

London Low Emission Zone  
Transport for London  
12<sup>th</sup> Floor  
42-50 Victoria Street  
London,  
SW1H 0TL

February 2007

Dear Sir / Madam,

### Scheme Order

The Central London Freight Quality Partnership (CLFQP) thanks Transport for London for the opportunity to comment on the Low Emission Zone proposals from 2008 and the presentation provided by Bryan Pay in November 2007. We are a partnership of public and private organizations whose aim is to improve the delivery of services to and from central London. Our membership includes seven London Boroughs, Central London Partnership, John Lewis Partnership amongst others who may be responding to the Scheme Order separately.

We welcome the changes introduced as a result of the previous consultation in 2006 especially the removal of nitrogen oxides from the scheme, the further phasing in of different size of vehicles and delaying introduction of the Euro IV until 2012. However, there is a feeling the scheme will not produce the improvements to air quality that the money invested by all involved. To improve this we urge TfL to reconsider including cars and investigate how restrictions on the other major pollutants like oxides of nitrogen and the finer particulates could be added to the scheme.

Our specific comments are as follows:

**Phase 1: Introduction of Euro III based scheme for HGVs, buses and coaches:** There is a general agreement that compliance will be achieved by all HGV firms in Britain but there remains concerns over enforcement of vehicles based in other countries – especially those from Eastern Europe and outside the EU.

**Phase 2: Introduction of emission standards for heavier LGVs and minibuses from 2010:** The introduction of the European based classification of vehicles is welcomed but there still issues on how you define the difference between a LGVs and some estate cars etc. on the street or in the DVLA log book. We suggest a simplification to this by including all van type

vehicles with panels instead of windows and pick ups. There should be further consideration on exempting or aiding vehicle replacement for smaller enterprises from the courier and removal industry as in many cases these vehicles are expensive to replace, if this is does not happen our members feel there will be an obstacle to competition between companies and likelihood of knock-on increase for these services.

**Phase 3: Introduction of Euro IV standards to the vehicles:** The use of Euro IV standards for a number of our members is still an issue and there are doubts that identification between those that comply and those which don't. We recommend that the assessment would be best implemented through an aged based test which would be straightforward to enforce on the street and in the office.

**Proposed Low Emission Zone Boundary:** We feel all motorways and trunk roads be included as this would be simpler to the driver to understand.

If you would like to discuss our position or this response further, please contact Matthew Mace at Central London Partnership on 020 7478 8467 or email [mmace@c-london.gov.uk](mailto:mmace@c-london.gov.uk).

**Professor Mike Browne**  
**Chairman**  
**Central London Freight Quality Partnership**