

## Appendix 5: Summary and analysis of stakeholder representations concerning detailed boundary, streetscape and traffic impacts

### Theme G7: Detailed boundary issues

| Item | Respondent           | Representation  | TfL Response   |
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| 1    | BAA                  | Willing to consent to the LEZ applying to private landside roads at Heathrow subject to mutual agreement on location of signs, turning points and enforcement rules. Legal agreement allowing the LEZ to apply to BAA roads would be restricted to the LEZ and not other methods of emissions or congestion control.  | TfL welcomes the consent given by BAA to include their roads within the LEZ. Should the Mayor confirm the Scheme, further detailed discussions would continue to take place to ensure agreement on operational issues.                                     |
| 2    | BAA                  | Concerned at the proposed use of Mondial Way off the A4 Bath Road as a turning point for vehicles wishing to divert from the LEZ. This is inappropriate for large vehicles and would seek an alternative for vehicles accessing from the M4 spur or A4.   | Such an alternative would only be needed if motorways were not to be included in the LEZ. TfL is recommending that motorways (with the exception of the M25) be included in the Zone, and so it is not expected that this would be a problem. <sup>1</sup> |
| 3    | Essex County Council | Because of the restricted nature of junction 5 on the M11, there is no adequate turning facility (i.e. a roundabout interchange) for non-compliant vehicles before entering the LEZ. Therefore suggests that this stretch of the M11 remains excluded and that adequate advanced signing on trunk roads and minor roads allows vehicles to divert away from the zone. | Agreed. TfL is in discussion with the Highways Agency about advance signing on the M11 approaching the M25 and on the M25 itself.  |

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| 4    | Hertfordshire County Council | Seeks confirmation that non-compliant bus services can turn around on private property that is just within the zone on the edge of the LEZ boundary. In particular services accessing Northwood Stn or Mount Vernon Hospital.  | TfL's intention is to cover as much of London as practically possible within the LEZ to maximise the scheme benefits and provide a consistent and clear boundary. This includes a number of cul-de-sacs, of which Station Approach to Northwood Station is one. If Station Approach is a public road, non-compliant vehicles should pay the charge to drive on it. In general entirely private roads would not be charged (although they can be with the land-owner's consent, for example roads within Heathrow Airport). Mount Vernon hospital is composed entirely of private roads leading from the boundary route. For clarity, TfL therefore recommends a change to the boundary to exclude the hospital from the zone. Non-compliant buses would be able to turn around on the private hospital roads. |
| 5    | Hertfordshire County Council | Understands that the London Borough of Enfield has suggested moving the LEZ boundary back to the southern side of the M25 at junction 25. This would have implications for those wishing to access properties on Bulls Cross Ride as they would need to enter the LEZ briefly before crossing back into Hertfordshire. | TfL does not propose to change the boundary in this area and access to properties on Bull's Cross Ride would not need to enter the LEZ before crossing back into Hertfordshire.   |

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| 6    | London Borough of Richmond upon Thames | If the concerns about signage cannot be addressed, then the LEZ boundary must be relocated to the borough boundary.  | Not acceptable if the borough boundary splits a link (a section of road between two junctions) as it could encourage u-turning with attendant safety risks.  |
| 7    | London Borough of Barnet               | Believes that the scheme should not result in unfair advantages being created. The scheme will clearly disadvantage businesses located within the scheme boundary area over those located outside. The creation of excluded routes and areas has the potential to create disadvantage locally, as well as causing unacceptable traffic management impacts. Where possible, area exclusions should be designed to minimise traffic management and environmental impacts and to guard against unfair commercial advantage. It is most important to avoid creating any road safety problems as a result of the scheme boundary. | TfL estimates that around 40% of the national HGV and coach fleets and slightly under 20% of the national fleet of heavier LGVs and minibuses would enter the LEZ every year. Therefore the impact of the Scheme is expected to be similar for a large proportion of operators based outside London as for those based inside London. This aspect is covered in more detail in <i>Theme L: Business Impacts</i> in Chapter 6 of the Report. TfL has sought to cover as much of the Greater London area as possible while retaining safe and suitable opportunities for drivers to turn away from the zone boundary if they wish to do so. Boundary points have been established as close to the borough boundary as practical. |

