



The Association of British Drivers

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Low Emission Zone Consultation
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3 January 2007

Submission to the Public Consultation on the Low Emission Zone (LEZ)

Dear Sirs,

On behalf of the Association of British Drivers (ABD) I wish to make the following comments on the proposed LEZ and the associated Scheme Order:

1. Although we are in favour of steps to tackle the excessive air pollution in London, particularly from larger diesel engined vehicles, we believe the proposed scheme is not justified. The cost is excessive and there would be a few simpler alternatives that would have minimal cost to construct, and no more costs on vehicle operators. For example, why not simply ban vehicles that are not compliant with newer vehicle emission standards after a certain date? This has been used in other countries without difficulty.

In addition, and as I said in response to the original proposals, it seems a very complex and expensive system to simply bring forward air quality improvement by a few years as we all know that as older vehicles get scrapped there should be a substantial improvement anyway.

2. The latest proposals suggest that "TfL is to look at the possibility of including cars in the LEZ at a later date". We are opposed to any inclusion of cars within the scheme, although the Scheme Order does not seem to include any such provision in any case.

3. As regards the particulars of the Scheme Order, our comments are:

A – We oppose the proposition that the scheme should be indefinite (para 16). We see no good reason to extend it beyond 2015 when air pollution levels should have substantially improved, and the parameters of the scheme will certainly require major reconsideration.

B – We oppose the proposition in Annex 3 to the Scheme where the application of any surplus generated from the scheme is discussed. It should be made clear that any surplus on the scheme is to be minimized and how such surplus or loss is to be calculated should be clearly specified. Any unexpected surplus should be applied to specific air quality improvement measures (as outlined in para (1) of Annex 3) and not to any general transport programmes. We consider it exceedingly important that this scheme is not used as a general revenue raising provision by TfL.

Yours sincerely

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About The Association of British Drivers (ABD)

The ABD is the leading independent organisation which represents the interests of private motorists in the United Kingdom. We campaign to protect the rights of individual road users and believe that road transport is a beneficial and essential element in the UK transport infrastructure. We oppose excessive taxation of motorists and are against tolls and road usage charging. We also campaign for more enlightened road safety policies. The Association is a “not for profit” voluntary organisation which is financially supported primarily by its individual members. More information on the ABD is available from our web site at www.abd.org.uk