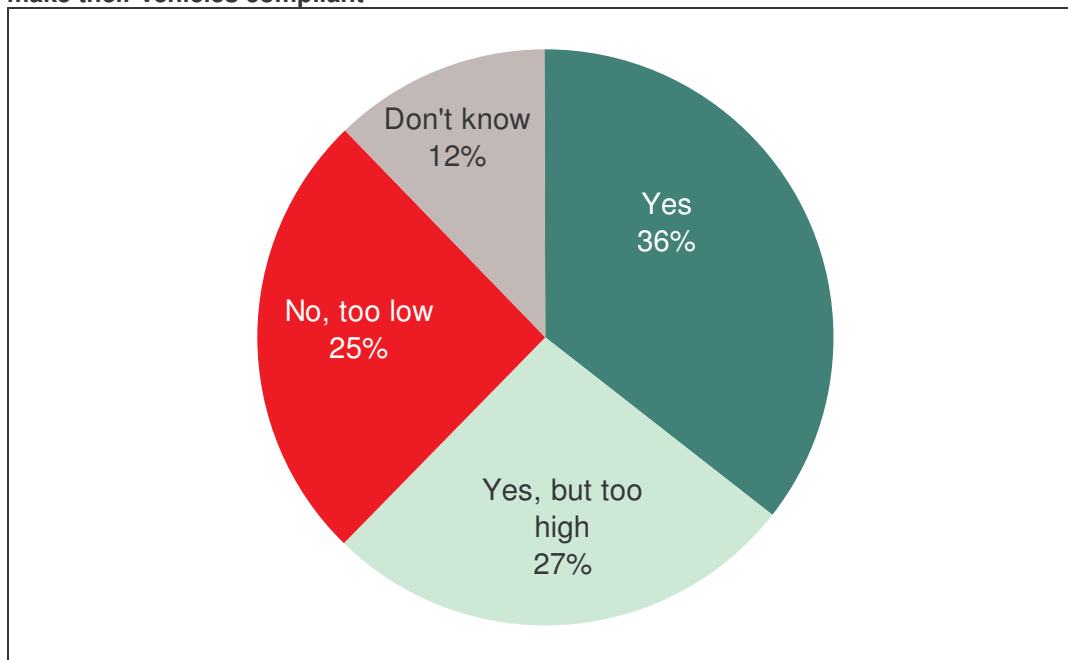
5.7 Agreement with Level of Charge and Penalty Charge

Respondents were asked whether the proposed level of charge was sufficient to incentivise operators to make their vehicles compliant. The text of the question was:

“Do you think the proposed level of charge (i.e. of £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 vehicles compliant?”

Over a third (36%) of public respondents think the proposed level of the charge is sufficient to incentivise operators to make their vehicles compliant, 27% think it is too high and 25% think it is too low. See Figure 20.

Figure 20: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant

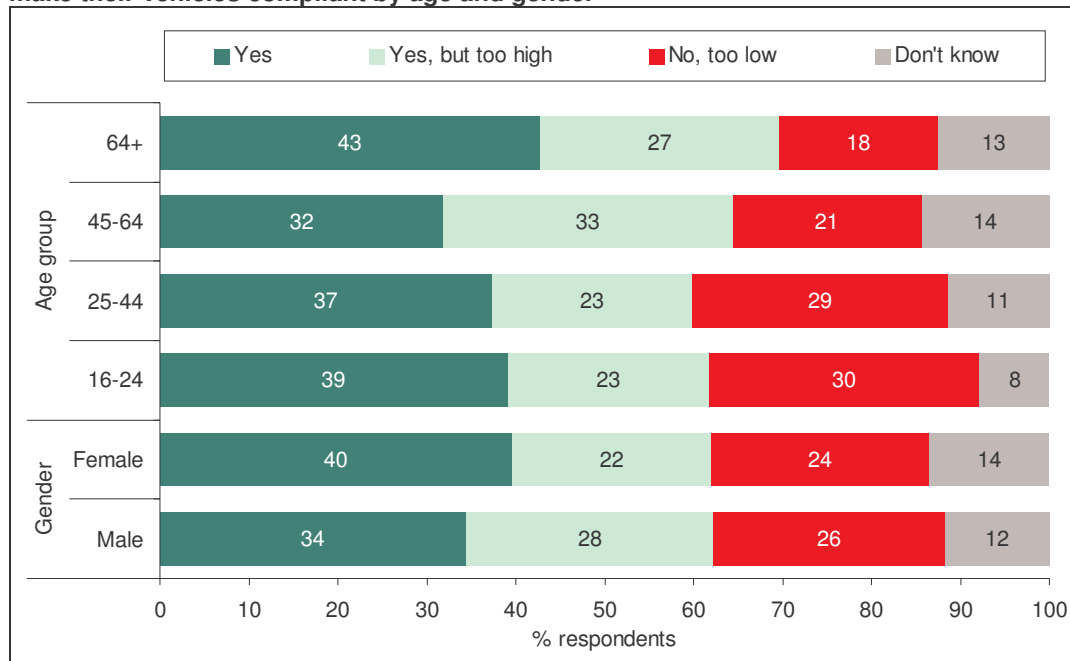


Base: 1,831

Women are more likely than men to think that the charge is at the appropriate level: 40% compared to 34%. Women are also less likely than men to think that the charge level it is too high: 22% compared to 28%.

The oldest age group (64 years old or older) is most likely to think that the charge is at the appropriate level and the 45 to 64 year olds are least likely to think that it is at the appropriate level and most likely to think that it is too high.

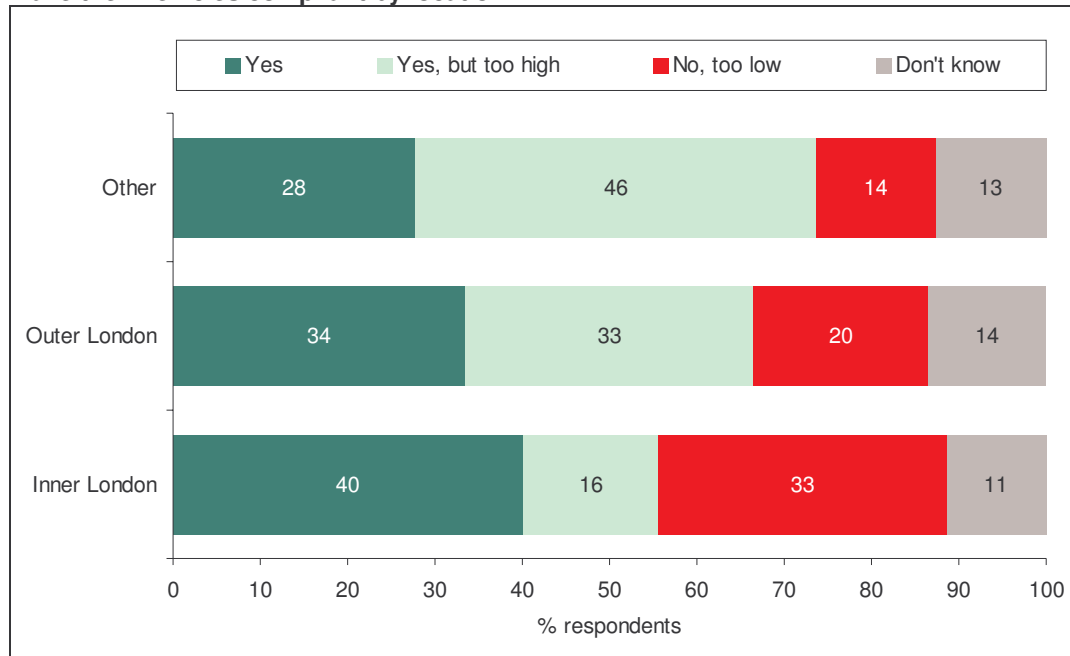
Figure 21: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by age and gender



Base: 1,269 men, 495 women; 115 16-24, 923 25-44, 605 45-64, 112 65+

Residents in Inner London are most likely to think that the proposed level of the charge is sufficient to incentivise operators to make their vehicles compliant or to think that it is too low and those outside London are least likely to think that the proposed level of the charge is sufficient or that it is too low.

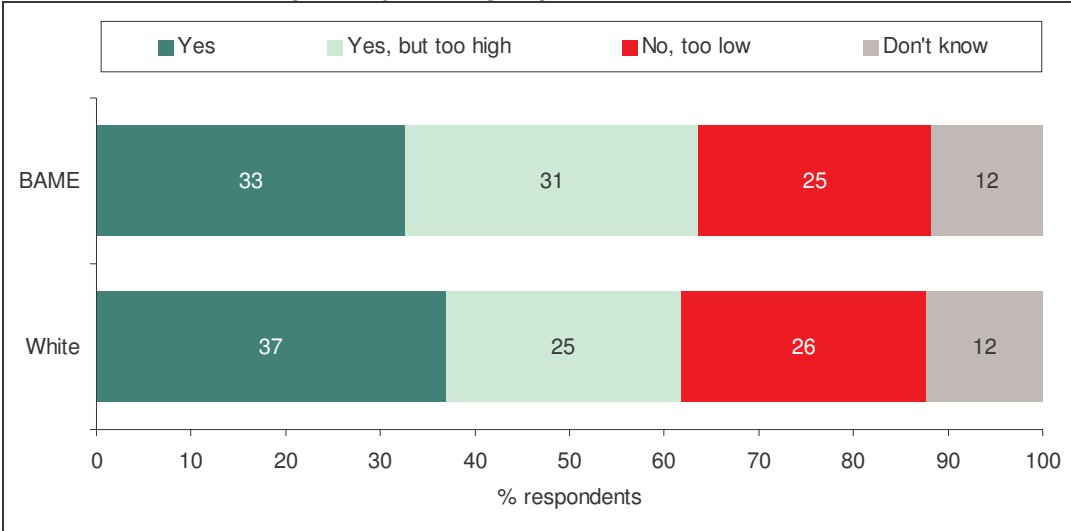
Figure 22: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by location



Base: 837 Inner London; 689 Outer London; 213 other

White residents are more likely than BAME¹⁶ residents to think that the proposed level of the charge is sufficient to incentivise operators to make their vehicles compliant.

Figure 23: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by ethnic group



Base: 1,538 White; 187 BAME

5.7.1. Penalty Charge

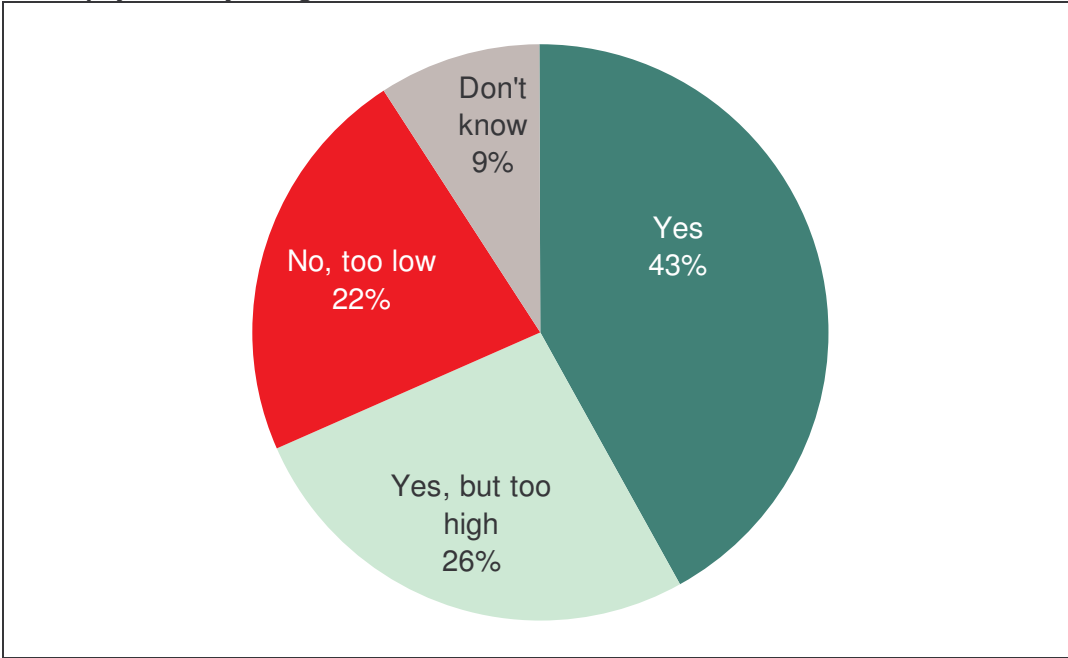
Respondents were asked whether the proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge was a sufficient deterrent. The text of the question was:

“Do you think 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?”

Forty three per cent of public respondents think the Penalty Charge is a sufficient deterrent, 25% think it is too high and 22% think it is too low. See Figure 24.

¹⁶ Black, Asian and Minority Ethnic groups

Figure 24: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent

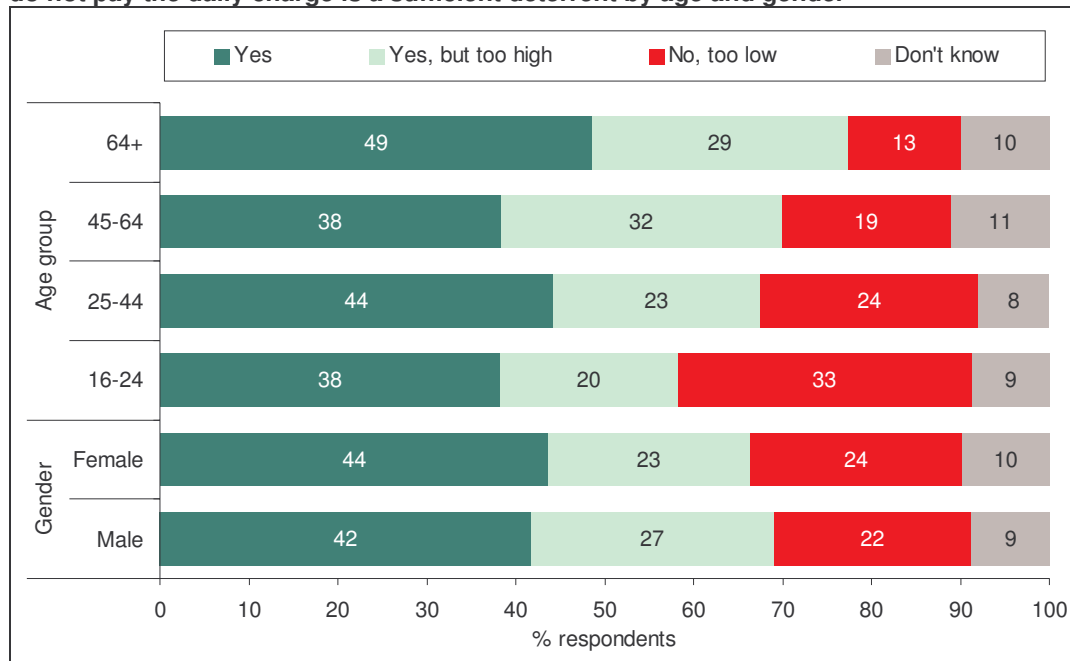


Base: 1,831

Women are slightly more likely than men to think that the Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent: 44% compared to 42%. Women are also slightly less likely than men to think that the Penalty Charge level it is too high: 23% compared to 27%.

The oldest age group (64 years old or older) is most likely to think that the Penalty Charge for non-compliant vehicles is a sufficient deterrent. The youngest age group (16 to 24 year olds) is most likely to think the Penalty Charge level is too low.

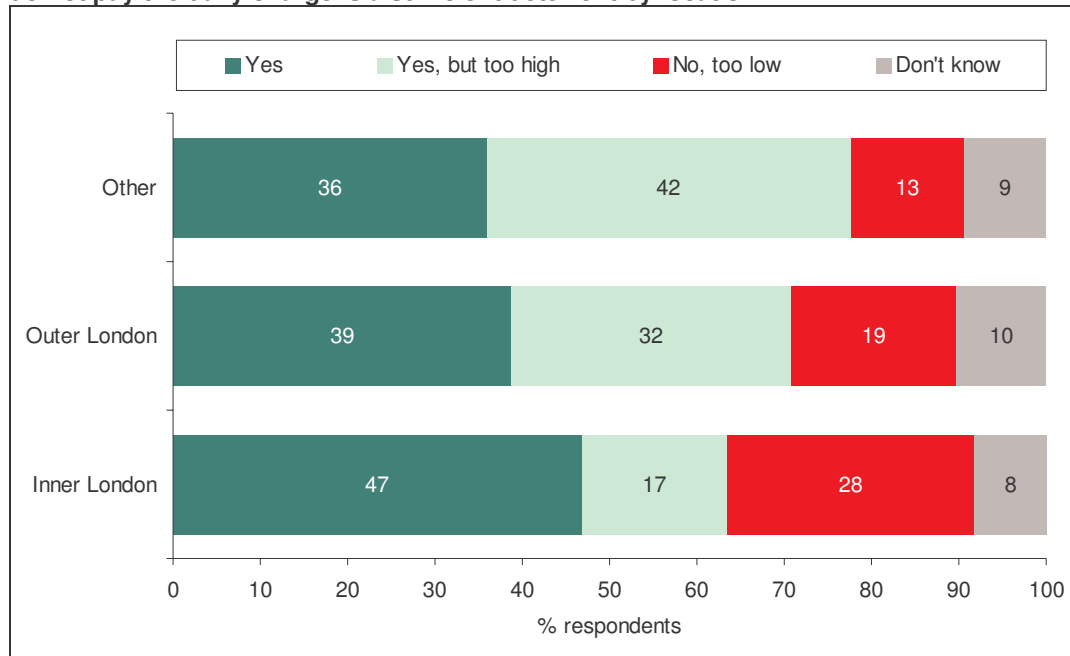
Figure 25: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent by age and gender



Base: 1,266 men, 497 women; 115 16-24, 923 25-44, 605 45-64, 111 65+

Residents in Inner London are most likely to think that the level of the Penalty Charge is a sufficient deterrent and to think that it is too low and those outside London are least likely to think that the level of the Penalty Charge is a sufficient deterrent and that it is too low.

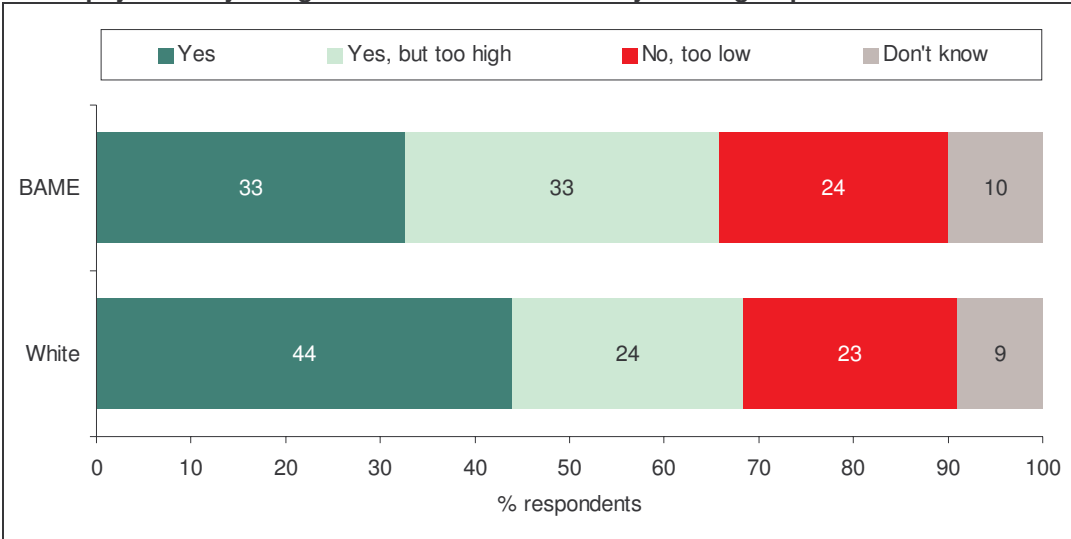
Figure 26: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent by location



Base: 837 Inner London; 688 Outer London; 214 other

White residents are much more likely than BAME¹⁷ residents to think that the level of the Penalty Charge is a sufficient deterrent: 44% compared to 33%.

Figure 27: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent by ethnic group

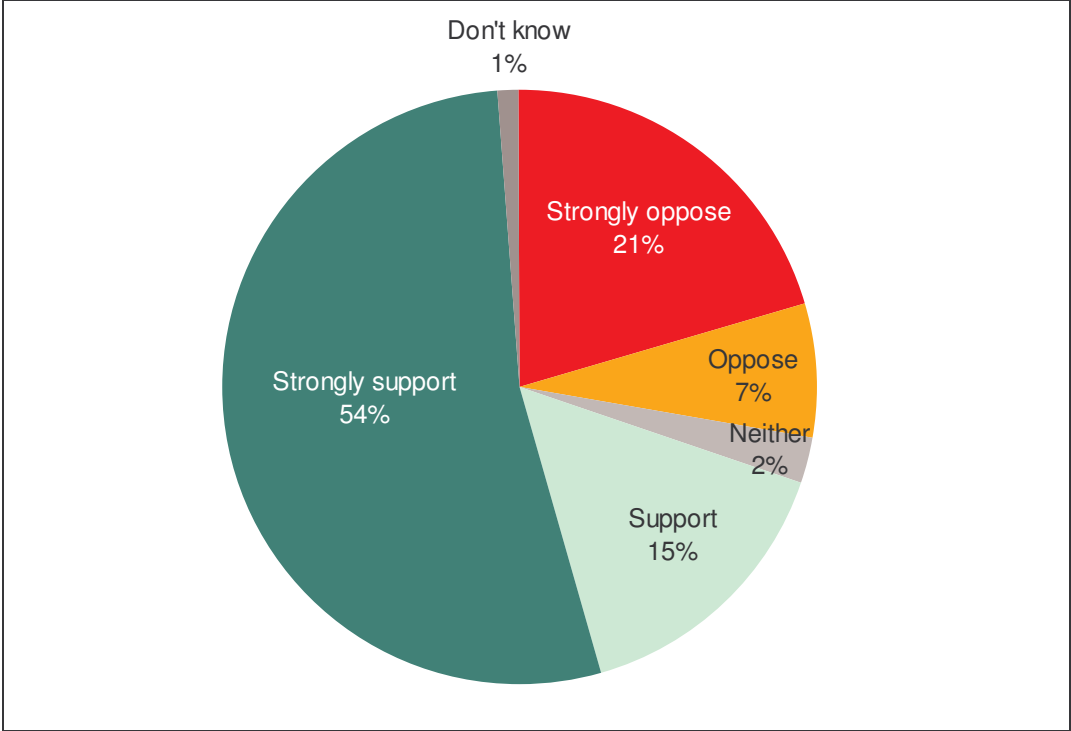


5.8 Agreement with Hours of Operation

The proposed hours of operation for the LEZ is 24 hours a day, 365 days a year. Over two thirds (69%) of public respondents support these hours of operation, including 54% who strongly support them. Just over a quarter (28%) oppose the proposed hours of operation, including 21% who strongly oppose them.

¹⁷ Black, Asian and Minority Ethnic groups

Figure 28: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year

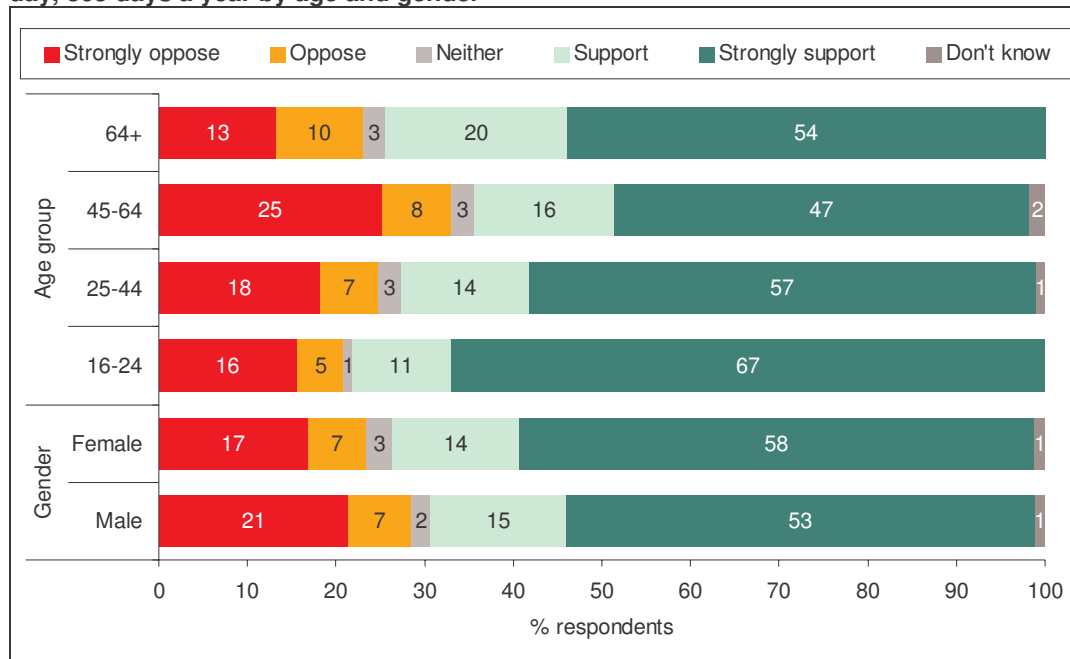


Base: 1,868

Women are more supportive of the proposed hours of operation than men: 58% of women strongly support the proposed hours of operation compared to 53% of men.

The youngest age groups are most supportive of the proposed hours of operation. Those aged between 45 and 64 years old are the least supportive.

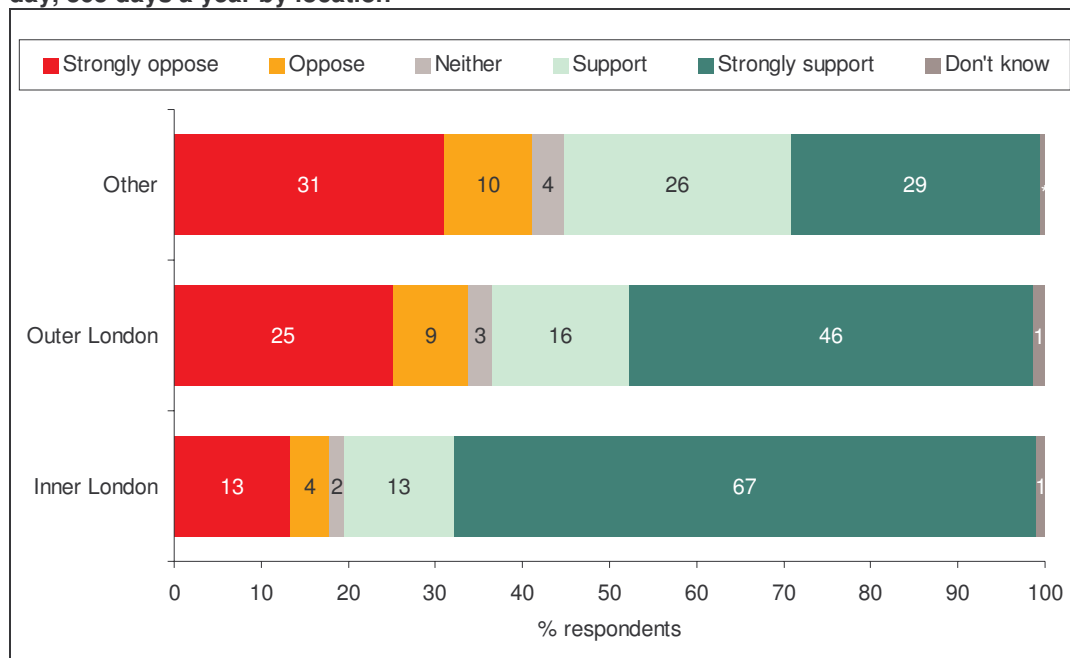
Figure 29: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year by age and gender



Base: 1,294 men, 504 women; 115 16-24, 934 25-44, 627 45-64, 113 65+

Residents in Inner London are most likely to support the proposed hours of operation and those outside London are least likely to support them.

Figure 30: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year by location

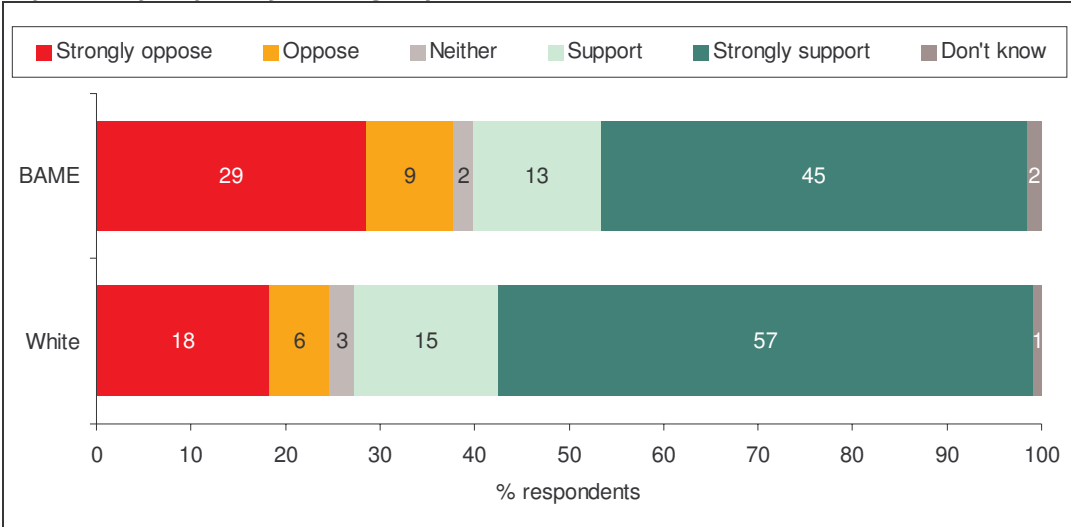


Base: 851 Inner London; 704 Outer London; 219 other

* = less than 0.5%

White residents are more likely to support the proposed hours of operation than BAME¹⁸ residents: 72% of white residents support the proposed hours of operation compared to 58% of BAME residents.

Figure 31: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year by ethnic group



Base: 1,558 White; 193 BAME

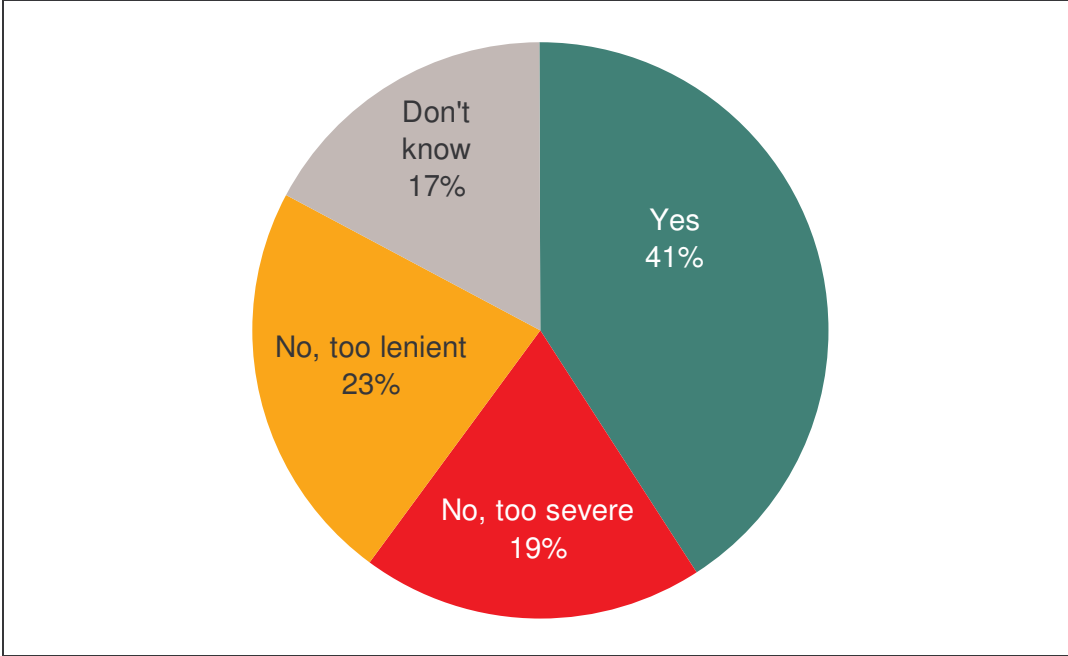
5.9 Agreement with Proposed Emission Standards

Respondents to the consultation questionnaire were asked if they thought that the proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches was appropriate.

Forty one per cent of public respondents think it is appropriate although a slightly larger proportion (42%) think it is not appropriate: 23% think it is too lenient and 19% think it is too severe. Over a sixth (17%) say they don't know.

¹⁸ Black, Asian and Minority Ethnic groups

Figure 32: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate



Base: 1,852

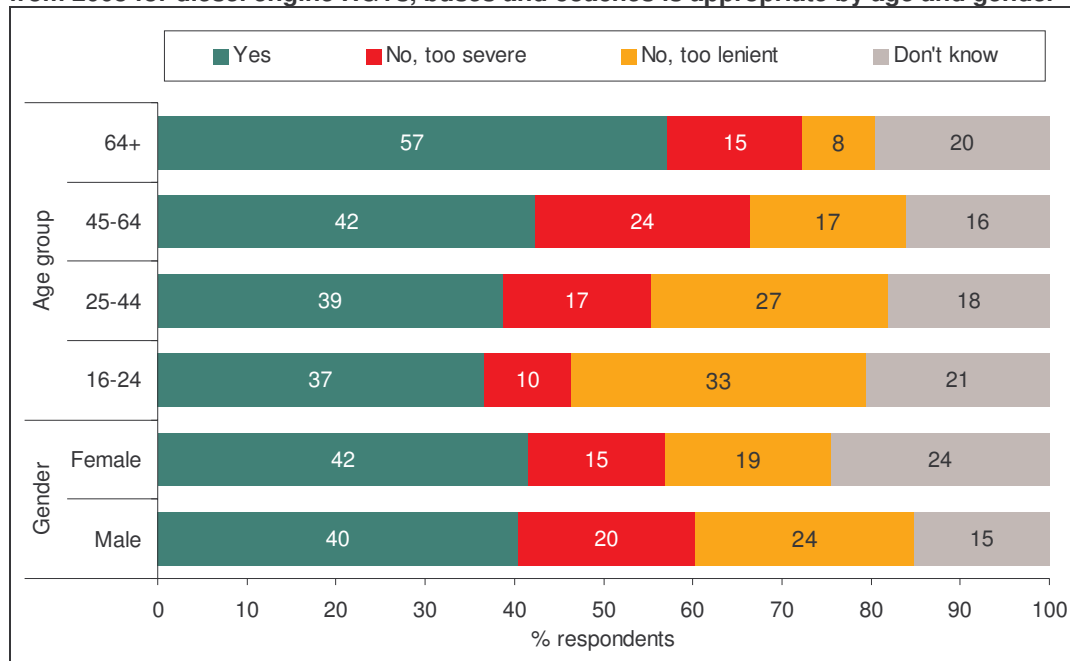
Men are slightly less likely than woman to think that the proposed emission standard is appropriate (40% compared to 42%) although higher proportions of men than women think they are both too lenient (24% compared to 19%) and too severe (20% compared to 15%). Women are more uncertain about the proposed emission standard with almost a quarter (24%) saying they don't know compared to 15% for men.

The oldest age group (those aged 64 years old or older) is most likely to think the proposed emission standard is appropriate and the least likely to think it is too lenient.

The youngest age group (16 to 24 years old) is most likely to think the proposed emission standard is too lenient.

Those aged between 45 and 64 years old are most likely to think the proposed emission standard is too severe compared to other age groups.

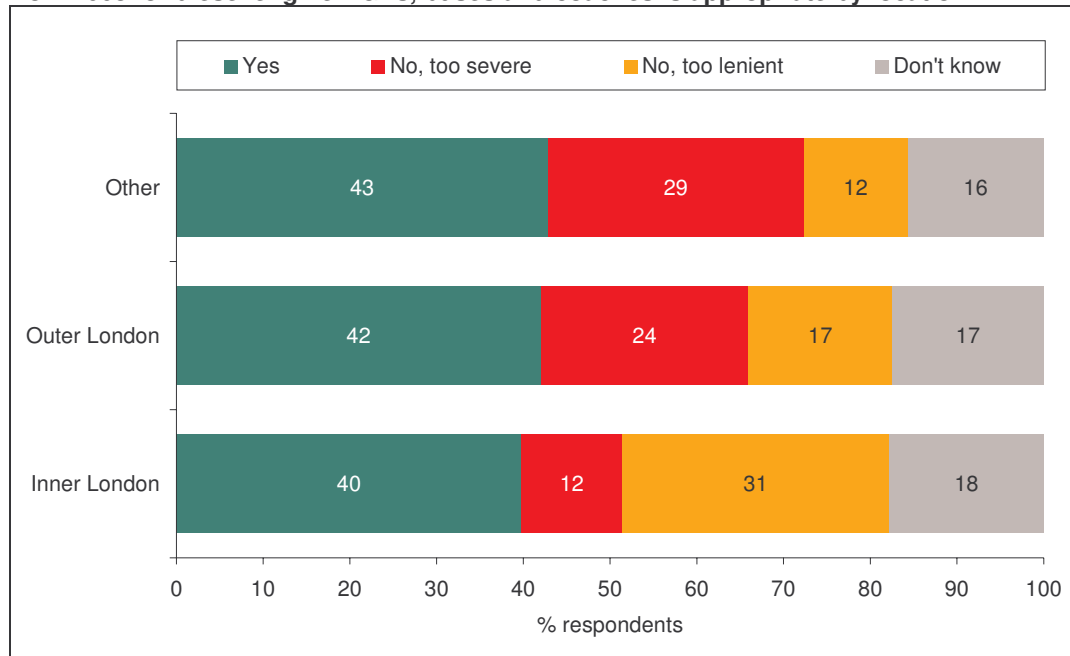
Figure 33: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate by age and gender



Base: 1,288 men, 495 women; 112 16-24, 932 25-44, 618 45-64, 112 65+

Residents in Inner London are most likely to think the proposed emission standard is too lenient (31% compared to 17% for Outer London and 12% for outside London) and least likely to think it is too severe (12% compared to 24% for Outer London and 29% for outside London).

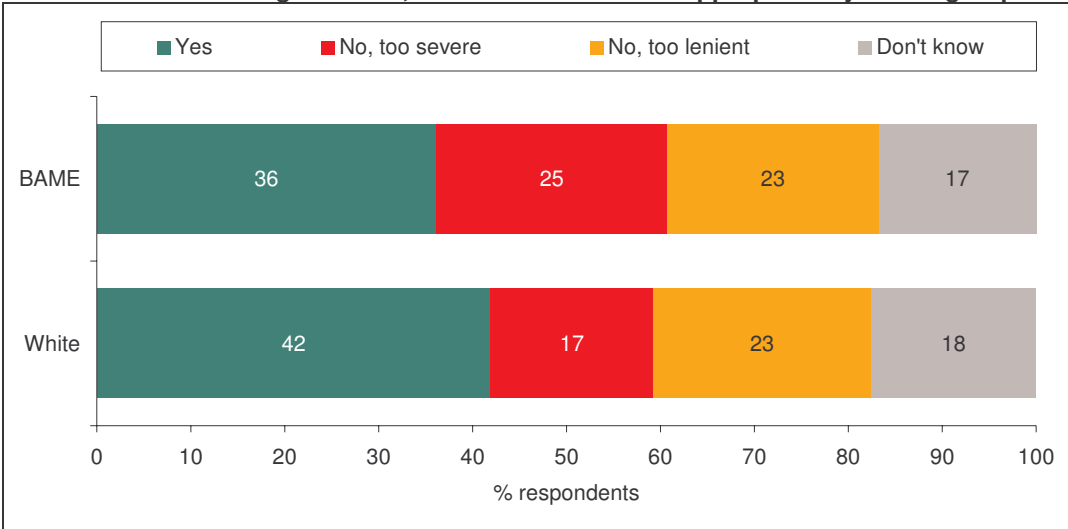
Figure 34: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate by location



Base: 842 Inner London, 699 Outer London; 217 other

BAME residents are more likely than white residents to think that the proposed emission standard is too severe (25% compared to 17%).

Figure 35: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate by ethnic group



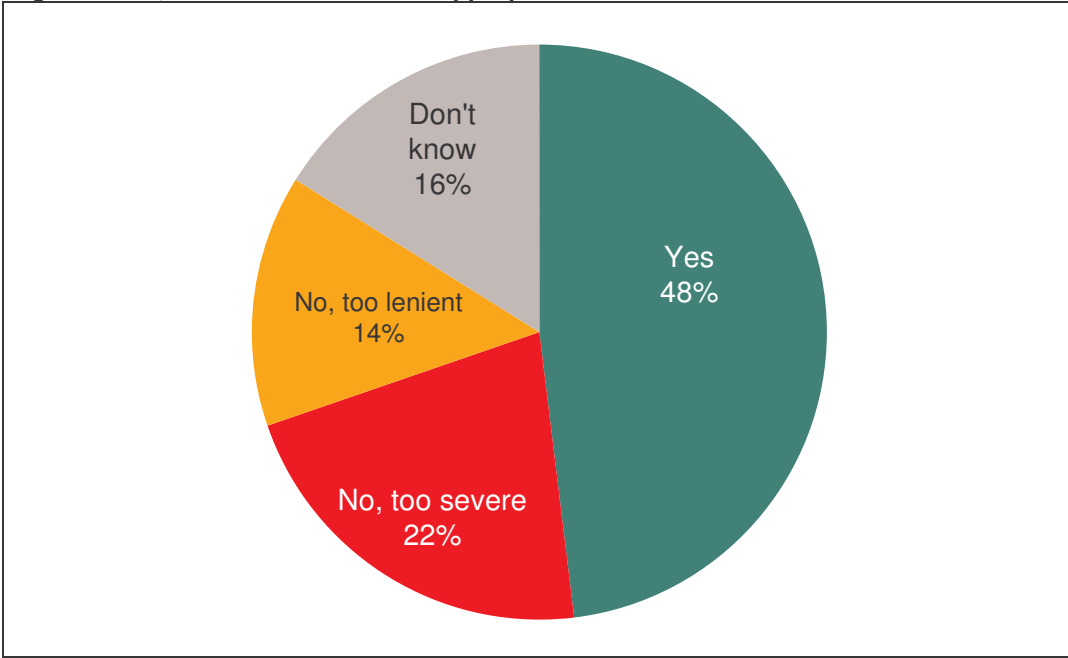
Base: 1,545 White, 91 BAME

5.10 Whether Higher Standard of Euro IV from 2012 is Appropriate

Respondents were asked if they thought that the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches was appropriate.

Almost half (48%) of public respondents think it is appropriate. Over a fifth (22%) think it is too severe and 14% think it is too lenient. Over a sixth (16%) say they don't know.

Figure 36: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate



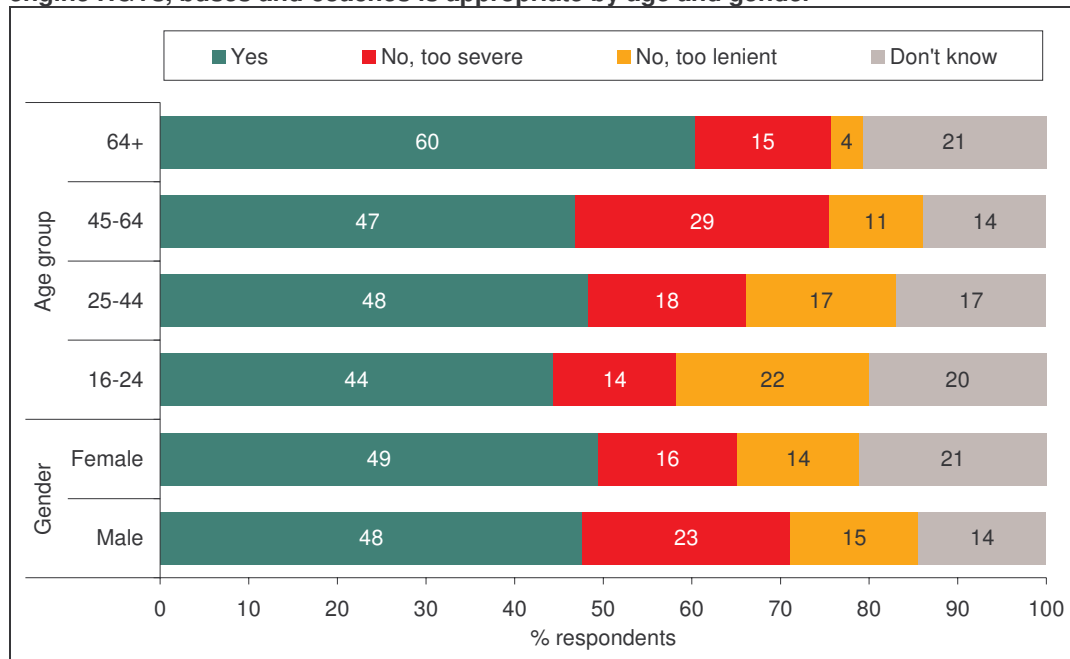
Base: 1,855

There is little difference in the proportions of men and women who think that the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate (49% women compared to 48% men) although higher proportions of men than women think they are both too lenient and too severe. Women are more uncertain than men with over a fifth (21%) saying they don't know compared to 14% for men.

The oldest age group (those aged 64 years old or older) is most likely to think that the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate and the least likely to think it is too lenient.

The youngest age group (16 to 24 years old) is most likely to think the proposed emission standard is too lenient.