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| 8    | London<br>Borough of<br>Barnet | <p>The following comments relate to specific zone boundary issues. It should be noted that much of the borough is covered by a 7.5T movement ban which may restrict the use of roads as diversion routes.</p> <p>A5/A41 – object to the exclusion of parts of the A5 from the zone which we believe has been proposed due to difficulties in signing the boundary at its northern end. Would not wish the northern section of the A5 to be seen as a route which is appropriate for larger vehicles to use as an alternative to the A41. Any difficulties in signing the boundary at the northern end of the A41 can be resolved by excluding the A41 from the borough boundary to (and including) the Spur Road roundabout. This roundabout will provide a convenient facility to allow non-compliant vehicles to turn round.</p> | <p>It has been established that due to the location of the borough boundary, it would not be possible to include the A5 within the zone as the entry sign would not be within London. However, to address the potential problem of vehicles approaching on the A41 using Spur Road and Brockley Hill rather than U-turning on the A41, TfL recommends a change the boundary to include Spur Road (and, for consistency, the area between but not including Brockley Hill and the A41). The roundabouts at either end of Spur Road would remain outside the zone to provide turn around opportunities.</p> |

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| 9    | London Borough of Barnet | <p>A1/A411 Barnet Lane – strongly supports the exclusion of the A1 from the borough boundary to (and including) the Stirling Corner roundabout. The exclusion should also include relevant slip roads at the Rowley Lane junction, the A411 Barnet Lane, and any parts of Stirling Way which fall within the borough boundary. The reason for this proposal is to ensure non-compliant vehicles travelling South on the A1 can be safely turned. Furthermore, the A1, A411 and Stirling Way provide the most direct and appropriate routes for vehicles travelling between the M25 and Borehamwood and Elstree.</p> <p>As Borehamwood and Elstree have a number of industrial and retail areas, as well as film/TV studios, it is likely that relatively large numbers of larger and specialist vehicles will need to access this area. Consider the environmental impact of excluding these routes will be minimal in comparison to the environmental impact of vehicles using alternative routes to access Borehamwood and Elstree.</p> | <p>Agreed.</p> <p>Agreed.</p> |

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| 10   | London Borough of Barnet | A1/Shell Filling Station – although the proposed zone boundary places the entrance from the A1 into the filling station at Stirling Corner, the sole authorised exit for this site is onto the A411 Barnet Road. This has two implications. Firstly, entry to the zone would be via private property rather than public highway. Secondly, non-compliant vehicles entering the site could only leave (without paying the charge) by exiting via the A1 entrance. This entrance is not designed for vehicles, especially HGV's, to exit and would pose considerable road safety concerns and may disrupt the movement of traffic. | Agreed. TfL recommends relocating the zone boundary in Barnet Road to the east of the filling station exit. |

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| 11   | London Borough of Barnet | <p>Supports the exclusion of (at least parts) of the A411 Barnet Road from the scheme boundary in order to allow non-compliant vehicles to exit the filling station site and return to the Stirling Corner roundabout. However, this poses the additional problem of how the scheme boundary on Barnet Road would be designed.</p> <p>Galley Lane - since no satisfactory turning point is available on Galley Lane, the scheme order proposes an 'escape' route from Galley Lane via Wood Street and High Street Barnet. The effect of this is to exclude a number of residential streets bounded by these roads with a number of industrial and retail sites contained within the area. Considers it likely that these roads will be used by vehicles making deliveries in this area rather than using it solely for the purposes of 'escape'. This could potentially confer an unfair advantage on those businesses accessed from the excluded roads, and adversely affect residents living within the area.</p> | <p>Agreed, as per Item 10 above. TfL has agreed to investigate a turn around facility for Galley Lane at the junction with Wood Street. It is proposed to change the boundary to facilitate this change and include Wood Street, east of Barnet Rd and High Street, south of St Albans Rd within the LEZ.</p> |
| 12   | London Borough of Barnet | <p>The junction between High Street and Wood Street is also congested and involves very tight turns. Has considerable concerns over the safety and impact on traffic movement resulting from proposals which would result in an increase in larger vehicles attempting turns at this junction.</p>  | <p>Addressed by proposed solution in Item 11 above.</p>   |

