



**Consultation on Variation Order to  
defer start date of Low Emission Zone  
Phase covering larger vans and  
minibuses from October 2010 to  
January 2012**

**Proposed by Transport for London**

**Response by the  
London Policy Unit of the  
Federation of Small Businesses**

**June 2010**

Contact:  
Hannah Holdroyd  
London Policy Officer  
Federation of Small Businesses  
2 Catherine Place  
London SW1E 6HF  
Tel: 020 532 2270  
e: [Hannah.holdroyd@fsb.org.uk](mailto:Hannah.holdroyd@fsb.org.uk)

The Federation of Small Businesses is the UK's largest campaigning pressure group, promoting and protecting the interests of the self-employed and owners of small firms. It is non-profit making and non-party political. Formed in 1974, it has 215,000 members across 33 regions and 230 branches.

In London, the Federation's policy work is overseen by the London Policy Unit which consists of members who are interested in the development of policy issues and lobbying for a better deal for London's small business community.

In this response, we are representing the views of the 7,000 FSB members in Greater London, drawn from London's micro and small business communities.

## Response Statement

The Mayor's Transport Strategy in Proposal 95b recommends the deferral of the inclusion of larger vans, minibuses, motorcaravans and other specialist vehicles into the Low Emission Zone (LEZ) from October 2010, to 3 January 2012.

The FSB has always supported realistic proposals to encourage operators to use cleaner vehicles. We therefore welcome the opportunity of commenting on this consultation. We also welcome the decision by the Mayor to defer the implementation of the start date for this phase of the LEZ because of his recognition that, in light of the economic downturn, it is fair to allow operators of these vehicles more time to comply with the standards required.

However, we feel that that there is a strong case to be made for putting back the implementation date to 1 October, 2012.

We are all aware that the Olympic and Paralympic Games will be taking place in August and September 2012. We believe that it would be more appropriate to make larger vans, minibuses, motorcaravans and other specialist vehicles subject to the LEZ at the later date of 1 October for the following reasons:

1. During the period of the Games, London is open to the world. We will have visitors who have never been to London before, and may never return to the city again. Many of those may come in vehicles which are not LEZ compliant, under the terms of the criteria. Particularly, we feel consideration should be given to those attending the Paralympic Games from a range of social clubs from both in Britain and abroad.

It is vital they are not deterred from this once in a lifetime opportunity by fears over non-compliance. Whilst we appreciate that first time offenders receive a letter and 28 days notice to comply should they wish to re-enter the LEZ, it is still entirely possible that groups and clubs planning to visit London during Games with their own vehicles, will, due to accessibility issues, be caught out. It may be the only time they ever plan to visit London. Whilst we understand that the intention is for the Games to be

the 'Public Transport' Games, the fact remains that most of London's underground and surface transport network is not an option for many people, especially those with accessibility issues; this section of the community should not be discriminated against.

It would be much better, for many reasons for those with accessibility needs, to travel to the games in one mini-van/coach or other multi person vehicle, rather than a number of cars. Cars which are not subject to the LEZ.

2. Many in London's small business community will need to take measures to minimise the impact of the Games on their businesses for a number of reasons including but not limited to the Olympic Route Network (ORN). Everyone wants to enjoy the Games and there will be many business benefits, but it is fair to say, they will cause interruption and inconvenience to many businesses. We do not feel that businesses should be further burdened by needing to be compliant with the LEZ at this time.
3. The proposed date of 3 January comes at a time when many businesses are experiencing shut downs for the festive period, and many will have during the months in the lead up to Christmas, had their busiest months of the year. Any businesses that have problems complying, or take longer than planned to comply, will be forced to try and make their vehicles compliant during a time when there are many bank holidays. We do not feel it is fair to put them in this position. The measures needed to comply are technical and should be carried out by specialists and these specialists may simply not be available during the Christmas/New Year Period.

Whenever the implementation date, TfL will have to clearly identify those who fall within this phase of the LEZ to make sure that those who need to comply have the right information to hand. We are happy to work with TfL and the Mayor to ensure the maximum public awareness about this issue.

In conclusion, whilst we accept that the Mayor and TfL have a responsibility to bring about emissions standards, the fact remains that London is leading the way in the UK by establishing the LEZ. There is nothing to be gained by forcing onerous standards on London's small business community, and London's visitors during a time that is supposed to showcase London to the world, and whilst the city's economy is adjusting to a new tighter, economic regime.

We appreciate that the LEZ will be extended, and that is not the question under consultation here, but it would be more appropriate to start this phase after the Olympic and Paralympic Games.