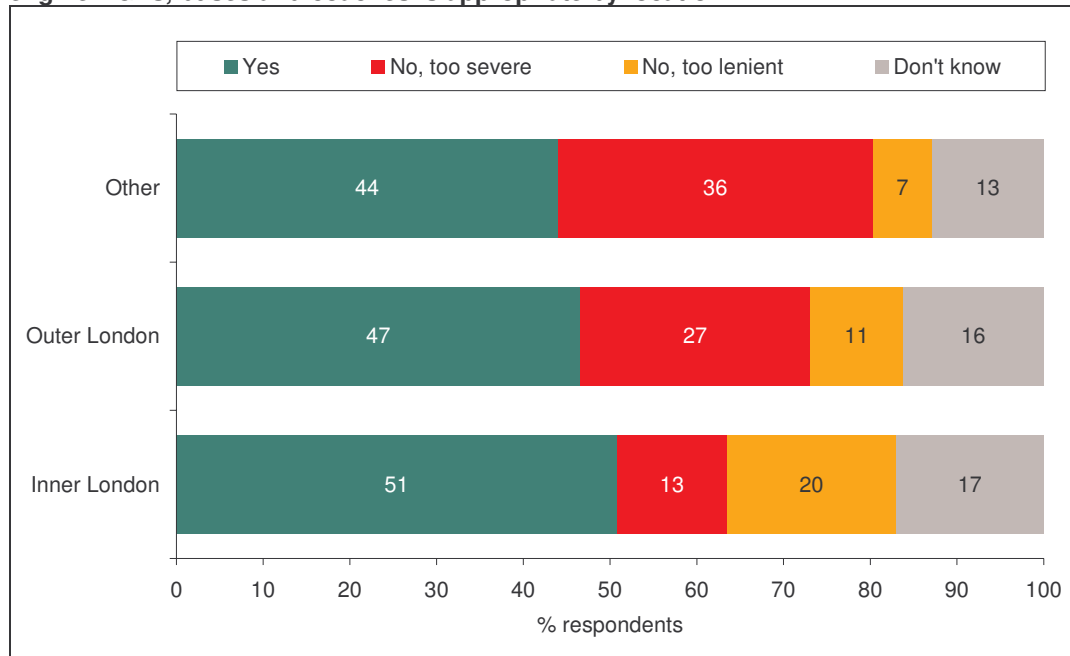
Figure 37: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate by age and gender



Base: 1,283 men, 502 women; 115 16-24, 929 25-44, 621 45-64, 111 65+

Residents in Inner London are most likely to think that the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate and least likely to think it is too severe.

Figure 38: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate by location

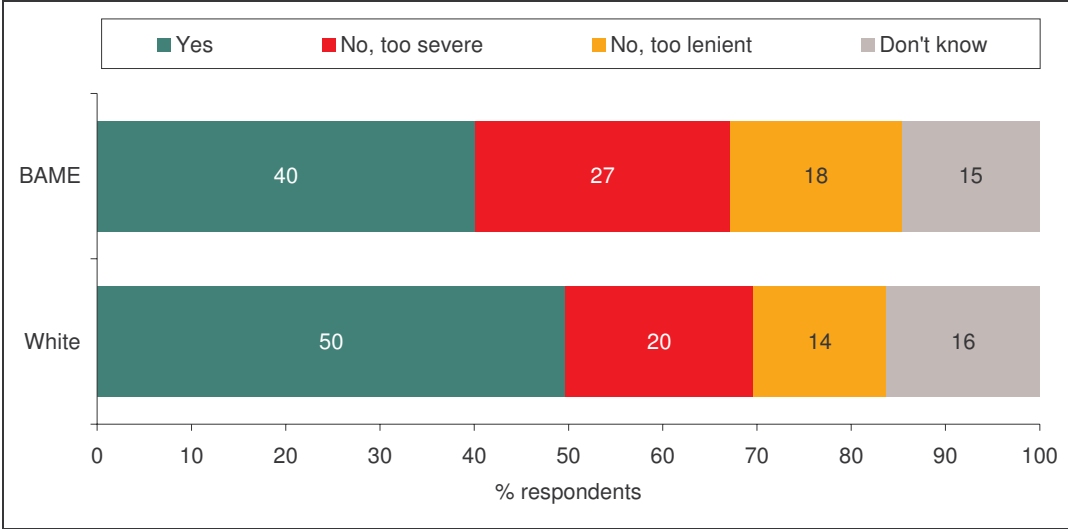


Base: 846 Inner London; 696 Outer London; 218 other

White residents are more likely than BAME residents to think that the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs,

buses and coaches is appropriate (50% compared to 40%) and less likely to think it is too severe (20% compared to 27%).

Figure 39: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate by ethnic group



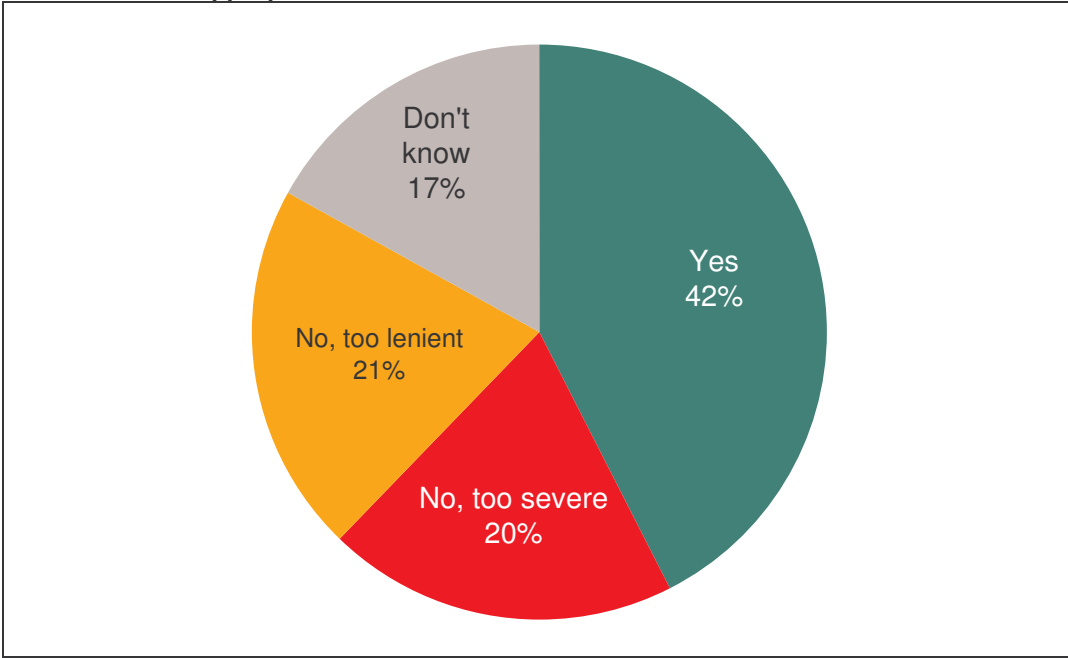
Base: 1,546 White; 192 BAME

5.11 Whether Emission Standard of Euro III for Minibuses and Heavier LGVs is Appropriate

Respondents were asked if they thought that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate.

Forty two per cent of public respondents think it is appropriate. Just over a fifth (21%) think it is too lenient and a fifth think it is too severe. Over a sixth (17%) say they don't know.

Figure 40: Whether emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate



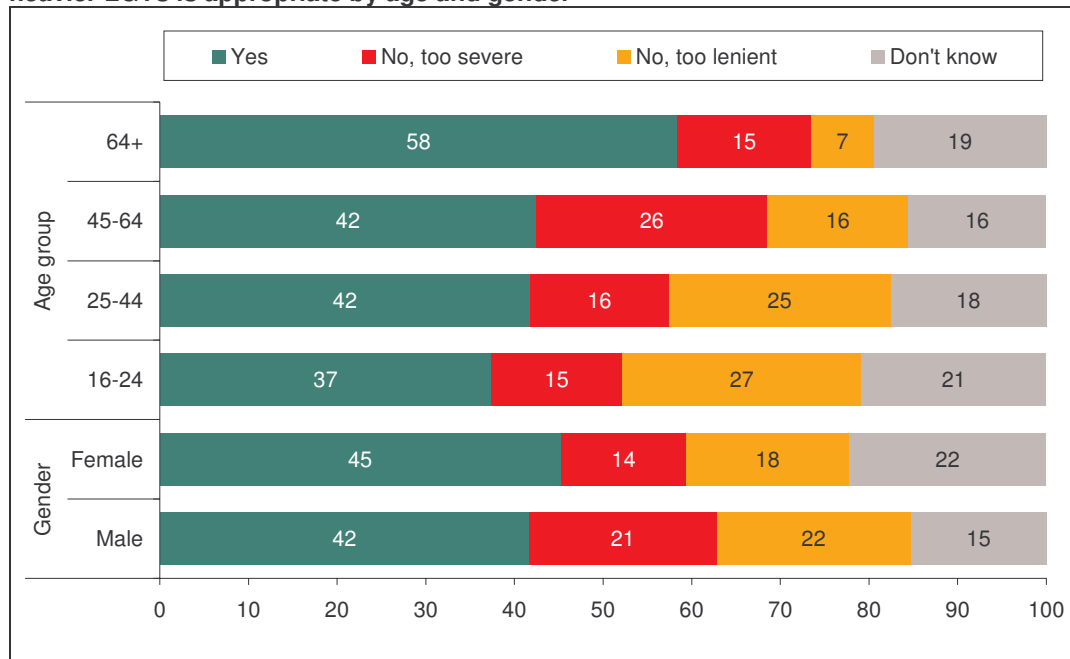
Base: 1,849

There is little difference in the proportions of men and women who think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate (45% women compared to 42% men) although higher proportions of men than women think they are both too lenient and too severe. Women are more uncertain than men with over a fifth (22%) saying they don't know compared to 15% for men.

The oldest age group (those aged 64 years old or older) is most likely to think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate and the least likely to think it is too lenient or too severe.

The youngest age group (16 to 24 years old) is most likely to think the proposed emission standard is too lenient.

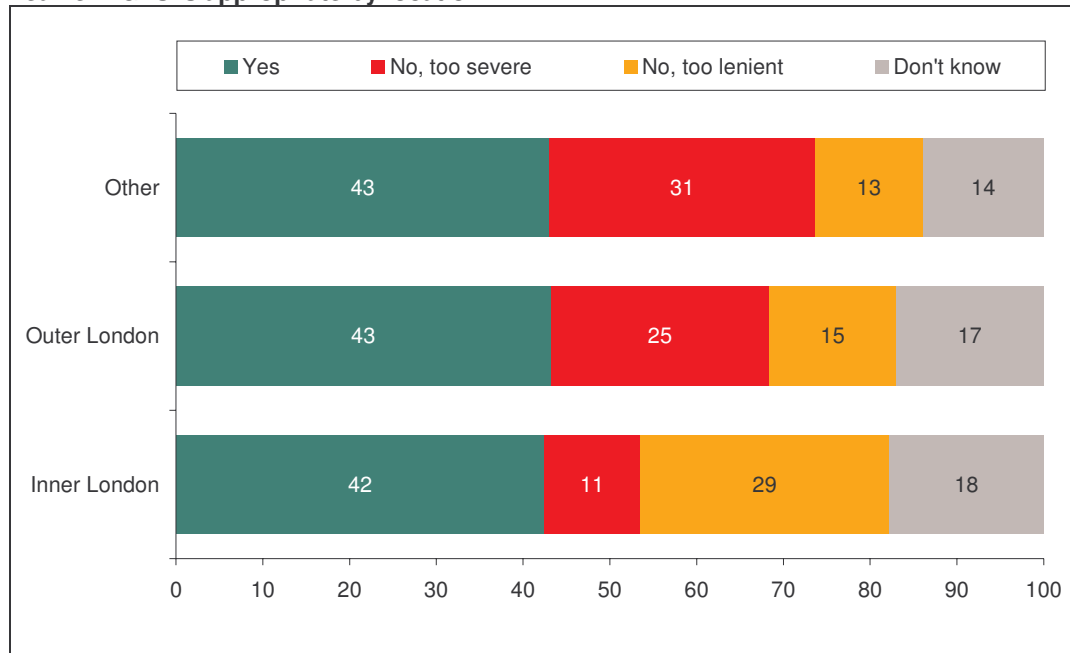
Figure 41: Whether emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by age and gender



Base: 1,288 men, 495 women; 115 16-24, 928 25-44, 617 45-64, 113 65+

There is almost no difference in the proportions who think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by location although residents from Inner London are most likely to think that the standard is too lenient and least likely to think it is too severe. Residents outside London, by contrast, are least likely to think that the standard is too lenient and most likely to think it is too severe.

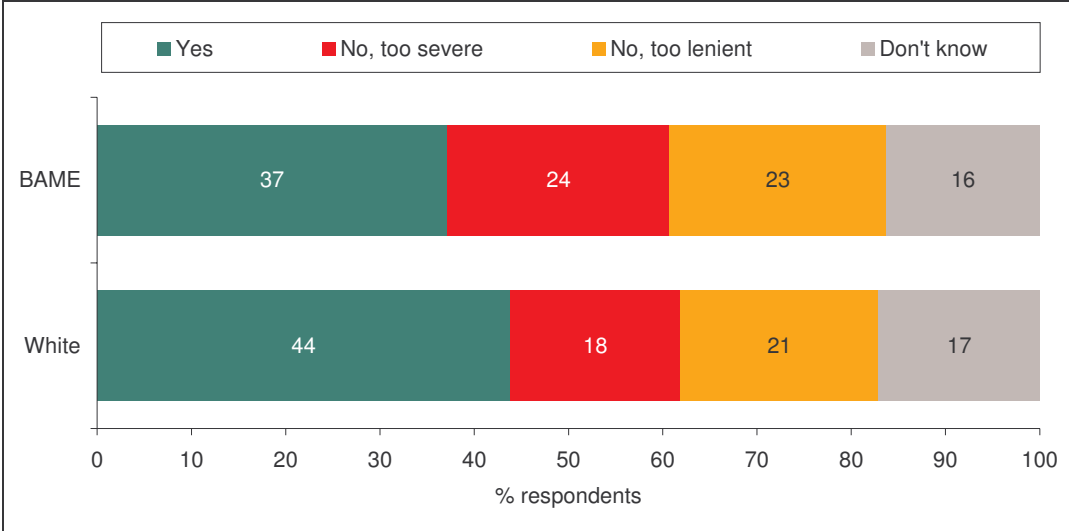
Figure 42: Whether emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by location



Base: 843 Inner London; 699 Outer London; 216 other

White residents are more likely than BAME residents to think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate (44% compared to 37%) and less likely to think it is too severe (18% compared to 24%).

Figure 43: Whether emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by ethnic group



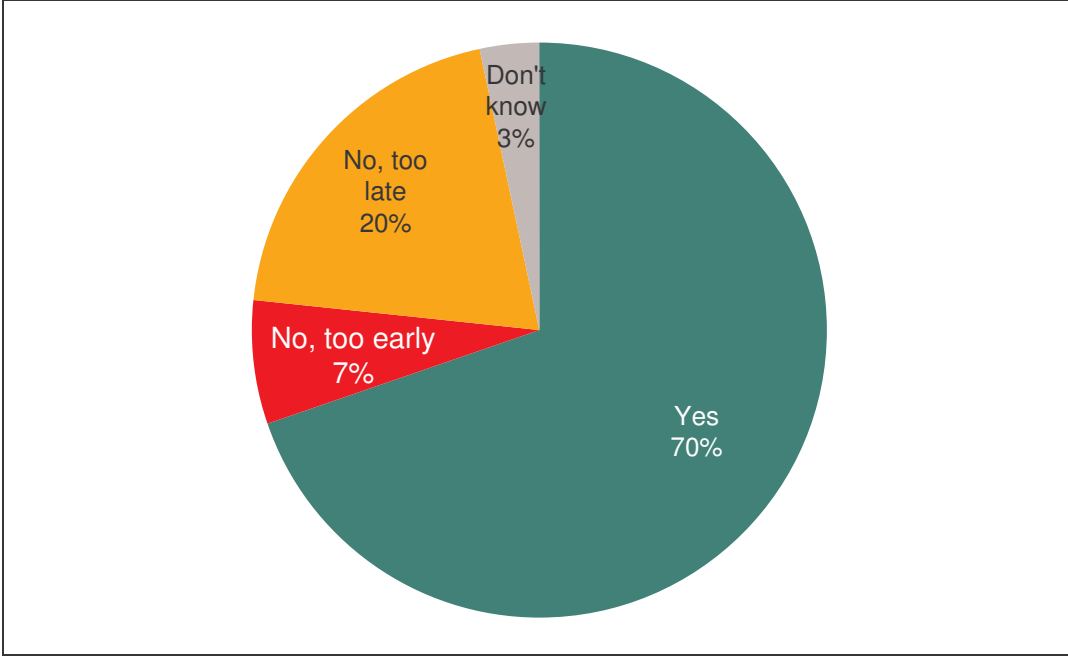
Base: 1,544 White; 191 BAME

5.11.1. Timing of Emission Standard

The 42% of respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate were asked whether they thought it was appropriate to introduce this standard in autumn 2010.

Over two thirds of this sample (70%) think it is appropriate to introduce the standard in autumn 2010 with a fifth who think it is too late and 7% who think it is too early.

Figure 44: Whether appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010



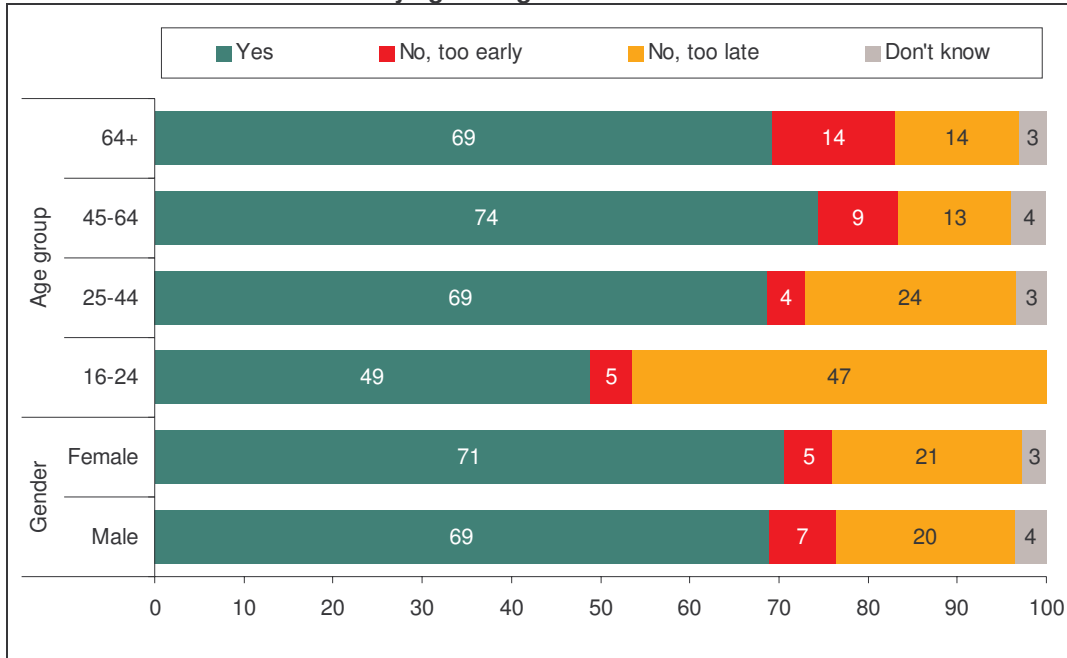
Base¹⁹: 772

There is little difference between men and women with respect to whether it is appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010.

The youngest age group is much more likely than the older age groups to think it is too late to introduce this standard in autumn 2010: 47% compared to between 13% and 24% for the other three age groups.

¹⁹ respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

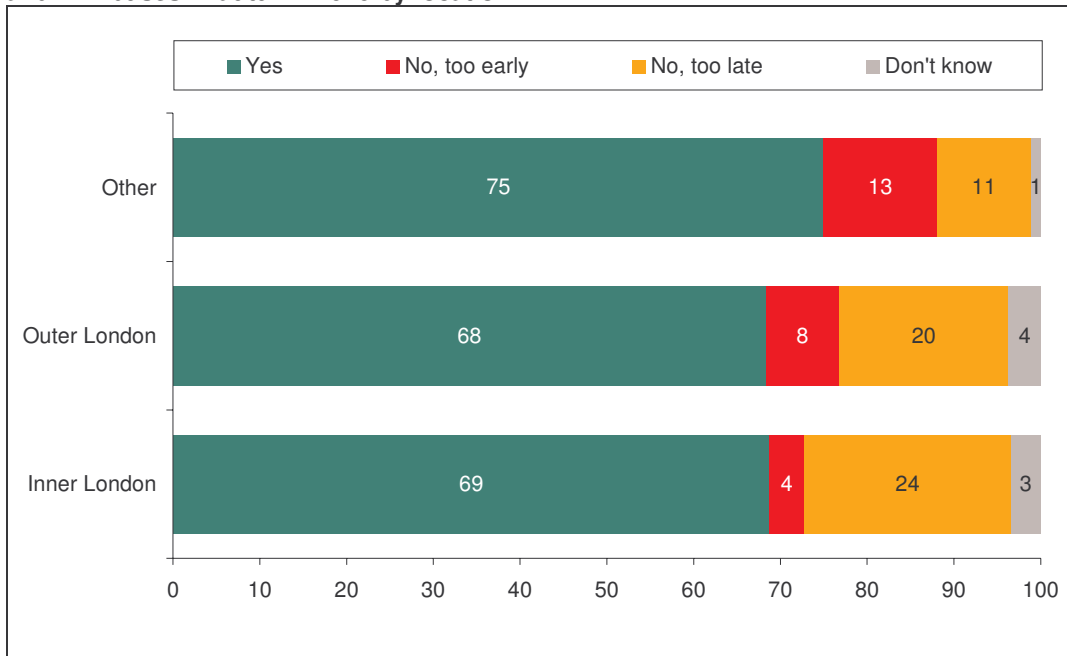
Figure 45: Whether appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010 by age and gender



Base²⁰: 528 men, 221 women; 43 16-24, 380 25-44, 258 45-64, 65 65+

Residents of Inner London are more likely to think it is too late to introduce this standard in autumn 2010: 24% compared 20% for Outer London and 11% for outside London.

Figure 46: Whether appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010 by location

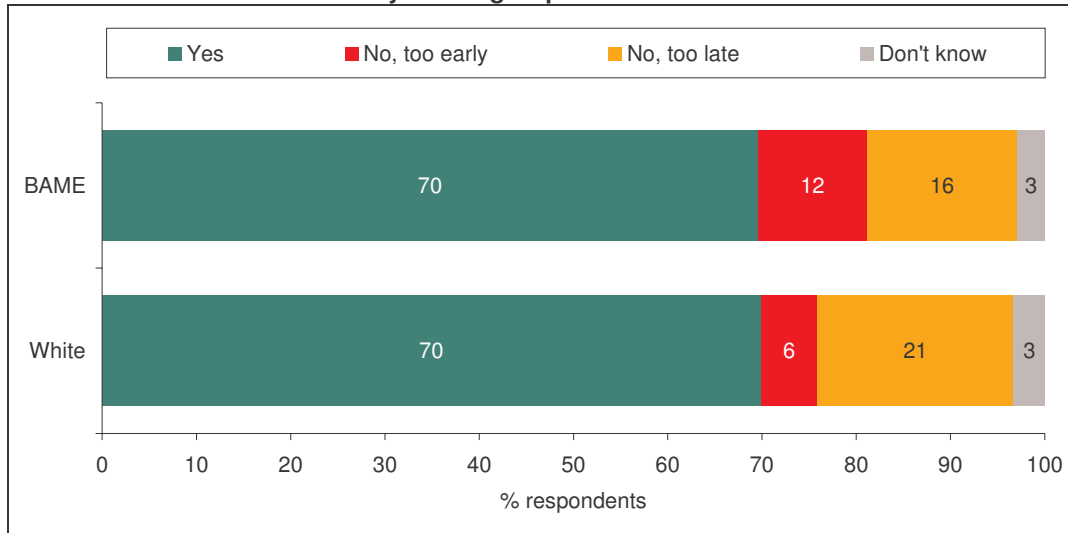


Base²¹: 352 Inner London; 297 Outer London; 92 other

²⁰ respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

There is little difference between white and BAME residents with respect to whether it is appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010. However, a larger proportion of white residents than BAME residents think it is too late to introduce this standard in autumn 2010: 21% compared to 16%.

Figure 47: Whether appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010 by ethnic group



Base²²: 667 White; 69 BAME

5.12 Which Vehicles Should the LEZ Apply to?

Respondents were asked which of the following list of types of vehicle the LEZ should apply to:

- Lorries (HGVs)
- Buses
- Coaches
- Heavier LGVs only
- All LGVs
- Minibuses
- SUVs (4x4s)
- Diesel cars
- Petrol cars
- Motorcycles.

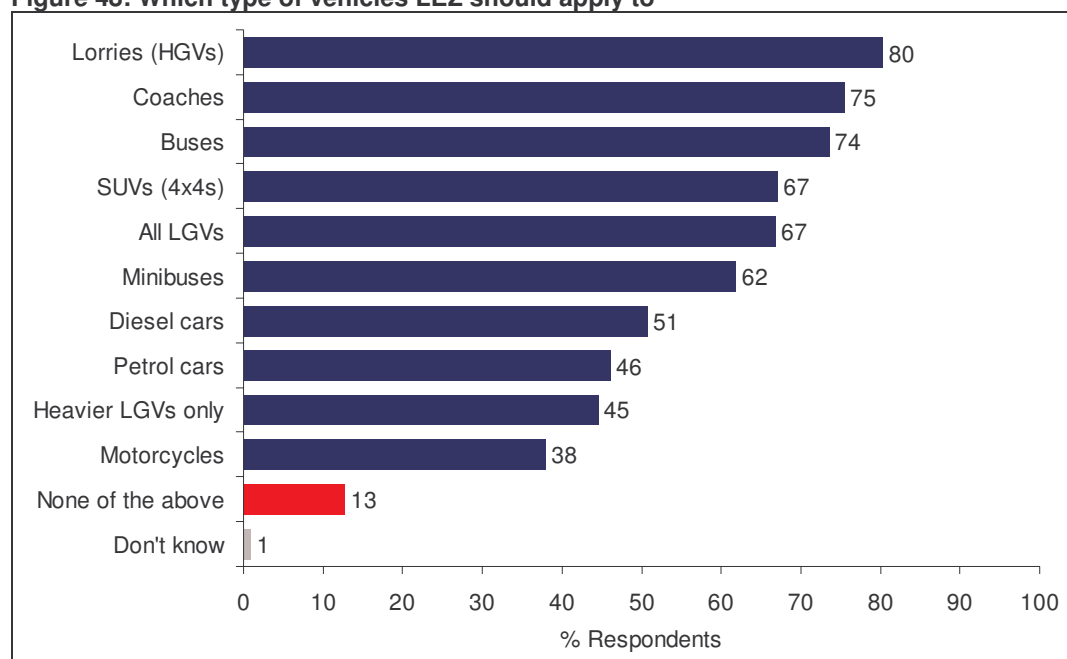
Eight tenths of public respondents (80%) think the LEZ should apply to HGVs, 75% to coaches and 74% to buses.

²¹ respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

²² respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

A similar proportion think it should apply to SUVs (4X4s) and all LGVs: 67%. Just over half the sample (51%) think diesel cars should be included and 46% think petrol cars should be included.

Figure 48: Which type of vehicles LEZ should apply to



Base: 1,858

Women respondents are more likely than men to mention each vehicle type.

Respondents aged between 45 and 64 years old were less likely than other age groups to mention HGVs and LGVs. The youngest age group are least likely to mention buses but most likely to mention LGVs, SUVs and petrol cars.

Table 8: Which vehicles LEZ should apply to by age and gender

	Gender		Age			
	Male %	Female %	16 to 24 %	25 to 44 %	45 to 64 %	65+ %
Lorries (HGVs)	79	86	89	83	76	83
Coaches	74	80	73	79	72	75
Buses	72	78	68	76	72	75
SUVs (4x4s)	67	70	81	72	59	73
All LGVs	66	71	74	71	61	70
Minibuses	61	66	59	67	57	61
Diesel cars	50	53	53	53	48	49
Petrol cars	45	52	51	50	41	40
Heavier LGVs only	44	47	40	45	45	50
Motorcycles	36	45	33	41	35	34
None of the above	14	8	9	10	16	11
Don't know	1	1	*	1	1	1
Base	1,288	501	114	930	622	114

* = less than 0.5%

Inner London residents are more likely than those resident elsewhere to mention each vehicle type.

Similarly white residents are more likely than BAME residents to mention each vehicle type.

Table 9: Which vehicles the LEZ should apply to by location and ethnic group

	Location			Ethnic group	
	Inner London %	Outer London %	Other %	White %	BAME %
Lorries (HGVs)	87	77	74	83	72
Coaches	82	72	68	78	67
Buses	78	72	67	75	68
SUVs (4x4s)	76	60	60	70	60
All LGVs	75	61	57	69	59
Minibuses	70	57	52	64	59
Diesel cars	59	43	43	53	47
Petrol cars	55	38	42	48	42
Heavier LGVs only	47	43	41	44	51
Motorcycles	45	31	32	39	36
None of the above	10	15	14	11	19
Don't know	1	1	1	1	2
Base	851	695	219	1,553	191

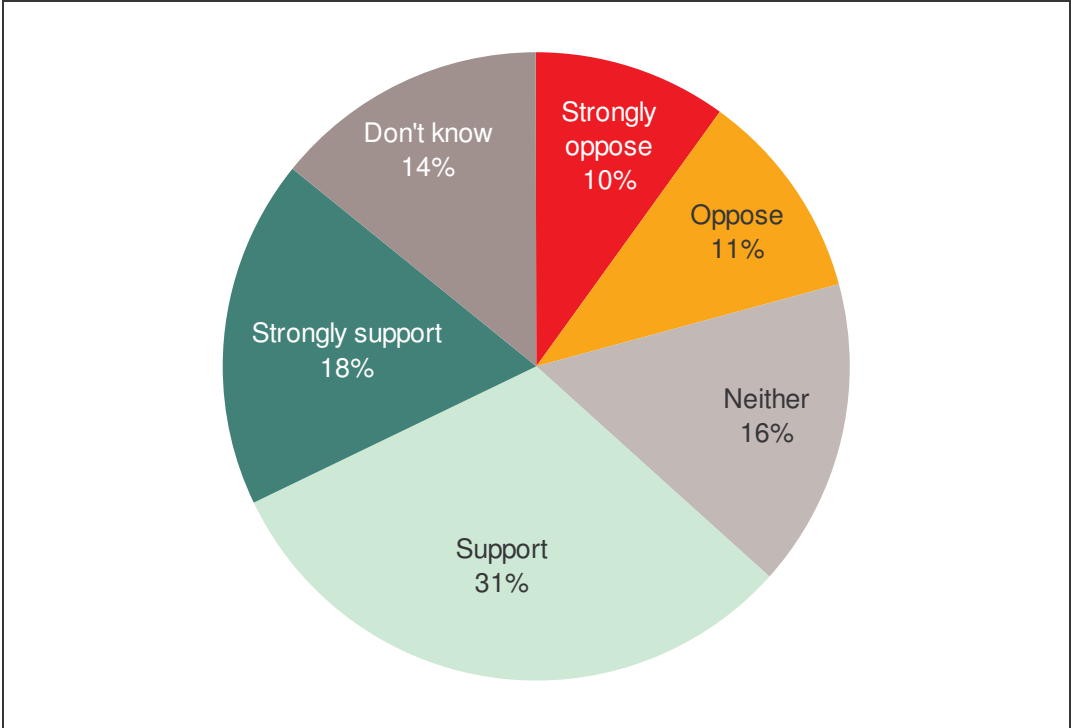
5.13 Agreement on Exempt Vehicles

Respondents were asked if they supported the proposals to exempt the vehicles mentioned on page 3 of the leaflet from the LEZ. These vehicles are:

- agricultural vehicles
- military vehicles
- historic vehicles not used for hire or reward
- non-road going vehicles which are allowed to drive on the highway (for example excavators)
- certain types of mobile crane.

Almost half of public respondents (49%) support the proposed exemptions and just over a fifth (21%) oppose them. Sixteen per cent neither support nor oppose the proposed exemptions and 14% do not know.

Figure 49: Support for proposed exemptions

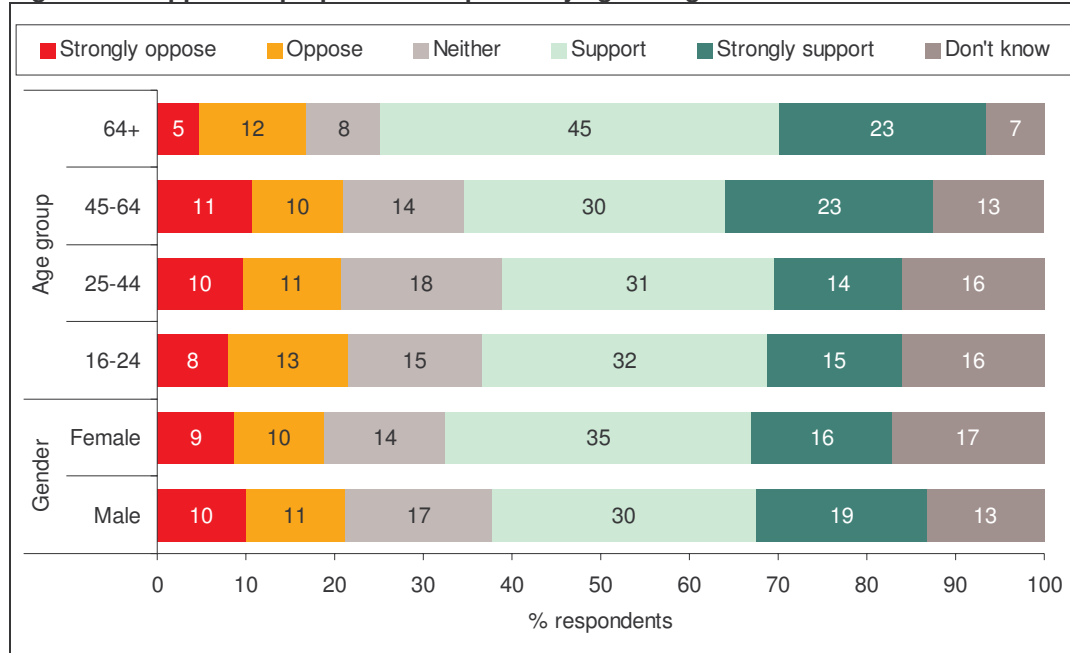


Base: 1,808

A slightly larger proportion of women than men support the proposed exemptions (51% compared to 49%) although more men support them strongly (19% compared to 16%).

The two oldest age groups are most in support of the proposed exemptions: 68% of respondents aged 64 or older and 53% of those aged 45 to 64 compared to 45% of respondents aged 25 to 44 and 47% of respondents aged 14 to 24.

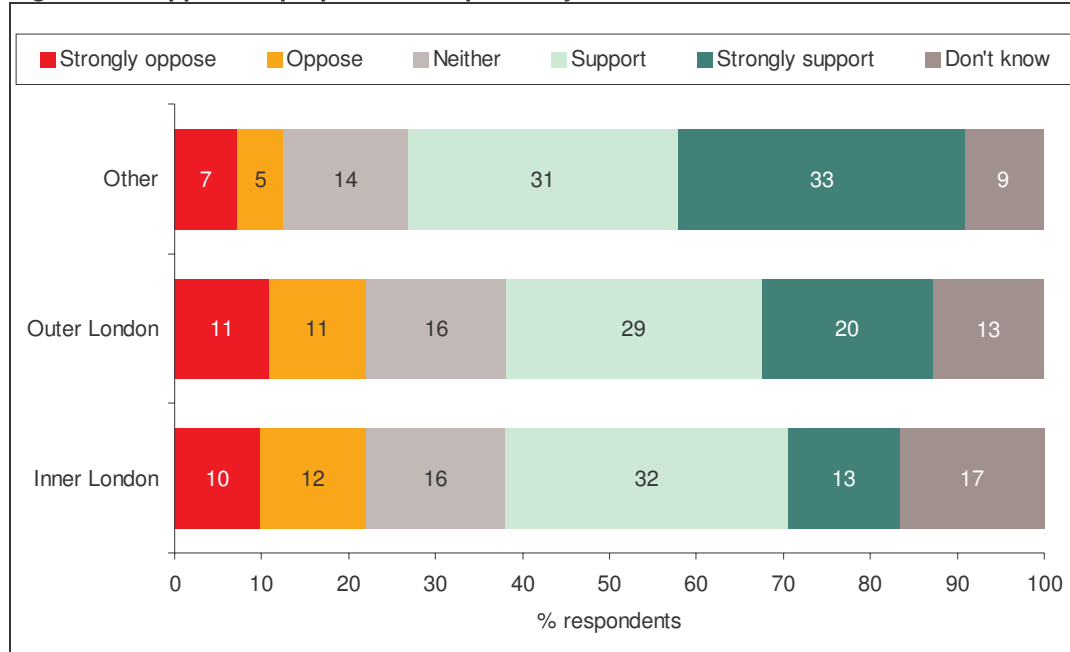
Figure 50: Support for proposed exemptions by age and gender



Base: 1,258 men, 483 women; 112 16-24, 914 25-44, 599 45-64, 107 65+

Inner London residents are least in support of the proposed exemptions and those living outside London most in support.

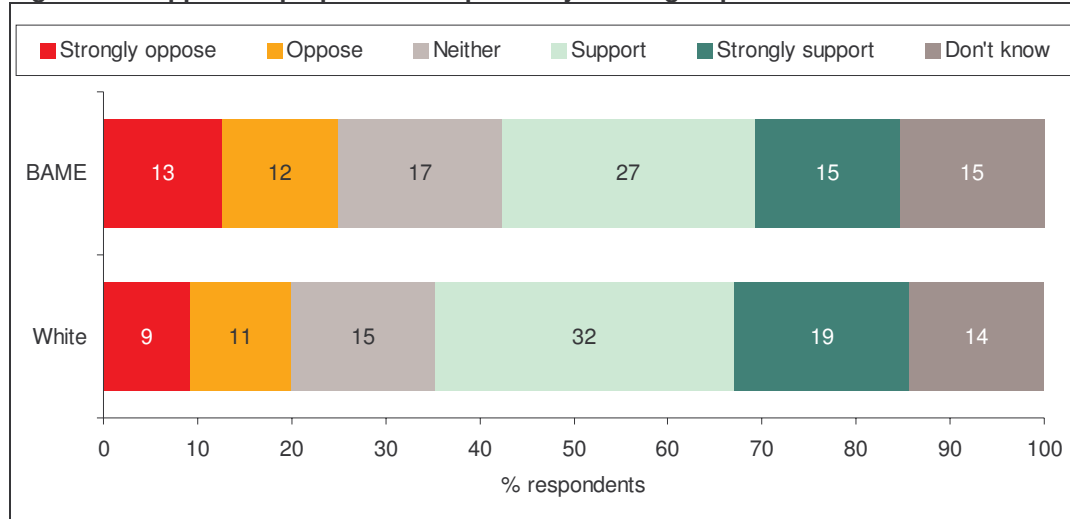
Figure 51: Support for proposed exemptions by location



Base: 826 Inner London; 687 Outer London; 209 other

White residents are more in support of the proposed exemptions than BAME residents.

Figure 52: Support for proposed exemptions by ethnic group



5.13.1. Other Views on Vehicle Exemptions

Following the question on the proposed exemptions respondents to the questionnaire were asked if they had any other views on vehicle exemptions and invited to write them in a text box.

Thirty one per cent (593 public respondents) made comments. The main comment, mentioned by 22%, was that there should be discounts and exemptions other than those included in the code frame (for example, an allowance of a fixed number of trips into the zone each year for specific vehicles, disagreement with the definition of historic vehicles being one built before 1973, more appropriate to use a fixed term to define the exemption rather than a construction date and private horsebox owners to be exempt).

Eleven per cent raised other vehicle exemption issues and 10% said there should be exemptions for heritage vehicles.

Seven per cent said there should be no exempt vehicles.

The table below shows all comments made by 1% or more of respondents.

Table 10: Other comments from public questionnaire (exemptions)

	%
Other discount and exemptions	22
Other vehicles to be included issues	11
Exemption for heritage vehicles	10
Should be no exempt vehicles	7
Taxis and mini-cabs should be included	6
Oppose a LEZ	6
Objective to raise revenues/another tax	4
Discounts/exemptions for community transport vehicles	4
Should apply to all vehicles	4
Other alternatives	3
Impact on small businesses	2
Other central government initiatives	2
Complementary measures	2
Support a LEZ	2
Discounts/exemptions for vehicles operated by public sector	2
Bus/coaches should be exempt	2
Exemptions for vehicles for which retrofit equipment not possible	2
Clear list of exemptions needed	2
Cost impacts on customers/businesses	2
Costs of buying new vehicles	2
Cost impacts on public and community fleets	1
Other charge level issues	1
Include SUVs (4X4)s	1
Impact on London's economy	1
Concerns with vehicles registered outside UK	1
Other incentives for cleaner vehicles	1
Other principle issues	1
Other consultation issues	1
Insufficient information provided	1
Improve general quality of life/public health	1
Military vehicles	1
Other reduced area of LEZ	1
Motorbikes should be included	1
Should include other emissions	1
Should be tax incentives & loans to help convert vehicles	1
Biofuel/greener vehicles discount	1
Use MOT test	1
Other vehicle emission issues	1
Cars should be included	1
Waste of money/better spent elsewhere	1
Inadequate consultation	1
Previous views expressed not taken into account	1
Economic and social impacts	1
Concerns with identifying non-compliant vehicles	1
Other operations issues	1
Should apply across the whole of UK	1
Buses should be included	1
Will increase bureaucracy/red tape	1
Political motivation	1
Other	7
Respondents	593

The comments have been grouped into category of response in Table 11 below. Over half (53%) of the comments were within the category 'discounts and exemptions'. Almost a quarter of the comments (24%) mentioned additional vehicles they would like included within the LEZ.

Fourteen per cent of the comments were on the principle of the LEZ, for example opposing or supporting the LEZ.

Table 11: Other comments by category of comment

	%
Discounts and Exemptions	53
Vehicles to be included	24
The principle of a Low Emission Zone	14
Suggested alternatives	9
Business sector /micro-economic impacts	5
Macro-Economic impacts	3
Consultation process/information	3
Enforcement	3
Boundary	2
Impacts on public and community sectors	2
Vehicle emission standards	2
Level of charge	2
Health impacts	2
Environmental impacts	1
Business Case	1
Timetable	1
Operations	1
Impacts on traffic	*
Olympics	*
Streetscape issues	*
Other	4
Respondents	593

* = less than 0.5%

5.14 Comments about the Proposal

Respondents were asked to write in any other comments about the proposed LEZ or to expand on any of the points raised earlier in a text box.

Thirty three per cent (1,573 public respondents) made comments.

The main comment, mentioned by 13%, was supporting the need for a LEZ.

Eleven per cent said the objective was to raise revenues or that it was another tax.

Seven per cent oppose the need for a LEZ.

Table 12: Main comments made from public questionnaires (exemptions)

	%
Support a LEZ	13
Objective to raise revenues/another tax	11
Oppose a LEZ	7
Complementary measures	6
Other discount and exemptions	6
Other alternatives	4
Impact on small businesses	4
Improve general quality of life/public health	4
Taxis and mini-cabs should be included	4
Other vehicles to be included issues	3
Other central government initiatives	3
Cost impacts on customers/businesses	3
Inadequate consultation	2
Concerns with vehicles registered outside UK	2
Should be tax incentives & loans to help convert vehicles	2
Previous views expressed not taken into account	2
Waste of money/better spent elsewhere	2
Include SUVs (4X4)s	2
Other consultation issues	2
Other operations issues	2
Impact on London's economy	2
Will increase bureaucracy/red tape	2
Other principle issues	2
Should apply across the whole of UK	2
Proposal commences too late	2
Exemption for heritage vehicles	2
Ban instead of a charging system	2
Other incentives for cleaner vehicles	1
Costs of buying new vehicles	1
Should include other emissions	1
Costs too high	1
Detailed boundary issues	1
Cars should be included	1
Buses should be included	1
Should apply to all vehicles	1
Impact on existing illnesses and allergies	1
Will lead to job losses	1
Other vehicle emission issues	1
Other reduced area of LEZ	1
Other charge level issues	1
Cost impacts on public and community fleets	1
Proposals are too extreme	1
Increase road testing of vehicles	1
Concerns with identifying non-compliant vehicles	1
Will fail to make adequate progress towards air quality targets	1
Proposal is premature	1
Extend to M25	1
Discounts/exemptions for community transport vehicles	1
Traffic diverting around London	1
Political motivation	1
Non transport-related alternatives	1
Other timetable issues	1
Other enforcement issues	1
Insufficient information provided	1
Other business case issues	1
Include motorways and trunk roads	1
Concerns with infrastructure and technology	1
Use MOT test	1
Should be no exempt vehicles	1
Other	12
Respondents	1,573

Note: all comments with 1% or more of responses are shown

The specific responses shown in Table 12 were allocated to the general categories of responses.

The main category of comment was on the principle of a LEZ, with 36% of all comments.

Nineteen per cent of comments suggested alternatives to the proposed LEZ.

Thirteen per cent of comments regarded the types of vehicles to be included.

Table 13: Main comments by category of response

	%
The principle of a Low Emission Zone	36
Suggested alternatives	19
Vehicles to be included	13
Discounts and Exemptions	10
Business sector /micro-economic impacts	9
Consultation process/information	8
Macro-Economic impacts	7
Boundary	6
Enforcement	6
Health impacts	6
Business Case	4
Environmental impacts	4
Timetable	3
Operations	2
Level of charge	2
Vehicle emission standards	2
Impacts on public and community sectors	2
Impacts on traffic	1
Streetscape issues	*
Olympics	*
Other	5
Respondents	1,930

* = less than 0.5%

5.15 All Comments

As can be seen above, many public respondents used the three free text boxes to make general comments about the LEZ. All the responses made to question 4, to question 15 and to the overall comments (question 16) were grouped together.

The main category of comment is on the principle of a LEZ, with 53% making comments in this category (with 29% opposing the LEZ, 14% saying the objective is to raise revenues or that it is another tax and 12% supporting the LEZ).

Forty per cent made comments on discounts and exemptions to the scheme (with 7% mentioning exemptions for heritage vehicles and 4% saying there should be no exemptions).

Twenty four per cent made comments under the category of vehicles to be included with taxis (6%) the main suggestion.

Twenty three per cent made comments suggesting alternatives (with 7% suggesting complementary measures and 4% suggesting that there should be other central government initiatives).

Table 14: All public questionnaire comments by category of response

	%
The principle of a Low Emission Zone	53
Discounts and Exemptions	40
Vehicles to be included	24
Suggested alternatives	23
Boundary	18
Business sector /micro-economic impacts	11
Consultation process/information	9
Macro-Economic impacts	9
Enforcement	6
Health impacts	5
Environmental impacts	5
Business Case	5
Timetable	3
Level of charge	2
Impacts on public and community sectors	2
Vehicle emission standards	2
Operations	2
Impacts on traffic	1
Olympics	1
Streetscape issues	*
Other	8
Base	1,069

* less than 0.5%

Table 15 shows the proportions of each specific comment. All responses over one per cent are shown individually.

The main comment (representing 20%) was opposing a need for the proposed LEZ. Nineteen per cent made comments suggesting other discount and exemptions, 14% said the objective of the LEZ was to raise revenues or that it was another tax and 12% support the LEZ.