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| 13   | London Borough of Barnet | Believes it is possible that turning facilities could be provided at the junction of Galley Lane/Wood Street/Barnet Road. However, as TfL were unwilling to contribute towards the cost of a safety and feasibility study of this location, it is not an option can recommend or support at this time.  | TfL's consultants are designing a turning facility at this junction, for discussion with the Borough. TfL is recommending a change to the boundary to facilitate these designs. |
| 14   | London Borough of Barnet | In order to avoid the potential for High Street, Wood Street and surrounding roads to be used as through routes for non-compliant vehicles making deliveries (as opposed to avoiding entering the zone), the Council supports a route from Galley Lane via A411 Barnet Road to the Stirling Corner roundabout. Removing the proposed excluded link between Galley Lane and High Street will reduce adverse impacts. The proposed alternative of Galley Lane/Barnet Road is also relatively unattractive as a through route for non-compliant vehicles, particularly for the southbound direction. | TfL is considering this as a fall-back option if the turning facility at Galley Lane/Wood Street/Barnet Road is found to be impractical.  |



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| 15   | London Borough of Barnet | <p>A1000, A1081 &amp; Kitts End Road – to mirror the ‘exempt’ route for the London Lorry Control Scheme, support the exclusion from the scheme boundary of the A1081 and the A1000 (north of their common junction) as well as Kitts End Road, in order to allow non-compliant vehicles using these roads to avoid entering the zone. The geometry of the common junction of the A1000 and A1081 may pose some difficulties for larger vehicles performing the required turning manoeuvre and would wish to see TfL’s assessment of the traffic management implications of this proposal, particularly in relation to the Network Management duty.</p>   | Agreed   |
| 16   | London Borough of Barnet | <p>M1 Motorway – is aware that TfL cannot implement a charging scheme on the M1 motorway without the consent of the Secretary of State. A copy of this consultation response will be sent to the Secretary of State to make him aware of the Council’s views.</p> <p>Considers it most unlikely that many non-compliant vehicles will wish to use the M1 motorway in Greater London if all roads directly connecting to it are included within the scheme boundary. The required signage and resolution of technical issues involved in including the M1 within the scheme boundary are unlikely to be justified by the exceptionally limited environmental benefits. It would appear that the overriding issue to consider is one of safe traffic management.</p> | <p>TfL has been in discussions with the Highways Agency about the feasibility of including motorways (excluding the M25) and trunk roads, for which they are responsible, that fall within the GLA area in the LEZ. TfL recommends that motorways and trunk roads (excluding the M25) are included in the LEZ.<sup>1</sup></p> |

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| 17   | London Borough of Barnet | Excluding the M1 terminal roundabout (Junction 1) from the zone boundary would allow non-compliant vehicles to be turned back at this junction.  | See Item 16 above.   |
| 18   | London Borough of Barnet | Considers the provision of turn-back facilities for vehicles exiting at M1 junction 2 of the motorway would be difficult and undesirable. Would therefore support the inclusion of the junction 2 slip roads in the scheme order if this is considered to be the most effective measure to prevent non-compliant vehicles from exiting at this junction. | See Item 16 above.   |
| 19   | London Borough of Barnet | Junction 4 (M1) provides north-facing sliproads only to and from the A41 (south). Turnback can be achieved at this junction by non-compliant vehicles travelling along the A41 to Spur Road roundabout, albeit with a risk of vehicles performing u-turns prior to the roundabout.   | TfL recommends changing the boundary from Junction 4 to the next junction in towards London, which is London Gateway Services <sup>1</sup> . Such a modification would have the effect of reducing the number of vehicles using the Junction 4 and the A41 as a turnback facility. The Services area would be excluded from the LEZ to provide opportunities for vehicles to turn and join the northbound carriageway of the M1. |
| 20   | London Borough of Barnet | Junction 3 (M1) provides no access to the public road network, but does provide access to the London Gateway Service Station and a number of depots including one formerly used for highway maintenance and control facilities.  | See Item 19 above.   |

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| 21   | London Borough of Barnet | <p>Asks for consideration of the fact that some vehicle operators may wish to operate on the basis that goods or people are transferred from non-compliant vehicles onto compliant ones for onward movement into London. For example, for articulated HGV's this could be achieved in a matter of minutes by simply swapping a non-compliant tractor unit with a compliant one.</p> <p>Believes it is not unreasonable to expect some degree of vehicle swapping to take place, and where possible, safe means to do so should be available. The London Gateway Service Area is one such location, and is already used by some coach companies for passenger transfer. Use of an off-road location such as a motorway service area is far preferable to the use of public highways.</p> | See Item 19 above. |
| 22   | London Borough of Barnet | <p>Considers that, should any parts of the M1 be included in the scheme order, there are significant advantages to excluding the M1 north of (and including) junction 3. This will allow non-compliant vehicle access to the service area and depots, and encourage the use of the service area for vehicle swaps in preference to other potentially unsafe locations.</p>  | See Item 19 above. |

