

London Low Emission Zone
Strategy Revisions
Transport for London
lez@tfl.gov.uk

Date: 16 November 2005

Dear Sir/Madam

RE: PROPOSAL TO ESTABLISH A LONDON LOW EMISSION ZONE

Thank you for the opportunity to comment on the proposed establishment of a Low Emission Zone (LEZ) in greater London.

We support in principle the proposed LEZ which will cover the Greater London Area including Heathrow Airport, and will aim to reduce emissions of PM₁₀ and NO₂ which are toxic to human health. We have several comments on the proposal which we outline below.

Sustainability assessment

Firstly, we welcome the proposal and the commitment of TfL to undertake a sustainability assessment as part of the process and we look forward to being consulted on the assessment in due course.

The impact of the proposal on PM10 and on NOx

As the proposal highlights, road-based transport accounts for over 40% of the emissions of PM₁₀ and NO₂, and yet the proposed LEZ if applied to Heavy Goods Vehicles (HGVs) only, will reduce these emissions by a fraction of this total. While the scheme will aim to meet the EU Air Quality Framework Directive for specified pollutants by applying EU standards for vehicle emissions for HGVs, it is disturbing to see that the impact of the scheme is likely to result in levels of PM₁₀ and NO₂ remaining above the EU Air Quality targets in 2010 when the proposed LEZ will take full effect.

In this regard, we would support the proposal to further investigate the option of extending the LEZ to LGVs by 2010, which would result in substantially greater reductions in PM₁₀ and NO₂.

In addition, it would be most helpful if the proposed LEZ contained a longer term future which set out in plan, how the EU Air Quality Framework Directive would be met beyond 2010, in cases where pollutant targets will not be achievable under current options.

The impact of the proposal on other emissions

It is noted that the scheme is unlikely to reduce carbon emissions and may in fact increase them as the transport industry retrofit particulate abatement technology to vehicles and switch to petrol fuel driven vehicles. While not specifically identified, we are concerned that there may be perverse incentives created to move from heavy goods vehicles to light goods vehicles both in the short term (until light goods vehicles are covered by the LEZ), and in the longer term as a cheaper alternative to outright replacement of diesel heavy goods vehicles, thereby increasing the potential for carbon emissions to rise. We look forward to this issue being considered as part of the SEA and the SA processes.

Impacts on the transport industry

The finely balanced economic impacts of introducing the LEZ will no doubt have been modelled in the work TfL has done to date. We would hope that this modelling has sought to get the right balance between putting in place incentives for the industry to move to cleaner vehicles, and sanctions for those firms which refuse to comply.

In this regard, it is noted that TfL propose to advise the Mayor on further investigations in relation to the impact of the proposal on small businesses, which are the most common users of LGVs. We look forward to reviewing the outcomes of these investigations and what, if any, measures are required to adequately support small businesses in this transition to cleaner vehicles.

Freight and tourism movements

In general, it is extremely difficult to assess the true efficacy of this proposal without fully appreciating the policy options available for reducing the impacts of road transport on air quality in London.

We believe that this proposal would benefit from being better placed in the context of what else is being done to reduce road based emissions (and quantitatively what difference these will make), particularly in terms of initiatives which rationalise the number of unnecessary road trips made into London by vehicles, made so either because other cleaner forms of transport are available, or because the linkages between supplier and receiver are made more directly, thereby reducing trip numbers.

Thank you once again for the opportunity to comment and we look forward to being able to comment on the next draft on the proposal in February 2006.

Yours sincerely



Pamela Castle OBE
Co-Chair