Table 15: All public questionnaire comments representing over 1% of respondents

	%
Oppose a LEZ	20
Other discount and exemptions	19
Objective to raise revenues/another tax	14
Support a LEZ	12
Other vehicles to be included issues	9
Complementary measures	7
Exemption for heritage vehicles	7
Taxis and mini-cabs should be included	6
Other alternatives	6
Impact on small businesses	5
Should be no exempt vehicles	4
Should apply across the whole of UK	4
Other central government initiatives	4
Cost impacts on customers/businesses	4
Extend to M25	4
Detailed boundary issues	4
Improve general quality of life/public health	3
Should apply to all vehicles	3
Other consultation issues	3
Discounts/exemptions for community transport vehicles	3
Other principle issues	3
Waste of money/better spent elsewhere	3
Impact on London's economy	2
Previous views expressed not taken into account	2
Costs of buying new vehicles	2
Should be tax incentives & loans to help convert vehicles	2
Concerns with vehicles registered outside UK	2
Include SUVs (4X4)s	2
Inadequate consultation	2
Other reduced area of LEZ	2
Other operations issues	2
Will increase bureaucracy/red tape	2
Other incentives for cleaner vehicles	2
Other charge level issues	2
Ban instead of a charging system	2
Should include other emissions	2
LEZ should cover Congestion Charging area only	2
Proposal commences too late	2
Cost impacts on public and community fleets	2
Costs too high	2
Discounts/exemptions for vehicles operated by public sector	1
Will lead to job losses	1
Will fail to make adequate progress towards air quality targets	1
Bus/coaches should be exempt	1
Exemptions for vehicles for which retrofit equipment not possible	1
Other boundary issues	1
Other vehicle emission issues	1
Buses should be included	1
Cars should be included	1
Political motivation	1
Insufficient information provided	1
Include motorways and trunk roads	1
Clear list of exemptions needed	1
Use MOT test	1
Concerns with identifying non-compliant vehicles	1
Impact on existing illnesses and allergies	1
Increase road testing of vehicles	1
Proposals are too extreme	1
Other enforcement issues	1

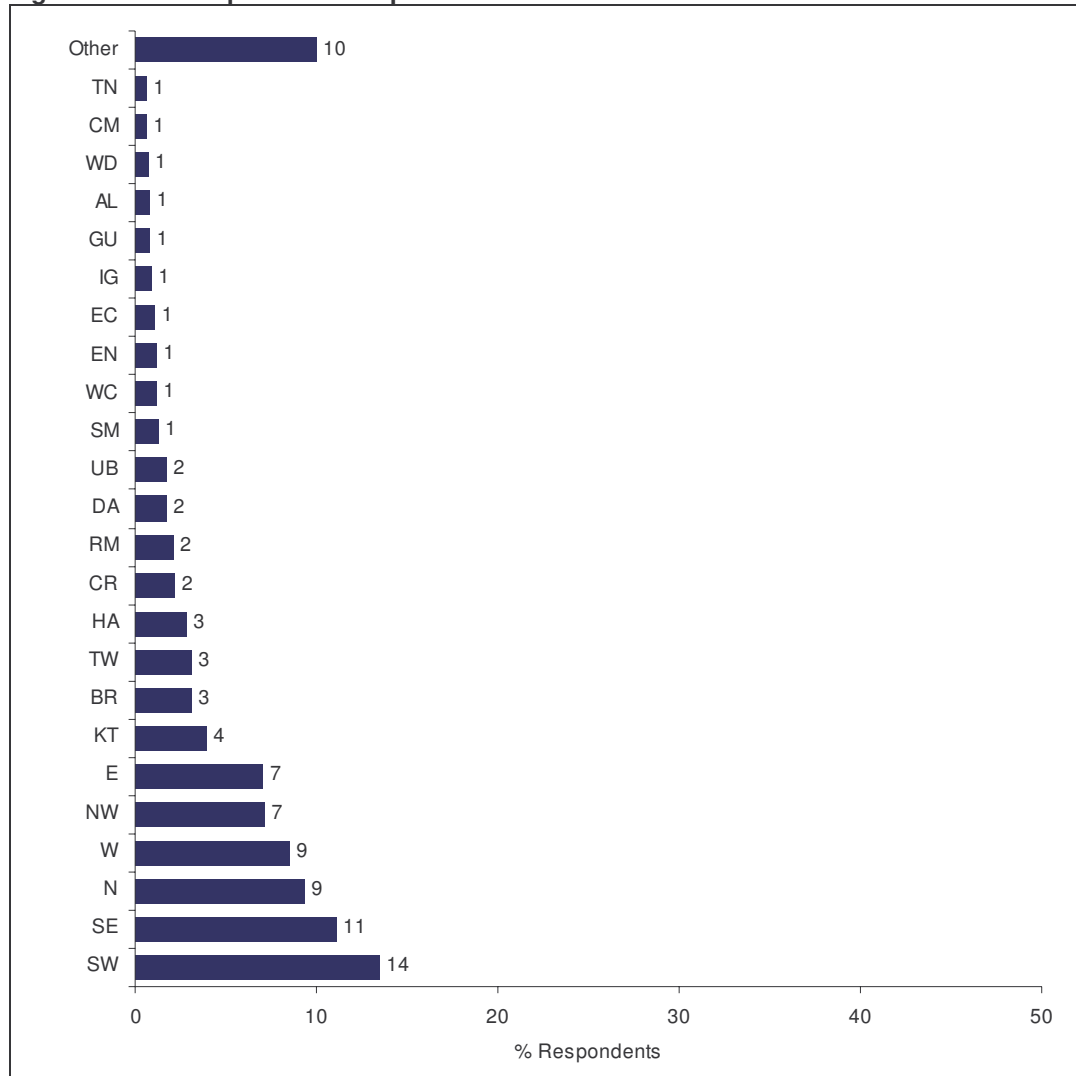
Proposal is premature	1
Displacement will increase pollution outside London	1
Other timetable issues	1
Non transport-related alternatives	1
Traffic diverting around London	1
Yet another charge on transport industry	1
Motorbikes should be included	1
Issues relating to 2012 Olympics	1
Economic and social impacts	1
Biofuel/greener vehicles discount	1
Other business case issues	1
Other	12
Respondents	1,069

5.16 Demographics

5.16.1. Postcode

Fifty nine per cent of public respondents live in the 'London postcode' area of EC, WC, E, N, W, SE and SW.

Figure 53: Public questionnaire postcode



Base: 1,802

5.16.2. Gender

Seventy two per cent of public respondents are male and 28% female.

Seventy three per cent of those who responded by Internet are male compared to 70% using the paper questionnaire.

Table 16: Gender

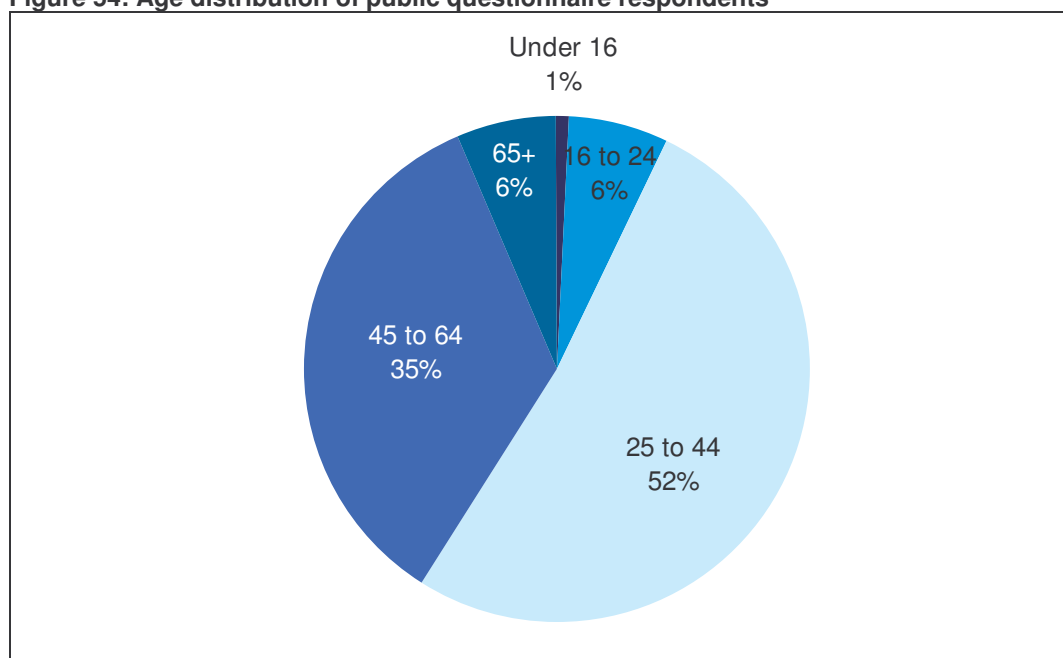
	Total %	Paper %	Internet %
Male	72	70	73
Female	28	30	27
Base	1,812	458	1,354

The gender split of these respondents is much more male oriented than the London population. According to the 2001 Census the London adult population (aged over 16) is 48% male and 52% female.

5.16.3. Age

The age distribution of those who responded is shown in Figure 54. Fifty two per cent of the respondents are aged 25-44 years and 35% are aged between 45 and 64 years.

Figure 54: Age distribution of public questionnaire respondents



Base: 1,818

The Internet sample has a much younger age profile than the postal sample with 67% aged 44 year olds or less compared to 34% for the postal sample.

The respondents to the public consultation have a much younger age profile than the London population aged over 16 according to the 2001 Census, see Table 17.

Table 17: Age

	Total %	Paper %	Internet %	2001 Census %
Under 16	1	2	*	-
16-24	6	4	7	15
25-44	52	28	60	44
45-64	35	48	30	25
65+	6	18	2	16
Base	1,818	459	1,359	5,723,353

* = less than 0.5%

5.16.4. Ethnic background

The respondents' ethnic background is predominantly white: 89%.

Table 18: Ethnic background

	Total* %	Paper* %	Internet* %	Census 2001 %
White	89	86	90	71
Asian	3	6	2	12
Black	2	2	1	11
Mixed	2	3	2	3
Chinese	1	2	1	1
Other	4	2	4	2
Base	1,766	443	1,323	5,723,353

According to the 2001 Census, 71% of the London population is white. The public consultation sample over represents whites and under represents Asian and Black respondents.

6. GENERAL PUBLIC OPEN RESPONSES

6.1 Response to Consultation

There were 34 general public written submissions in total. Twenty four took the form of letters and ten were emails.

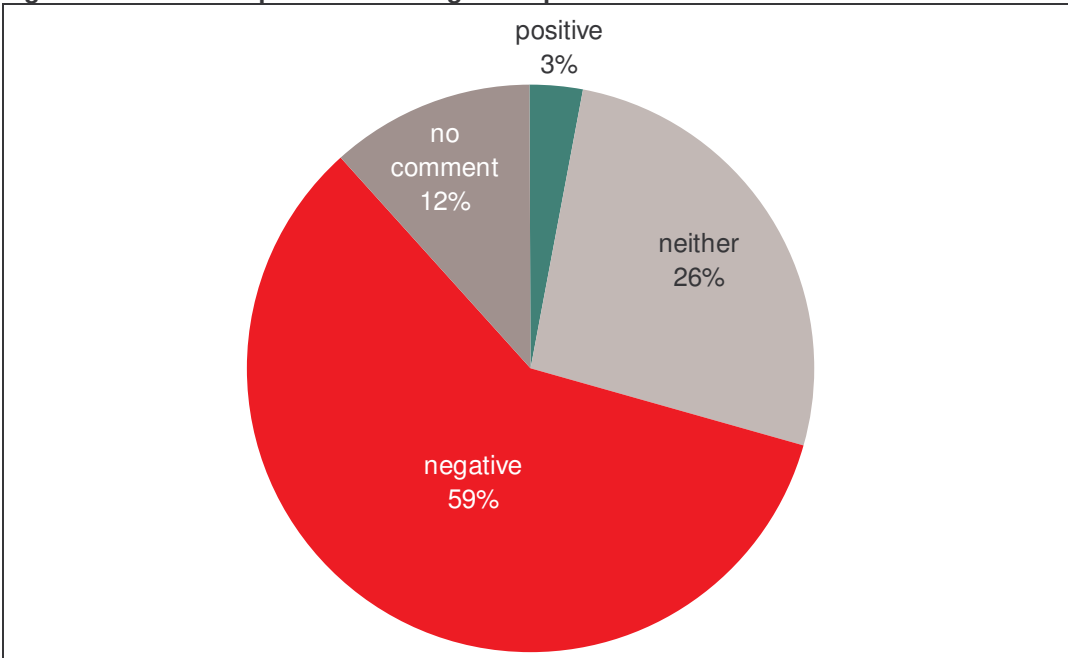
Twenty seven gave postcodes. Responses were predominantly from the London area:

- Five were in the ‘London postcode’ area²³
- Seven were in the ring of postcodes around the London postcode area²⁴
- Seven were in the South East
- Four were in the North West
- One each was from the South West, Wales, the East Midlands and Scotland.

6.2 Support and Opposition to the Proposal

Overall, twenty responses (59%) were negative towards the LEZ proposal, one (3%) was positive, nine (26%) neither supported nor opposed the proposed LEZ and four (12%) made no comments with respect to the proposed LEZ.

Figure 55: Overall response from the general public



Base: 34

²³ EC, WC, SE, SW, E, N, W, NW

²⁴ KT, SM, CR, BR, DA, RM, IG, EN, HA, UB, TW, WD

6.3 Summary of Most Frequently Raised Issues

Amongst the general public respondents, 30 of the 34 respondents made comments that could be coded. Table 19 shows these comments grouped into the main categories of response.

The most frequently raised category concerned the principle of a LEZ (e.g. support or oppose for the need for a LEZ) which accounted for 22 of the responses.

Sixteen of the responses were concerned with discounts and exemptions to the LEZ (e.g. exemptions for heritage vehicles).

Sixteen of the responses were concerned with business sector/micro-economic impacts (e.g. impact on small businesses).

Twelve of the responses were concerned with the public consultation process or the information provided by TfL (e.g. previous views expressed not taken into account and insufficient information provided).

Ten of the responses were concerned with macro-economic impacts of the LEZ (e.g. cost impacts on customers and businesses and the impact on London's economy).

Nine of the responses were suggestions for alternatives to the LEZ (e.g. other incentives for cleaner vehicles, complementary measures and a ban instead of a charging system).

Table 19: Analysis by categories and overall nature of response from public open responses

	Total n	Positive n	Negative n	Neither n
The principle of a Low Emission Zone	22	1	18	3
Discounts and Exemptions	16	1	8	7
Business sector/micro-economic impacts	16	0	15	1
Consultation process/information	12	0	9	3
Macro-Economic impacts	10	0	10	0
Suggested alternatives	9	0	7	2
Impacts on public and community sectors	6	0	5	1
Business Case	5	0	5	0
Boundary	5	0	5	0
Level of charge	4	0	4	0
Environmental impacts	4	0	4	0
Vehicle emission standards	3	0	2	1
Enforcement	3	0	3	0
Health impacts	3	1	2	0
Impacts on traffic	3	0	2	1
Vehicles to be included	2	0	1	1
Streetscape issues	2	0	2	0
Olympics	2	0	2	0
Operations	1	0	0	1
Other	4	0	3	1
Base (responses)	132	3	108	21

6.4 Detailed Analysis of Most Frequently Raised Issues

Overall, the most frequently raised issues by the general public respondents were with respect to other discounts and exemptions to the LEZ than included in the proposal and the impact of the LEZ on small businesses. Eight respondents mentioned each issue.

Seven said the objective of the LEZ was to raise revenues or complained that it was another tax.

Five comments each were on the following issues:

- support for the LEZ
- opposition to the LEZ
- that the LEZ was a waste of money (which could be better spent elsewhere)
- exemptions for heritage vehicles
- cost impacts on customers/businesses.

Table 20 shows all detailed responses

Table 20: Overall – all public open responses

	n
Other discount and exemptions	8
Impact on small businesses	8
Objective to raise revenues/another tax	7
Support a LEZ	5
Oppose a LEZ	5
Waste of money/better spent elsewhere	5
Exemption for heritage vehicles	5
Cost impacts on customers/businesses	5
Impact on London's economy	4
Other consultation issues	3
Other vehicle emission issues	3
Other public and community sector issues	3
Previous views expressed not taken into account	3
Insufficient information provided	3
Proposals are too extreme	2
Other principle issues	2
Ban instead of a charging system	2
Other incentives for cleaner vehicles	2
Complementary measures	2
Other alternatives	2
Detailed boundary issues	2
Charge should be lower (HGVs, buses and coaches)	2
Penalty charge is too high (HGVs, buses and coaches)	2
Yet another charge on transport industry	2
Costs of buying new vehicles	2
Ongoing costs of retrofitting abatement equipment	2
Other business impact issues	2
Cost impacts on public and community fleets	2
Scrapping old vehicles	2
Economic and social impacts	2
Traffic diverting around London	2
More research/modelling work needed	2
Issues relating to 2012 Olympics	2
Other Issues	27
Base (responses)	132

More details on the key concerns are given below.

6.4.1. Other discount and exemptions

Eight responses suggested discounts and exemptions issues other than those included in the code frame.

Three respondents suggested that there should be an allowance of a fixed number of trips into the zone each year for specific vehicles.

“Vehicles that are classed as historic should pay a much reduced entry charge if used for hire and reward. However their use should be limited to 100 days per annum per vehicle at this concessionary rate.”

“Extend the Historic Vehicle exemption to PSV (private service vehicle) Operators for a limited number of “on street appearances” per vehicle per year.”

“...allow bona fide operators into London on the limited number of occasions that they wish to come each year and not allow vehicles in a less stringent state of repair to come when they please.”

Three disagreed with the definition of historic vehicles being one built before 1973.

“However I must disagree with the proposed definition of a historic vehicle as being one built before 1973. There are designs of bus that were specific to London which were built after this time and it is wrong that they should be discriminated against simply on this basis.”

One thought that it would be more appropriate to use a fixed term to define the exemption, rather than a construction date, because it presents *“a more logical and more permanent definition of 'historic' vehicles.”*

One asked for private horsebox owners, whether HGV or LGV, to be exempt from the proposed regulations.

Finally one respondent pointed out a perceived illogicality in the proposals:

“There is no logical reason for requiring historic vehicles which are used for hire and reward to be compliant whilst not requiring compliance from their sisters which are not used for hire and reward. The travelling public only hire historic vehicles for short, infrequent journeys so the emissions created have no measurable effect on the level of emissions in London.”

6.4.2. Impact on small businesses

Eight respondents made comments about the negative impact that the LEZ would have on small businesses.

“This scheme will make some smaller operators reconsider the viability of staying in business and it will discourage many others from travelling into the city for work.”

“Especially badly hit would be the smallest operators for whom the cost of re-engining non-compliant vehicles would be huge, when compared with their revenue from these vehicles.”

Two respondents mentioned companies that used historic or heritage buses being negatively affected, one mentioned the impact on small transport companies, one mentioned horsebox owners and one mentioned the impact on showmen.

6.4.3. Objective to raise revenues/another tax

Seven respondents said that the main objective of the proposed LEZ was to raise revenue or complained that it was just another tax.

“All that your planned emission zone is likely to achieve is to raise unfair revenues, yet another tax on the commercial motorist.”

“... this is just another time wasting tax on ordinary motorists who genuinely have to travel into London.”

“People see this as just another way of making money (“A Stealth Tax”) some haulage companies are going to stop deliveries to shops and other businesses because they truly believe that is just another way of making money and fleecing the motorist.”

6.4.4. Support need for a LEZ

Five respondents expressed support for the principle of the LEZ. Two gave unreserved support.

“First, I must state that I agree in principle with the proposal. Reduction of emissions by targeting vehicles which have the largest harmful emissions is a sensible and cost effective strategy.”

“I am strongly in agreement with the objectives of this scheme and look forward to seeing further improvements in London's air quality.”

The other three, whilst expressing support for the LEZ, also expressed some concerns. For example this respondent was concerned with the potential impact on the London to Brighton Run:

“Whilst I fully support efforts to reduce emissions, current proposals do not appear to make any allowance for historic vehicles. It would be a great shame if these plans should result, for example, in the demise of the famous London to Brighton Run which brings some much needed colour and romance to the city. Provision should be made for historic vehicles - and not just on a licence for the day basis - they are part of our heritage and should not be ignored.”

6.4.5. Oppose a LEZ

Five respondents made comments in opposition to the principle of the LEZ.

6.4.6. Waste of money/better spent elsewhere

Five respondents complained that the LEZ would be a waste of money or that the revenues needed to run the scheme could better be spent elsewhere.

“Perhaps instead of wasting tax payers' money ... could spend this money on doing what he is in the job to do which is to create a safe environment for all Londoners.”

Another stated that a more effective use of resources would be to focus on people who die from accidents or injuries in the home every year as there many more of them than the “an estimated 1000 premature deaths due to poor quality air in London.”

The other three focused on the cost of the consultation exercise.

“This consultation is a complete waste of London tax payer's money and is yet another example of the profligate way it is being misspent.”

6.4.7. Exemption for heritage vehicles

Five respondents made comments about the exemption of heritage vehicles. The leaflet states that historic vehicles not used for hire or reward would be exempt from the scheme.

One welcomed the proposed exemption:

“I welcome the exclusion from the proposals for historic vehicles. London is famous throughout the world for its iconic road transport vehicles, and it is right that they will have a place on the streets where they were familiar within the right historical context.”

The other four asked for historic or heritage vehicles, including those used for hire and reward, to be included in the scheme:

"I would ask that preserved vintage London Transport buses (over 25 years of age, on a "rolling date" basis) should be allowed to use London's roads. This is because these vehicles are an important part of London's heritage, and contribute only a very minimal amount of emissions, on a percentage basis. ...I would also ask that heritage bus services (such as the present heritage route 9 and route 15 operations) and special events (such as Chelsea Flower Show, Wimbledon Fortnight, wedding hires etc) should be allowed to continue operation."

6.4.8. Cost impacts on customers/businesses

Five respondents raised concerns with costs being passed on to customers or businesses.

"But with a particulate trap for an HGV costing up to £5000 and £200 a year to service, you can bet they will be passing on the costs."

"Yes, the price of deliveries will have to go up to cover the costs, this business is hard enough without more taxes."

One said this would lead to increased inflation and another said that the increased costs would cause some to go out of business.

6.4.9. Impact on London's economy

Four respondents complained about the impact of the LEZ on London's economy.

"All that your planned emission zone is likely to achieve is to raise unfair revenues, yet another tax on the commercial motorist, which will inevitably push up the costs of food and other essential goods massively for Londoners."

"The net result will be that the customer will suffer. Either the cost will be passed on or more likely London will be the loser as trips will go to other towns and cities."

7. BUSINESS QUESTIONNAIRES

7.1 Response to the Consultation

There were 5,639 business questionnaires received by February 23 2007:

- 5,162 paper questionnaires
- 477 Internet questionnaires.

Business questionnaires received after this date were passed to TfL for analysis.

The first sixteen questions of both the business and general public questionnaires were the same. Questions 17-21 of the business questionnaire included questions on the nature of the business whereas questions 17-20 of the general public questionnaire included questions about the respondent.

7.2 Summary of Most Frequently Raised Issues

Almost three quarters (74%) of business respondents think that it is important or very important to tackle poor air quality in London with 38% saying it is very important. Fourteen per cent do not think it is important.

Businesses who responded to the questionnaire are fairly evenly split with respect to the proposed LEZ: 47% of businesses support the proposed LEZ and 45% oppose it. However, there are more who strongly oppose than strongly support the proposed LEZ.

Transport and distribution businesses are more strongly opposed to the proposed LEZ than all other types of businesses, with over half of them (55%) opposed to the LEZ.

Businesses based in Inner London are most likely to support the proposed LEZ: 54% compared to 41% of business based in Outer London and 40% based outside London.

7.2.1. Details of the Proposed Scheme

Less than a third (30%) of business respondents think the proposed boundary of the LEZ is appropriate. Forty four per cent think it should be a smaller area and 8% think it should be a larger area.

Over two thirds of businesses (67%) think that the motorways within London should **not** be included in the LEZ.

Fifty four per cent think the proposed level of charge²⁵ is too high, 27% think it is sufficient to incentivise operators to make their vehicles compliant and 9% think it is too low.

Fifty three per cent of business respondents think the proposed level of Penalty Charge²⁶ for non-compliant vehicles which do not pay the daily charge is too high, 31% think the charge is sufficient to incentivise operators to make their vehicles compliant and 7% think it is too low.

Over half (52%) oppose the hours of operation²⁷, 34% strongly oppose the hours. Forty three per cent support the proposed hours of operation, 21% strongly support them.

Forty four per cent of business respondents think that the proposed emission standard of Euro III for Particulate Matter from 2008 for diesel engine HGVs, buses and coaches is appropriate although a slightly smaller proportion (43%) think it is not appropriate: 38% think it is too severe and 5% think it is too lenient.

Almost half (48%) of business respondents think the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is **not** appropriate: 45% think it is too severe and 3% think it is too lenient. Over a tenth (11%) say they don't know.

Forty three per cent of business respondents think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is **not** appropriate: 38% think it is too severe and 6% think it is too lenient. Thirteen per cent say they don't know.

Almost two thirds of respondents (65%) think the LEZ should apply to HGVs, and buses. Sixty two per cent think it should apply to coaches. More think it should apply to SUVs than to all LGVs: 52% compared to 48%. Over a third of the sample (36%) think diesel cars should be included and 32% think petrol cars should be included. Almost a fifth (19%) think none of the vehicle types listed should be included.

Over half of business respondents (56%) supports the proposals to exempt certain vehicles from the LEZ²⁸. and just under a quarter (24%) opposes them. Thirteen per cent neither support nor oppose the proposed exemptions and 7% do not know.

²⁵ £200 for diesel-engine Heavy Goods Vehicles, buses and coaches and £100 for diesel-engine minibuses and heavier Light Goods Vehicles

²⁶ £1000 for diesel-engine HGVs, buses and coaches and £500 for diesel-engine minibuses and heavier LGVs

²⁷ 24 hours a day, 365 days a year.

²⁸ agricultural vehicles, military vehicles, historic vehicles not used for hire or reward, non-road going vehicles which are allowed to drive on the highway (for example excavators) and certain types of mobile crane.

7.2.2. Comments about the Proposal

The main comment (25% of responses) is opposing the LEZ.

Nineteen per cent say the objective of the LEZ is to raise revenues or that it is another tax.

Twelve per cent suggest other discounts and exemptions, and the same proportion are concerned about the impact of the LEZ on small businesses.

Nine per cent are concerned about the impact of the LEZ on London's economy.

7.2.3. Business Characteristics

There was a very wide distribution of responses from businesses. No postcode location accounted for more than 4% of responses. Sixteen per cent of businesses are based in the 'London postcodes' of EC, WC, E, N, NW, W, SE and SW.

The main business sector by far is transport and distribution with over a third of all businesses (36%) from this sector. Services account for 20%, construction 10% and manufacturing 8%.

Over half (51%) the businesses are small with between one and nine employees within Great Britain. Fifteen per cent employ 100 or more staff.

Over a quarter (27%) operate at least one HGV within the proposed London LEZ with 19% operating HGVs first registered on or after October 2001.

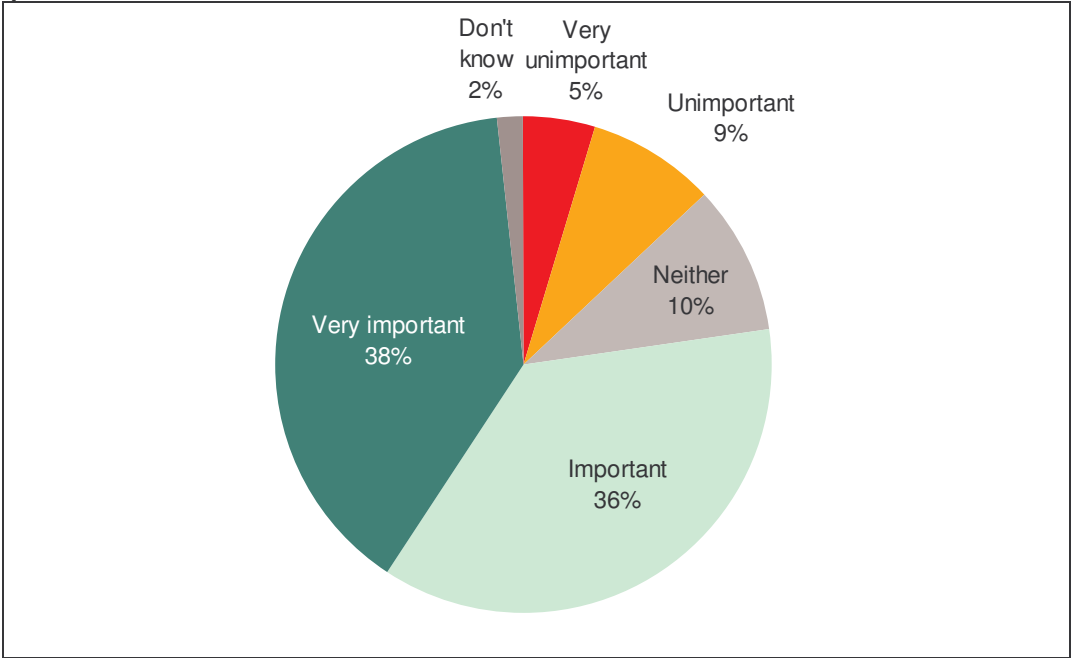
Bus/coach use is much lower with 8% operating at least one bus/coach within the proposed London LEZ with 7% operating at least one bus/coach first registered on or after October 2001.

Over a quarter (28%) operate at least one LGV/minibus within the proposed London LEZ with 21% using LGVs/minibuses first registered on or after January 2002.

7.3 Importance of Tackling Poor Air Quality in London

Almost three quarters of business respondents (74%) to the consultation think that it is important or very important to tackle poor air quality in London with 38% saying it is very important. Fourteen per cent do not think it is important.

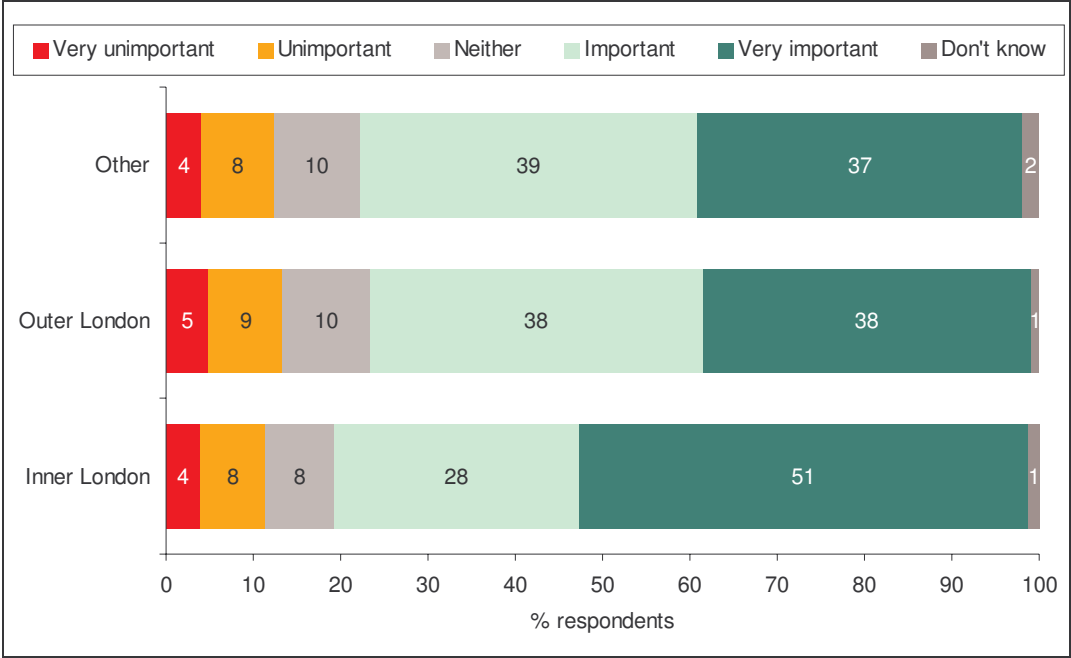
Figure 56: Importance of tackling poor air quality in London from business questionnaires



Base: 5,504

Over half (51%) the businesses based in Inner London think it is **very** important to tackle poor air quality in London compared to 38% of businesses in Outer London and 37% of businesses outside London.

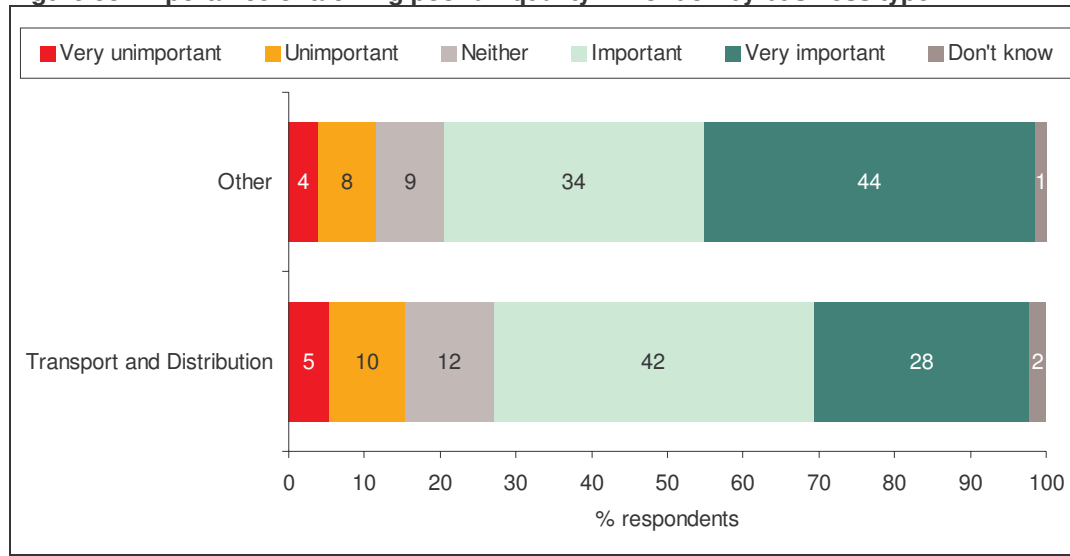
Figure 57: Importance of tackling poor air quality in London by location



Base: 545 Inner London; 991 Outer London; 3,383 other

Transport and distribution businesses are less likely than other types of businesses to say it is important to tackle poor air quality in London, with 28% of them saying it is **very** important compared to 44% for other businesses.

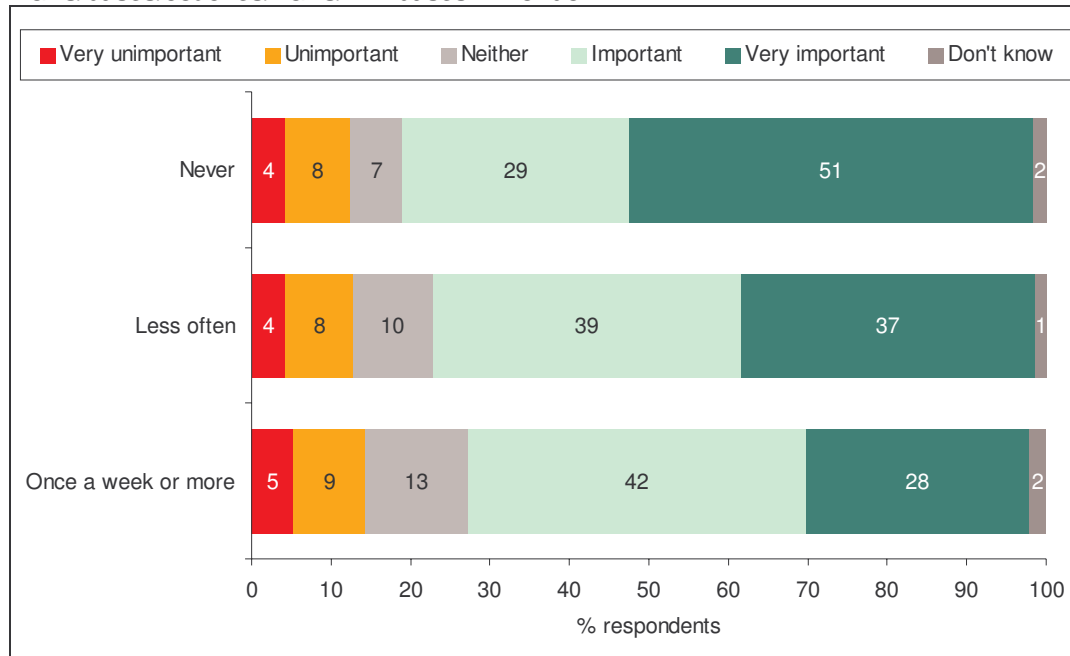
Figure 58: Importance of tackling poor air quality in London by business type



Base: 1,780 transport and distribution, 3,173 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are much more likely to say it is important to tackle poor air quality in London than businesses which do operate HGVs, coaches, buses, LGVs or minibuses in London: 51% which never operate HGVs, coaches, buses, LGVs or minibuses in London say it is **very** important to tackle poor air quality in London compared to 28% of businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more.

Figure 59: Importance of tackling poor air quality in London by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,922, less often 1,495, never 2,087

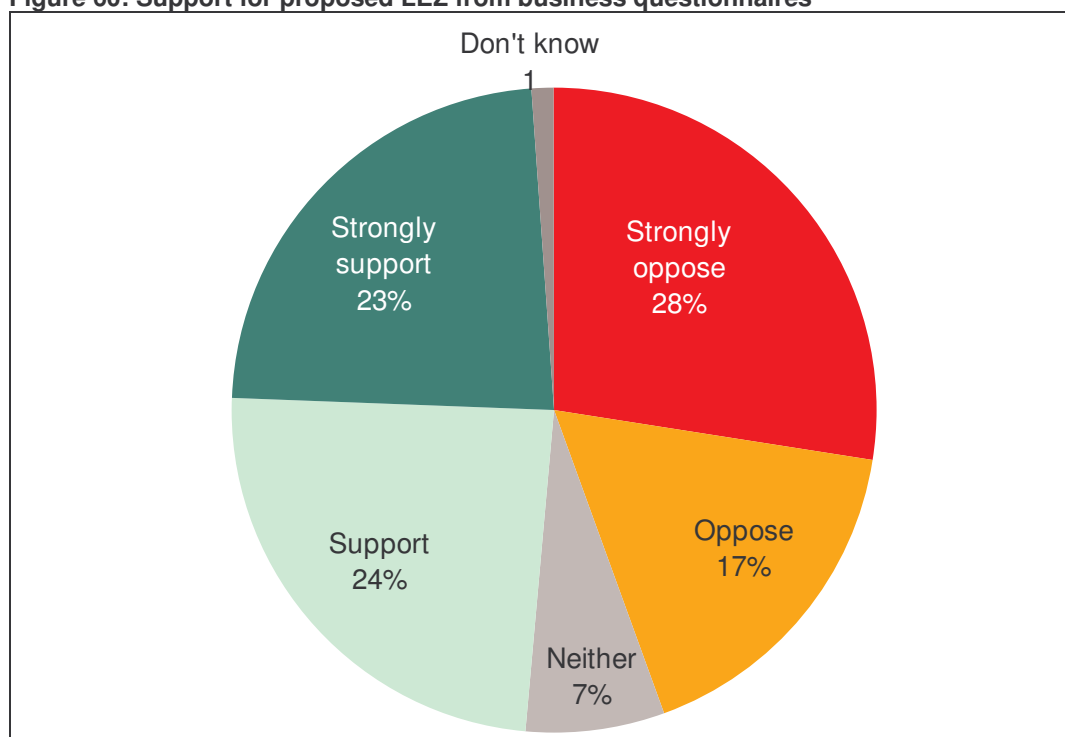
7.4 Support for the LEZ Proposal

Question 2 of the questionnaire sought the views of respondents on the proposed LEZ as described in the consultation leaflet. The question asked was:

“Do you support or oppose the proposal to introduce a Low Emission Zone (LEZ) in Greater London as described in the leaflet?”

Businesses who responded to the consultation questionnaire are fairly evenly split with respect to the proposed LEZ: 47% of businesses support the proposed LEZ and 45% oppose it. However, there are more who strongly oppose than strongly support the proposed LEZ. See Figure 60.

Figure 60: Support for proposed LEZ from business questionnaires



Base: 5,502

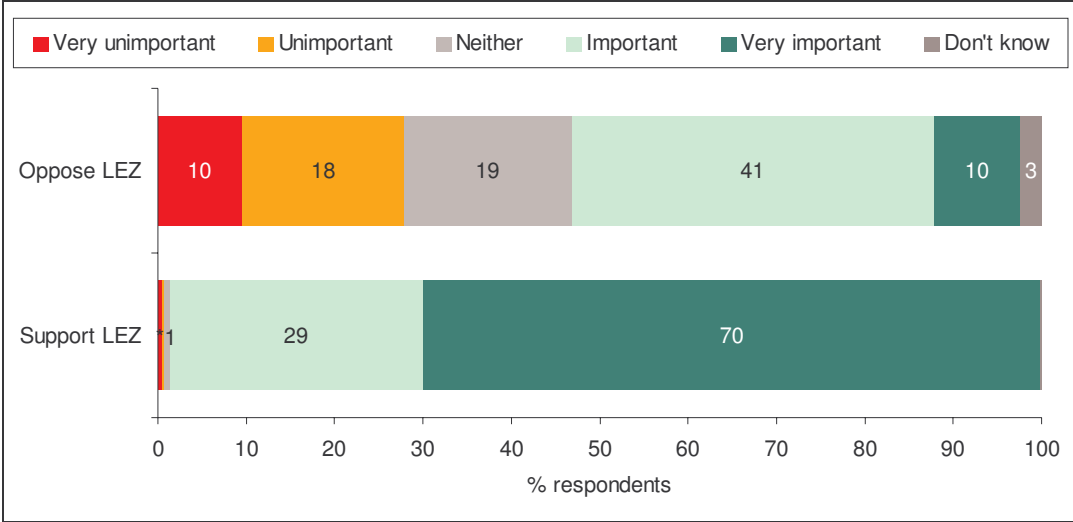
Internet respondents are more supportive of the LEZ proposal with 54% in support compared to 44% for the paper questionnaire.

Table 21: Support for proposed LEZ from business questionnaires

	Total %	Paper %	Internet %
Strongly support	23	24	34
Support	24	24	20
Neither support nor oppose	7	7	8
Oppose	17	17	20
Strongly oppose	28	27	34
Don't know	1	1	1
Base	5,502	5,069	433

There is a very strong correlation between support for the LEZ and the importance of tackling air pollution in London.

Figure 61: Importance of tackling poor air quality in London from business questionnaires by whether support or oppose the LEZ

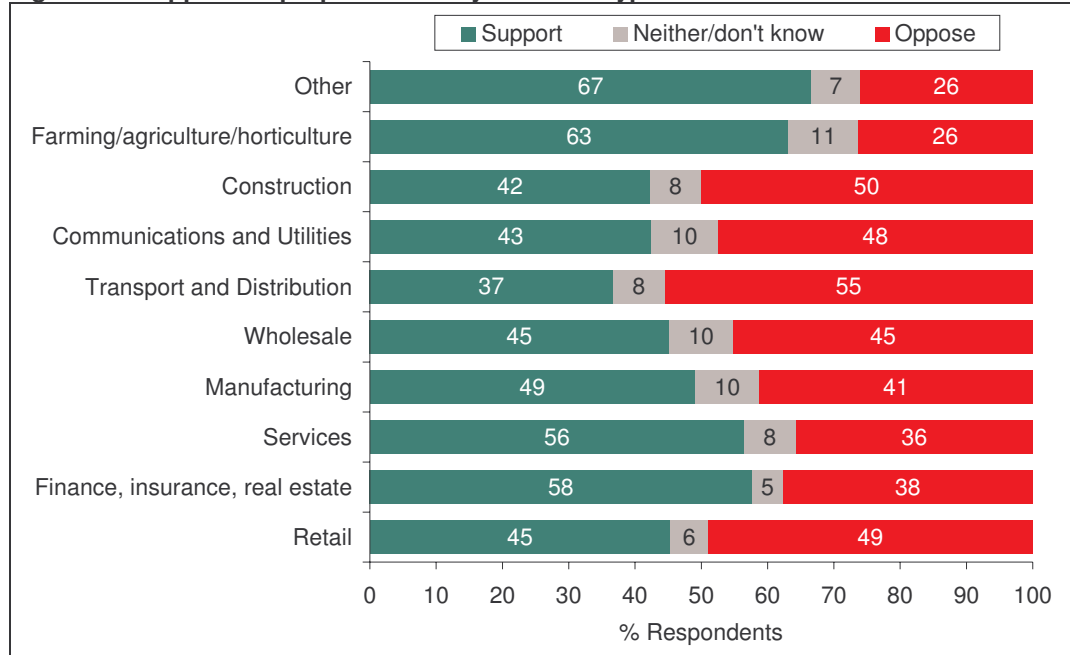


Base: support LEZ 2,621; oppose LEZ 2,403
 * = less than 0.5%

7.4.1. Business Type

Analysis of support for the proposed LEZ by business type is shown in Figure 62. Transport and distribution businesses are more strongly opposed to the proposed LEZ than all other types of businesses, with over half of them (55%) opposed to the LEZ. Construction, retail and communications and utilities businesses are also strongly opposed to the LEZ with more in opposition than in support.

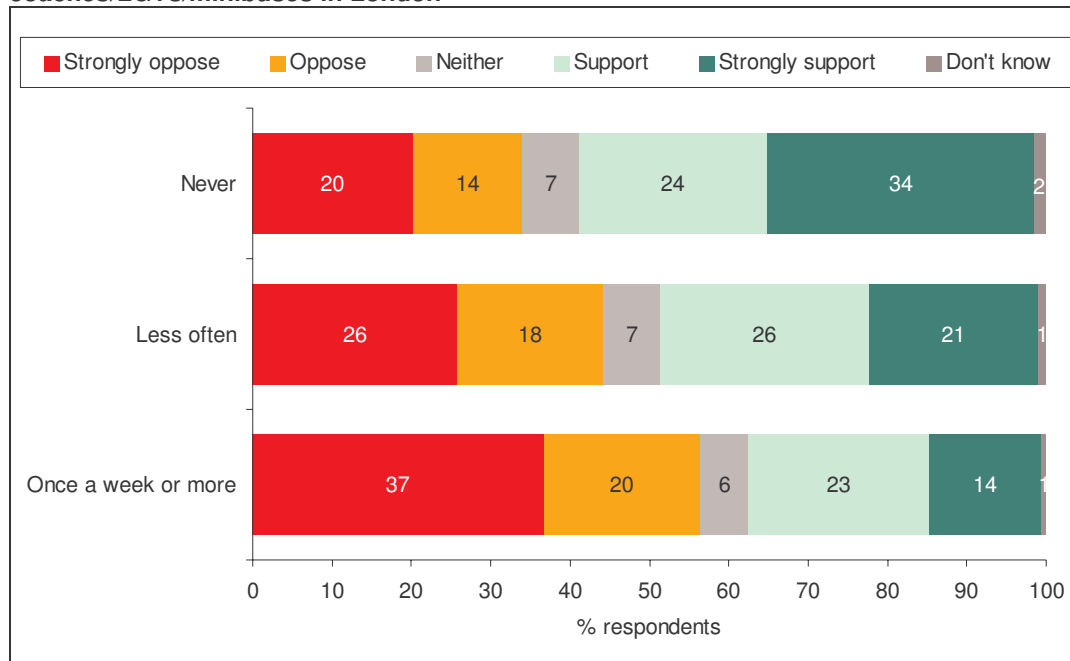
Figure 62: Support for proposed LEZ by business type



Base: Retail 302, Finance, insurance, real estate 85, Services 988, Manufacturing 381, Wholesale 186, Transport and Distribution 1,779, Communications and Utilities 80, Construction 487, Farming/agriculture/horticulture 38, Other 645

The more frequently that businesses operate HGVs, coaches, buses, LGVs or minibuses in London the more likely they are to be against the proposed LEZ: 58% of businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London support the proposed LEZ compared to 37% of businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more.

