



LEZ Variation Order consultation  
Transport for London  
Windsor House  
42-50 Victoria St  
London SW1H 0TL

25 June, 2010

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Dear Sirs,

## **London Low Emission Zone Variation Order**

We thank you for inviting us to comment on the Mayor's proposed changes to the London Low Emission Zone.

### **Date Change**

We fully support the decision to change the commencement date from 4 October 2010 to 3 January 2012 when larger vans and minibuses would be brought into scope of the London Low Emission Zone.

The lead in time would give van and minibus operators the opportunity to start planning and preparing for the change and ensure their fleets are compliant with the EURO 3 emission standards as a minimum.

### **Penalty Charge**

We support the proposed amendment to the penalty charge relating to the disposal of vehicles which will be increased from £60 to £70 in line with other London Borough's charges.

### **Large Van Definition**

Having reviewed the variation order we note the continued use of the definition of larger van as a diesel-engined vehicle between 1.205 tonnes (unladen) and 3.5 tonnes (gross vehicle weight). As we have mentioned in previous consultation responses, the use of 1.205 tonnes (unladen) as a starting point is not well known or understood by operators and could lead to confusion. We believe this is particularly relevant for car-derived vans. We therefore would encourage TfL to consider using consistent and appropriate terminology that would be better understood to support a clear communication strategy on ensuring compliance and facilitate a behavioural change.

We would also support an initial soft enforcement phase at the beginning where drivers are simply sent warning letters rather than fines if their van is not compliant for an initial period of 3 months.

### **British Vehicle Rental and Leasing Association**

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We hope our comments add value to the proposed changes and are happy to expand on any particular area in necessary.

Yours sincerely,

**Amanda Brandon**  
Legal Services Executive

***Bona-fides BVRLA, the industry and its members***

- The BVRLA is the trade body for companies engaged in the leasing and rental of cars and commercial vehicles. Its members provide rental, leasing and fleet management services to corporate users and consumers. They operate a combined fleet of 2.5 million cars, vans and trucks, buying nearly half of all new vehicles sold in the UK.
- Through its members and their customers, the BVRLA represents the interests of more than two million business car drivers and the millions of people who use a rental vehicle each year. As well as lobbying the Government on key issues affecting the sector, the BVRLA regulates the industry through a mandatory code of conduct. [www.bvrla.co.uk](http://www.bvrla.co.uk)