Figure 63: Support for proposed LEZ by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London

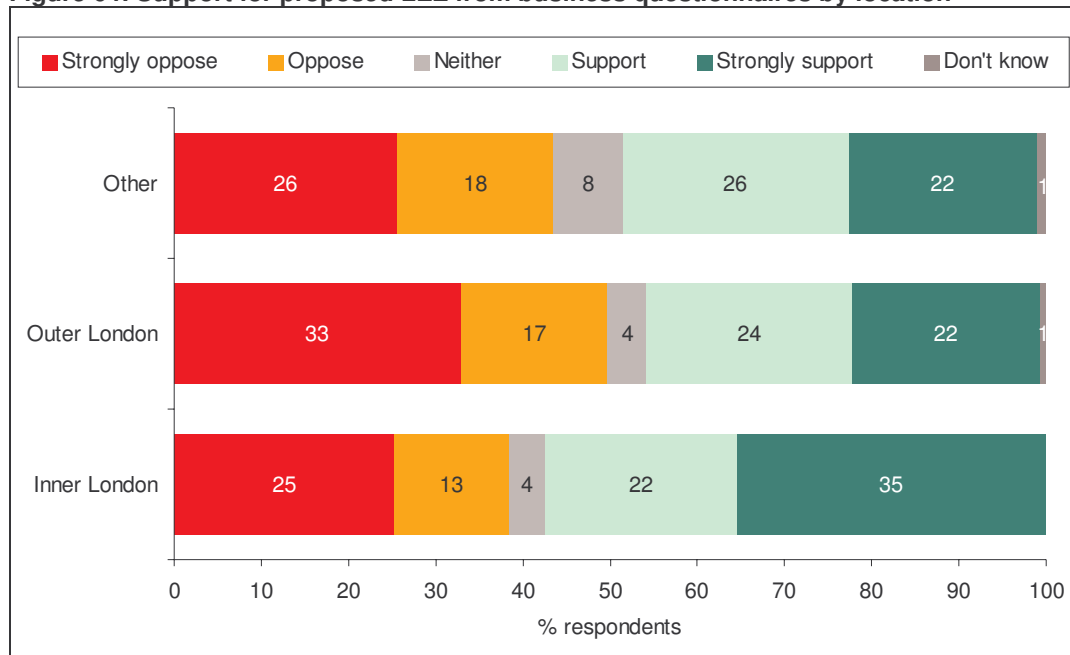


Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,923, less often 1,493, never 2,086

7.4.2. Location

Businesses based in Inner London are most likely to support the proposed LEZ with 57% in support compared to 46% of business based in Outer London and 48% based outside London.

Figure 64: Support for proposed LEZ from business questionnaires by location



Base: 547 Inner London; 990 Outer London; 3,376 other

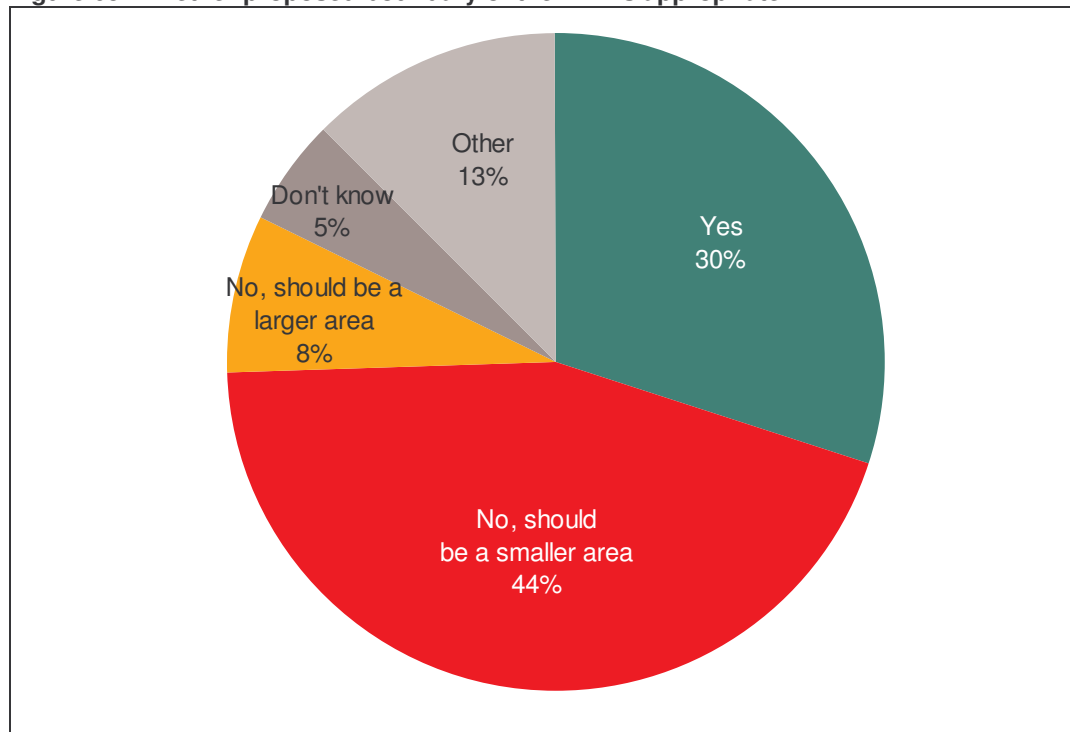
* = less than 0.5%

7.5 Agreement with Proposed Boundary

Less than a third of the business respondents (30%) think the proposed boundary of the LEZ is appropriate. Forty four per cent think it should be a smaller area and 8% think it should be a larger area.

Thirteen per cent ticked the 'other' box. These respondents were invited to write in their comment in a free text box. An analysis of their responses is at the end of this section.

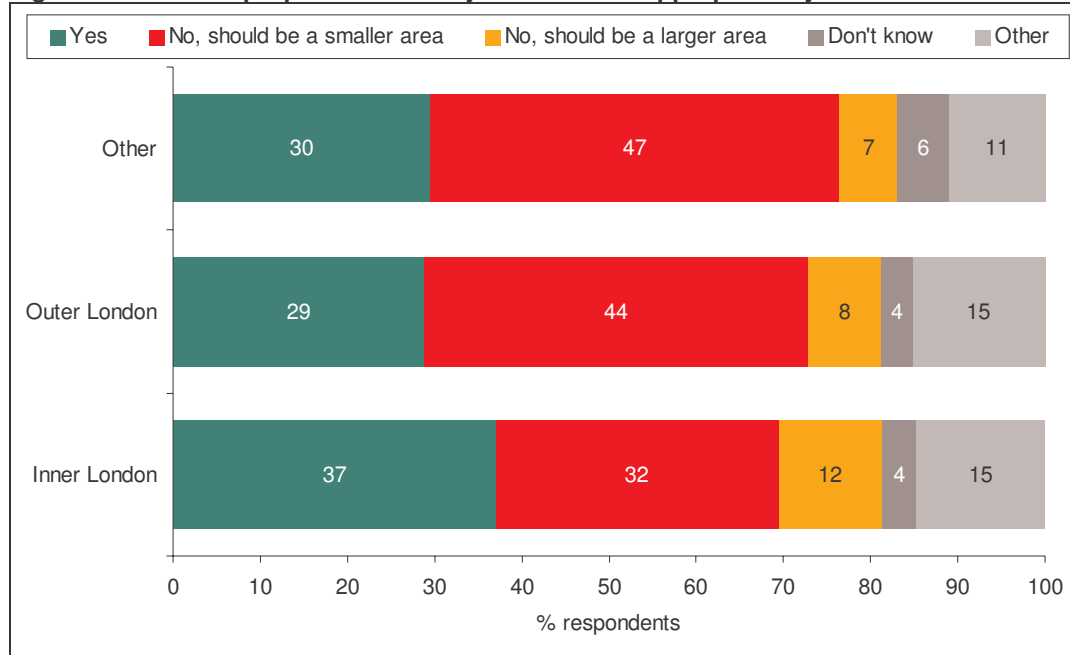
Figure 65: Whether proposed boundary of the LEZ is appropriate



Base: 5,452

Over a third (37%) of the businesses based in Inner London think the proposed boundary of the LEZ is appropriate compared to 29% of businesses based in Outer London and 30% of businesses based outside London. Nearly half (47%) of businesses based outside London think it should be a smaller area compared to 32% of businesses based in Inner London.

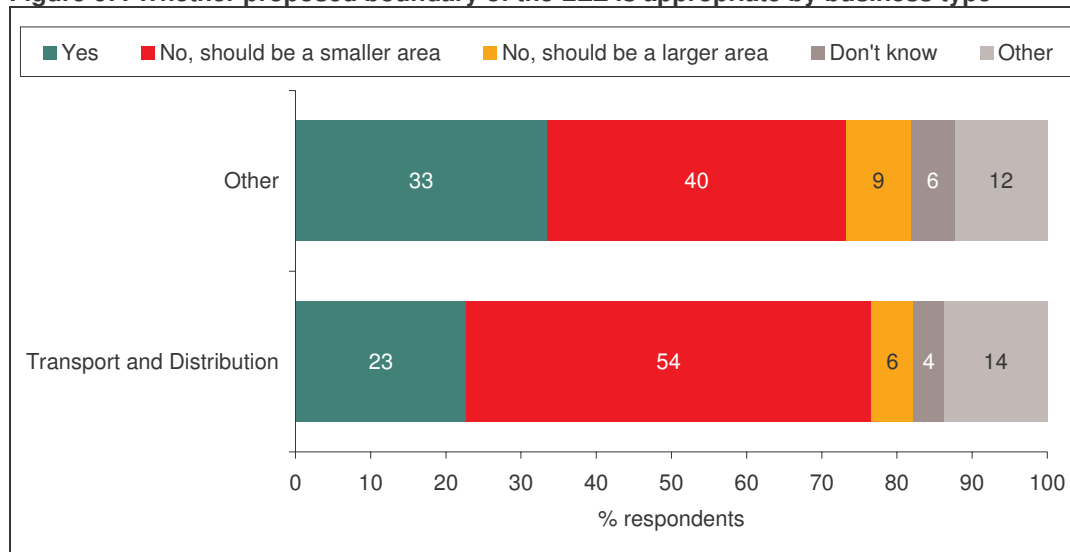
Figure 66: Whether proposed boundary of the LEZ is appropriate by location



Base: 543 Inner London; 979 Outer London; 3,365 other

Transport and distribution businesses are much less likely than other types of businesses to think the proposed boundary of the LEZ is appropriate, 23% compared to 33% for other businesses. Over half (54%) of transport and distribution businesses think the area should be smaller.

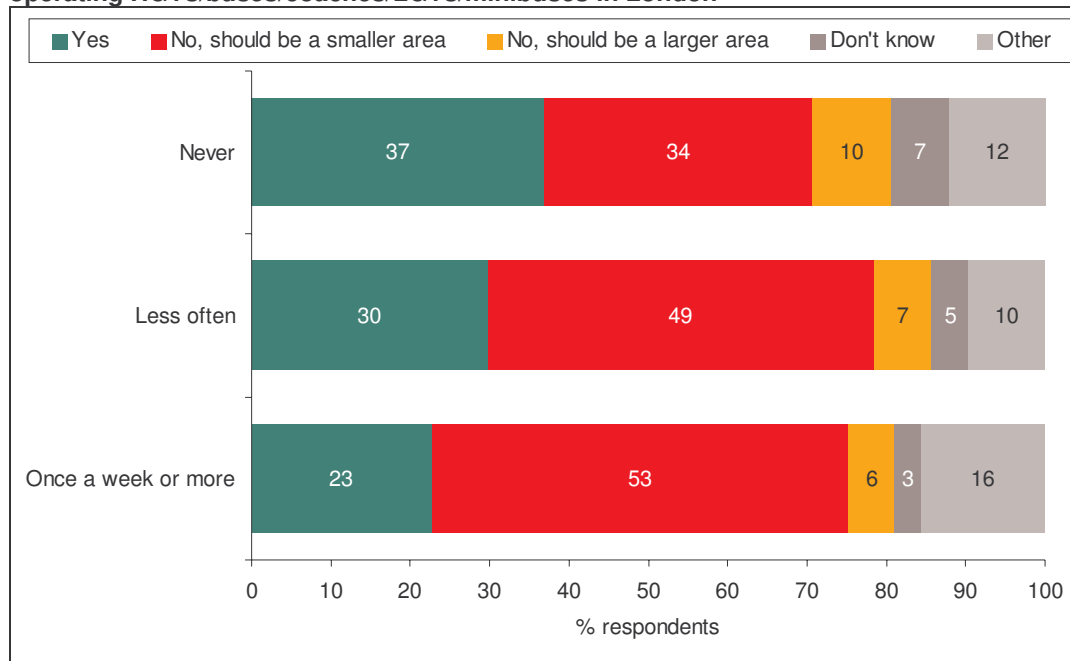
Figure 67: Whether proposed boundary of the LEZ is appropriate by business type



Base: 1,767 transport and distribution, 3,145 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are much more likely to think the proposed boundary of the LEZ is appropriate than businesses which do operate these vehicles in London: 37% which never operate these vehicles London compared to 23% of businesses which operate these vehicles in London once a week or more.

Figure 68: Whether proposed boundary of the LEZ is appropriate by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,903, less often 1,485, never 2,064

7.5.1. Comments

The questionnaire asked those who said 'other' (13%) to write down their response in an open text box. Twenty per cent of this sample made comments.

The main comment, made by 39% of respondents, was opposition to a LEZ. Other comments included that the objective of the LEZ was to raise revenues or that it was just/another tax, (9%), that it should apply to the whole of the UK (8%), and that it should be a smaller area (8%).

Although the question was related to the boundary, the first two most frequent comments were about the principle of the scheme. The next four comments were about the boundary.

The table below shows all comments representing 1% or more of respondents.

Table 22: Other comments from business questionnaire (boundary)

	%
Oppose a LEZ	39
Objective to raise revenues/another tax	9
Should apply across the whole of UK	8
Other reduced area of LEZ	8
Detailed boundary issues	7
Extend to M25	5
Impact on small businesses	4
LEZ should cover Congestion Charging area only	4
Other alternatives	3
Other central government initiatives	3
Yet another charge on transport industry	2
Impact on London's economy	2
Other principle issues	2
Cost impacts on customers/businesses	2
Other boundary issues	2
Waste of money/better spent elsewhere	1
Other discount and exemptions	1
Monitoring of social issues	1
Other incentives for cleaner vehicles	1
Should include other emissions	1
Will lead to job losses	1
Costs of buying new vehicles	1
Broader UK economy issues	1
Political motivation	1
Will increase bureaucracy/red tape	1
Costs too high	1
Traffic diverting around London	1
Complementary measures	1
Concerns with vehicles registered outside UK	1
Use MOT test	1
Support a LEZ	1
Proposal is premature	1
Should be tax incentives & loans to help convert vehicles	1
Will fail to make adequate progress towards air quality targets	1
Displacement will increase pollution outside London	1
Other Issues	1
Other	9
Respondents	1,105

The comments have been grouped into categories of response in Table 23 below. Although the question asked for responses from those who ticked the 'other' box with respect to a question on the boundary of the LEZ only 33% made comments directly to do with boundary issues. The majority made comments on the principle of the LEZ, for example opposing or supporting the LEZ.

Eight per cent made comments about business sector or micro-economic impacts and 8% suggested alternatives to the LEZ.

Table 23: Other comments by category of comments (boundary)

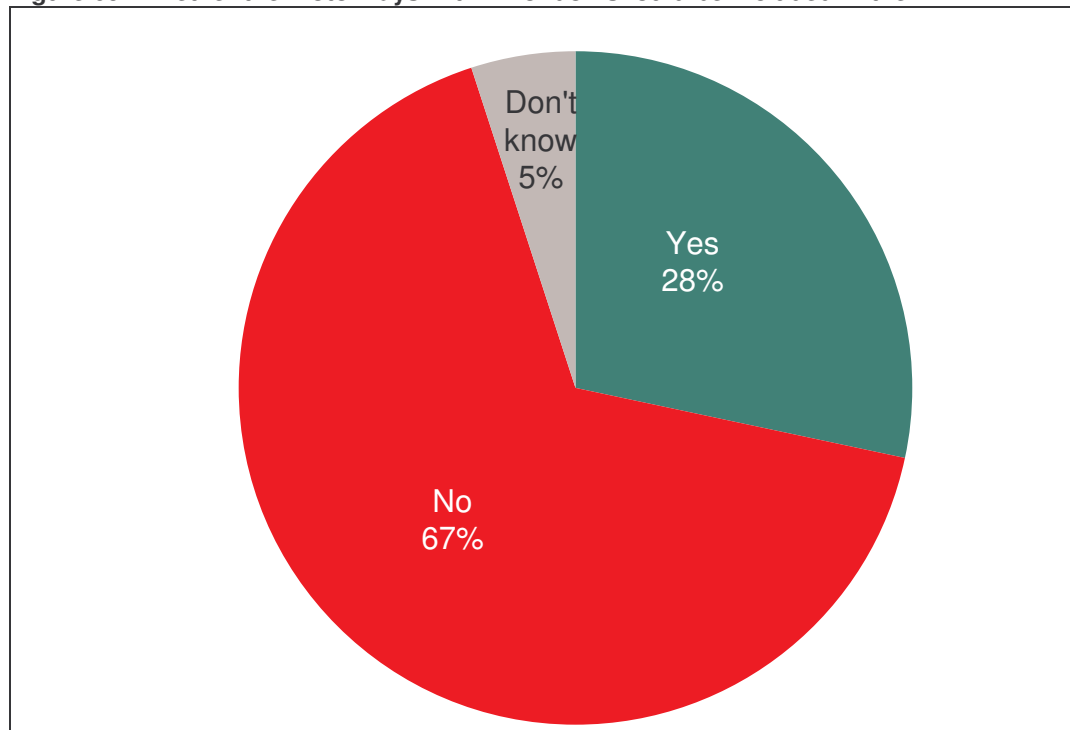
	%
The principle of a Low Emission Zone	52
Boundary	33
Business sector /micro-economic impacts	8
Suggested alternatives	8
Macro-Economic impacts	7
Environmental impacts	2
Discounts and Exemptions	2
Business Case	2
Vehicles to be included	2
Enforcement	2
Impacts on public and community sectors	1
Consultation process/information	1
Timetable	1
Impacts on traffic	1
Vehicle emission standards	*
Operations	*
Health impacts	*
Level of charge	*
Other	6
Respondents	1,105

* = less than 0.5%

7.6 Whether Motorways Should be Included

Over two thirds of business respondents (67%) think that the motorways within London should **not** be included in the LEZ.

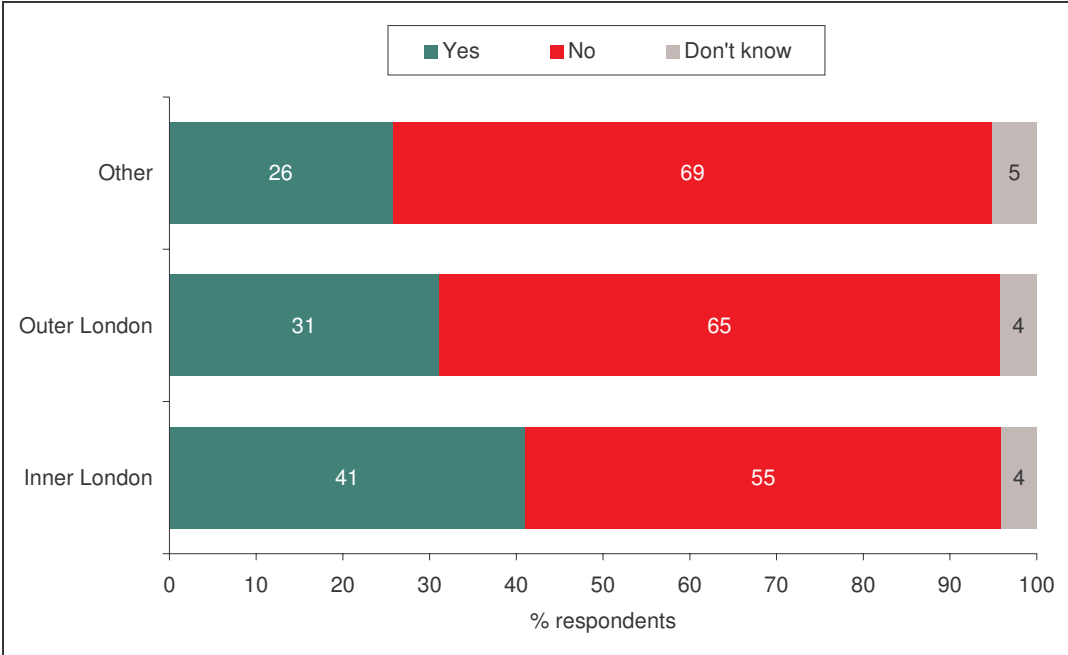
Figure 69: Whether the motorways within London should be included in the LEZ



Base: 5,492

Businesses based in Inner London are more likely to think motorways within London should be included in the LEZ than businesses based in Outer London and outside London.

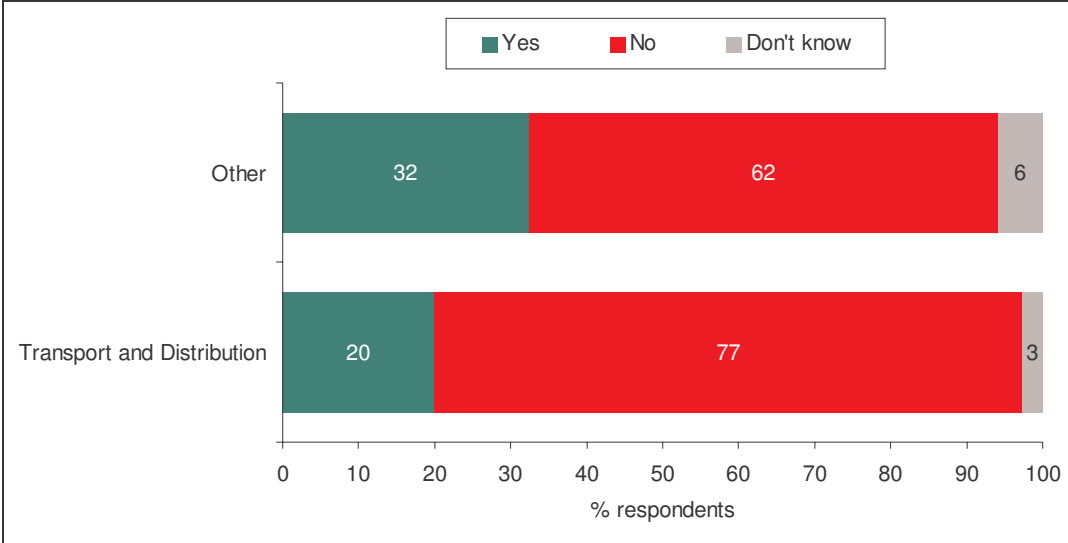
Figure 70: Whether the motorways within London should be included in the LEZ by location



Base: 544 Inner London; 994 Outer London; 3,380 other

Transport and distribution businesses are less likely than other types of businesses to think motorways within London should be included in the LEZ: 20% compared to 32%.

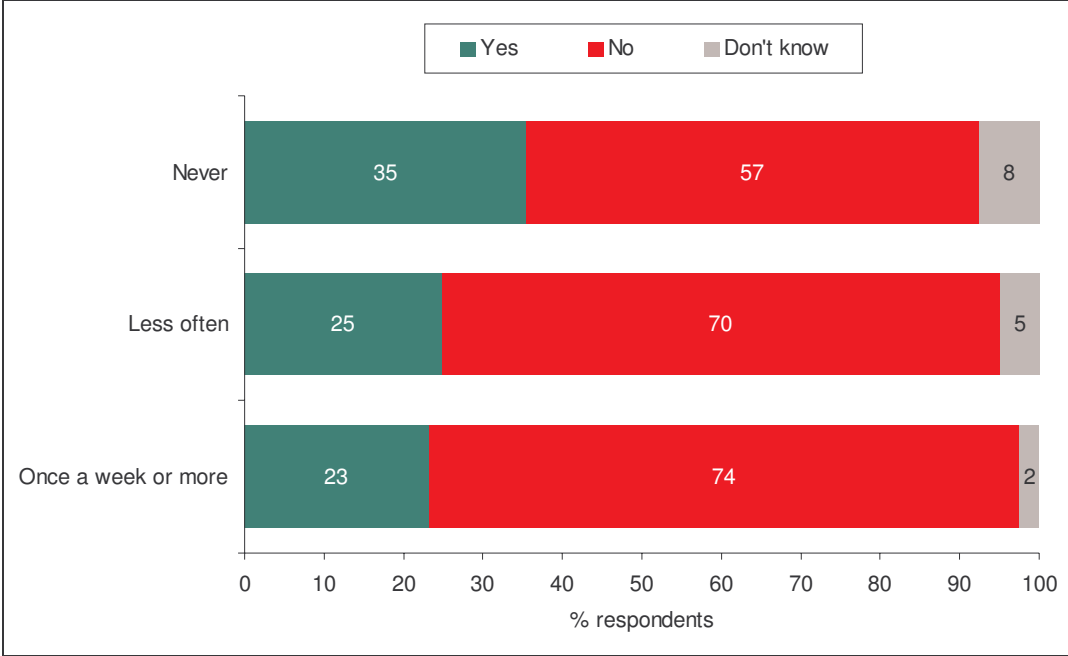
Figure 71: Whether the motorways within London should be included in the LEZ by business type



Base: 1,785 transport and distribution, 3,163 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are much more likely to say motorways within London should be included in the LEZ than businesses which do operate HGVs, coaches, buses, LGVs or minibuses in London.

Figure 72: Whether the motorways within London should be included in the LEZ by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,929, less often 1,497, never 2,066

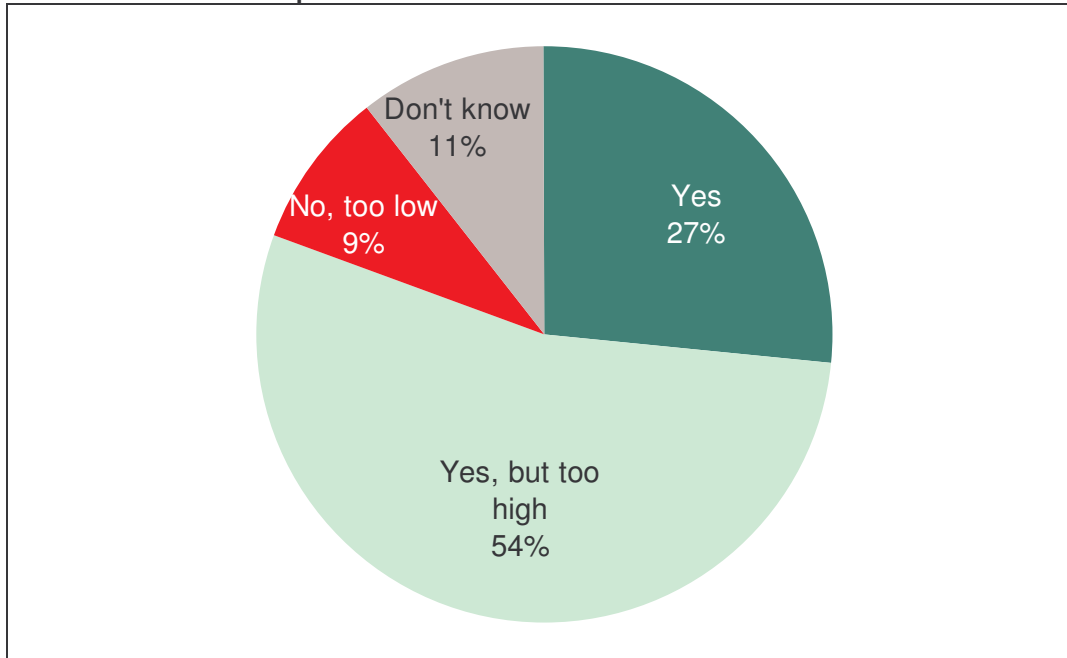
7.7 Agreement with Level of Charge and Penalty Charge

Business respondents were asked whether the proposed level of charge was sufficient to incentivise operators to make their vehicles compliant. The text of the question was:

“Do you think the proposed level of charge (i.e. of £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 vehicles compliant?”

The majority of business respondents (54%) think it is too high; half that proportion (27%) think the charge is sufficient to incentivise operators to make their vehicles compliant and 9% think it is too low.

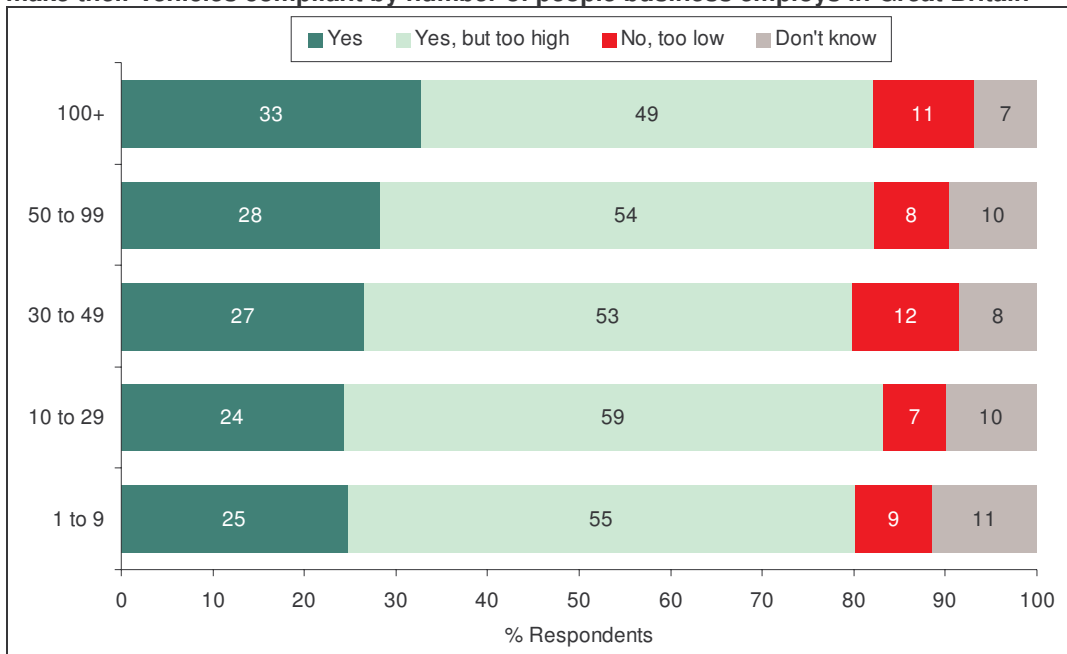
Figure 73: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant



Base: 5,263

The larger the business (as defined by number of employees in Great Britain) the more likely it was to think the proposed level of charge was sufficient to incentivise operators to make their vehicles compliant: 33% of companies employing 100 or more compared to 25% of companies employing between one and nine.

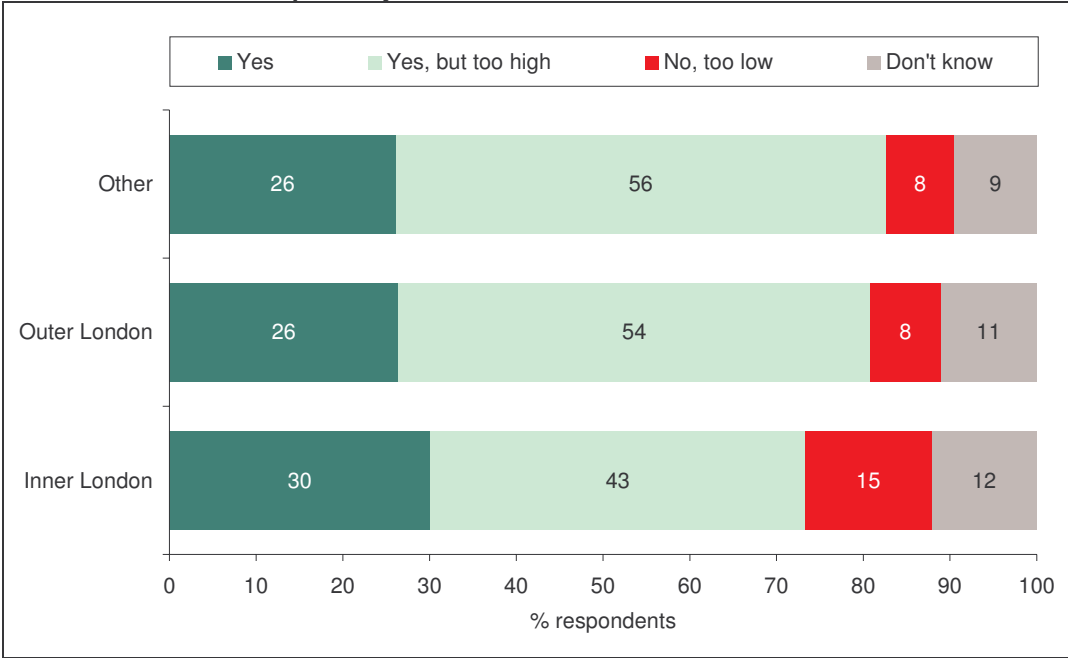
Figure 74: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by number of people business employs in Great Britain



Base: Employees in Great Britain: 1-9 2,397, 10-29 911, 30-49 365, 50-99 326, 100+ 701

Businesses based in Inner London are more likely than businesses based elsewhere to think that the charge is sufficient to incentivise operators to make their vehicles compliant and that it is too low and less likely to think the charge is too high.

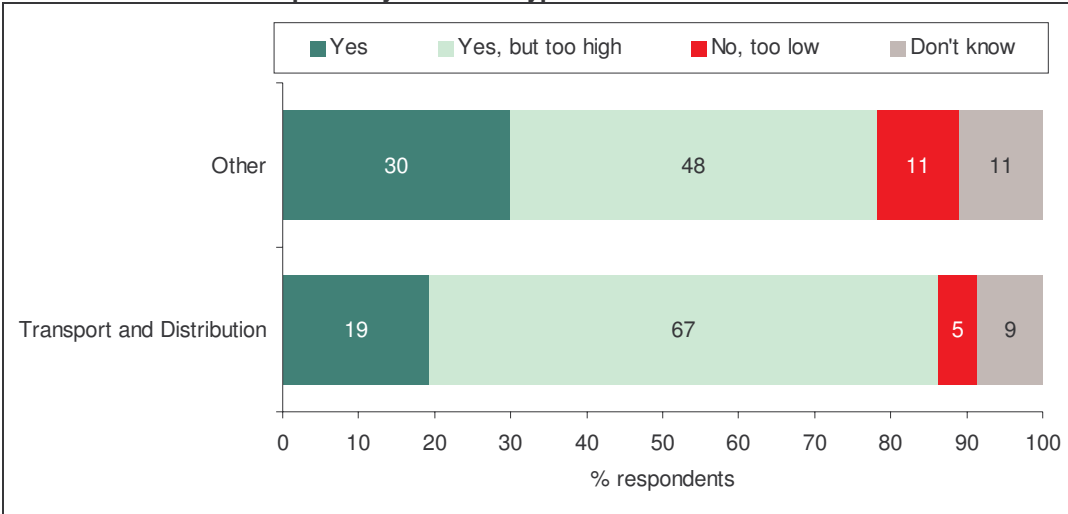
Figure 75: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by location



Base: 521 Inner London; 942 Outer London; 3,267 other

Transport and distribution businesses are less likely than other types of businesses to think the charge is sufficient to incentivise operators to make their vehicles compliant and more likely to think the proposed level of charge is too high.

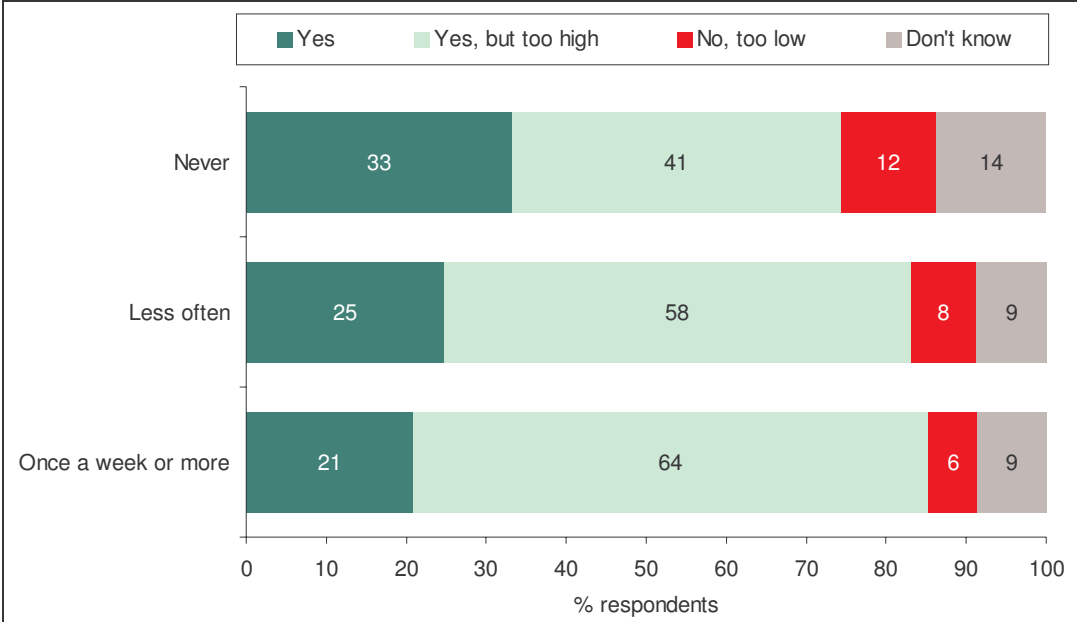
Figure 76: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by business type



Base: 1,686 transport and distribution, 3,067 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are much more likely to say the proposed level of charge is sufficient to incentivise operators to make their vehicles compliant and less likely to say the level of the charge is too high than businesses which do operate HGVs, coaches, buses, LGVs or minibuses in London.

Figure 77: Whether proposed level of charge is sufficient to incentivise operators to make their vehicles compliant by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,833, less often 1,452, never 1,978

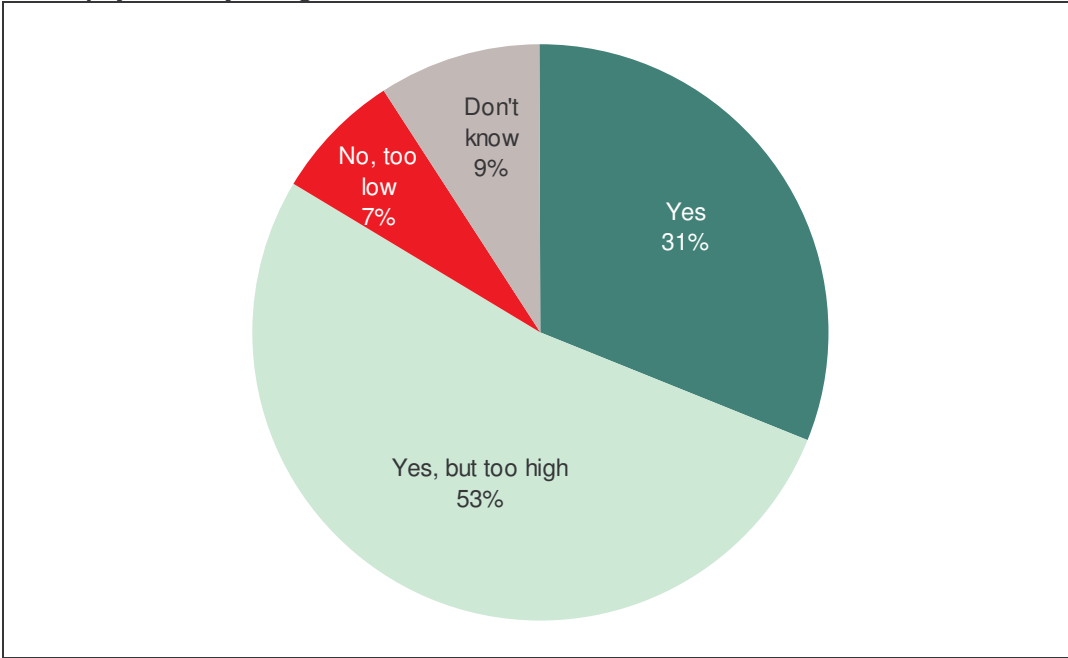
7.7.1. Penalty Charge

Business respondents were asked whether the proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge was a sufficient deterrent. The text of the question was:

“Do you think 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?”

The majority of business respondents (53%) think the proposed level of the Penalty Charge is too high, 31% think it is a sufficient deterrent, and 7% think it is too low. See Figure 79.

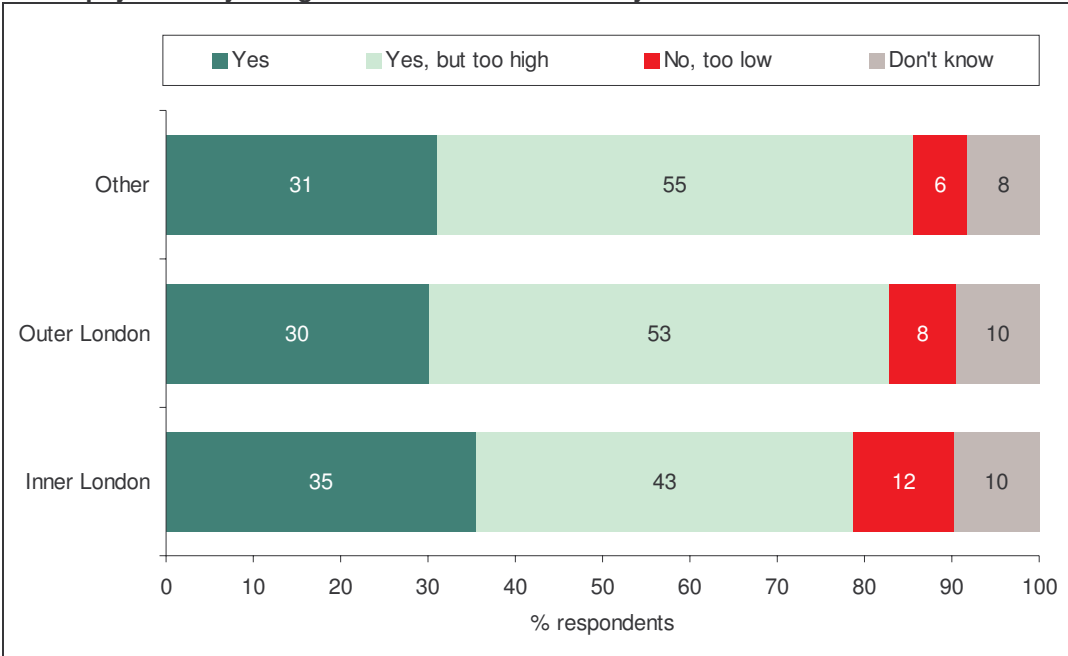
Figure 78: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent



Base: 5,264

Businesses based in Inner London are more likely than those based elsewhere to think the proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent and less likely to think the proposed level of Penalty Charge is too high.

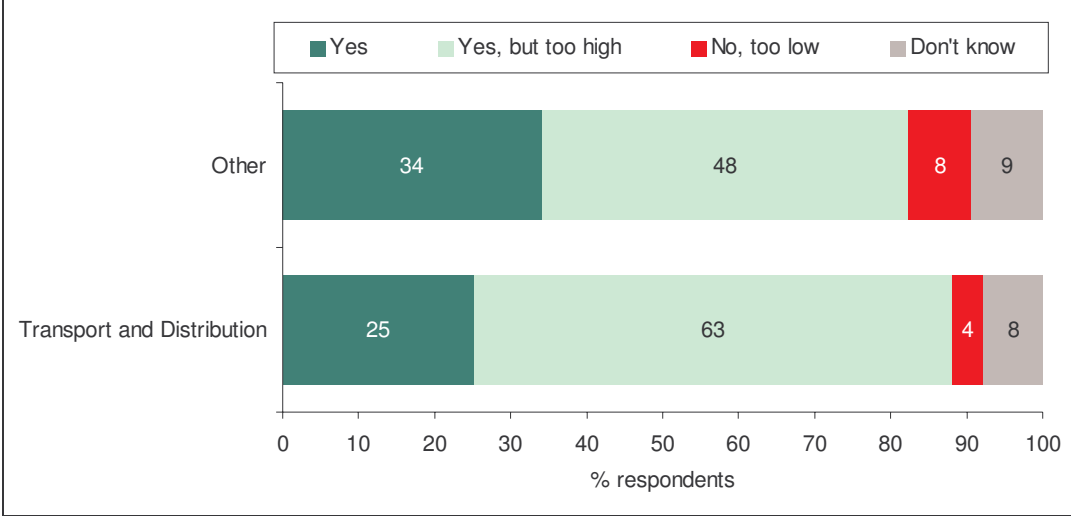
Figure 79: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent by location



Base: 527 Inner London; 947 Outer London; 3,261 other

Transport and distribution businesses are less likely than other types of businesses to think the proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent (25% compared to 34%) and more likely to think the proposed level of Penalty Charge is too high (63% compared to 48%).

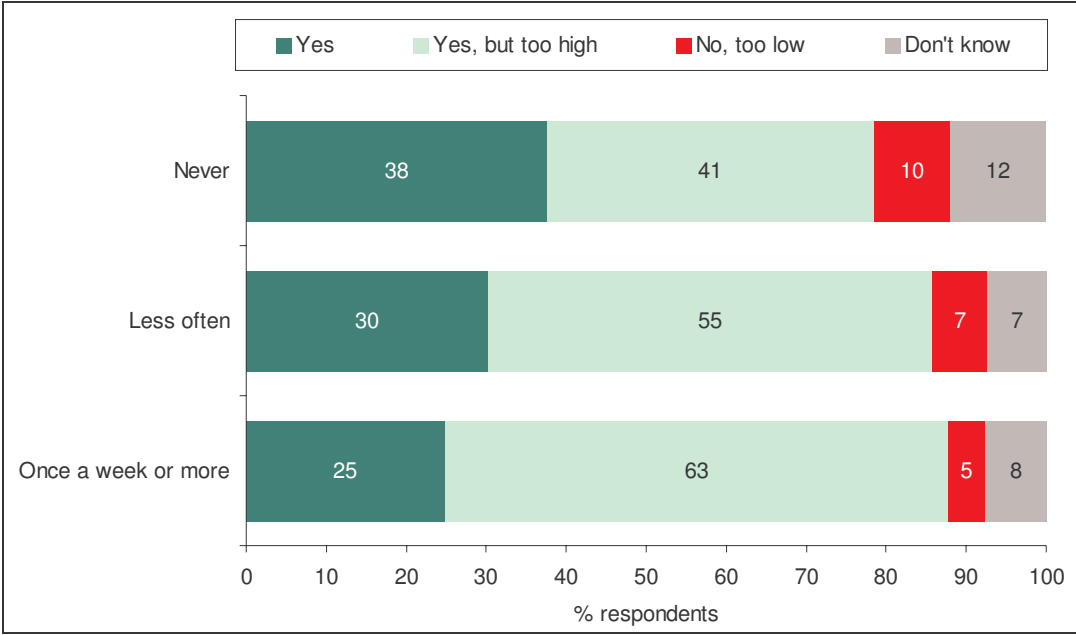
Figure 80: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent by business type



Base: 1,694 transport and distribution, 3,062 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are less likely to think the proposed level of Penalty Charge for non-compliant vehicles is a sufficient deterrent and less likely to think the proposed level of Penalty Charge is too high than businesses which do operate HGVs, coaches, buses, LGVs or minibuses in London.

Figure 81: Whether proposed level of Penalty Charge for non-compliant vehicles which do not pay the daily charge is a sufficient deterrent by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London

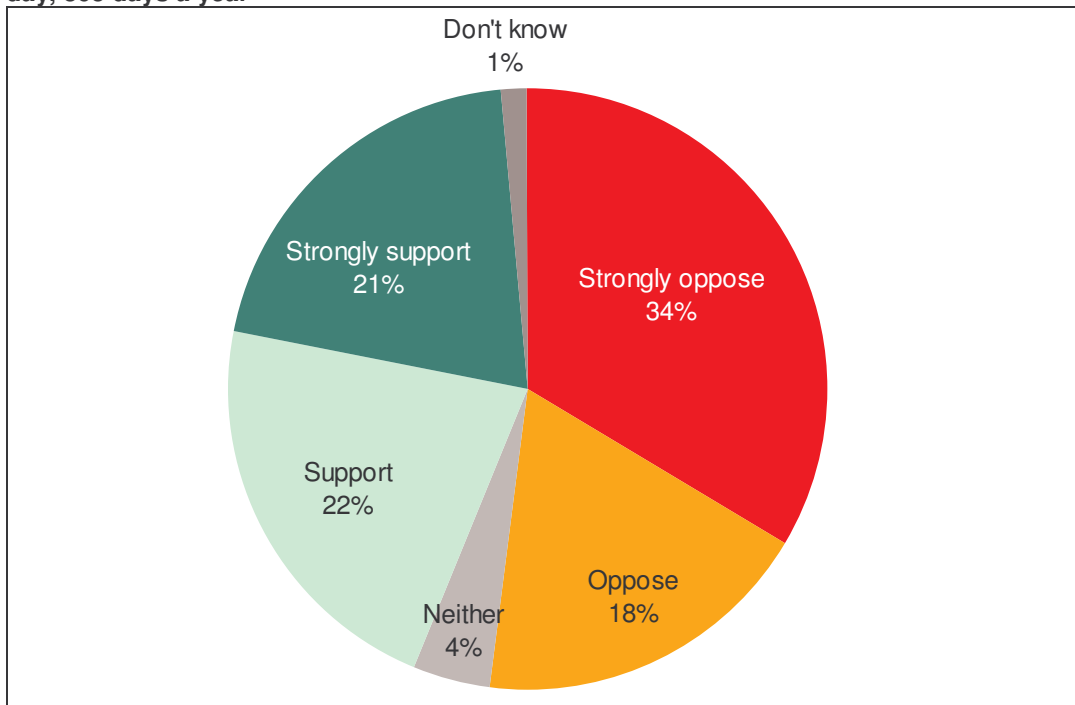


Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,842, less often 1,455, never 1,967

7.8 Agreement with Hours of Operation

The proposed hours of operation for the LEZ is 24 hours a day, 365 days a year. The majority (52%) of business respondents oppose these hours of operation, 34% strongly oppose them. Forty three per cent support the proposed hours of operation, 21% strongly support them.

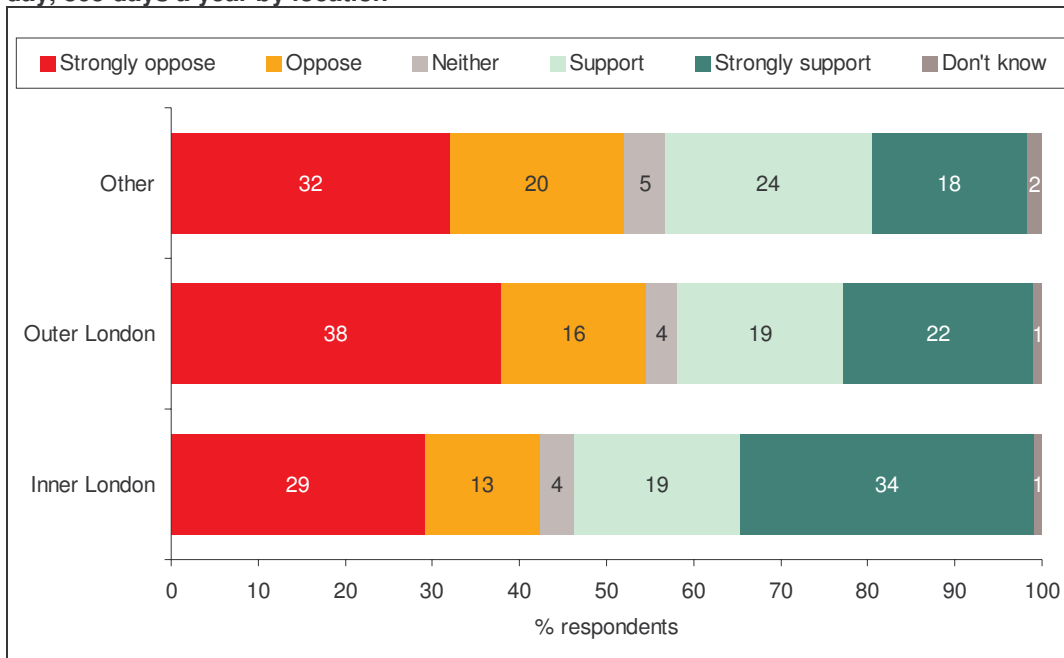
Figure 82: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year



Base: 5,507

Businesses based in Inner London are much more likely to support the proposed hours of operation than businesses based in Outer London or outside London: 34% strongly support compared to 22% in Outer London and 18% elsewhere.

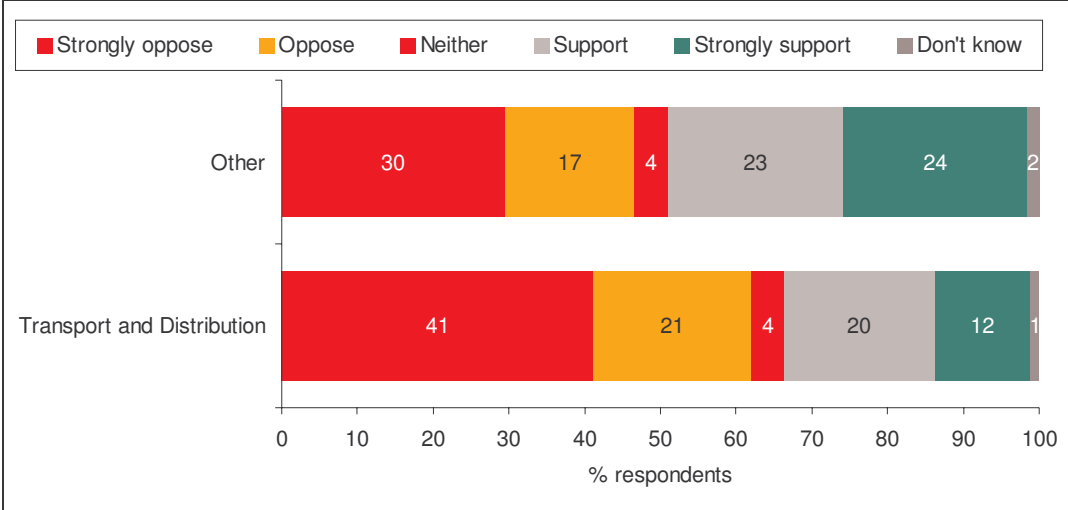
Figure 83: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year by location



Base: 547 Inner London; 995 Outer London; 3,392 other

Transport and distribution businesses are much more opposed to the proposed hours of operation than other types of businesses with 62% in opposition compared to 47% for other businesses.

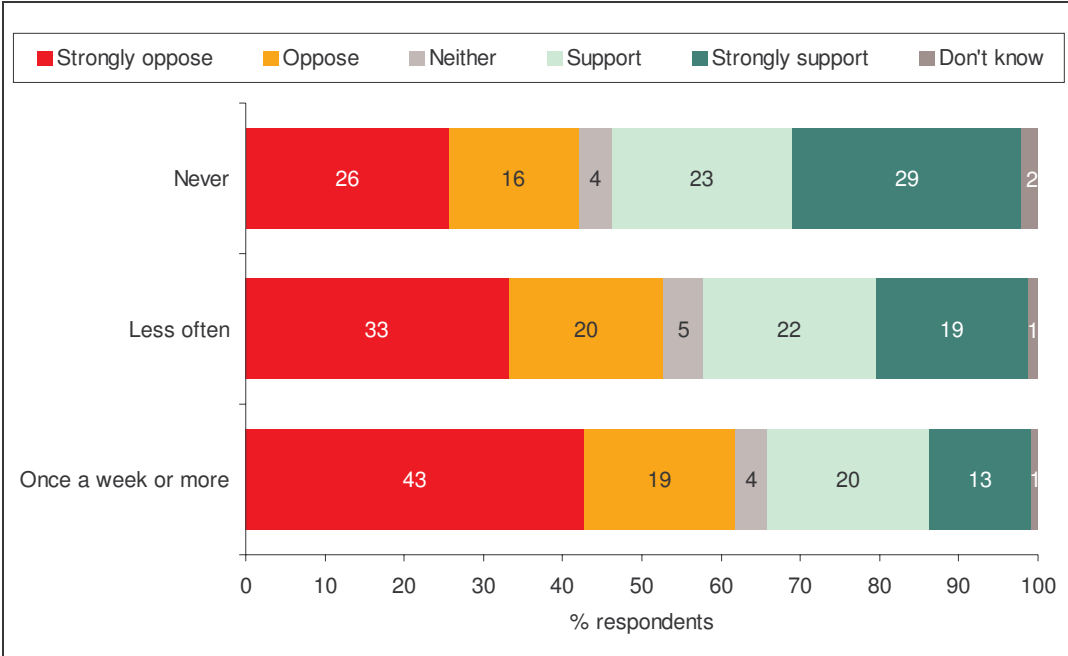
Figure 84: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year by business type



Base: 1,794 transport and distribution, 3,166 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are much more likely to support the proposed hours of operation than businesses which do operate HGVs, coaches, buses, LGVs or minibuses in London: 52% which never operate HGVs, coaches, buses, LGVs or minibuses in London support the proposed hours compared to 33% of businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more.

Figure 85: Whether support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



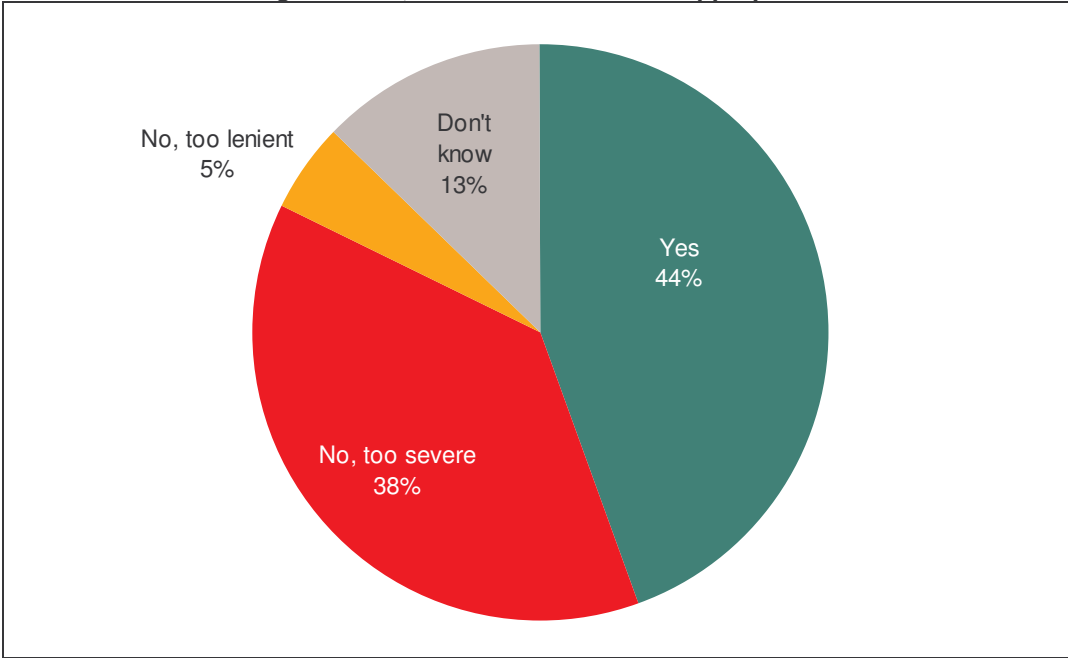
Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,930, less often 1,501, never 2,076

7.9 Agreement with Proposed Emission Standards

Business respondents to the consultation questionnaire were asked if they thought that the proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches was appropriate.

Forty four per cent think it is appropriate. A slightly smaller proportion (43%) thinks it is not appropriate: 38% think it is too severe and 5% think it is too lenient. Thirteen per cent say they don't know.

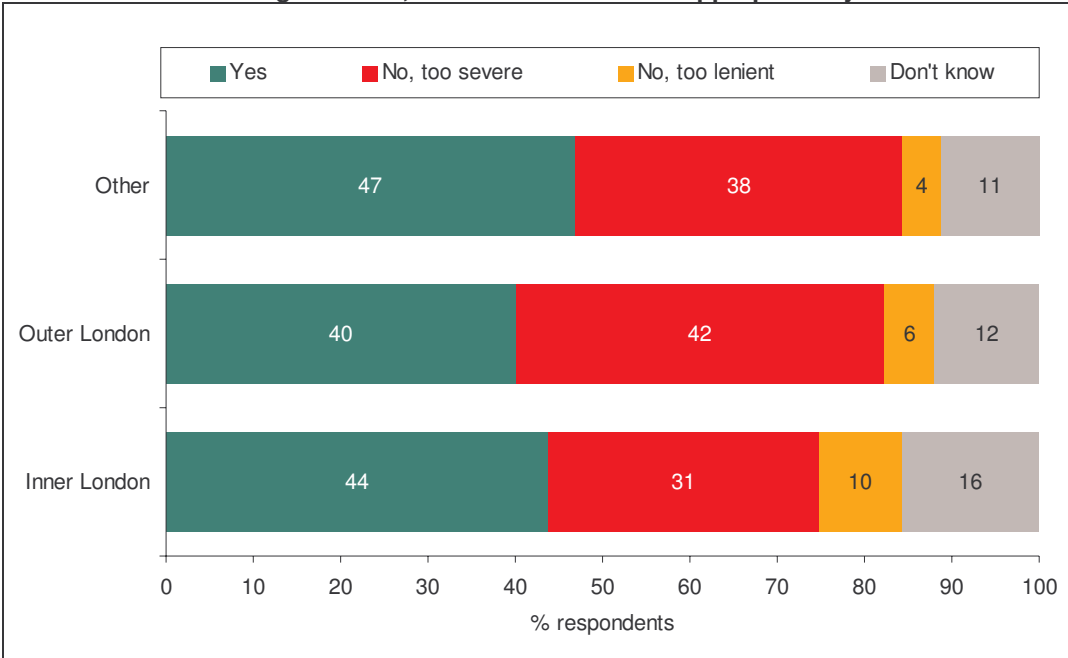
Figure 86: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate



Base: 5,469

Businesses based outside London are most likely to think the proposed emission standards are appropriate with 47% saying they are appropriate compared to 40% for businesses based in Outer London and 44% for businesses based in Inner London. Businesses based in Outer London are most likely to think that the proposed emission standards are too severe.

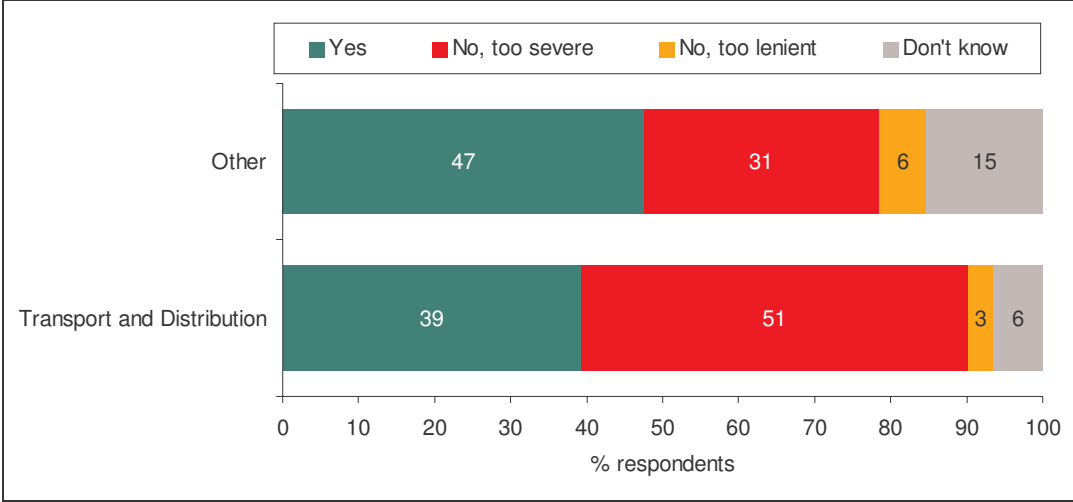
Figure 87: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate by location



Base: 539 Inner London; 989 Outer London; 3,381 other

Transport and distribution businesses are much more likely to think the proposed emission standards are too severe than other types of businesses, with 51% of them saying that the proposed emission standards are too severe compared to 31% for other types of businesses.

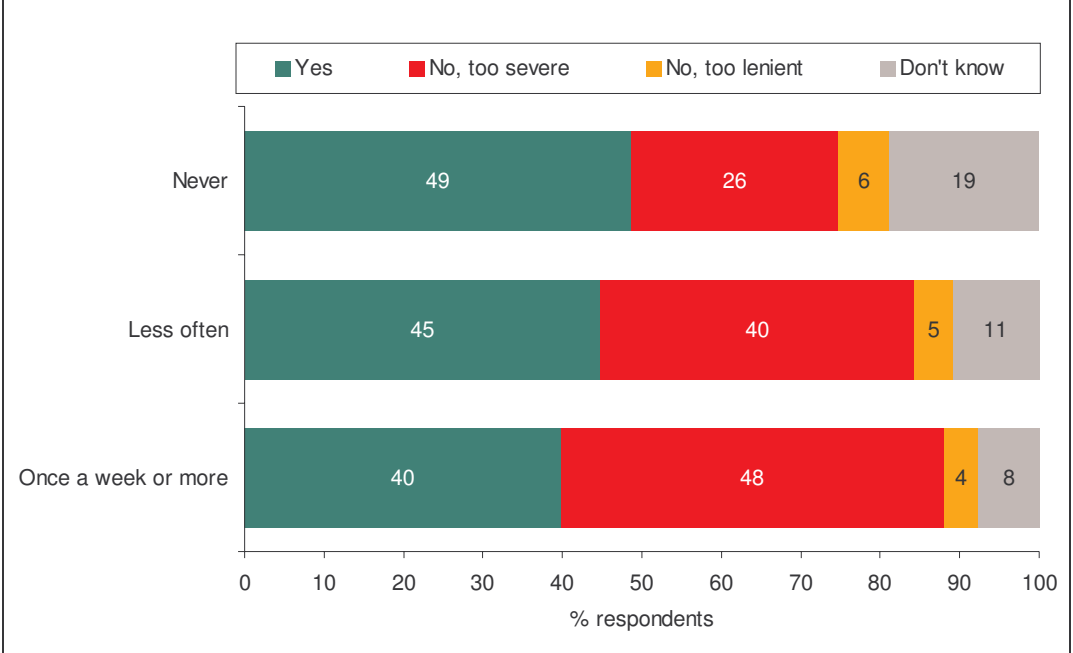
Figure 88: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate by business type



Base: 1,788 transport and distribution, 3,152 other

Businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or much more likely than those which never operate HGVs, coaches, buses, LGVs or minibuses in London to think the proposed emission standards are too severe: 48% compared to 26%.

Figure 89: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



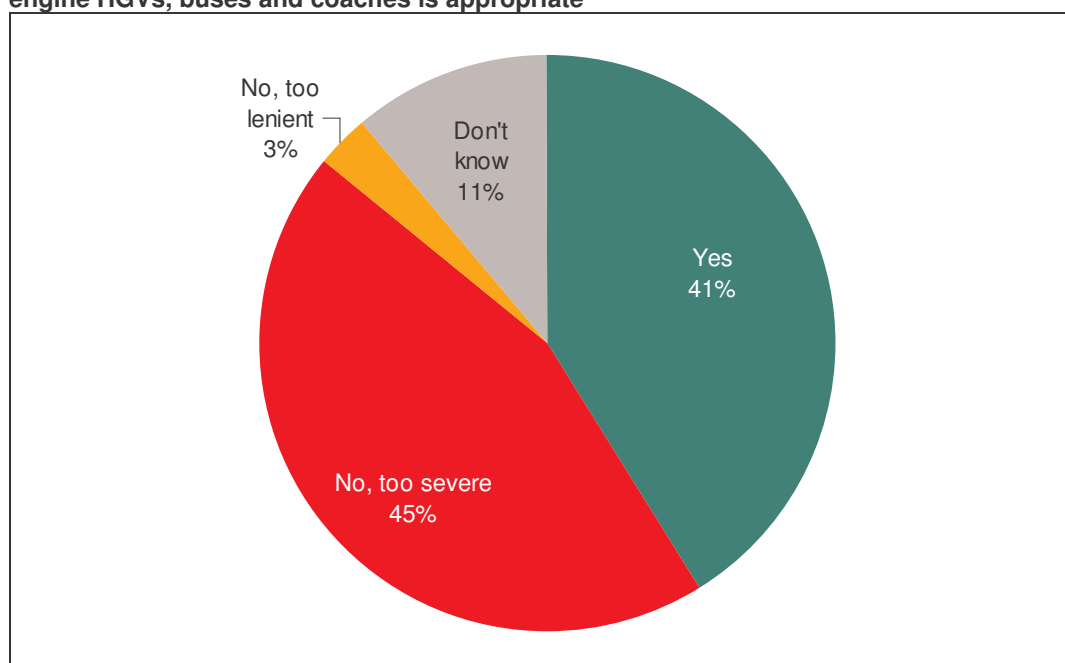
Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,927, less often 1,504, never 2,038

7.10 Whether Higher Standard of Euro IV from 2012 is Appropriate

Business respondents were asked if they thought that the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches was appropriate.

Almost half (48%) think it is **not** appropriate: compared with 41% who think it is appropriate. Of those who do not think the emission standard is appropriate, 45% think it is too severe and 3% think it is too lenient. Over a tenth (11%) say they don't know.

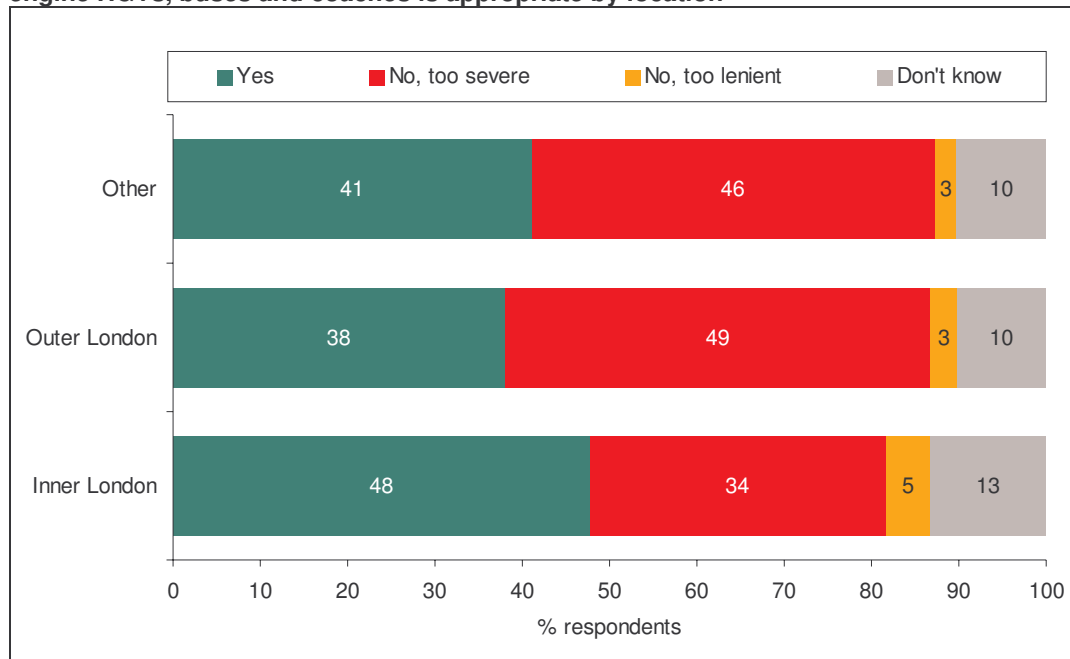
Figure 90: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate



Base: 5,456

Businesses based in Inner London are most likely to think the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate with 48% saying it is appropriate compared to 38% of businesses based in Outer London and 41% based outside London.

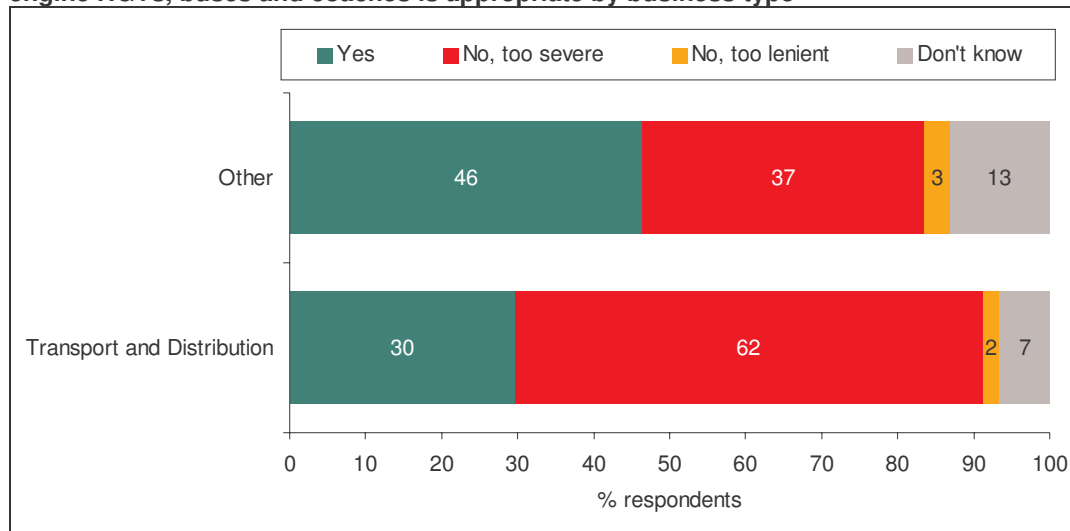
Figure 91: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate by location



Base: 538 Inner London; 990 Outer London; 3,371 other

Transport and distribution businesses are very much more likely than other types of businesses to think the introduction of the higher emission standard in 2012 is too severe: 62% compared to 37% for other types of businesses.

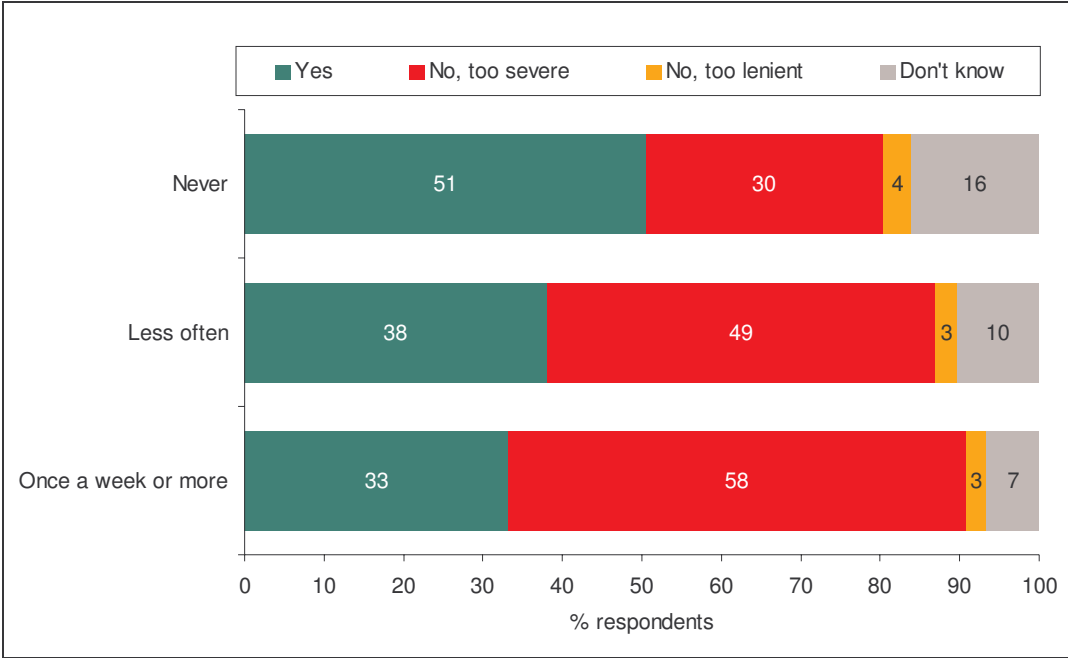
Figure 92: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate by business type



Base: 1,779 transport and distribution, 3,147 other

Businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more are almost twice as likely as those which never operate HGVs, coaches, buses, LGVs or minibuses in London to think the introduction of the higher emission standard in 2012 is too severe: 58% compared to 30%.

Figure 93: Whether the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



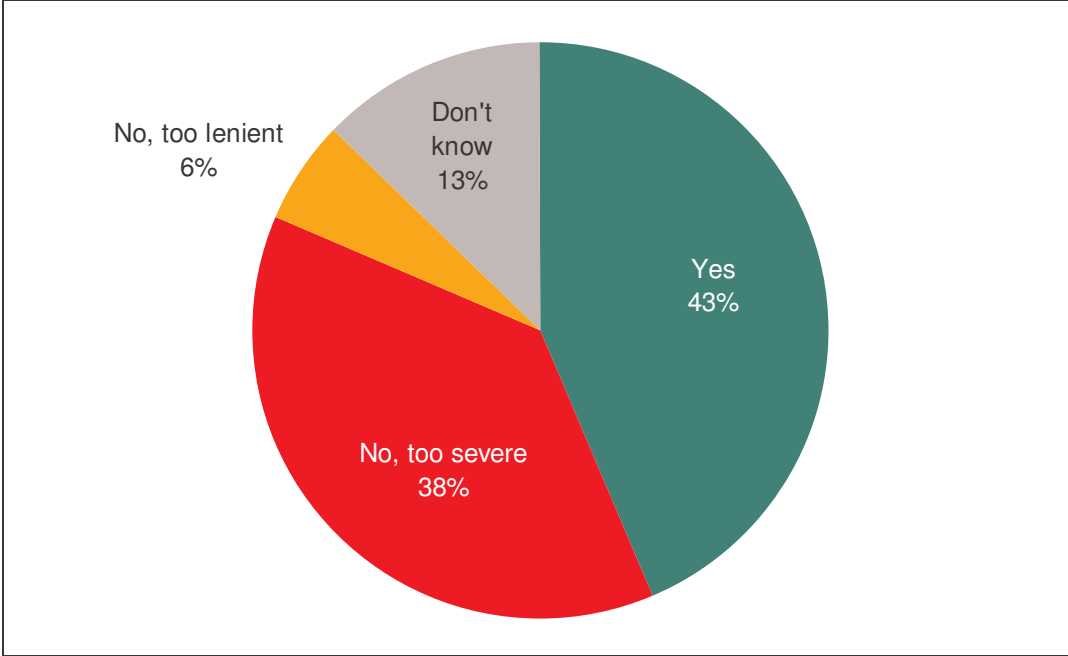
Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,920, less often 1,495, never 2,041

7.11 Whether Emission Standard of Euro III for Minibuses and Heavier LGVs is Appropriate

Business respondents were asked if they thought that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate.

Forty three per cent think it is appropriate and a slightly higher proportion (44%) think it is **not** appropriate: 38% think it is too severe and 6% think it is too lenient. Thirteen per cent say they don't know. See Figure 94.

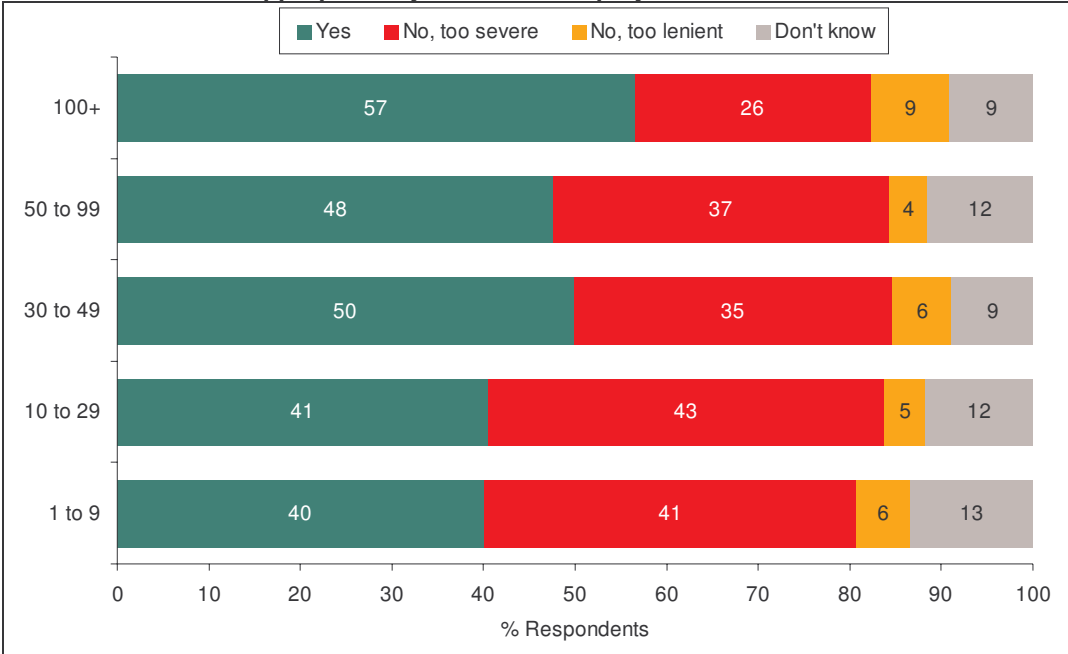
Figure 94: Whether proposed emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate



Base: 5,434

There was a tendency for larger businesses (as defined by number of employees in Great Britain) to be more likely than small businesses to think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate and less likely to think it is too severe.

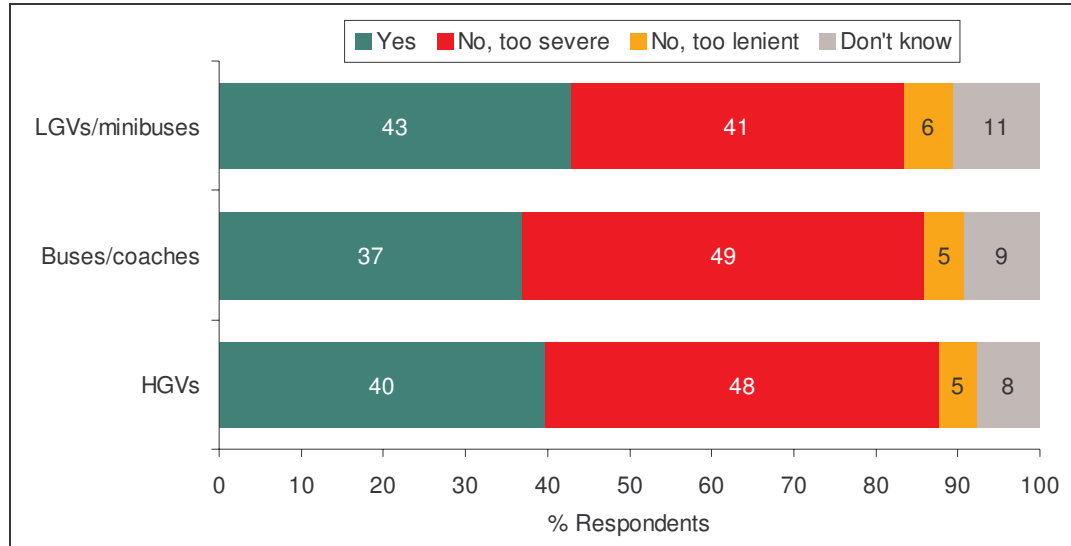
Figure 95: Whether proposed emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by number of employees in Great Britain



Base: Employees in Great Britain: 1-9 2,397, 10-29 911, 30-49 365, 50-99 326, 100+ 701

Businesses which operate LGVs/minibuses are more likely than operators of buses/coaches and HGVs to think that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate and less likely to think it is too severe.

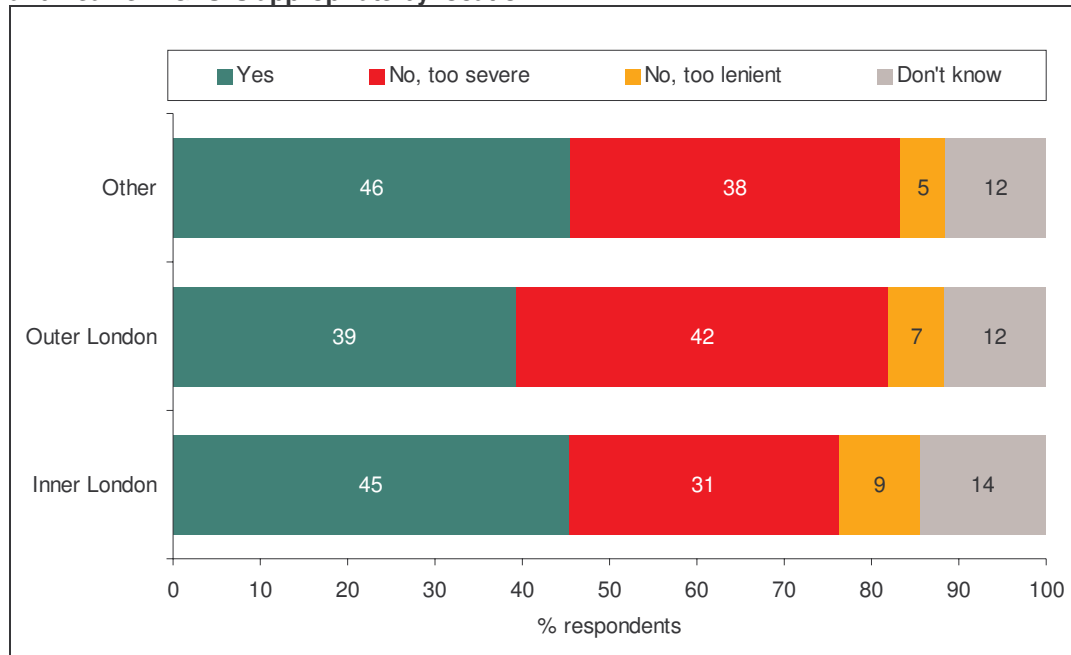
Figure 96: Whether proposed emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by whether operate HGVs, buses/coaches, LGVs/minibuses within zone



Base: Operate vehicles within proposed zone: HGVs 1,718, buses/coaches 574, LGVs/minibuses 1,994

Businesses based in Inner London are least likely to think the proposed emission standard (of Euro III for diesel-engine minibuses and heavier LGVs) is too severe and most likely to think it is too lenient.

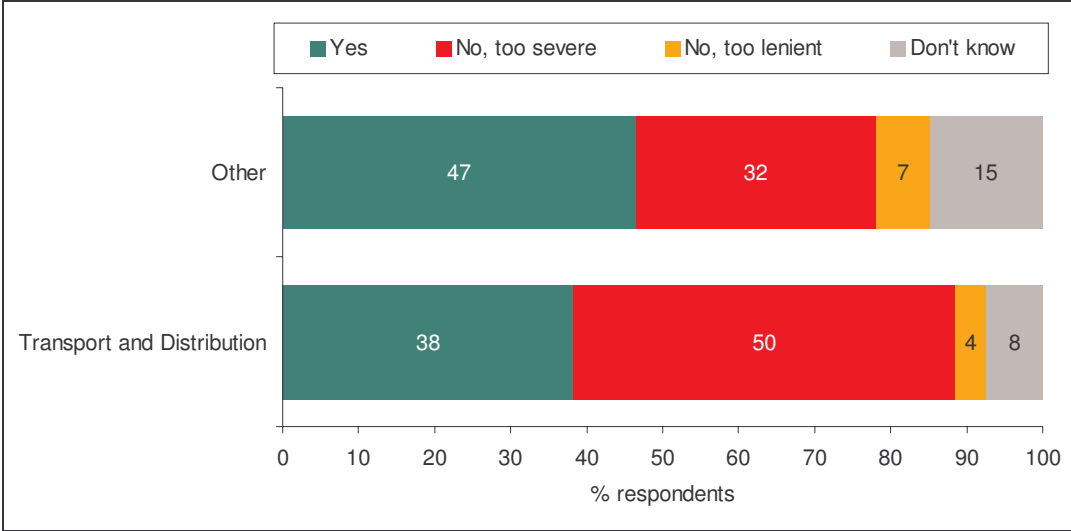
Figure 97: Whether proposed emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by location



Base: 535 Inner London; 986 Outer London; 3,358 other

Transport and distribution businesses are much less likely to think the proposed emission standard is appropriate than other types of businesses, with 50% of them saying that the proposed emission standard is too severe compared to 32% for other types of businesses.

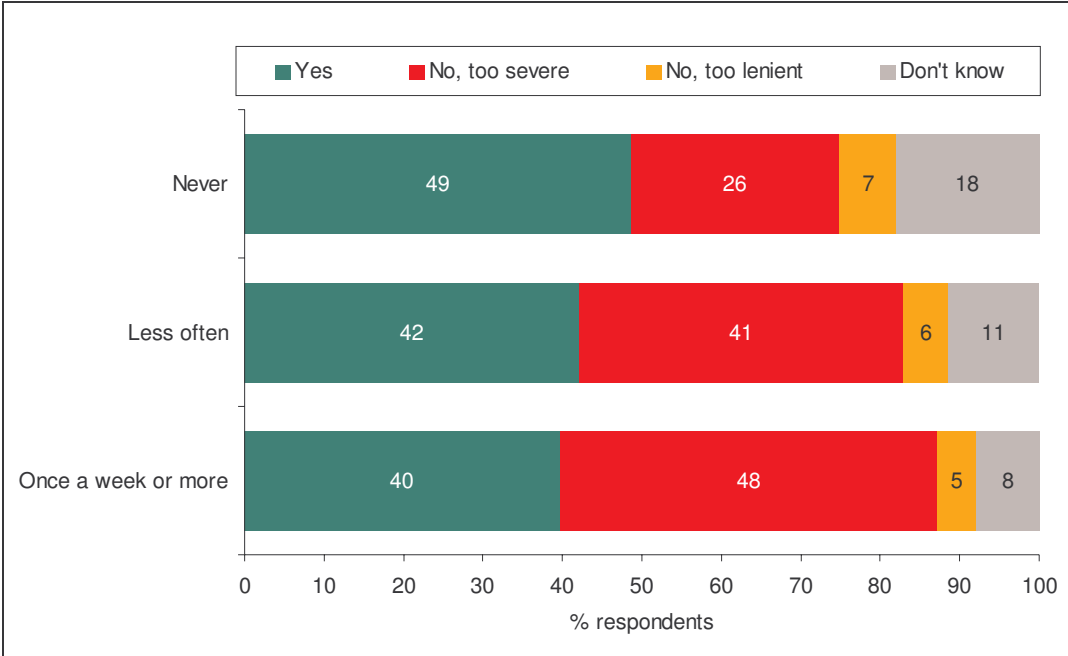
Figure 98: Whether proposed emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by business type



Base: 1,769 transport and distribution, 3,141 other

Businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more are almost twice as likely as those which never operate HGVs, coaches, buses, LGVs or minibuses in London to think the proposed emission standard is too severe: 48% compared to 26%.

Figure 99: Whether proposed emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



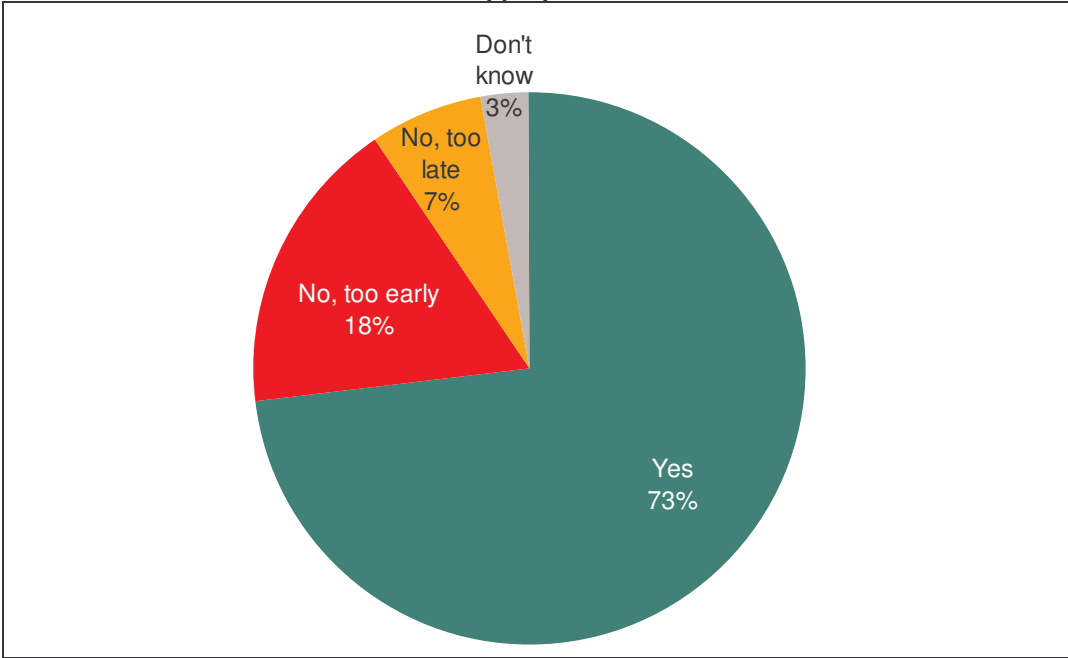
Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,911, less often 1,489, never 2,034

7.11.1. Timing of Emission Standard

The 43% of business respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate were asked whether they thought it was appropriate to introduce this standard in autumn 2010.

Almost three quarters of this sample (73%) think it is appropriate to introduce the standard in autumn 2010 with almost a fifth (18%) who think it is too early and 7% who think it is too late.

Figure 100: Whether proposed emission standard of Euro III for diesel-engine minibuses and heavier LGVs from autumn 2010 is appropriate

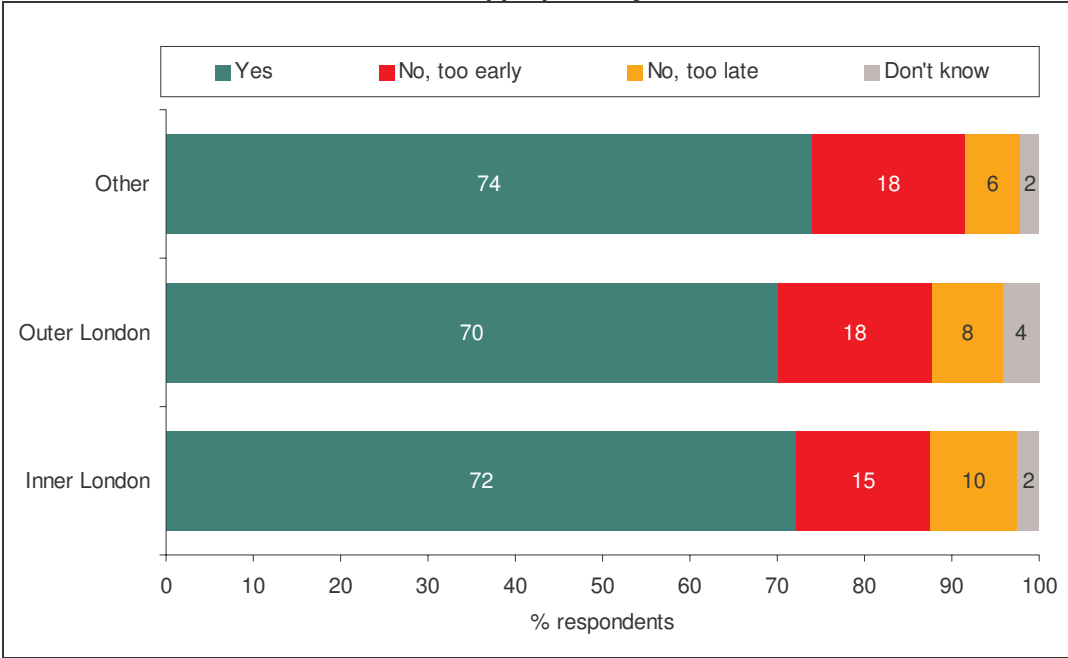


Base²⁹: 2,353

There is relatively little difference in attitudes towards the timing of the proposed emission standard of Euro III for diesel-engine minibuses and heavier LGVs by location amongst those who think the emission standard is appropriate. Between 70% and 74% think the timing of autumn 2010 is correct.

²⁹ respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

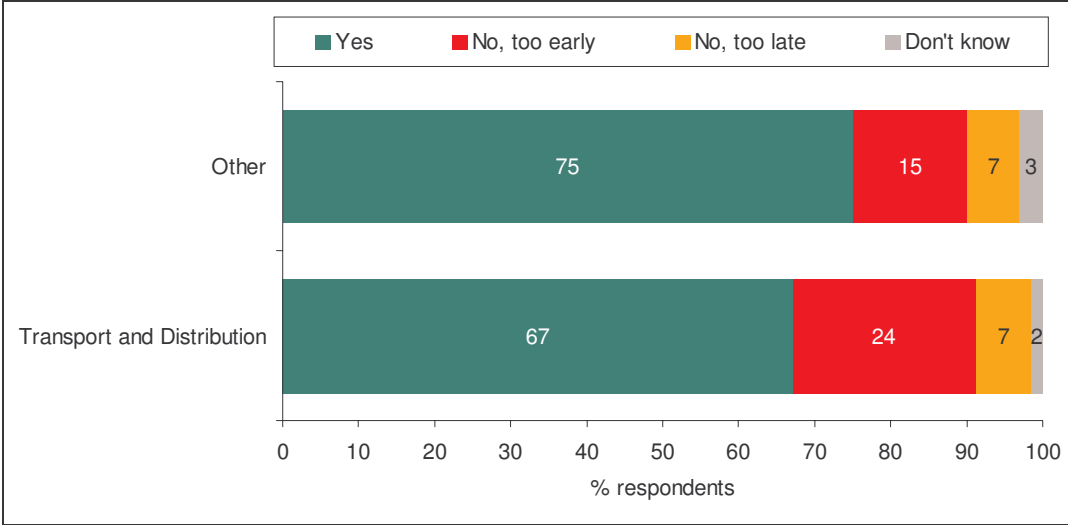
Figure 101: Whether proposed emission standard of Euro III for diesel-engine minibuses and heavier LGVs from autumn 2010 is appropriate by location



Base³⁰: 241 Inner London; 385 Outer London; 1,513 other

Transport and distribution businesses who agree with the emission standard of Euro III for diesel-engine minibuses and heavier LGVs are more likely to think autumn 2010 is too early than other types of businesses: 24% compared to 15%.

Figure 102: Whether proposed emission standard of Euro III for diesel-engine minibuses and heavier LGVs from autumn 2010 is appropriate by business type



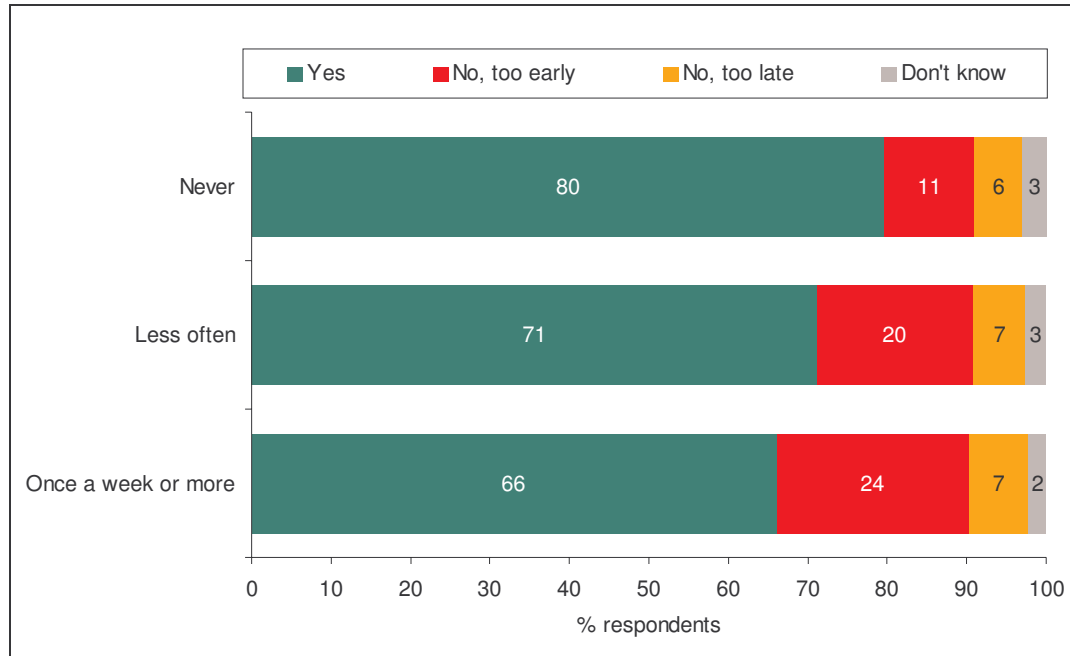
Base³¹: 672 transport and distribution, 1,452 other

³⁰ respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

³¹ respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

Businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more are more than twice as likely as those which never operate HGVs, coaches, buses, LGVs or minibuses in London to think autumn 2010 for the emission standard of Euro III for diesel-engine minibuses and heavier LGVs is too early: 24% compared to 11%.

Figure 103: Whether proposed emission standard of Euro III for diesel-engine minibuses and heavier LGVs from autumn 2010 is appropriate by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



Base³²: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 749, less often 627, never 977

7.12 Which Vehicles Should the LEZ Apply to?

Business respondents were asked which of the following list of types of vehicle the LEZ should apply to:

- Lorries (HGVs)
- Buses
- Coaches
- Heavier LGVs only
- All LGVs
- Minibuses
- SUVs (4x4s)
- Diesel cars
- Petrol cars
- Motorcycles.

³² respondents who agreed that the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate

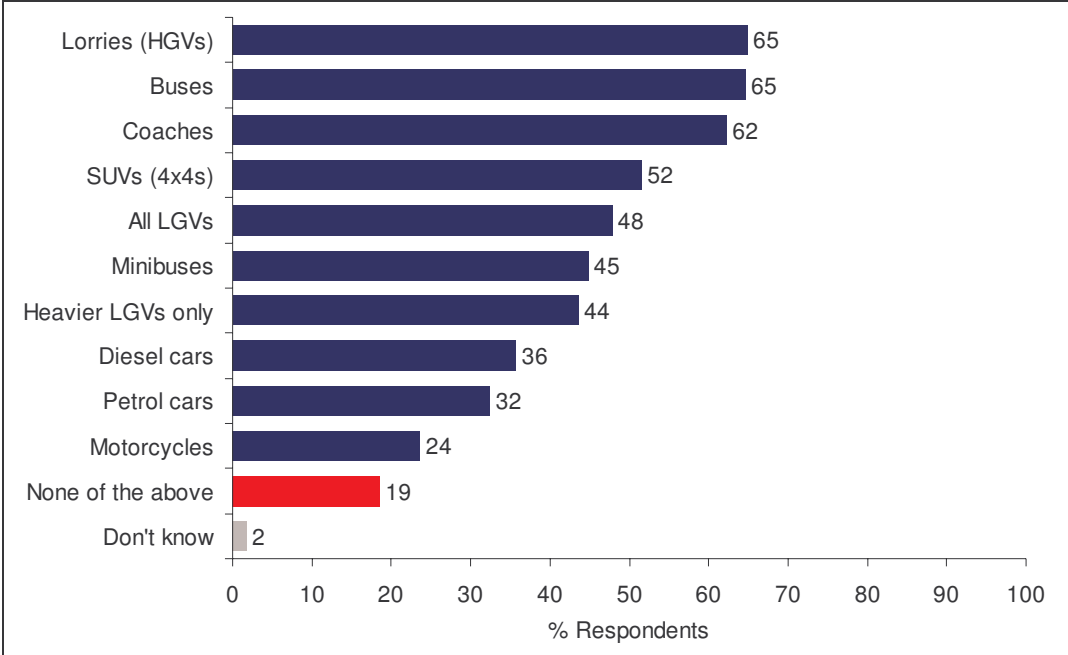
Almost two thirds of respondents (65%) think the LEZ should apply to HGVs and buses. Sixty two per cent think it should apply to coaches.

More think it should apply to SUVs than to all LGVs: 52% compared to 48%.

Over a third of the sample (36%) think diesel cars should be included and 32% think petrol cars should be included.

Almost a fifth (19%) think none of the vehicle types listed should be included.

Figure 104: Which type of vehicles LEZ should apply to



Base: 5,416

Inner London businesses are more likely than businesses based elsewhere to mention each vehicle type except petrol cars (mentioned more often by businesses based outside London).

Non-transport and distribution businesses are much more likely than transport and distribution businesses to mention HGVs, buses, coaches and heavier LGVs and less likely to mention vehicles not planned to be included such as cars and motorcycles.

Table 24: Which vehicles LEZ should apply to by location and business type

	Location			Business type	
	Inner London %	Outer London %	Other %	Transport and Distribution %	Other %
Lorries (HGVs)	75	63	65	53	71
Buses	72	64	65	57	69
Coaches	72	62	62	52	68
SUVs (4x4s)	53	47	54	54	50
All LGVs	56	45	48	43	50
Minibuses	50	42	46	42	46
Heavier LGVs only	46	44	44	37	47
Diesel cars	38	32	38	42	33
Petrol cars	32	28	35	41	28
Motorcycles	25	22	25	29	21
None of the above	15	22	17	21	17
Don't know	1	1	2	1	2
Base	536	974	3,348	1,767	3,120

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are more likely to mention those vehicle types than businesses that do operate them.

Table 25: Which vehicles LEZ should apply to by frequency of operating HGVs/buses/coaches in London

	Once a week or more often %	Less often %	Never %
Lorries (HGVs)	57	66	72
Buses	60	67	67
Coaches	57	63	67
SUVs (4x4s)	47	54	54
All LGVs	40	48	55
Minibuses	41	44	49
Heavier LGVs only	37	44	49
Diesel cars	36	38	34
Petrol cars	33	36	29
Motorcycles	23	26	22
None of the above	23	16	17
Don't know	1	1	3
Base	1,210	1,022	1,281

7.13 Agreement on Exempt Vehicles

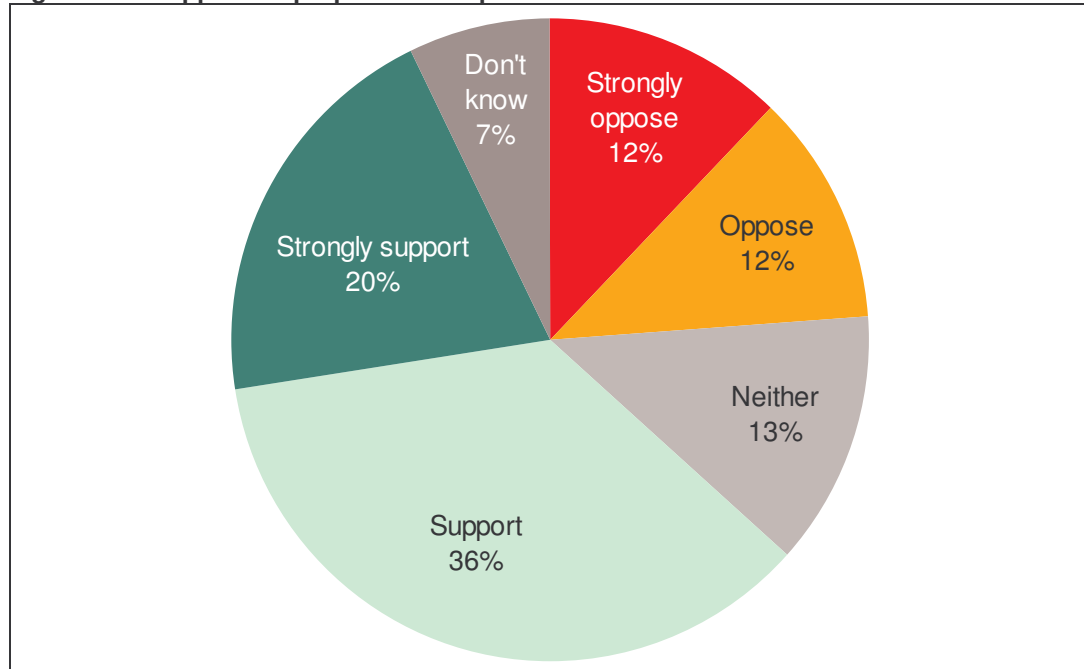
Business respondents were asked if they supported the proposals to exempt the vehicles mentioned on page 3 of the leaflet from the LEZ. These vehicles are:

- agricultural vehicles
- military vehicles
- historic vehicles not used for hire or reward
- non-road going vehicles which are allowed to drive on the highway (for example excavators)

- certain types of mobile crane.

Over half of business respondents (56%) supports the proposed exemptions and just under a quarter (24%) opposes them. Thirteen per cent neither support nor oppose the proposed exemptions and 7% do not know.

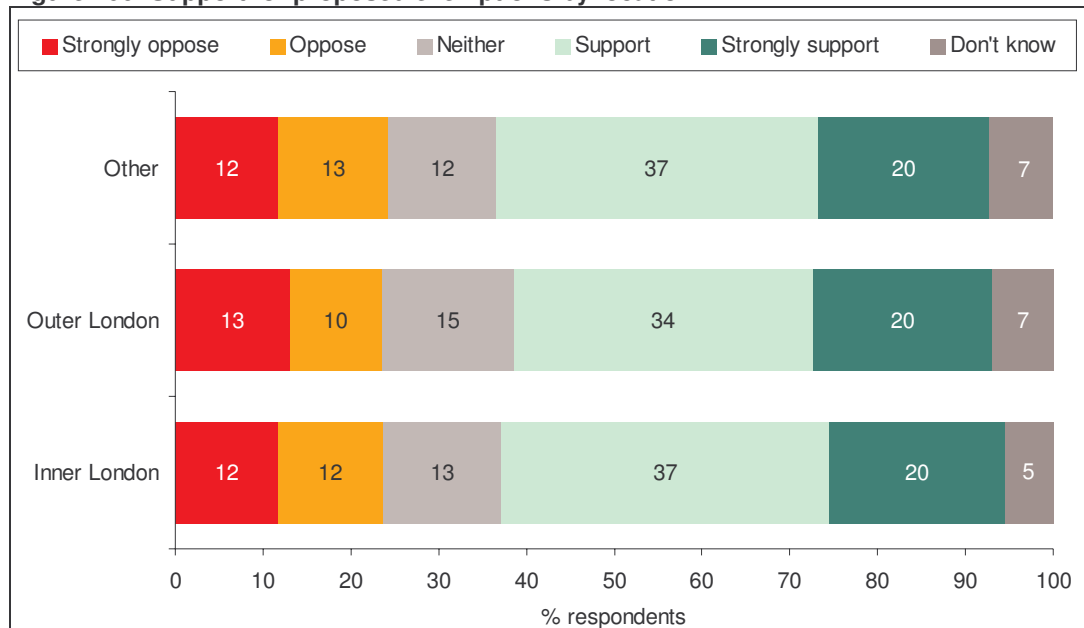
Figure 105: Support for proposed exemptions



Base: 5,296

There is little difference in the level of support for the proposed exemptions by the location of the business.

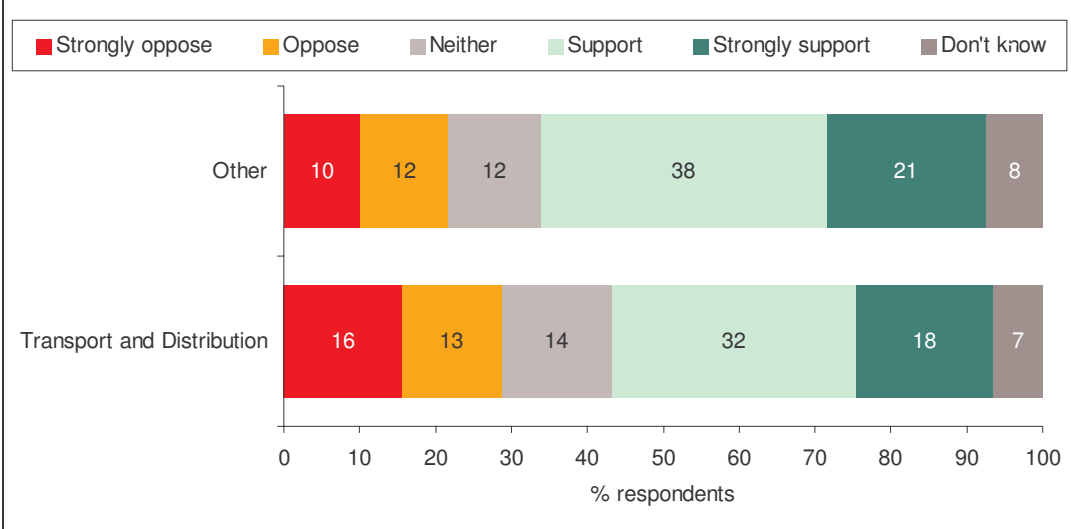
Figure 106: Support for proposed exemptions by location



Base: 545 Inner London; 991 Outer London; 3,383 other

Transport and distribution businesses are less likely than other types of businesses to support the proposed exemptions: 29% oppose the exemptions compared to 22%.

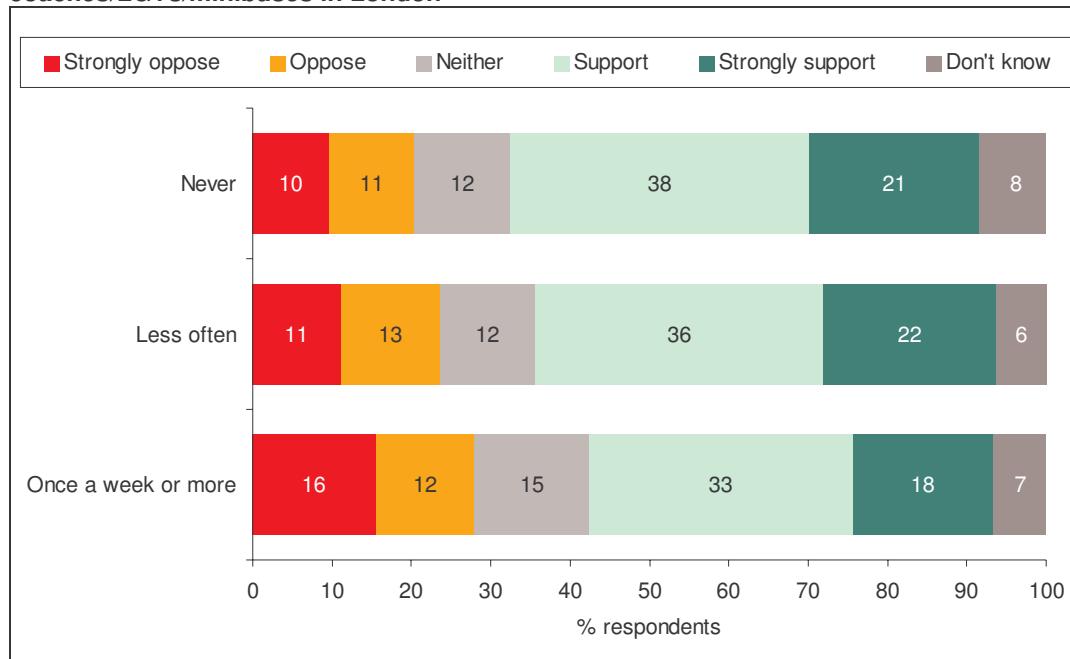
Figure 107: Support for proposed exemptions by business type



Base: 1,723 transport and distribution, 3,066 other

Businesses which never operate HGVs, coaches, buses, LGVs or minibuses in London are more likely to support the proposed exemptions than businesses which do operate HGVs, coaches, buses, LGVs or minibuses in London: 59% which never operate HGVs, coaches, buses, LGVs or minibuses in London support the exemptions compared to 51% of businesses which operate HGVs, coaches, buses, LGVs or minibuses in London once a week or more.

Figure 108: Support for proposed exemptions by frequency of operating HGVs/buses/coaches/LGVs/minibuses in London



Base: Operate HGVs/coaches/buses/LGVs/minibuses in London once a week or more often 1,835, less often 1,467, never 1,994

7.13.1. Other Views on Vehicle Exemptions

Following the question on the proposed exemptions respondents to the questionnaire were asked if they had any other views on vehicle exemptions and invited to write them in a text box.

Twenty six per cent (1,435 respondents) made comments. The main comment, mentioned by 20%, is that there should be discounts and exemptions other than those included in the code frame.

Ten per cent say they opposed the LEZ.

Nine per cent say there should be no exempt vehicles, 7% raise other issues about vehicles to be included and 5% say there should be exemptions for heritage vehicles.

Table 26 shows all comments made by 1% or more of respondents.

Table 26: Other comments from business questionnaire (exemptions)

	%
Other discount and exemptions	20
Oppose a LEZ	10
Should be no exempt vehicles	9
Other vehicles to be included issues	7
Exemption for heritage vehicles	5
Objective to raise revenues/another tax	5
Discounts/exemptions for community transport vehicles	4
Bus/coaches should be exempt	4
Taxis and mini-cabs should be included	4
Discounts/exemptions for vehicles operated by public sector	3
Biofuel/greener vehicles discount	3
Other alternatives	3
Should apply to all vehicles	2
Cars should be included	2
Impact on small businesses	2
Impact on London's economy	2
Cost impacts on customers/businesses	2
Other central government initiatives	1
Yet another charge on transport industry	1
Support a LEZ	1
Concerns with vehicles registered outside UK	1
Buses should be included	1
Use MOT test	1
Proposal is premature	1
Primary non-road going vehicles	1
Other principle issues	1
Other incentives for cleaner vehicles	1
Include SUVs (4X4)s	1
Other reduced area of LEZ	1
Costs of buying new vehicles	1
Complementary measures	1
Coaches should be included	1
Other	13
Respondents	1,435

The comments have been grouped into categories of response in Table 27 below. Half the comments made are within the category 'discounts and exemptions'. Almost a fifth (18%) mention additional vehicles they would like included within the LEZ.

Seventeen per cent made comments on the principle of the LEZ, for example opposing or supporting the LEZ.

Table 27: Other comments by category of comment (exemptions)

	%
Discounts and Exemptions	50
Vehicles to be included	18
The principle of a Low Emission Zone	17
Suggested alternatives	6
Macro-Economic impacts	6
Business sector /micro-economic impacts	5
Enforcement	2
Timetable	2
Boundary	1
Vehicle emission standards	1
Environmental impacts	1
Business Case	1
Impacts on public and community sectors	1
Level of charge	1
Consultation process/information	1
Health impacts	*
Impacts on traffic	*
Operations	*
Olympics	*
Streetscape issues	*
Other	*
Respondents	1,435

* = less than 0.5%

7.14 Comments about the Proposal

Business respondents were asked to write in any other comments about the proposed LEZ or to expand on any of the points raised earlier in a text box.

Forty four per cent (2,442 respondents) made comments. The main comment, mentioned by 18%, is that the objective of the LEZ is to raise revenues or that it is another tax.

Twelve per cent are concerned at the impact on small businesses, 9% say they oppose the LEZ, 8% are concerned about the impact of the LEZ on London's economy and 7% mention cost impacts on customers or businesses.

Table 28: Main comments made in business questionnaires

	%
Objective to raise revenues/another tax	18
Impact on small businesses	12
Oppose a LEZ	9
Impact on London's economy	8
Cost impacts on customers/businesses	7
Other alternatives	5
Yet another charge on transport industry	4
Will lead to job losses	4
Proposal is premature	4
Costs of buying new vehicles	4
Other discount and exemptions	4
Other central government initiatives	3
Support a LEZ	3
Other principle issues	3
Concerns with vehicles registered outside UK	3
Costs too high	2
Should apply across the whole of UK	2
Cars should be included	2
Complementary measures	2
Should be tax incentives & loans to help convert vehicles	2
Waste of money/better spent elsewhere	2
Other vehicles to be included issues	2
Taxis and mini-cabs should be included	2
Broader UK economy issues	2
Other incentives for cleaner vehicles	2
Other reduced area of LEZ	2
Impact on tourism	2
Proposals are too extreme	1
Will increase bureaucracy/red tape	1
Other consultation issues	1
Inadequate consultation	1
All charges should be lower	1
Political motivation	1
Previous views expressed not taken into account	1
Bus/coaches should be exempt	1
Should include other emissions	1
Other timetable issues	1
Insufficient information provided	1
Should apply to all vehicles	1
Discounts/exemptions for community transport vehicles	1
Detailed boundary issues	1
Ban instead of a charging system	1
Buses should be included	1
Should be no exempt vehicles	1
Will fail to make adequate progress towards air quality targets	1
Other business impact issues	1
Midnight to Midnight hours	1
Biofuel/greener vehicles discount	1
Impact on residual values of non compliant vehicles	1
Other vehicle emission issues	1
Use MOT test	1
Extend to M25	1
Other charge level issues	1
Exemption for heritage vehicles	1
Will do nothing in relation to greenhouse gases.	1
Economic and social impacts	1
Issues relating to 2012 Olympics	1
Other Issues	1
Other	14
Respondents	2,442

Note: all comments with 1% or more of responses are shown

The specific responses shown in Table 28 were allocated to the general categories of responses.

The main category of comment with 37% of all comments is under the principle of the LEZ, for example opposing or supporting the LEZ.

Almost a quarter (24%) made comments under the category 'business sector/micro-economic impacts', for example 'impact on small businesses', 'yet another charge on transport industry' and 'costs of buying new vehicles.'

Twenty three per cent made comments under the category 'macro-economic impacts', for example 'impact on London's economy and 'cost impacts on customers and/or businesses.'

Fourteen per cent made comments under the category 'suggested alternatives', for example 'other central government initiatives' and 'other incentives for cleaner vehicles.'

Table 29: All Main comments from business questionnaires by category of response

	%
The principle of a Low Emission Zone	37
Business sector/micro-economic impacts	24
Macro-Economic impacts	23
Suggested alternatives	14
Vehicles to be included	9
Discounts and Exemptions	8
Boundary	6
Timetable	5
Business Case	5
Enforcement	5
Consultation process/information	5
Environmental impacts	3
Level of charge	2
Vehicle emission standards	2
Operations	1
Impacts on public and community sectors	1
Impacts on traffic	1
Health impacts	1
Olympics	1
Streetscape issues	*
Other	7
Respondents	2,442

* = less than 0.5%

7.15 All Comments

As can be seen above, many respondents used the three free text boxes to make general comments about the LEZ. All the responses made to question 4, to question 15 and to the overall comments (question 16) were grouped together.

The main category of comment is on the principle of a LEZ, with 55% making comments in this category (with 25% opposing the LEZ, 19% saying the

objective is to raise revenues or that it is another tax and 3% supporting the LEZ).

Thirty per cent made comments on discounts and exemptions to the scheme (with 3% mentioning exemptions for heritage vehicles, 3% mentioning exemptions for community transport vehicles, 3% saying buses and coaches should be exempt and 5% saying there should be no exemptions).

Almost a quarter (24%) made comments under the category 'business sector/micro-economic impacts' (with 12% mentioning the impact on small businesses, and 5% saying the LEZ is yet another charge on the transport industry and 4% mentioning the costs of buying new vehicles).

Twenty three per cent made comments on macro-economic impacts (with 9% mentioning the impact on London's economy and 7% mentioning the cost impacts on customers and/or businesses).

Seventeen per cent made comments on boundary issues (with 5% saying the LEZ should apply to the whole of the UK and 4% saying the LEZ should be a smaller area).

Sixteen per cent made comments on suggested alternatives (with 4% saying other central government initiatives should be considered and 2% mentioning complementary measures).

Sixteen per cent made comments on vehicles to be included (with the main vehicle types mentioned being taxis and mini-cabs (3%) and cars (3%)).

Table 30: All comments from business questionnaires by category of response

	%
The principle of a Low Emission Zone	55
Discounts and Exemptions	30
Business sector/micro-economic impacts	24
Macro-Economic impacts	23
Boundary	17
Suggested alternatives	16
Vehicles to be included	16
Enforcement	5
Timetable	5
Business Case	5
Consultation process/information	4
Environmental impacts	4
Vehicle emission standards	2
Level of charge	2
Impacts on public and community sectors	2
Operations	1
Impacts on traffic	1
Health impacts	1
Olympics	1
Streetscape issues	*
Other	10
Respondents	3,114

* less than 0.5%

Table 31 shows the proportions of each specific comment. All responses over one per cent are shown individually. Those under one per cent are grouped into the broader categories such as 'economic impacts' and shown in bold.

The main comment (made by 25% of respondents) is opposing the LEZ. Nineteen per cent say the objective of the LEZ is to raise revenues or that it is another tax. Twelve per cent suggest other discounts and exemptions, and the same proportion are concerned about the impact of the LEZ on small businesses.

Table 31: All comments from business questionnaires representing over 1% of respondents (percentages)

	%
Oppose a LEZ	25
Objective to raise revenues/another tax	19
Other discount and exemptions	12
Impact on small businesses	12
Impact on London's economy	9
Cost impacts on customers/businesses	7
Other alternatives	7
Other vehicles to be included issues	5
Yet another charge on transport industry	5
Should apply across the whole of UK	5
Should be no exempt vehicles	5
Other reduced area of LEZ	4
Other central government initiatives	4
Will lead to job losses	4
Proposal is premature	4
Costs of buying new vehicles	4
Other principle issues	4
Support a LEZ	3
Taxis and mini-cabs should be included	3
Detailed boundary issues	3
Concerns with vehicles registered outside UK	3
Cars should be included	3
Bus/coaches should be exempt	3
Discounts/exemptions for community transport vehicles	3
Exemption for heritage vehicles	3
Costs too high	2
Complementary measures	2
Waste of money/better spent elsewhere	2
Extend to M25	2
Other incentives for cleaner vehicles	2
Should be tax incentives & loans to help convert vehicles	2
Should apply to all vehicles	2
Biofuel/greener vehicles discount	2
Broader UK economy issues	2
LEZ should cover Congestion Charging area only	2
Discounts/exemptions for vehicles operated by public sector	2
Impact on tourism	2
Will increase bureaucracy/red tape	1
Proposals are too extreme	1
Should include other emissions	1
Inadequate consultation	1
Political motivation	1
Use MOT test	1
Other consultation issues	1
Buses should be included	1
Other boundary issues	1

Other timetable issues	1
All charges should be lower	1
Previous views expressed not taken into account	1
Monitoring of social issues	1
Other business impact issues	1
Will fail to make adequate progress towards air quality targets	1
Insufficient information provided	1
Ban instead of a charging system	1
Include SUVs (4X4)s	1
Other vehicle emission issues	1
Will do nothing in relation to greenhouse gases.	1
Primary non-road going vehicles	1
Cost impacts on public and community fleets	1
Economic and social impacts	1
Issues relating to 2012 Olympics	1
Midnight to Midnight hours	1
Impact on residual values of non compliant vehicles	1
Vehicle emission standards	1
Environmental impacts	1
Impacts on traffic	1
Enforcement	1
Vehicles to be included	1
Level of charge	1
Suggested alternatives	1
Discounts and Exemptions	1
Business sector /micro-economic impacts	1
Operations	1
Business Case	1
Timetable	1
Macro-Economic impacts	1
Health impacts	*
Impacts on public and community sectors	*
Boundary	*
Streetscape issues	*
Consultation process/information	*
Other	1
Respondents	3,114

7.16 Business Characteristics

7.16.1. Company Location

Eighty nine per cent of respondents gave postcode information.

There was a very wide distribution of responses from businesses. No postcode location accounted for more than 4% of responses. See Table 32.

Table 32: Postcode location of business

	%		%
SW	3.7	S	1.1
SE	2.7	PO	1.0
TN	2.4	GL	1.0
TW	2.4	BR	1.0
CM	2.2	SA	1.0
W	2.2	CT	1.0
GU	2.1	DE	1.0
E	2.0	IG	1.0
RM	1.9	EC	0.9
DA	1.8	NE	0.8
RG	1.8	LU	0.8
ME	1.8	WD	0.8
N	1.8	DN	0.8
HP	1.7	EX	0.8
NW	1.7	M	0.8
NN	1.6	BH	0.7
KT	1.6	CB	0.7
SG	1.6	ST	0.7
UB	1.6	CF	0.7
B	1.5	SN	0.7
BN	1.4	SP	0.7
SS	1.4	SK	0.7
NG	1.3	AL	0.6
CR	1.2	WA	0.6
LE	1.2	SY	0.6
PE	1.2	BA	0.6
RH	1.2	TF	0.6
SO	1.2	PR	0.6
MK	1.2	WC	0.6
BS	1.2	PL	0.5
NR	1.2	WS	0.5
CO	1.2	YO	0.5
HA	1.2	WF	0.5
EN	1.1	DY	0.5
CV	1.1	BB	0.5
IP	1.1	EH	0.5
SL	1.1	TA	0.5
OX	1.1	Other	11.1

Base: 3,442

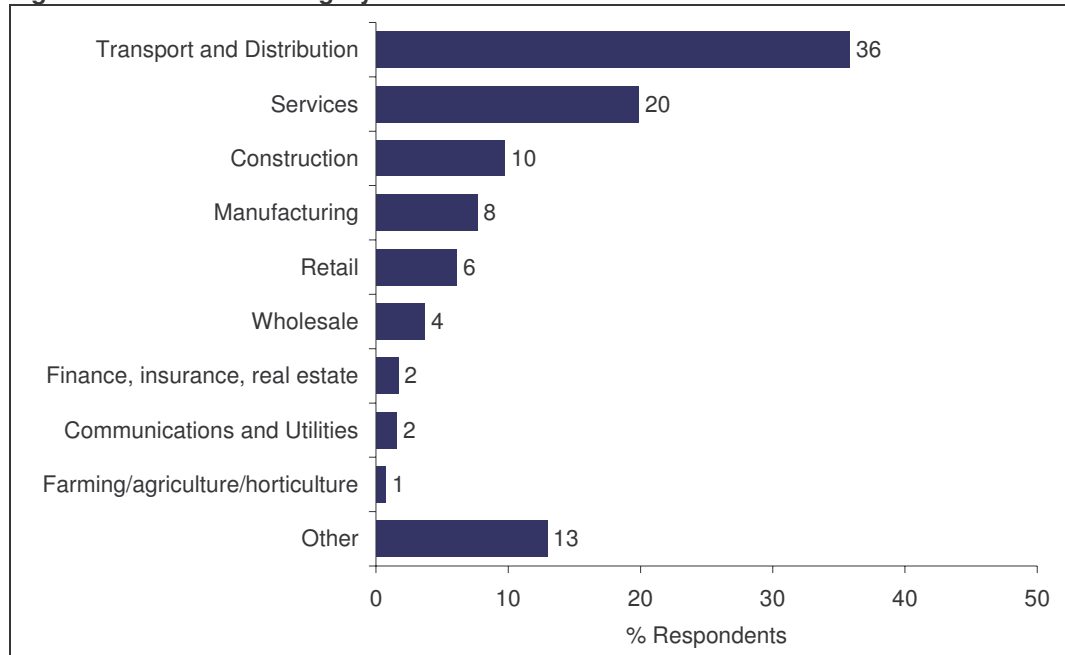
Sixteen per cent of businesses are based in the 'London postcodes' of EC, WC, E, N, NW, W, SE and SW.

7.16.2. Business Category

Respondents were asked to classify themselves under a list of business categories. The main business sector by far is transport and distribution with over a third of all businesses (36%) from this sector.

Services account for 20%, construction 10% and manufacturing 8%.

Figure 109: Business category



Base: 5,037

A higher proportion of transport and distribution companies are based outside London than within London: 40% outside London, 33% in Outer London and 19% in Inner London.

Over a quarter of Inner London businesses are in the service sector compared to 23% in Outer London and 18% outside London.

Table 33: Business category by location

	Inner London %	Outer London %	Other %
Transport and Distribution	19	33	40
Services	27	23	18
Construction	10	13	9
Manufacturing	4	3	10
Retail	7	6	6
Wholesale	5	4	4
Finance, insurance, real estate	3	2	1
Communications and Utilities	2	1	2
Farming/agriculture/horticulture	*	*	1
Other	22	15	10
Base	523	952	3,268

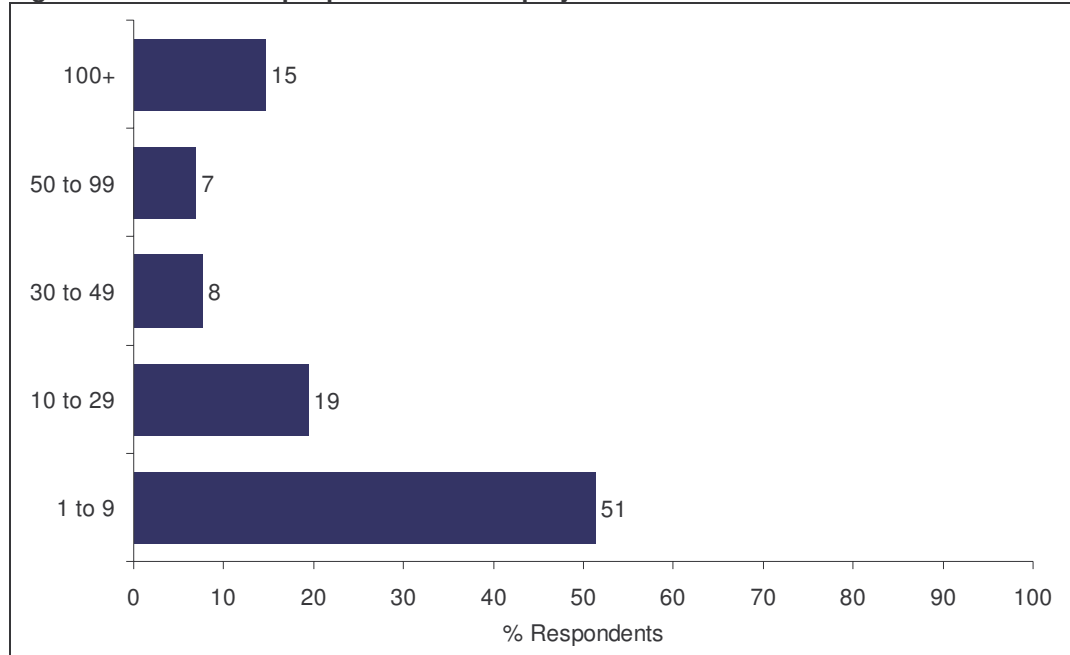
* = less than 0.5%

7.16.3. Number of People Business Employs

Over half (51%) the businesses which responded are small businesses with between one and nine employees within Great Britain.

Fifteen per cent of business employ 100 or more staff within Great Britain.

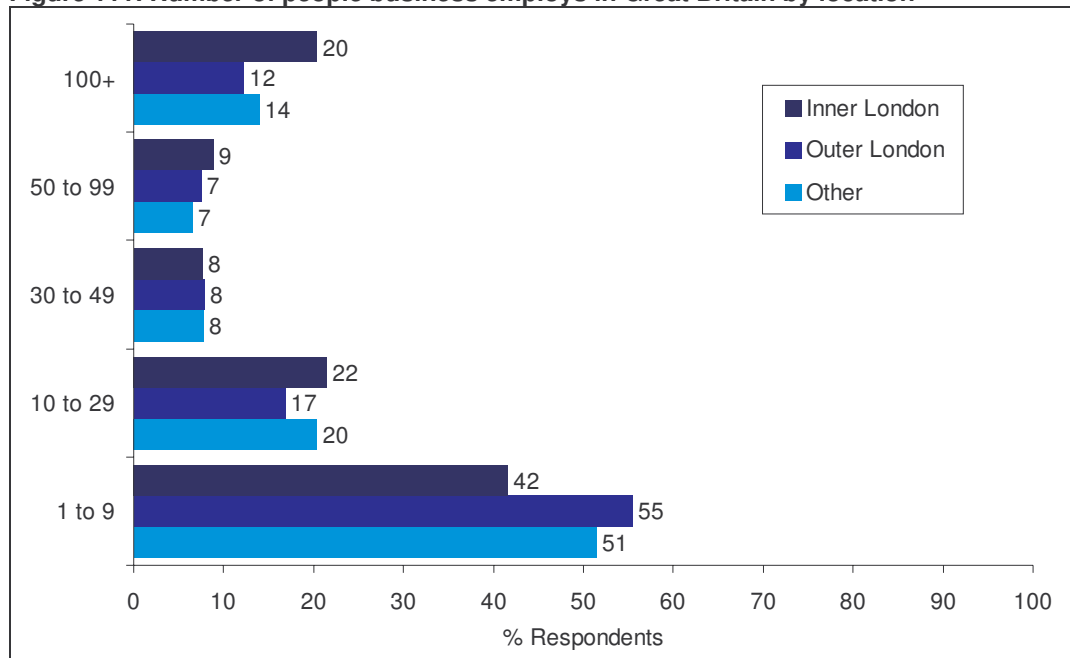
Figure 110: Number of people business employs in Great Britain



Base: 4,945

Inner London based businesses tend to be larger than those based elsewhere with a fifth employing 100 or more staff within Great Britain compared to 12% of businesses based in Inner London and 14% of businesses based outside London.

Figure 111: Number of people business employs in Great Britain by location



Base: Inner London 521, Outer London 934, Other 3,233

7.16.4. Vehicles Operated

Respondents were asked how many of the following categories of vehicles they operate within the proposed London LEZ.

- HGVs
- HGVs first registered on or after 1 October 2001
- Buses/Coaches
- Buses/Coaches first registered on or after 1 October 2001
- LGVs/Minibuses
- LGVs/Minibuses first registered on or after 1 January 2002
- Cars
- Cars first registered on or after 1 July 1992
- Cars first registered on or after 1 January 2002.

It was assumed that those who did not enter anything into the boxes used no vehicles.

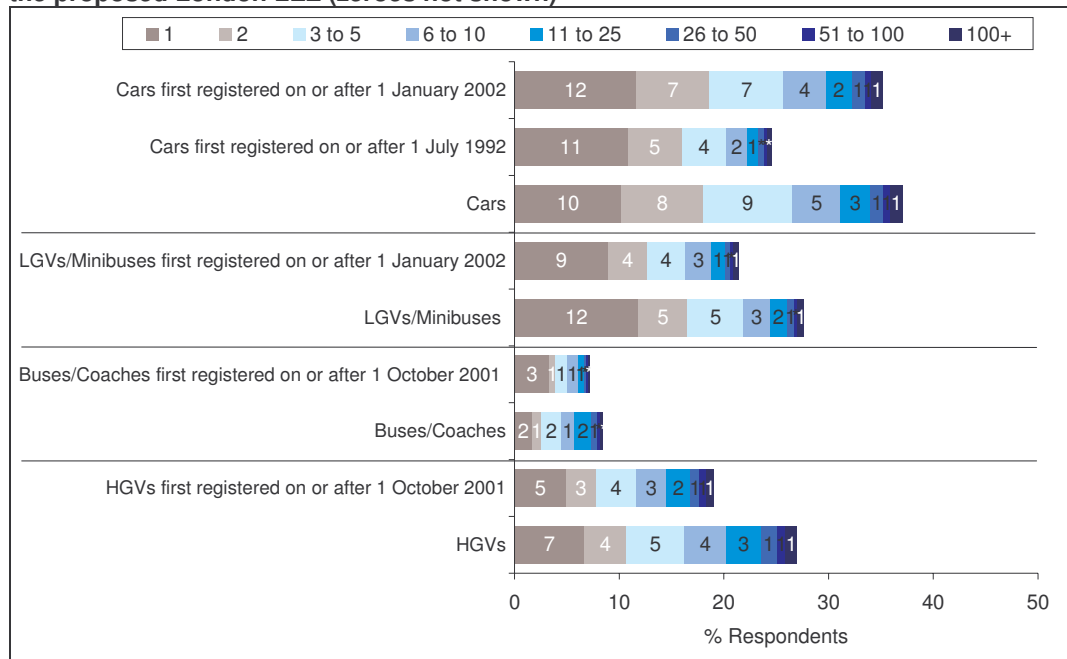
Over a quarter (27%) of the business respondents operate at least one HGV within the proposed London LEZ with 19% operating HGVs first registered on or after October 2001.

Bus/coach use was much lower for this sample with 8% operating at least one bus/coach within the proposed London LEZ with 7% operating buses/coaches first registered on or after October 2001.

A similar proportion of businesses operate LGVs/minibuses as operate HGVs with 28% operating at least one LGV/minibus within the proposed London LEZ with 21% operating LGVs/minibuses first registered on or after October 2001.

Car use within the proposed LEZ is highest with 37% overall and 25% with cars first registered on or after 1 July 1992 and 35% with cars first registered on or after 1 January 2002.

Figure 112: Numbers of HGVs, buses/coaches, LGVs/minibuses and cars operated within the proposed London LEZ (zeroes not shown)

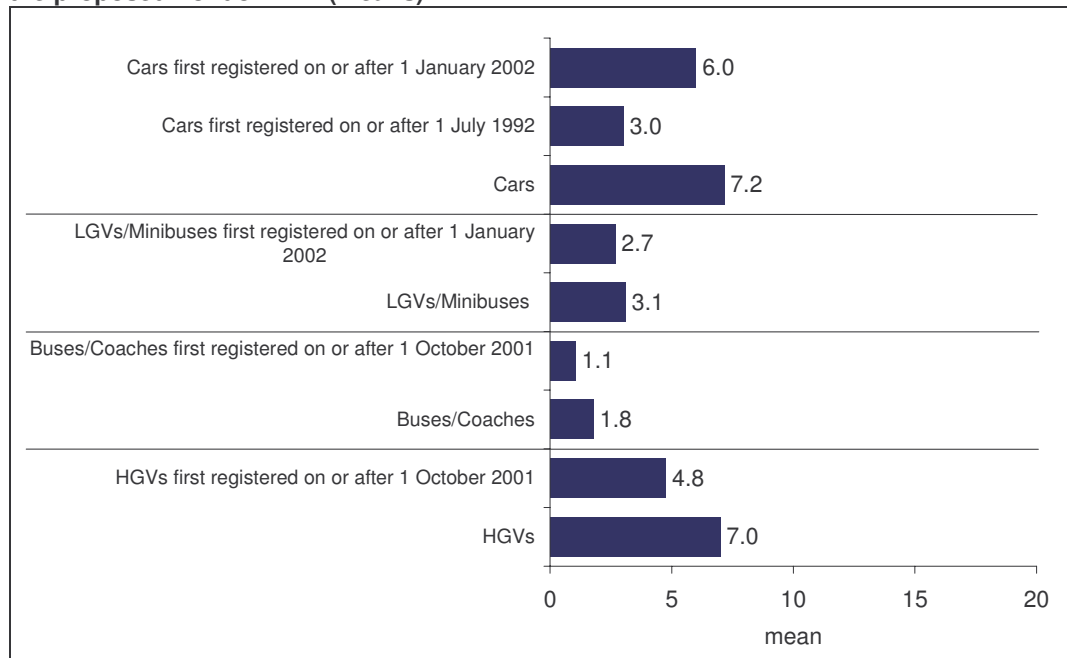


Base: 5,296

* = less than 0.5%

The mean number of each vehicle type operated within the proposed LEZ is shown in Figure 113.

Figure 113: Numbers of HGVs, buses/coaches, LGVs/minibuses and cars operated within the proposed London LEZ (means)



Base: 5,296

Means exclude respondents who mention 4,000 or more vehicles

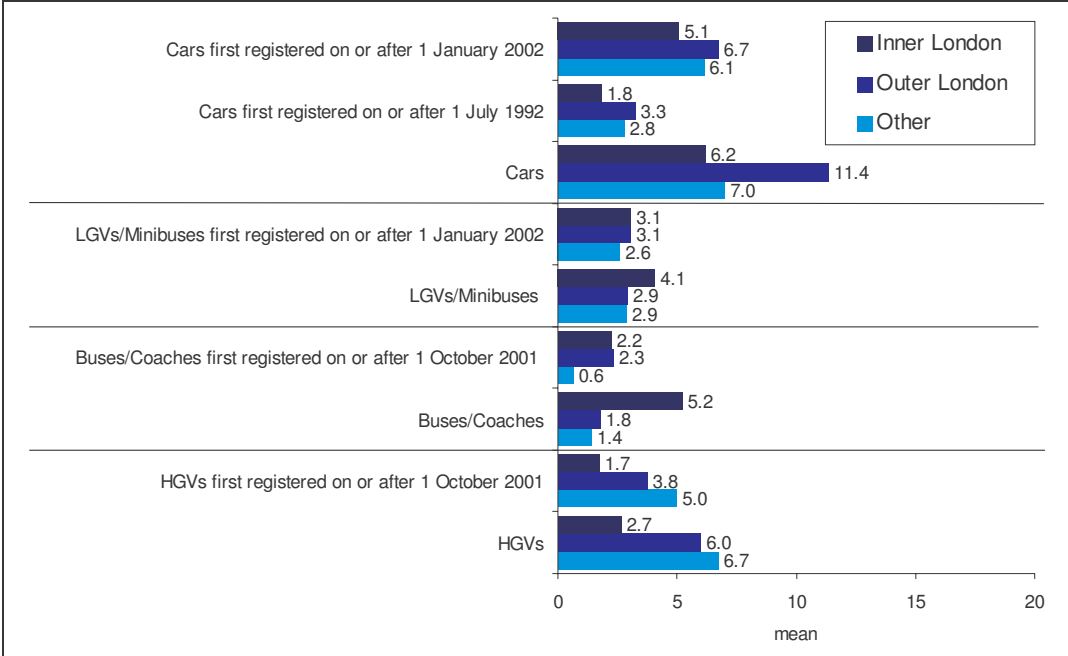
Analysis by business location shows that businesses based outside London and Outer London operate more HGVs than those based in Inner London. By

contrast, Inner London based businesses are more likely to operate buses/coaches than businesses based elsewhere.

There is less of a pattern with respect to LGVs/minibuses.

Outer London businesses are most likely and Inner London businesses are least likely to operate cars in the proposed LEZ.

Figure 114: Numbers of HGVs, buses/coaches, LGVs/minibuses and cars operated within the proposed London LEZ by location (means)

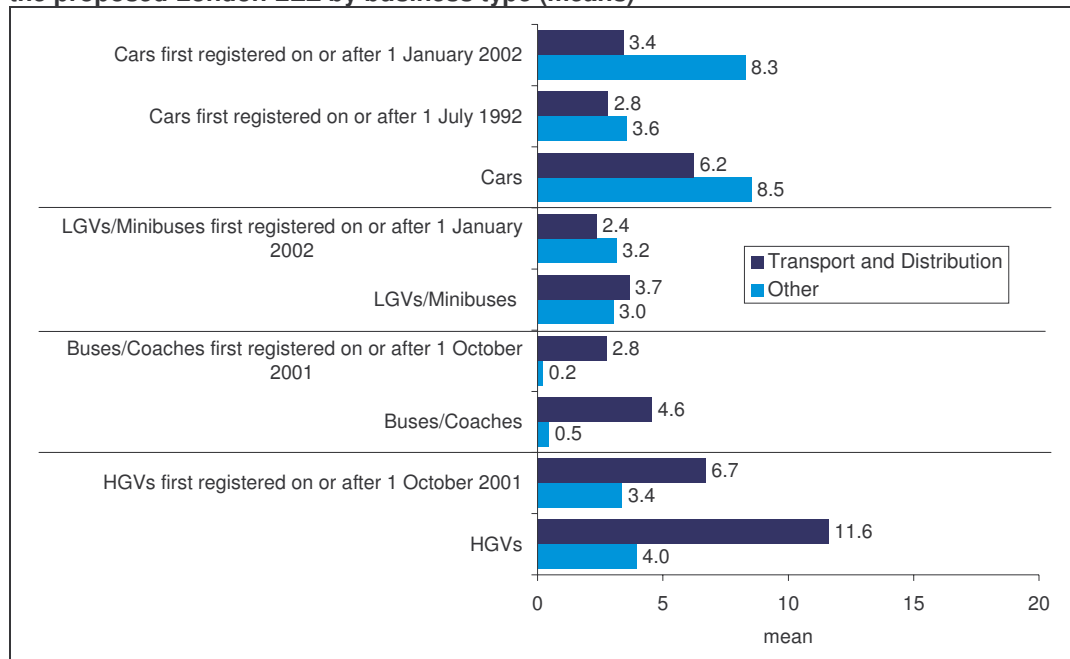


Base: Inner London 528, Outer London 945, Other 3,295
 Means exclude respondents who mention 4,000 or more vehicles

As would be expected transport and distribution companies are much more likely to operate HGVs and buses/coaches within the proposed LEZ than other types of businesses.

Cars are more likely to be operated within the proposed LEZ by other types of businesses and there is little difference with respect to LGVs/minibuses by type of business.

Figure 115: Numbers of HGVs, buses/coaches, LGVs/minibuses and cars operated within the proposed London LEZ by business type (means)



Base: Transport and distribution 1,723, other 3,066
 Means exclude respondents who mention 4,000 or more vehicles

7.16.5. Frequency of Operating HGVs, Buses/Coaches or LGVs/minibuses Within the Proposed LEZ

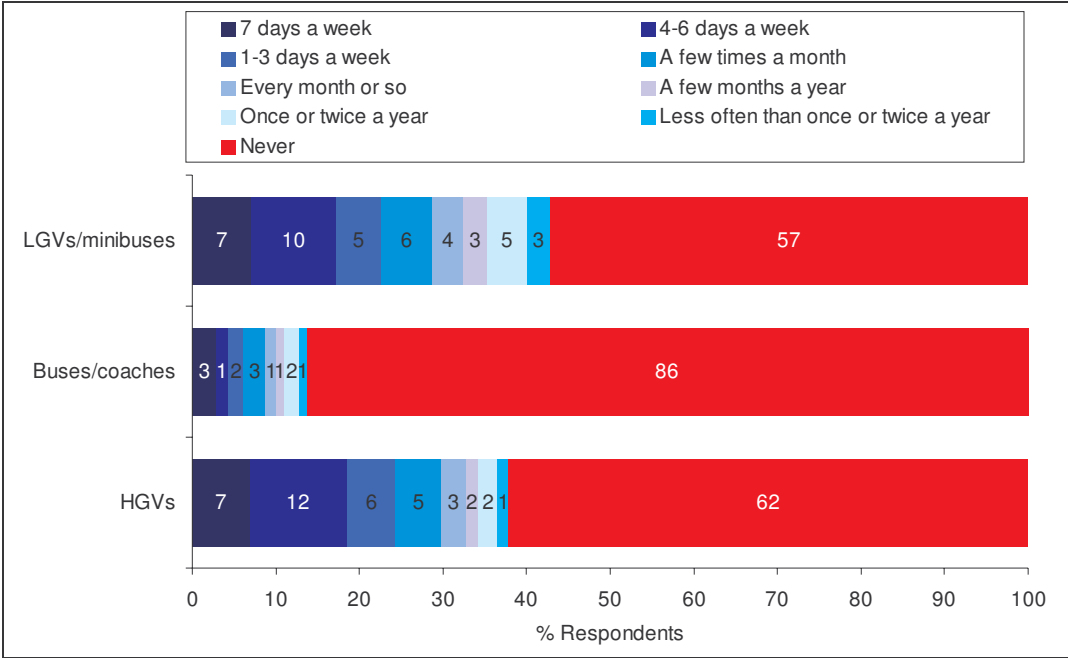
Respondents were asked how often their company operates HGVs, buses/coaches or LGVs/minibuses within the proposed LEZ.

A quarter of businesses who responded to the public consultation operate HGVs within the proposed LEZ at least once a week. Over half (62%) never operate HGVs within the proposed LEZ.

LGV/minibus use is lower, with 22% of businesses operate LGVs/minibuses within the proposed LEZ at least once a week. Fifty seven per cent never operate LGVs/minibuses within the proposed LEZ.

Eighty six per cent of businesses never operate buses/coaches within the proposed LEZ.

Figure 116: Frequency of operating HGVs, buses/ coaches or vans within the proposed LEZ



Base: HGVs 4,611, buses/coaches 4,311, LGVs/minibuses 4,738

There is a higher usage of HGVs, buses/coaches and LGVs/minibuses in the proposed LEZ by companies based in Inner and Outer London than those based outside London:

- 25% of Inner London and 31% of Outer London businesses operate HGVs once a week or more often compared to 23% of businesses based outside London;
- 34% of Inner London and 41% of Outer London businesses operate LGVs/minibuses once a week or more often compared to 16% of businesses based outside London;
- 6% of Inner London and 10% of Outer London businesses operate buses/coaches once a week or more often compared to 5% of businesses based outside London.

Table 34: Frequency of operating HGVs, buses/ coaches or vans within the proposed LEZ by location

	HGVs			Buses/coaches			LGVs/minibuses		
	Inner London %	Outer London %	Other %	Inner London %	Outer London %	Other %	Inner London %	Outer London %	Other %
7 days a week	8	12	5	3	6	2	13	17	3
4-6 days a week	14	16	11	2	3	1	17	19	7
1-3 days a week	3	3	7	1	1	2	4	6	6
A few times a month	1	2	7	1	1	3	3	4	7
Every month or so	*	1	4	1	1	2	2	2	5
A few months a year	*	*	2	1	1	1	1	1	4
Once or twice a year	1	1	3	3	1	1	4	3	5
Less often than once or twice a year	1	*	2	1	1	1	3	2	3
Never	71	65	59	87	84	86	53	46	60
Base	469	863	2,968	449	802	2,760	488	882	3,042

* = less than 0.5%

8. BUSINESS OPEN RESPONSES

8.1 Response to the Consultation

There were 52 open written submissions from businesses. Fifty were received as letters/documents and two as emails.

Forty four (85%) gave postcodes. The responses were spread throughout Great Britain.

- Six were in the 'London' postcode area³³
- Nineteen were in the ring of postcodes around the London postcode area³⁴
- Eight were in the South East
- Four were in the East Midlands
- Three were in the North East
- Two were in the West Midlands
- One was in the South West
- One was in the North West

The business sample was largely bus/coach or freight operators:

- 7 coach operators
- 6 vintage bus hire/owners
- 5 haulage/freight companies
- 4 horse transport companies
- 4 leisure companies
- 3 bus operators
- 3 business service companies
- 3 removals companies
- 2 manufacturing companies
- 2 catalyst manufacturers
- 8 other (automotive engineering service & vehicle recovery, driving school, farming, oil, gas and petrochemical, plumber, private service vehicle (PSV) Operator, repair garage, school, vehicle leasing and fleet management).

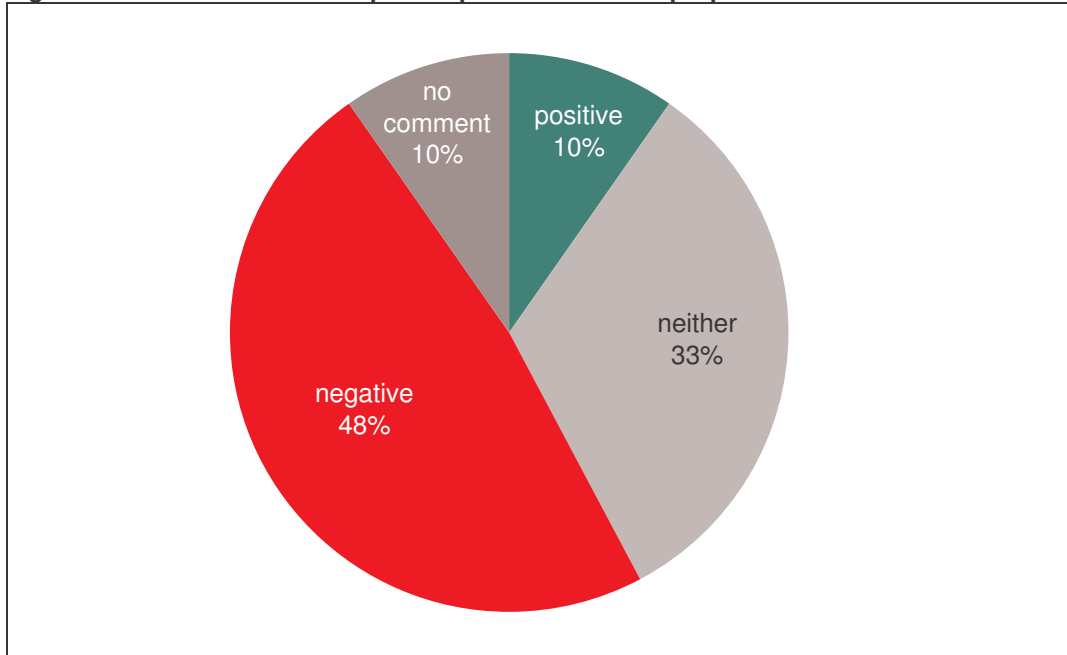
8.2 Support and Opposition to the Proposal

Overall, 25 of the submissions (48%) were opposed to the proposed LEZ and five respondents (10%) supportive of it. Seventeen respondents (33%) had neutral views on the proposal and five made no comments with respect to the proposed LEZ.

³³ EC, WC, SE, SW, E, N, NW, W

³⁴ KT, SM, CR, BR, DA, RM, IG, EN, HA, UB, TW, WD

Figure 117: Overall business open response to the LEZ proposal



Base: 52

8.3 Summary of Most Frequently Raised Issues

Amongst the businesses who wrote open submissions, 49 of the 52 respondents made comments that could be coded. The remaining three did not make relevant comments. Table 35 shows these comments grouped into the main categories.

The most frequently raised category concerned business sector/micro-economic impacts (e.g. costs of buying new vehicles, ongoing costs of retrofitting abatement equipment and impact on small businesses); which accounted for 58 of the responses.

Thirty five of the responses were concerned with the principle of a LEZ (e.g. support or oppose for the need for a LEZ).

Twenty eight of the responses were concerned with macro-economic impacts of the LEZ (e.g. that it will lead to job losses, cost impacts on customers and businesses and the impact on London's economy).

Twenty four of the responses were concerned with discounts and exemptions to the LEZ (e.g. exemptions for vehicles for which retrofit equipment not possible and exemptions for heritage vehicles).

Twenty one of the responses were concerned with the public consultation process or the information provided by TfL (e.g. the consultation was inadequate and insufficient information provided).

Nineteen of the responses were concerned with vehicle emission standards (e.g. issues with respect to the proposed emission standards).

Eighteen of the responses were suggestions for alternatives to the LEZ (e.g. increase road testing of vehicles, complementary measures and other central government initiatives).

Other frequently raised concerns were:

- Timetable (e.g. concerns that the timetable was too premature);
- Impacts on public and community sectors (e.g. cost impacts on public and community fleets and impact on cross-border bus service);
- Level of charge (e.g. charge should be lower).

Table 35: Analysis of business open responses by categories and overall nature of response

	Total n	Positive n	Negative n	Neither N
Business sector/micro-economic impacts	58	0	35	23
The principle of a Low Emission Zone	35	5	21	9
Macro-Economic impacts	28	0	15	13
Discounts and Exemptions	24	0	4	20
Consultation process/information	21	0	11	8
Vehicle emission standards	19	5	6	8
Suggested alternatives	18	4	11	3
Timetable	15	2	10	3
Impacts on public and community sectors	12	0	5	7
Level of charge	9	1	3	5
Enforcement	8	0	1	7
Business Case	7	1	3	3
Boundary	7	1	5	1
Environmental impacts	6	0	2	4
Vehicles to be included	4	1	0	3
Health impacts	3	0	2	1
Olympics	2	0	2	0
Streetscape issues	1	0	1	0
Other	3	1	2	0
Base (responses)	281	21	139	118

Table 36 shows attitudes by business type. All five haulage/freight companies were opposed to the proposed LEZ as were the three business service companies.

Table 36: Response by business categories

	coach operators	vintage bus hire/owners	haulage/freight companies	horse transport companies	bus operators	leisure companies	business service companies	removals companies	manufacturing companies	catalyst manufacturers	other
Positive										2	2
Negative	5	1	5	2		3	2	1			5
Neither	2	5		2	3	1		2	1		1
No comment							1		1		
Base	7	6	5	4	3	4	3	3	2	2	8

8.4 Detailed Analysis of Most Frequently Raised Issues

Overall, the most frequently raised concern by business respondents was concerned with the impact of the scheme on small businesses (mentioned by 19 respondents).

Sixteen complained about the cost of buying new vehicles. Thirteen made comments that were supportive of the principle of the LEZ.

Twelve respondents said that the LEZ would cause costs to be passed on to customers or other businesses and 11 raised Issues on discounts and exemptions.

Other frequently raised issues were:

- Opposition to the LEZ (10 respondents)
- The LEZ is premature (10 respondents);
- Concerns with ongoing costs of retrofitting abatement equipment (9 respondents);
- Concerns that the LEZ will lead to job losses (8 respondents).

Table 37 shows all detailed responses.

Table 37: Overall – all business open responses

	N
Impact on small businesses	19
Costs of buying new vehicles	16
Support a LEZ	13
Cost impacts on customers/businesses	12
Other discount and exemptions	11
Oppose a LEZ	10
Proposal is premature	10
Ongoing costs of retrofitting abatement equipment	9
Will lead to job losses	8
Exemption for heritage vehicles	6
Inadequate consultation	6
Other consultation issues	6
Other vehicle emission issues	5
Other principle issues	5
Other alternatives	5
Impact on residual values of non compliant vehicles	5
Other business impact issues	4
Complementary measures	4
Yet another charge on transport industry	4
Other public and community sector issues	4
Impact on London's economy	4
Insufficient information provided	4
Political motivation	3
Increase road testing of vehicles	3
Other business case issues	3
Other timetable issues	3
Should apply across the whole of UK	3
Concerns with identifying non-compliant vehicles	3
Charge should be lower (HGVs, buses and coaches)	3
Exemptions for vehicles for which retrofit equipment not possible	3
Cost impacts on public and community fleets	3
Impact on cross-border bus service	3

Extension to NOx (Nitrogen Oxide) standard	3
Objective to raise revenues/another tax	2
Proposals are too extreme	2
Other incentives for cleaner vehicles	2
Other central government initiatives	2
Poor benefit/cost ratio	2
Other vehicles to be included issues	2
Agree with use of Euro standards	2
Disagree with use of Euro standards	2
Effectiveness of abatement equipment	2
Derogation	2
Concerns with vehicles registered outside UK	2
Penalty charge is too high (HGVs, buses and coaches)	2
Charge should be lower (LGVs and minibuses)	2
Monitoring of social issues	2
Will fail to make adequate progress towards air quality targets	2
Other air quality impacts	2
Economic and social impacts	2
Broader UK economy issues	2
Impact on tourism	2
Previous views expressed not taken into account	2
More research/modelling work needed	2
Issues relating to 2012 Olympics	2
Other Issues	33
Base (respondents)	52

Note: responses add up to more than the base as more than one response could be given.

More details on the key concerns are given below.

8.4.1. Impact on small businesses

Nineteen respondents complained about the impact of the LEZ on small businesses. The businesses who responded comprised:

- 4 vintage bus hire/owners
- 4 coach operators
- 3 haulage/freight companies
- 2 horse transport companies
- 4 other businesses.

All complained about the impact of the LEZ on their business.

“However I am very worried about the affect on my business and having supported Government Ministers on getting people back into buses I feel this could be the final straw.”

Coach operator

“This will effectively mean that only the large operators will flourish and small businesses like mine will not survive. Please consider the following: SMALL BUSINESSES CAN'T COMPETE ON PRICES BECAUSE THEY WORK ON LOW PROFIT MARGINS.”

Coach operator

“The bottom line, even though we don't go in the LEZ a lot, is that it could and more than likely will put most London travelling showmen out of business, please think carefully as most of us showmen don't know any other business, only show business.”

Leisure

“In effect this would result in the loss of most, if not all of our market and will have the effect of stopping these operations.”

Bus operator

A Vintage bus hire/owner said that the LEZ posed a dilemma to small businesses, *“of which there are many. It is our choice and our freedom to operate heritage buses.”*

8.4.2. Costs of buying new vehicles

Sixteen businesses mentioned the costs of buying new vehicles to comply with the proposed emission standards. The businesses who mentioned the costs of buying new vehicles included three horse transport companies. One of them mentioned that the horse transport industry's vehicle fleet comprises very specialised equipment and this leads to much higher purchase costs than for other vehicle types as well as a much longer vehicle life:

“Where other sectors of the transport industry enjoy a certain commonality of vehicle type ... the horse transport industry requires a very specific type of vehicle that is principally built around the welfare of horses. These lorries typically cost double the amount to build and consequently have a much longer life than their general haulage counterparts. This means that the average life of a horse lorry is between 12 - 20 years.”

Horse transport

A bus operator mentioned the cost of upgrading little used vehicles such as those used on rail replacement work and said *“It is unlikely that replacement of these vehicles with newer stock would be a viable option.”*

Three removals companies mentioned the high cost of replacing their vehicles:

“In our case, to replace the six non - Euro III vehicles based at our London depot would involve expenditure in the region of £350,000. We would face a similar problem in 2012 when the Euro IV vehicles become subject to the LEZ charge.”

Removals

“We simply cannot afford to change our fleet when an average sized vehicle can cost over £45,000.”

Removals business

Other responses were from a wide range of business types including haulage/freight, a driving school, a vintage bus hire/owner, a leisure company, a coach operator, a garage and a farmer. Example comments include:

"We have just replaced our vehicles due to the changes on the gearboxes, which was an EU directive. Although the EU, have put this on hold until 2012 our government has ignored this and carrying on with it. Then we get this bomb shell dropped on us, is the Mayor of London going to replace our vehicles (I think not)."

Driving school

"As our business is already in a decline it would be far too expensive to go into the LEZ with our vehicles as they are and far too expensive to buy all new lorries."

Leisure company

"To replace all three vehicles by 2008 will be impossible for us, considering the short time scale."

Farmer

8.4.3. Support a LEZ

Thirteen business respondents made comments in support of the principle of the LEZ.

Three businesses which make products related to lower emissions welcomed the proposals. The two catalyst manufacturers were strongly in support of the proposed LEZ:

"... strongly support the principle of the LEZ, as we believe that it will make a significant contribution to improving air quality in London and the rest of the UK, as well as benefiting the UK economy."

Catalyst manufacturer

"...welcome the proposals outlined by the Mayor in the proposed Scheme Order, and to offer our support on the operation and implementation of the scheme."

Catalyst manufacturer

The oil, gas and petrochemical company also voiced strong support for the scheme:

"We welcome the Mayor of London's Low Emission Zone initiative to reduce emissions from the most polluting vehicles in London. Our industry is developing a range of cleaner fuels for transport, and in particular, we believe our Synthetic Fuels could help reduce the road transport emissions in Greater London."

Oil, gas and petrochemical company

A school gave unreserved support to the proposals.

The other six companies who voiced support for the principle of the LEZ also had reservations.

“In principle I think the LEZ a sound and sensible development. As one who lives deep in rural England every time I come to London I can feel the change in air quality in my lungs and don't very much enjoy it (so why should anyone else?). However, I do feel there are several areas that have been overlooked in the proposed legislation.”

Horse transport

“We support the general principle of the LEZ, are pleased that the proposals recognise the differing needs of heritage vehicles, but are very concerned that the specifics may deprive Londoners the opportunity to travel on 1950s (and earlier) vintage buses when they wish, with the peace of mind that they are operated to PSV standards.”

Vintage bus hire/owner

“Although we agree with an LEZ in principle (we are one of the first companies in UK to purchase a Euro 5 engine truck) we do have major concerns regarding your current LEZ proposals and the immediate impact it will have on our business and that of our suppliers.”

Removals

Two were concerned with the timeframe of the proposed LEZ.

“We strongly support the GLA's intentions to reduce commercial vehicle emissions within the M25. However the time frame is too short.”

Automotive engineering service & vehicle recovery

“...we feel that a longer time frame should be given.”

Removals

Other concerns included the costs of the scheme to their business.

8.4.4. Other discount and exemptions

Eleven businesses asked for other discounts or exemptions.

Three vintage bus hire/owners asked for specific exemptions.

One vintage bus hire/owner thought it was an anachronism that vintage buses not used for hire and reward could enter the LEZ free of charge as:

“... it would probably open the way for preservationists to use their 'historic' buses for weddings for hire and reward on the pretext that they have 'historic' tax and are exempt, while those of us who use their historic buses legally on 'bus' tax will be penalised. A historic bus will pollute the same amount irrespective of use.”

Vintage bus hire/owner

Another vintage bus hire/owner asked for **all** pre-1973 buses and coaches are to be made exempt regardless of their taxation class or mode of operation.

Another suggested disregarding the proposed differentiation between historic buses and heritage PSVs and to, instead:

“...introduce a daily exemption for all non-compliant heritage buses, based on a fixed number of days (use in the LEZ area). We suggest 40 days per year. Further days beyond this would be charged as normal.”

Vintage bus hire/owner

Similarly, a coach operator asked for an exemption to be made for all passenger carrying vehicles not operating in the Zone on a daily basis:

“...possibly by a registration scheme for say £200 per year permitting 50 days use in the zone per year. This would result in only a nominal charge per day per passenger, and not discriminate against London as a coach destination for people throughout Britain.”

Coach operator

Two horse transport companies asked for exemptions for their vehicles:

“I believe that horse lorries should be granted an exemption within the LEZ for a finite period ...and likewise I believe that when the rest of the HGV class goes onto Euro IV horse lorries should be allowed to stay on Euro III levels.”

Horse transport

A removals company asked for the removals industry to be granted an exemption because of the special nature of their work (in which vehicles stand idle for long periods while they are loaded/unloaded resulting in “very low mileage and very low pollution”).

A leisure company asked for amphibious operators to be exempt from the LEZ “until such time as the technology exists to enable compliance to be achieved.”

8.4.5. Cost impacts on customers/businesses

Overall, 12 businesses complained about the cost impacts on customers/businesses caused by the LEZ.

Three vintage bus hire/owners said that their customers would not be able to afford the increased costs that they would have to charge:

“Our buses visit London usually once a week for weddings. Our customers pay a premium price to travel in a Routemaster bus which reflects the high standing and operating costs. They will not be prepared to pay an additional £200 for the privilege.”

Vintage bus hire/owner

“A £200 fee would be the equivalent of roughly a 40-50% price increase for the average job. We would expect that for many clients this would take the hire over their budget and we would thus expect to lose a minimum of 75% of our current market.”

Vintage bus hire/owner

Three coach operators and two bus operators likewise said that their customers would not be able to afford the increased costs:

“I regularly take the Caribbean Churchgoers to other churches around the country but to go into London to collect and return them will mean the £200 surcharge. Since I operate on a very low profit margin I would have to increase my charges to them.”

Coach operator

“...the costs will have to be passed on to the people travelling on our vehicles. In the cases of the Private School the costs will have to be passed on to parents of the pupils travelling. In the case of the work we do for Surrey County Council it will mean an extra £90.00 plus per day per vehicle and these costs will be passed on to the rate payer.”

Coach operator

“We understand that the charge to be levied upon non-compliant vehicles is to be £200 per day. To pass this on to our customers would mean that the cost of most hires would increase by around 50%.”

Bus Operator

Two haulage companies, a horse transport company and a removals company also complained that the increased costs would be passed on to their customers.

A haulage/freight company said the passed on costs would lead to higher inflation:

“Moreover companies from outside London would be forced into seeking large extra payments from customers in order to be able to deliver into the Capital thereby substantially inflating the costs of all products delivered into London and making business in Greater London far less competitive than those outside. Costs would then be passed on to the consumer fanning the flames of inflation.”

Haulage/freight

8.4.6. Oppose a LEZ

Ten businesses made comments opposing the principle of the LEZ.

“As a matter of principle, we oppose all forms of emission charging, until it is clear that monies raised are invested in the

road infrastructure, which is what people really want (as endorsed by their behaviour) and what the economy desperately needs.”

Vehicle leasing and fleet management

“I must register an objection to further restrict transport in London though fiscal means. I believe your proposed solution to the perceived problem is simplistic and ridiculous. Rules regarding vehicle emissions are already in force nationally.”

Leisure company

“We run a well maintained fleet of vehicles and object to your emission proposals.”

Coach operator

Three businesses specifically cited the GLA or the Mayor in expressing their disapproval of the proposed LEZ:

“The Government is, quite rightly, enforcing standards for the production of new vehicles so why does the GLA feel it right or necessary to tinker round the edges?”

Vehicle leasing and fleet management

8.4.7. Proposal is premature

Ten businesses said that the timescale for the proposed LEZ was premature. The responses included three removals companies and two freight/haulage companies.

“...if there is to be a London Emission Zone, then it is being introduced far too quickly.”

Removals

“The LEZ implementation timeframe of Feb 2008 will not give us and our suppliers enough time to upgrade our fleets to the specified LEZ Euro Three spec minimum.”

Removals

“Our suggestion to the Mayor is to instruct TFL to delay the LEZ for two years in order to bring a more balanced and reasonable approach to the issue.”

Freight/haulage

“Please consider the charge for small businesses and extend the date for conversion to 2012 for owner drivers so that people like me can have time to comply.”

Coach Operator

One of the removals companies said that in the removals industry they tend to keep their vehicles for a long time due to the low annual mileage and therefore a longer time frame should be given for the LEZ.

Three businesses asked for more time specifically because of the high cost involved in meeting the emissions standards.

"If a two year lead time is given from May 2007, if the zone is approved, then it would give all companies involved a chance, without causing colossal expense at a time when most operators are already pushed near to breaking."

Haulage/Freight

"Again the majority of competitors are there for fun and the Corinthian Spirit of the event and could not possibly afford to change their lorries for several years to come."

Horse transport

8.4.8. Ongoing costs of retrofitting abatement equipment

Nine businesses complained about the ongoing cost of retrofitting abatement equipment.

"Any vehicle equipped with Selective Catalytic Reduction or Particulate Trap will incur additional maintenance costs."

Bus operator

"The large cost of the exhaust filters."

Haulage/Freight

Seven companies specifically mentioned the high cost of retrofitting abatement equipment.

"The cost of modifying our vehicle to meet LEZ specifications is beyond our means."

Vintage bus hire/owner

"We operate three vehicles built between 1961 and 1967 and so it would cost an extremely large amount of money to find or design an engine that could be fitted to our vehicles. In any case our vehicles are only used, on average, for 17 days per vehicle per year and achieve an average mileage of 2,000 km per vehicle per year it would take decades, possibly centuries, to justify the cost."

Vintage bus hire/owner

"You cannot lift the body off a Euro I or a Euro II chassis and onto a Euro IV or Euro V chassis without a great deal of modification and expense or, sometimes, not at all."

Removals

8.4.9. LEZ will lead to job losses

Eight businesses said that the introduction of the LEZ will lead to job losses. The businesses included two vintage bus hire/owners and two freight/haulage companies.

“It would be cheaper for us to cease trading with the loss of 3 jobs and the burden of unemployment benefits on the state. Even on our gross turnover of about £100k, this would amount to a 10% increase in costs.”

Vintage bus hire/owner

“If the LEZ scheme were to be introduced with the severity indicated in this booklet, I will have no alternative but to pack up the business that I have built over the last 10 years making four employees redundant.”

Farmer

9. COMPARISON WITH PREVIOUS CONSULTATION

9.1 Introduction

This chapter sets out a comparison of the findings from responses to the public and business consultation questionnaires in the current consultation on the detail of the LEZ proposal and the preceding consultation on the principle of the scheme as set out in revisions to the Mayor’s Transport and Air Quality Strategies.

The Scheme Order consultation ran from 11 November 2006 to 2 February 2007 and the preceding Strategy Revisions consultation ran from 30 January to 24 April 2006.

The comparisons are only made with those questions which were the same or very similar in both consultations.

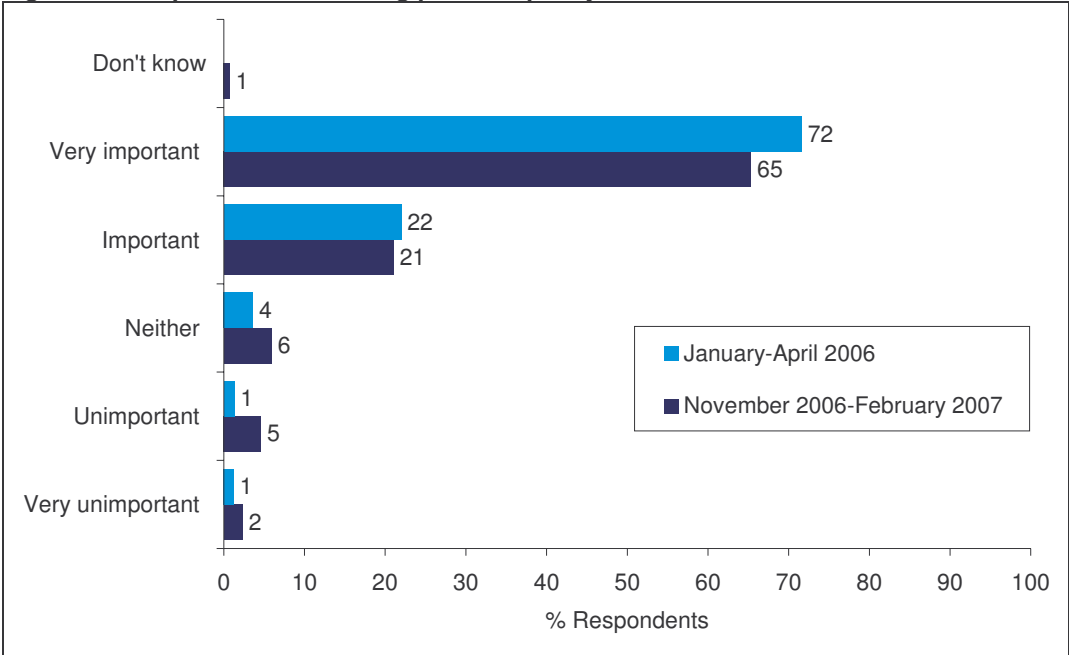
9.2 General Public Questionnaires

There was a much larger response to the initial public consultation from the general public: 4,799 questionnaires compared to 1,993 questionnaires in the current consultation.

9.2.1 Importance of Tackling Poor Air Quality in London

There has been a fall in the proportion who think that it is very important to tackle poor air quality in London: 65% compared to 72%.

Figure 118: Importance of tackling poor air quality in London



Base: November 2006-February 2007 1,878, January-April 2006 4,790

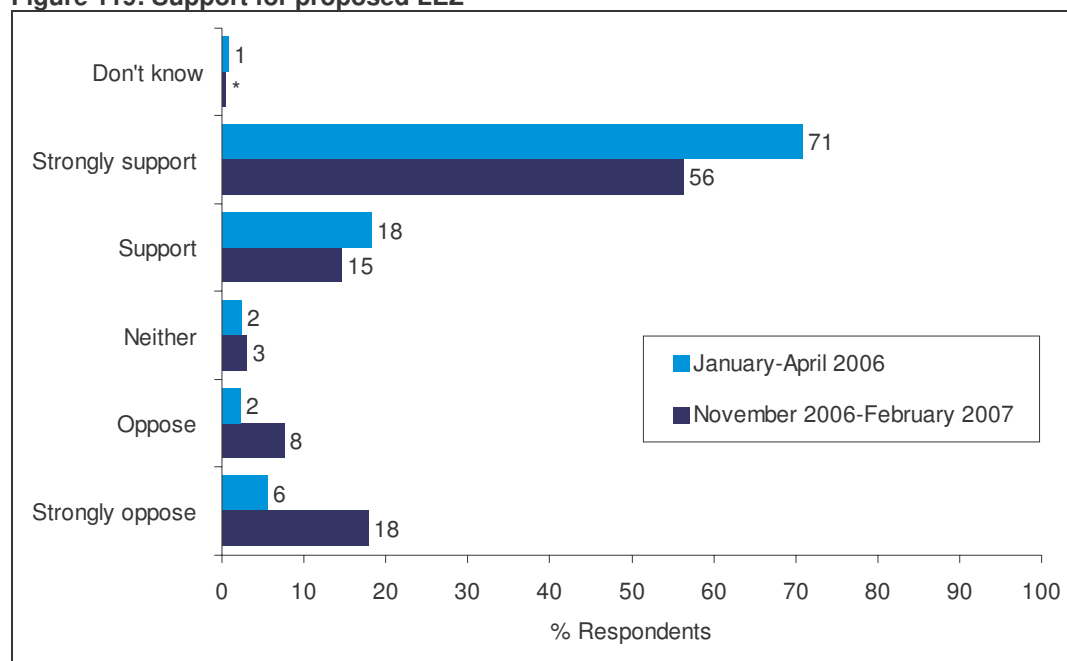
9.2.2. Support for the LEZ Proposal

Respondents to both consultation questionnaires were asked:

“Do you support or oppose the proposal to introduce a Low Emission Zone (LEZ) in Greater London as described in the leaflet?”

Support for the proposed LEZ has fallen with 71% of general public respondents supporting the proposed LEZ in the most recent consultation compared to 89% in the previous consultation.

Figure 119: Support for proposed LEZ



Base: November 2006-February 2007 1,869, January-April 2006 4,789

9.2.3. Agreement with Proposed Emission Standards

There was a difference in the questions asked with respect to the proposed emission standards in the two consultation questionnaires:

- Current

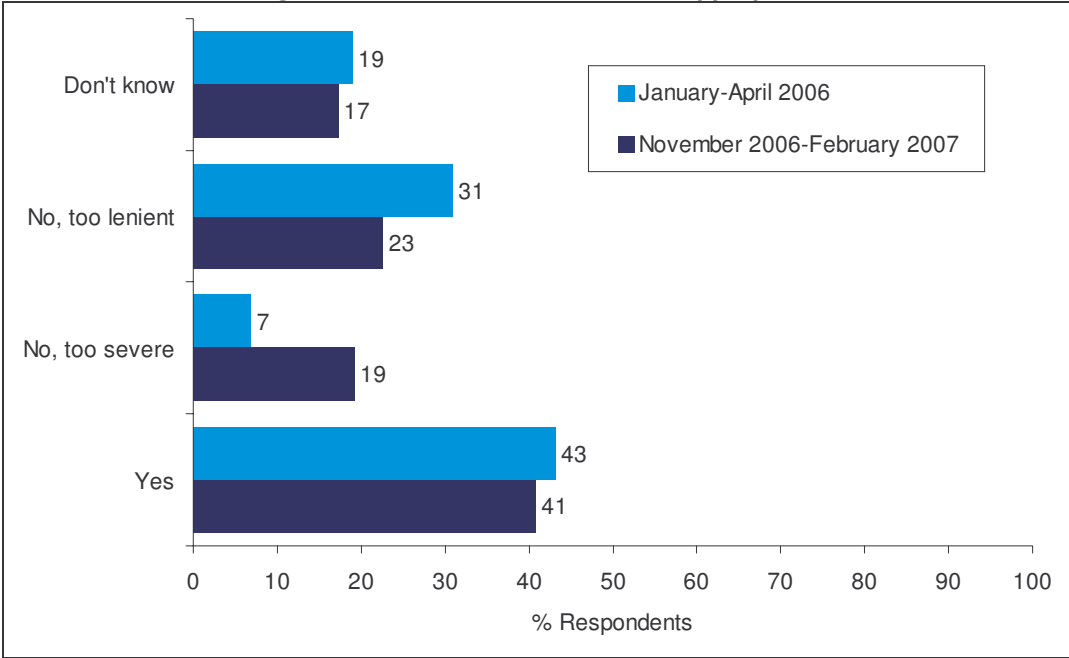
“Do you think the emissions standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate?”

- Previous

“Do you think that the proposed emission standards (of Euro III for particulates PM10 by 2008 and Euro IV for PM10 from 2010) are appropriate?”

A similar proportion in each consultation thought the proposed emission standards were appropriate (41% current and 43% previous). However, in the most recent consultation a larger proportion think the standards are too severe: 19% compared to 7% and a significantly³⁵ smaller proportion think the standards are too lenient: 23% compared to 31%.

Figure 120: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate³⁶



Base: November 2006-February 2007 1,582, January-April 2006 4,786

9.2.4. Which Vehicles Should the LEZ Apply to?

In the current consultation the questionnaire included a much larger list of vehicles:

- Lorries (HGVs)
- Buses
- Coaches
- Heavier LGVs only
- All LGVs
- Minibuses
- SUVs (4x4s)
- Diesel cars
- Petrol cars
- Motorcycles.

In the previous consultation the questionnaire the following vehicles were listed:

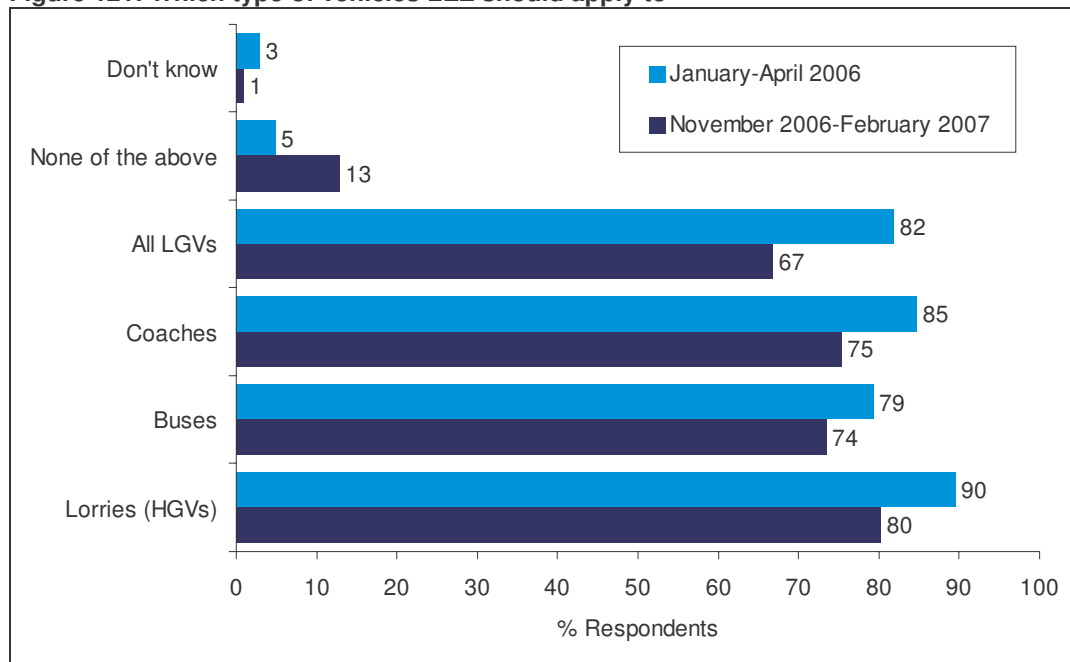
³⁵ at the 80% confidence level
³⁶ whether proposed emission standards (of Euro III for particulates PM10 by 2008 and Euro IV for PM10 from 2010) are appropriate for previous consultation

- Lorries (HGVs)
- Buses (all types)
- Coaches
- Vans (LGVs).

For the purpose of comparison we have used the latter list and assumed that 'all LGVs' from the current consultation questionnaire is equivalent to 'Vans (LGVs)' in the previous consultation.

Fewer respondents think the LEZ should apply to HGVs, buses, coaches and LGVs in the current consultation compared to the previous one and more think it should apply to no vehicles.

Figure 121: Which type of vehicles LEZ should apply to



Base: November 2006-February 2007 1,588, January-April 2006 4,783

9.2.5. Respondent Characteristics

The sample for the most recent consultation was significantly more likely to be male: 72% compared to 65% and were significantly more likely to be older: 41% aged over 45 years old compared to 23% in the previous consultation.

There was no significant difference in the ethnicity of the two samples.

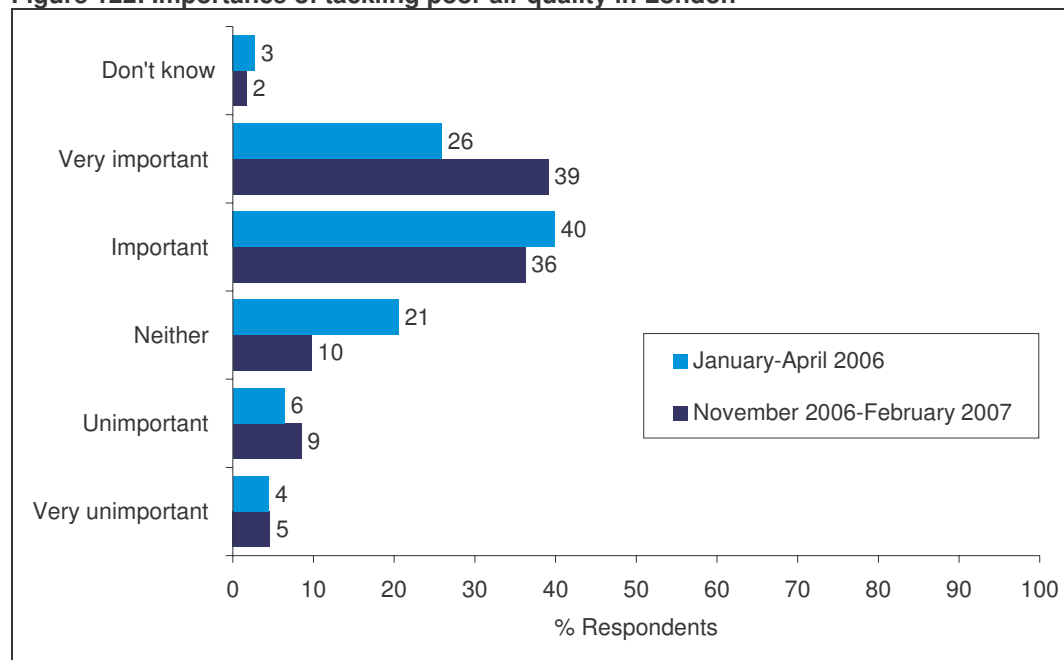
9.3 Business Questionnaires

In contrast to the general public questionnaire samples there was a larger response to the current public consultation from businesses: 5,639 questionnaires compared to 3,701 questionnaires in the previous consultation.

9.3.1. Importance of Tackling Poor Air Quality in London

There has been a significant³⁷ rise in the proportion of businesses who think that it is very important to tackle poor air quality in London: 39% compared to 26%.

Figure 122: Importance of tackling poor air quality in London



Base: November 2006-February 2007 5,504, January-April 2006 3,637

9.3.2. Support for the LEZ Proposal

Support for the proposed LEZ has risen significantly³⁸ with 47% of business respondents supporting the proposed LEZ in the most recent consultation compared to 42% in the previous consultation.

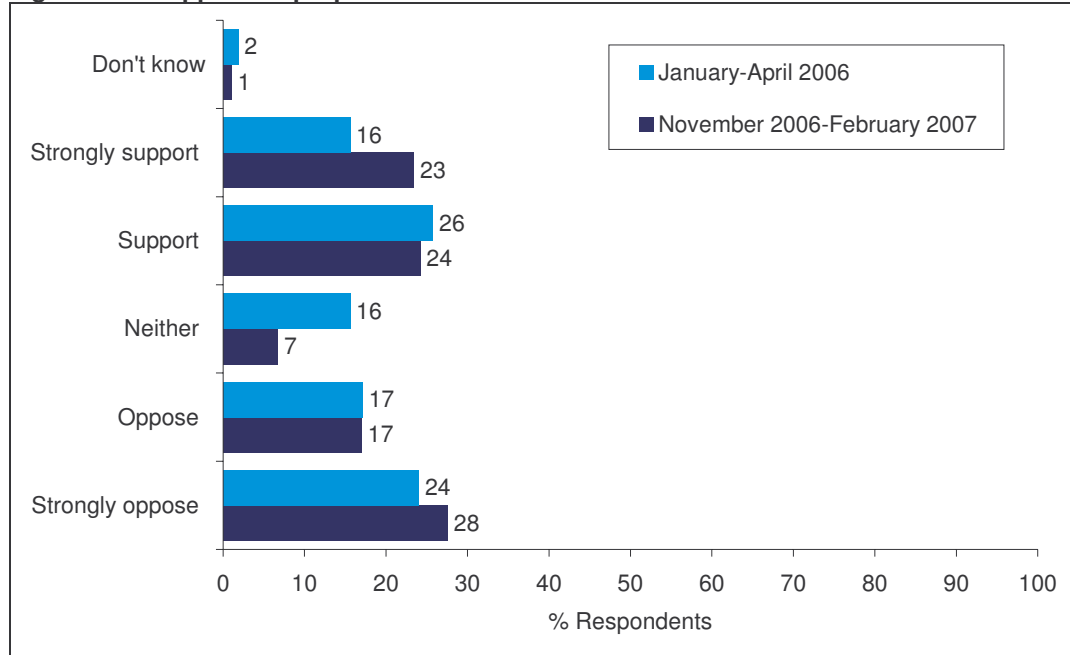
The proportions both strongly supporting and strongly opposing the proposed LEZ have increased significantly³⁹ since the previous consultation.

³⁷ at the 80% confidence level

³⁸ at the 80% confidence level

³⁹ at the 80% confidence level

Figure 123: Support for proposed LEZ



Base: November 2006-February 2007 5,502, January-April 2006 3,642

9.3.3. Agreement with Proposed Emission Standards

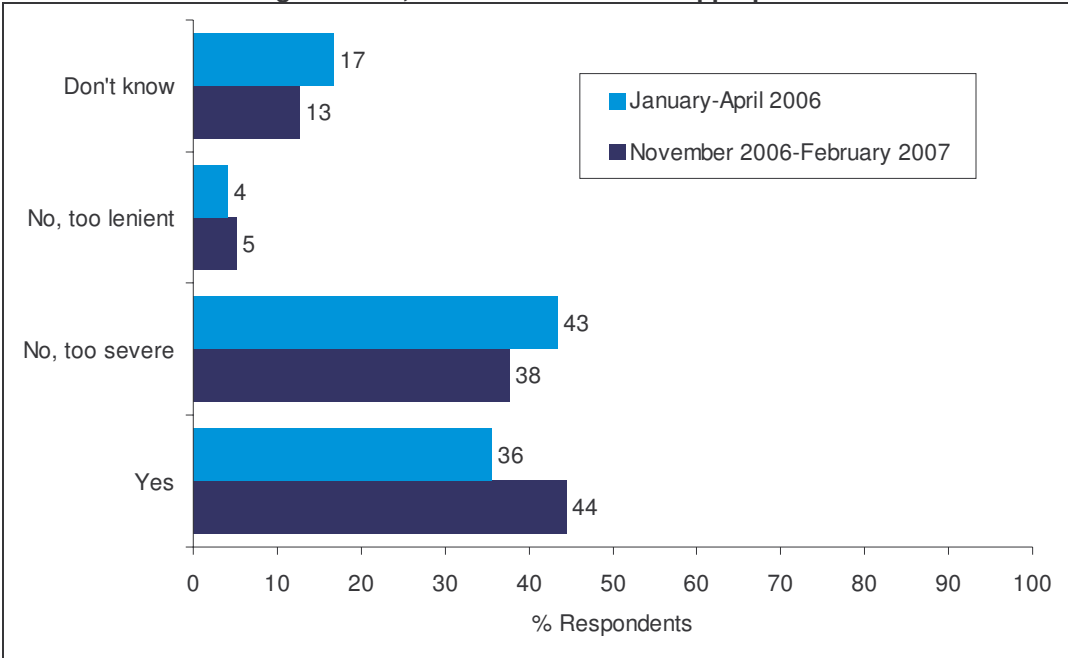
As stated in 9.2.3 above, there was a difference in the questions asked with respect to the proposed emission standards in the two consultation questionnaires.

A significantly⁴⁰ larger proportion in the current consultation think the proposed emission standards are appropriate (44% current and 36% previous) and significantly⁴¹ fewer think the standards are too severe: 38% compared to 43%.

⁴⁰ at the 80% confidence level

⁴¹ at the 80% confidence level

Figure 124: Whether proposed emission standard of Euro III for Particulate Matter (PM) from 2008 for diesel engine HGVs, buses and coaches is appropriate⁴²



Base: November 2006-February 2007 5,469, January-April 2006 3,638

9.3.4. Which Vehicles Should the LEZ Apply to?

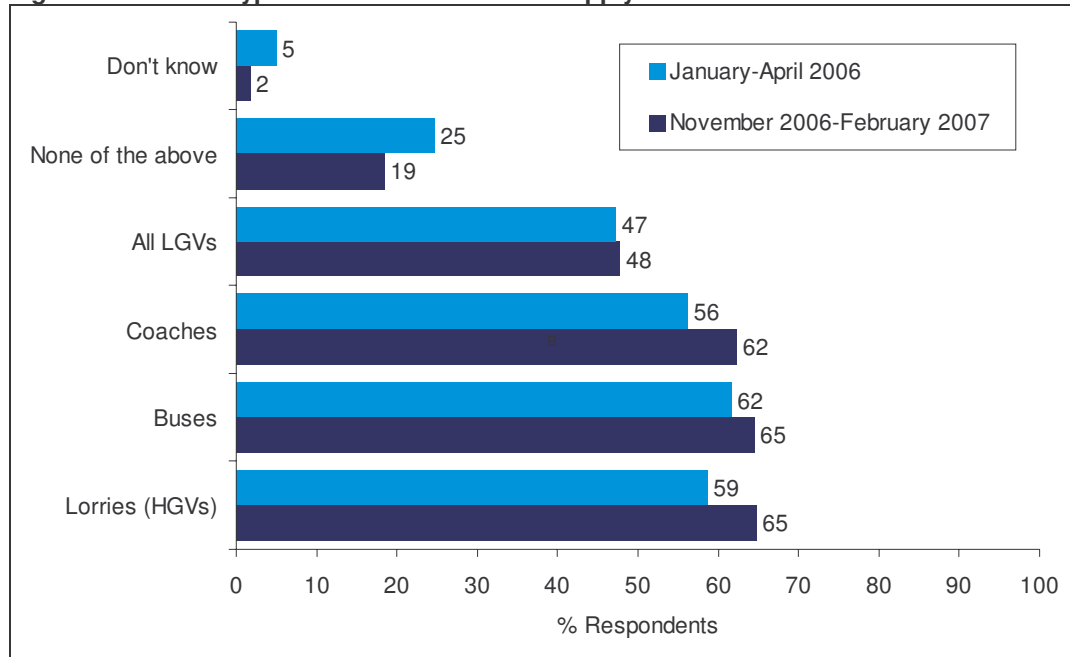
As stated above in 9.2.4, the current consultation questionnaire included a much larger list of vehicles and we have compared the results for the smaller list used in the previous consultation.

Significantly⁴³ larger proportions of business respondents think the LEZ should apply to HGVs, buses and coaches in the current consultation compared to the previous one. There was no significant difference with respect to LGVs.

⁴² 'whether proposed emission standards (of Euro III for particulates PM10 by 2008 and Euro IV for PM10 from 2010) are appropriate for previous consultation

⁴³ at the 80% confidence level

Figure 125: Which type of vehicles LEZ should apply to

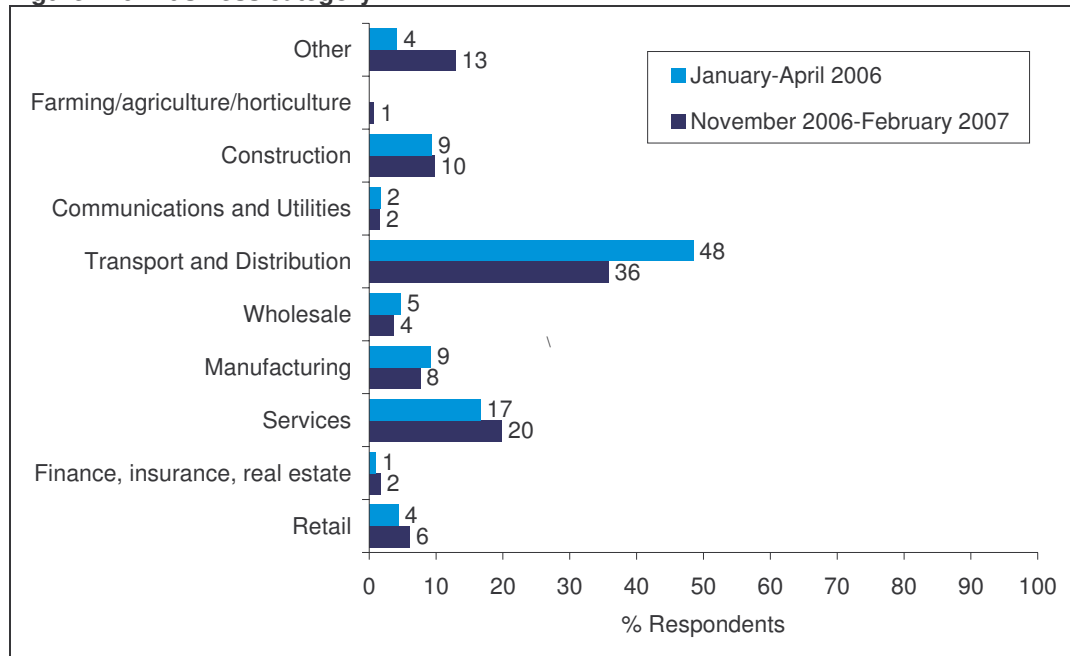


Base: November 2006-February 2007 5,416, January-April 2006 3,513

9.3.5. Business Characteristics

In the current consultation there was a larger response from businesses in the service and retail sectors and a smaller response from businesses in the transport and distribution sector.

Figure 126: Business category



Base: November 2006-February 2007 5,416, January-April 2006 3,513

Respondents were asked how often their company operates HGVs, buses/coaches or LGVs/minibuses⁴⁴ within the proposed LEZ.

Businesses were more likely to operate HGVs within the proposed LEZ in the previous consultation: 50% compared to 38% operate HGVs within the proposed LEZ.

There was little difference in the proportions operating buses/coaches or LGVs/minibuses within the proposed LEZ between the two consultations.

Table 38: Frequency of operating vehicles within the proposed LEZ

	HGVs		Buses/coaches		LGVs/minibuses*	
	Current %	Previous %	Current %	Previous %	Current %	Previous %
7 days a week	7	6	3	3	7	6
4-6 days a week	12	14	1	2	10	12
1-3 days a week	6	10	2	2	5	6
A few times a month	5	8	3	3	6	6
Every month or so	3	4	1	2	4	3
A few months a year	2	3	1	1	3	3
Once or twice a year	2	3	2	1	5	3
Less often than once or twice a year	1	2	1	1	3	2
Never	62	50	86	86	57	57
Base	4,611	3,701	4,311	3,701	4,738	3,701

* minibuses in current consultation only

⁴⁴ minibuses in current consultation only

APPENDIX A

Consultation Booklet and Questionnaire for General Public

- **Q14** Do you support the proposals to exempt the vehicles mentioned on page 3 of the leaflet from the LEZ?

TICK ONE BOX ONLY

- Strongly support Oppose
 Support Strongly oppose
 Neither Don't know

- Q15** If you have any other views on vehicle exemptions please write in the box below.

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- Q16** Please write in the box below if you wish to make any other comments about the proposed LEZ or expand on any of the points raised above.

--	--	--	--

Questions about you

- Q17** What is the first part of the postcode?

PLEASE ENTER THE FIRST TWO LETTERS AND FIRST TWO NUMBERS ONLY. FOR EXAMPLE SW10

--	--	--	--

THESE QUESTIONS ARE FOR CLASSIFICATION PURPOSES ONLY

- Q18** Are you:

TICK ONE BOX ONLY

- Male Female

- Q19** What is your age group?

TICK ONE BOX ONLY

- Under 16 45-64
 16-24 65+
 25-44

- Q20** What is your ethnic background?

TICK ONE BOX ONLY

- White Mixed
 Asian Chinese
 Black Other

Please tick the box if you wish any details that may identify you to be kept confidential and not made public.

Data protection statement

TfL and the Mayor of London will use the information you have supplied in response to this consultation only for the purpose of assessing the proposal. Responses may be made publicly available. However, personal details will be kept confidential. You do not have to provide any personal information, but this information will help TfL to understand the range of responses. For example, responses may be analysed by postcode areas to identify local issues.

APPENDIX B

Consultation Booklet and Questionnaire for Businesses



Have your say on the proposed London Low Emission Zone



For more information call **0845 722 4577**.

Calls are charged up to 5p per minute from a BT landline.
Mobile and other network costs may vary.



0203 0000 0000

MAYOR OF LONDON

Transport for London



Purpose of this leaflet

In early 2006, a public consultation took place on revisions to the Mayor of London's Air Quality and Transport strategies regarding the principle of introducing a Low Emission Zone (LEZ) in London. That consultation showed strong public support for a London LEZ. Based on this and modifications to the original proposals resulting from the consultation, the Mayor published the revisions to his Transport and Air Quality Strategies and decided to proceed with developing detailed proposals for a LEZ. Transport for London (TfL) has now prepared these proposals for a London LEZ scheme. This leaflet provides information about the proposals and offers you an opportunity to give your views on them.

A questionnaire and further information can be found at the back of this leaflet. Please note that your comments on the proposals detailed in this leaflet must be received by **1 February 2007**.

If the Mayor confirms the LEZ Scheme Order with or without modifications, it is proposed that the scheme would come into effect in three stages based on vehicle type. This would potentially begin in early 2008 with the heaviest diesel-engine Heavy Goods Vehicles (HGVs) – over 12 tonnes in weight, followed by lighter diesel-engine HGVs – between 3.5 and 12 tonnes, buses and coaches in summer 2008, and heavier diesel-engine Light Goods Vehicles (LGVs) – under 3.5 tonnes and diesel-engine minibuses in autumn 2010.

The proposed LEZ would complement the Mayor's existing Bus and Taxi emission strategies, which require these vehicles to meet standards comparable to, or exceeding, the proposed 2008 LEZ emission standards.

1

Why implement a Low Emission Zone in London?

A LEZ is a designated area where measures have been put in place to improve air quality by preventing or deterring the most polluting vehicles from driving in the Zone.

London has the worst air pollution in the UK and amongst the worst in Europe. Air pollution affects the quality of life of a large number of Londoners, especially those with respiratory and cardiovascular conditions. It was estimated that in 2005 some 1000 premature deaths and a similar number of hospital admissions occurred due to poor air quality in London. Many more people experience discomfort as a result of air quality aggravating existing conditions.

The Mayor has a legal obligation to take steps towards meeting national and European Union (EU) air quality objectives which are designed to protect human health. Based on current trends, and without further action, it is predicted that London will not meet its 2010 objectives for two pollutants: PM₁₀ (fine particulates) and NO₂ (nitrogen dioxide, formed from emissions of oxides of nitrogen, NO_x). In London, road transport is the single biggest source of emissions of these pollutants. Encouraging certain vehicles to meet emission standards to drive within the LEZ would reduce the concentration of PM₁₀ and NO₂ in the air and thereby improve the health of people living in, working in and visiting the capital.

On the basis of TfL's analysis and in the absence of any suitable national initiatives, a LEZ represents the most effective option for achieving reductions of the most harmful road transport generated emissions in London between 2008 and 2015. This particular LEZ is the most viable initiative to achieve air quality improvements in London.



2

Which vehicles would be included in the Low Emission Zone?

As the LEZ is designed to discourage the use of the most individually polluting vehicles in London, the scheme is targeted at older diesel-engine HGVs, buses, coaches, heavier LGVs and minibuses. Both UK registered and non-UK registered vehicles would need to comply with the LEZ, with vehicles being defined using European vehicle definitions to ensure a legal basis that applies equally across the EU. The LEZ would also apply to some private vehicles which are lorry-derived vehicles, such as some horse boxes and some motor homes. It is not proposed that cars be included in the LEZ at this stage, although the Mayor has asked TfL to look at the implications of potentially including cars at a later date.

It is proposed that a small number of vehicle types would be exempt from the scheme. These include agricultural vehicles, military vehicles, historic vehicles not used for hire or reward, non-road going vehicles which are allowed to drive on the highway (for example excavators) and certain types of mobile crane. These vehicles typically use engines certified to different standards than road-going engines. Some of these vehicles are proposed to be exempt due to their unsuitability for retrofitting pollution abatement equipment, conversion to an alternative fuel, or engine replacement.



3

Where and when would a Low Emission Zone operate?

In order to maximise the health and air quality benefits of the LEZ, it is intended that the Zone would operate 24 hours a day, 365 days per year and cover the Greater London area.

The proposed boundary has been designed to allow vehicles to divert away from the Zone should they wish. Vehicles that do not meet the emission standards would be able to use the M25 to bypass Greater London without entering the Zone. The map on pages 5 and 6 outlines the area to be covered by the LEZ. Detailed maps can be found in electronic format at tfl.gov.uk/lezlondon. Hard copies have been deposited at TfL's offices at Fath Lawson House, 15-17 Dacre Street, London, SW1 0NR.

An option is to include the motorways (excluding the M25) and trunk roads in London (i.e. the M1, M4, M11 and A3113) in the Zone. The Department for Transport is responsible for these roads. Their inclusion would require the approval of the Secretary of State for Transport.

Views are invited on the area covered by the proposed Zone, in particular whether or not the motorways and trunk roads in London should be covered by the LEZ, and the proposed boundary of the LEZ.



4



For exact details of the boundary visit tfl.gov.uk/lezlondon

5

6

What are the proposed emission standards?

It is proposed that the emission standards for the LEZ scheme would be based on 'Euro standards'. These are European standards which define the limits for exhaust emissions for new vehicles sold in EU member states, and which these vehicles must comply with when manufactured from a certain date.

The table on pages 9 and 10 summarises the vehicles proposed to be included in the LEZ, the dates the scheme would become applicable to them, and the proposed emission standards they would be required to meet.

From early 2008 HGVs over 12 tonnes would be required to comply with a standard of Euro III for particulates (PM) in order to drive within the LEZ without paying the charge. From mid 2008 a standard of Euro III for PM would apply to all diesel-engine HGVs (i.e. goods vehicles over 3.5 tonnes), buses and coaches (i.e. passenger carrying vehicles over 5 tonnes with more than 9 seats plus the driver's seat). From autumn 2010 a standard of Euro III for PM would apply to heavier diesel-engine LGVs and minibuses.

From early 2012 all diesel-engine HGVs, buses and coaches would be required to meet a standard of Euro IV for PM in order to drive in the LEZ without paying the charge. It is not proposed that the standard for heavier diesel-engine LGVs and minibuses would be increased in 2012.



7

8

Vehicle type and definitions	European vehicle class(es)	Proposed date of LEZ scheme implementation	Proposed vehicle emission standard required to drive in the LEZ at no charge
Heavier HGVs Goods vehicles exceeding 12 tonnes (gross vehicle weight) 	N ₁	February 2008	Euro III for PM
		January 2012	Euro IV for PM
Lighter HGVs Goods vehicles between 3.5 and 12 tonnes (gross vehicle weight) 	N ₁	July 2008	Euro III for PM
		January 2012	Euro IV for PM
Buses and coaches Passenger vehicles with more than eight seats plus the driver's seat exceeding 5 tonnes (gross vehicle weight) 	M ₁	July 2008	Euro III for PM
		January 2012	Euro IV for PM
Heavier LGVs Goods vehicles between 1.205 tonnes (unladen) and 3.5 tonnes (gross vehicle weight) 	N ₁ – class II & class III	October 2010	Euro III for PM
Minibuses Passenger vehicles with more than eight seats plus the driver's seat below 5 tonnes (gross vehicle weight) 	M ₁	October 2010	Euro III for PM

For more information please see the detailed Scheme Description and Supplementary Information document and Scheme Order at tfl.gov.uk/lezlondon

9

10

How would I know if my vehicle meets the proposed standards?

The Euro III standard became mandatory for all newly manufactured HGVs, buses and coaches in the EU in October 2001. TfL would assume that a vehicle is Euro III compliant if it was first registered on or after 1 October 2001.

Should the scheme be confirmed, the standard for diesel-engine HGVs, buses and coaches would be tightened in 2012 to a standard of Euro IV for PM. Vehicles first registered on or after 1 October 2006 would be assumed to be Euro IV compliant.

Should the scheme be confirmed to include heavier diesel-engine LGVs and minibuses from Autumn 2010, those vehicles first registered on or after 1 January 2002 would be assumed to be compliant - the date when the Euro III standard becomes mandatory for all newly manufactured LGVs.



11

Would I need to register my vehicle under the LEZ scheme?

The vast majority of operators from the UK would not need to register their vehicles with TfL as they would already be listed in a database of compliant and non-compliant vehicles based on information held by the Driver and Vehicle Licensing Agency (DVLA). However, a small number of operators who, for example, retrofit new engines or abatement equipment to their vehicle so that it complies with the emission standards, and where this is not recorded with the DVLA, would need to submit documentation to TfL to demonstrate this. Other reasons why the emission standard of a vehicle may not be readily identified by TfL and why some operators may need to register are:

- Vehicles may not be registered with the DVLA in the UK (i.e. all non-UK vehicles and vehicles registered in Northern Ireland)
- Vehicles which meet the minimum Euro standards set by the LEZ, but were first registered before the date TfL will use as a proxy as described on page 11 of this leaflet
- Vehicles which had pollution abatement equipment retrofitted to meet the required emission standards but do not have a Reduced Pollution Certificate (RPC) or are not registered with the Energy Saving Trust as having done so. In these cases a fitting certificate would have to be provided and approved by TfL.
- Vehicles which have had a new engine fitted that meets the required emission standards
- Vehicles which have been converted to run with an approved fuel conversion.

Operators of these vehicles would need to register with TfL in order to drive within the LEZ without paying the charge. They would be able to do this by post from summer 2007 onwards.

Should the Mayor decide to proceed with a LEZ, detailed information about registration processes would be made available to operators.

12



How much would the charge be for vehicles that do not meet the required emission standards?

A daily charge of £200 is proposed for non-compliant HGVs, buses and coaches to drive in the LEZ, and £100 for non-compliant heavy LGVs and minibuses. The levels of charge are designed to encourage operators driving frequently within the Zone to ensure their vehicles are compliant, whilst at the same time allowing operators of non-compliant vehicles to drive within the proposed LEZ on an occasional basis, albeit at a cost.

Should the charge not be paid for a non-compliant vehicle, a penalty charge would apply. This would be £1,000 (reduced to £500 if paid within 14 days) for HGVs, buses and coaches, and £500 (reduced to £250 if paid within 14 days) for heavy LGVs and minibuses.

13

How could vehicle operators comply with the scheme?

Under the proposals, operators would have a range of options available to them for making their vehicles compliant with the LEZ. Operators may choose to fit particulate abatement equipment, replace or re-engine their vehicles, reorganise their fleets so that only compliant vehicles operate within the LEZ, or pay the daily charge.

TfL is working with other organisations to ensure that sufficient information is available to operators about their options for complying with the LEZ. If the Mayor wished to proceed with the LEZ scheme following this consultation, it is anticipated that the Energy Saving Trust (EST) and Vehicle and Operator Services Agency (VOSA) would provide information on their websites about these options.

A TfL helpline where vehicle operators can get more information about the consultation has been established. The helpline can be accessed in the UK by phoning 0845 722 4577. Operators calling from outside the UK should call +44 (0)1254 404 110.



14



How would the Low Emission Zone be enforced?

The LEZ would be enforced using Automatic Number Plate Recognition (ANPR) cameras – both fixed and mobile – within the Greater London area.

These would photograph the number plates of vehicles and check vehicle details against a database of compliant and non-compliant vehicles and vehicles for which the charge had been paid. If the charge had not been paid, a penalty charge notice would be issued to the registered keeper of the vehicle.

How would the Low Emission Zone be implemented?

It is proposed that the LEZ would be implemented using a Scheme Order under the GLA Act 1999 rather than by a traffic regulation order which would ban vehicles. The Scheme Order sets out the detail of the scheme and provides the legal basis for it. The Scheme Order is the legal document which this consultation invites views on and is available from TfL, as described on page 16 of this leaflet, along with explanatory notes and other consultation documents. The Scheme Order approach is preferred to other implementation mechanisms, such as a ban, as it is judged to be more flexible and allows operators to make a choice as to whether they pay the daily charge if they are not compliant with the proposed emission standards. However, the level of the charge has been set to discourage frequent use and encourage compliance.

What impacts would a London Low Emission Zone have?

A LEZ would make London a more pleasant place to live, work and visit with the improved air quality and associated health benefits that it would bring. These impacts are summarised on page 17. More detailed information on the expected impacts can be obtained from TfL as part of this consultation. Please see page 18 for contact details.



Impacts

Environment Whilst the introduction of the LEZ would not bring London into full compliance with the National Air Quality Strategy and EU Directive, it would deliver progress towards improving air quality in London. The proposed LEZ would bring reductions in emissions of PM₁₀ and NO_x in the London area.

Health There would be a number of health benefits resulting from implementation of a LEZ in London, including: a reduction in premature deaths; a reduction in years of life lost; reduced hospital admissions for people with respiratory illnesses; fewer days of impaired activity for those sensitive to the effects of air pollution; and improved health for those with pre-existing respiratory conditions.

Economy & Business There would be some small direct and indirect impacts on the London and UK economy from the LEZ as it would bring forward or impose costs on some vehicle operators. Many operators would not be particularly affected as they already operate compliant vehicles or intend to upgrade their fleets prior to the implementation of the LEZ. Other operators may replace their vehicles, retro-fit their vehicles with particulate traps or allocate compliant vehicles within their fleets to London routes. The relative costs are likely to be greater for smaller operators which tend to have the largest number of non-compliant vehicles.

Equalities The impact of the LEZ on the community is likely to be positive due to the health benefits arising from the reduced emissions. The most significant positive impact is likely to be experienced by the young, older people and others who are vulnerable to air pollution, have existing respiratory problems and/or live close to areas of high pollution.

More information

Further copies of this leaflet and additional consultation documents on the LEZ (including the Scheme Order) are available on TfL's website at tfl.gov.uk/lezlondon. They can also be requested by phoning 0845 722 4577 from within the UK or +44 (0)1254 604 110 from outside the UK.

You can phone 0845 722 4577 to obtain this leaflet in Braille, large print, audio tape, Arabic, Bengali, Chinese, Czech, Danish, Dutch, French, German, Greek, Gujarati, Hindi, Italian, Polish, Punjabi, Spanish, Turkish, Urdu and Vietnamese. Leaflets in all other EU official languages are also available on request.





Your views

TfL invites you to comment on the proposals by completing the questionnaire. You can find a copy of the questionnaire on tfl.gov.uk/lezlondon if you wish to make any additional comments to those provided on the questionnaire, please enclose these together with your questionnaire in an envelope and address to (no stamp required)

Freepost RLUA-CUHG-JGIL
Low Emission Zone Consultation
Chiswick Gate
595-608 Chiswick High Road
London W4 5RT

Questionnaires and comments must be received no later than 2 February 2007.

19

What happens next?

The consultation will run until 2 February 2007. TfL will then prepare a report to the Mayor of London incorporating comments received during the consultation.

The Mayor will then decide whether or not to confirm the Scheme Order, with or without modifications, in order to implement a Low Emission Zone for London. Once a decision has been made TfL will publicise this decision, along with the reasons behind the decision.

Should the Mayor decide to proceed with the scheme, the next steps in the process would be:

- **spring 2007** – approval of the LEZ Scheme Order under the GLA Act 1999 and launch of LEZ Enquiries Helpline
- **summer 2007** – registration opens for those operators who need to register with the scheme
- **autumn 2007** – operators are able to pay the daily charge for non-compliant vehicles in advance of the introduction of the scheme
- **early 2008** – scheme to go live for diesel-engine HGVs over 12 tonnes
- **summer 2008** – scheme to go live for diesel-engine HGVs, buses and coaches under 12 tonnes.

If the Mayor confirms the Scheme Order, a significant operator information campaign would take place to help ensure that operators are aware of the LEZ. The earliest a LEZ could be operational in London would be February 2008.



20

Data protection statement

TfL and the Mayor of London will use the information you have supplied in response to this consultation only for the purpose of assessing the proposal. Responses may be made publicly available. However, personal details will be kept confidential. You do not have to provide any personal information, but this information will help TfL to understand the range of responses. For example, responses may be analysed by postcode areas to identify local issues.

21

PLEASE COMPLETE THE QUESTIONNAIRE, PLACE IN AN ENVELOPE AND POST TO:
FREEPOST RULA-CUHG-JGKL, LOW EMISSION ZONE CONSULTATION,
CHISWICK GATE, 598-608 CHISWICK HIGH ROAD, LONDON W4 5RT

General Questions

- Q1** How important is it to tackle poor air quality in London?
TICK ONE BOX ONLY
 Very important Unimportant
 Important Very unimportant
 Neither Don't know
- Q2** Do you support or oppose the proposal to introduce a Low Emission Zone (LEZ) in Greater London, as described in the leaflet?
TICK ONE BOX ONLY
 Strongly support Oppose
 Support Strongly oppose
 Neither Don't know

Questions about the LEZ proposal

- Q3** Do you think the proposed boundary of the LEZ as shown on the map on pages 5 and 6 of the leaflet is appropriate?
TICK ONE BOX ONLY
 Yes
 No, should be a smaller area
 No, should be a larger area
 Don't know
 Other

Q4 If other, please write in the box below.

- Q5** Do you think that the motorways within London as shown on the map on pages 5 and 6 of the leaflet should be included in the LEZ?
TICK ONE BOX ONLY
 Yes Don't know
 No
- Q6** Do you think the proposed level of charge (i.e. of £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 vehicles compliant?
TICK ONE BOX ONLY
 Yes No, too low
 Yes, but too high Don't know

- Q7** Do you think 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?
TICK ONE BOX ONLY
 Yes No, too low
 Yes, but too high Don't know

- Q8** Do you support or oppose the proposals for the LEZ to operate 24 hours a day, 365 days a year?
TICK ONE BOX ONLY
 Strongly support Oppose
 Support Strongly oppose
 Neither Don't know

- Q9** Do you think the emissions standard of Euro III for Particulate Matter (PM) from 2008 for diesel-engine HGVs, buses and coaches is appropriate? (These types of vehicles manufactured after October 2001 will be Euro III compliant).
TICK ONE BOX ONLY
 Yes No, too lenient
 No, too severe Don't know

- Q10** Do you think the introduction of a higher standard of Euro IV from 2012 for diesel-engine HGVs, buses and coaches is appropriate? (These types of vehicles manufactured after October 2006 will be Euro IV compliant).
TICK ONE BOX ONLY
 Yes No, too lenient
 No, too severe Don't know

- Q11** Do you think the emissions standard of Euro III for diesel-engine minibuses and heavier LGVs is appropriate? (These types of vehicles manufactured after January 2002 will be Euro III compliant).
TICK ONE BOX ONLY
 Yes No, too lenient
 No, too severe Don't know

- Q12** If you agree with Q11 above, do you think that it is appropriate to introduce this standard for diesel-engine heavier LGVs and minibuses in autumn 2010?
TICK ONE BOX ONLY
 Yes No, too late
 No, too early Don't know

- Q13** Which of the following types of vehicle do you think the LEZ should apply to?
TICK ALL THAT APPLY
 Lorries (HGVs) SUVs (4x4s)
 Buses Diesel cars
 Coaches Petrol cars
 Heavier LGVs only Motorcycles
 All LGVs None of the above
 Minibuses Don't know

Q14 Do you support the proposals to exempt the vehicles mentioned on page 3 of the leaflet from the LEZ?

TICK ONE BOX ONLY

- Strongly support Oppose
 Support Strongly oppose
 Neither Don't know

Q15 If you have any other views on vehicle exemptions please write in the box below.

--	--	--	--

Q16 Please write in the box below if you wish to make any other comments about the proposed LEZ or expand on any of the points raised above.

--	--	--	--

Questions about your business

Q17 What is the first part of the postcode of your business?

PLEASE ENTER THE FIRST TWO LETTERS AND FIRST TWO NUMBERS ONLY, FOR EXAMPLE SW10

--	--	--	--

Q18 How many of the following types of vehicle does your business operate within the proposed LEZ?

WRITE IN NUMBER FOR EACH TYPE OF VEHICLE

- | | | | | | |
|--|--|--|--|--|--|
| HGVs | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| HGVs first registered on or after 1 October 2001 | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| Buses/Coaches | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| Buses/Coaches first registered on or after 1 October 2001 | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| LGVs/Minibuses | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| LGVs/Minibuses first registered on or after 1 January 2002 | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| Cars | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| Cars first registered on or after 1 July 1992 | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |
| Cars first registered on or after 1 January 2002 | <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> <td style="width: 25px; height: 18px;"></td> </tr> </table> | | | | |
| | | | | | |

Q19 Which of the following categories best describes your business?

TICK ONE BOX ONLY

- Retail
 Finance, insurance, real estate
 Services
 Manufacturing
 Wholesale
 Transport and distribution
 Communications and utilities
 Construction
 Other

IF OTHER PLEASE SPECIFY IN BOX BELOW

--	--	--

Q20 How many people does your business employ in Great Britain?

TICK ONE BOX ONLY

- 1-9
 10-29
 30-49
 50-99
 100+

Q21 How often does your company operate HGVs, buses/coaches or LGVs/minibuses within the proposed LEZ?

ENTER X IN EACH COLUMN

	HGVs	Buses/coaches	LGVs/minibuses
7 days a week	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4-6 days a week	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
1-3 days a week	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A few times a month	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Every month or so	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
A few months a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Once or twice a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Less often than once or twice a year	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Never	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Data protection statement

TfL and the Mayor of London will use the information you have supplied in response to this consultation only for the purpose of assessing the proposal. Responses may be made publicly available. However, personal details will be kept confidential. You do not have to provide any personal information, but this information will help TfL to understand the range of responses. For example, responses may be analysed by postcode areas to identify local issues.

APPENDIX C

Code Frame

#	Theme description
A	The principle of a Low Emission Zone
A1	Support a LEZ
A2	Oppose a LEZ
A3	Political motivation
A4	Objective to raise revenues/another tax
A5	Restricts London boroughs from introducing charging schemes
A6	Will increase bureaucracy/red tape
A7	Proposals are too extreme
A8	Other principle issues
B-C	Suggested alternatives
B1	Increased road user charging incentives
B2	Congestion charging specific road user charging schemes
B3	Ban instead of a charging system
B4	London Councils should administer LEZ (TRO options)
B5	Increase road testing of vehicles
B6	Other incentives for cleaner vehicles
B7	Complementary measures
B8	Non transport-related alternatives
B9	Other central government initiatives
C1	Other alternatives
D	Business Case
D1	There is a good business case for LEZ
D2	Poor benefit/cost ratio
D3	Costs too high
D4	Waste of money/better spent elsewhere
D5	Other business case issues
E	Timetable
E1	Proposed timetable is correct
E2	Proposal is premature
E3	Proposal commences too late
E4	Confused over introduction dates
E5	LEZ should be extended post 2015
E6	Euro IV timetable issues
E7	Other timetable issues
F-G	Vehicles to be included
F1	HGVs
F2	LGVs
F3	Cars
F4	Buses
F5	Coaches
F6	Minibuses
F7	Taxis and mini-cabs
F8	Should apply to all vehicles
F9	Vehicle definition issues
G1	Include SUVs (4 X4)s
G2	Motorbikes
G3	Other vehicles to be included issues

H-J	Vehicle emission standards
H1	Agree with use of Euro standards
H2	Disagree with use of Euro standards
H3	Propose age-based standard for LGVs
H4	Propose age-based standard for all categories
H5	Effectiveness of abatement equipment
H6	Certification of abatement equipment
H7	Certification for abatement equipment for foreign registered vehicles
H8	Extension to NOx (Nitrogen Oxide) standard
H9	Euro IV for LGVs
J1	Euro V standard
J2	Does not reflect bus/coach life cycles
J3	Derogation
J4	Other vehicle emission issues
K	Boundary
K1	Proposed boundary is correct
K2	LEZ should cover Congestion Charging area only
K3	Other reduced area of LEZ
K4	Extend to M25
K5	Include motorways and trunk roads
K6	Should apply across the whole of UK
K7	Detailed boundary issues
K8	Other boundary issues
L	Operations
L1	Midnight to Midnight hours
L2	Methods of payment
L3	Registration processes
L4	Other operations issues
M	Enforcement
M1	Concerns with vehicles registered outside UK
M2	Concerns with infrastructure and technology
M3	Concerns with identifying non-compliant vehicles
M4	Drivers will learn to avoid fixed cameras
M5	Concerns with persistent evaders
M6	Removal and immobilisation issues
M7	Use MOT test
M8	Other enforcement issues
N-P	Level of charge
N1	All charges are correct
N2	All charges should be higher
N3	All charges should be lower
N4	Proposed charge is correct (HGVs, buses and coaches)
N5	Charge should be higher (HGVs, buses and coaches)
N6	Charge should be lower (HGVs, buses and coaches)
N7	Penalty charge level is correct (HGVs, buses and coaches)
N8	Penalty charge is too high (HGVs, buses and coaches)
N9	Penalty charge is too low (HGVs, buses and coaches)
P1	Proposed charge is correct (LGVs and minibuses)
P2	Charge should be higher (LGVs and minibuses)
P3	Charge should be lower (LGVs and minibuses)
P4	Penalty charge level is correct (LGVs and minibuses)

P5	Penalty charge is too high (LGVs and minibuses)
P6	Penalty charge is too low (LGVs and minibuses)
P7	Other charge level issues
Q-R	Discounts and Exemptions
Q1	Should be no exempt vehicles
Q2	Clear list of exemptions needed
Q3	Discounts/exemptions for community transport vehicles
Q4	Discounts/exemptions for vehicles operated by public sector
Q5	Exemption for heritage vehicles
Q6	Biofuel/greener vehicles discount
Q7	Exemptions for vehicles for which retrofit equipment not possible
Q8	Military vehicles
Q9	Utility vehicles (e.g. gas)
R1	Primary non-road going vehicles
R2	Bus/coaches should be exempt
R3	Other discount and exemptions
S	Business sector /micro-economic impacts
S1	Yet another charge on transport industry
S2	Should be tax incentives & loans to help convert vehicles
S3	Costs of buying new vehicles
S4	Ongoing costs of retrofitting abatement equipment
S5	Relocating fleets outside London
S6	Impact on residual values of non compliant vehicles
S7	Impact on small businesses
S8	Other business impact issues
T	Impacts on public and community sectors
T1	Cost impacts on public and community fleets
T2	Impact on cross-border bus service
T3	Impact on voluntary services
T4	Provision of borough contracted-out services
T5	Monitoring of social issues
T6	Other public and community sector issues
U	Environmental impacts
U1	Will fail to make adequate progress towards air quality targets
U2	Impacts on NO ₂ levels
U3	Will do nothing in relation to greenhouse gases.
U4	Displacement will increase pollution outside London
U5	Should include other emissions
U6	Scrapping old vehicles
U7	Monitoring of impacts
U8	Other air quality impacts
V	Streetscape issues
V1	Signage
V2	Camera & Monitoring sites
V3	Other streetscape issues
V	Health impacts
V5	Impact on existing illnesses and allergies
V6	Improve general quality of life/public health
V7	Economic and social impacts
V8	Monitoring health and equalities impacts
V9	Other health impacts

W	Impacts on traffic
W1	Increased traffic through move to smaller vehicles
W2	Traffic diverting around London
W3	Rat running to avoid cameras will cause congestion
W4	Modal shift
W5	Monitoring traffic impacts
W6	Other traffic impacts
X	Macro-Economic impacts
X1	Impact on London's economy
X2	Will lead to job losses
X3	Broader UK economy issues
X4	Impact on tourism
X5	Should link with other freight policies
X6	Night-time lorry ban
X7	Monitoring economic impacts
X8	Cost impacts on customers/businesses
X9	Other economic impacts
Y	Consultation process/information
Y1	Previous views expressed not taken into account
Y2	Inadequate consultation
Y3	Insufficient information provided
Y4	Need for further operator information and ongoing support
Y5	More research/modelling work needed
Y6	Other consultation issues
Z	Olympics
Z1	Issues relating to 2012 Olympics
Z	Other
Z2	Rude/Irrelevant
Z3	Other Issues

APPENDIX D

List of Other Organisations that have Responded

Other Organisations (20)

3rd Hayes (St Mary's) Scout Group Transport Division
Association of Transport Co-ordinating Officers (ATCO)
Automotive Green Developments
British Horse Society, The
British Universities Sports Association, The (BUSA)
Cornwall Meals on Wheels
Earls Court and Olympia Group
Edmonton Canoe Group
GMB London Region
Knightsbridge Association, The
Littl'uns Equine Rescue Trust
London Association of Recovery Operators
Marine Society & Sea Cadets (MSSC)
Marylebone Association, The
Putney Labour Party
Royal Yachting Association
Solent Protection Society, The
West London Friends of the Earth
Westminster, Kensington & Chelsea Friends of the Earth
Westminster Society, The