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| 23   | London<br>Borough of<br>Barnet | <p>M1 Junction 3 – assuming the M1 is excluded from the scheme boundary, the proposed scheme order boundary follows the existing sliproad carriageways on the north-eastern side of the M1. The sliproads at junction 3 were originally planned to link with a roundabout, but the roundabout was not completed at the time of construction of the M1 due to a planned link with the A1. The existing sliproads make use of the partially completed roundabout but there are ongoing safety concerns about this junction.</p> <p>One solution to the safety concerns would be the completion of the roundabout to allow traffic to circulate in a conventional manner. However, the proposed scheme order boundary would include the ‘missing’ part of the roundabout within the zone, requiring a future amendment to the order if a safety scheme were to be implemented. The Council strongly supports the modification of the scheme boundary at junction 3 to reflect the completed roundabout rather than the existing layout. This will eliminate the need for future amendments, without any practical impact on the operation of the LEZ.</p> | <p>Noted, but an amendment to the Scheme boundary would not be made unless and until the details of a possible junction modification are known.</p> |

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| 24   | London Borough of Bexley     | <p>With respect to the proposed boundary within the borough, Thames Road and North Cray Road require further consideration before the Scheme Order is made. As part of a road improvement scheme in Thames Road, a new roundabout will be introduced at the junction between Thames Road and Iron Mill Lane. This improvement will be completed by mid-June 2007 and therefore the boundary should be amended to this roundabout. North Cray Road passes through a mainly residential area and the Council is concerned that vehicles that do not comply with the low emissions criteria will be diverted to pass through this area. This would be contrary to the principles behind the Scheme Order. Would wish to see North Cray Road included within the low emissions zone and those vehicles that do not comply will be able to use existing turning facilities at the roundabouts at the north east and south west ends of the dual carriageway. (Sheets 10 and 14) The alternative route for vehicles that do not comply would be via the M25 London Orbital motorway.</p> | <p>TfL has obtained from Bexley a plan showing the Thames Road improvement, including the roundabout at Thames Road, which would be used as a turn-around facility. TfL recommends that the boundary is changed accordingly. North Cray Road can be included in the LEZ but TfL considers that the boundary should remain unchanged to avoid traffic using the small roundabout at the Vicarage Rd/North Cray Rd junction and returning through Bexley Village. It is considered more suitable for diversionary traffic to continue south on North Cray Rd to the A20.</p> |
| 25   | London Borough of Hillingdon | <p>In general supports the proposed boundary of the LEZ, however the boundary does not seem to include the A3113 or the section of the M40 which runs from the borough boundary to the M25. These roads must be included within the boundary for the scheme to be effective.</p>   | <p>It is not possible to include the A3113 as it forms the diversion route for traffic approaching the A4. The section of the M40 from the borough boundary to the M25 cannot be included in the LEZ because it is outside the GLA area.</p>   |

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| 26   | Royal Borough of Kingston upon Thames | It is already known that the area surrounding the A3 has the worst air quality in the Borough and these proposals do not address this. This is a long term initiative so a long term view needs to be taken. Therefore the Council considers that all of the A3 should be included.                       | The section of the A3 as far as the Malden Roundabout has been excluded from the LEZ in order to provide turn-around facilities for side roads where facilities are not available closer to the London boundary |
| 27   | Royal Borough of Kingston upon Thames | The location of the large entry signs must take account of residential amenity. Malden Rushett is a case in point. At the junction of A243 and B280, HGVs are likely to have difficulty turning and these unsafe and failed manoeuvres may lead to the use of inappropriate routes.                       | The size of signs would be dictated by the speed of approaching traffic. Vehicle turning circle analysis has shown that the geometry of the turns is acceptable.  |
| 28   | Royal Borough of Kingston upon Thames | Entry signs to the LEZ in Clayton Road will not offer a safe turning facility for HGVs because of the potential highway safety hazard posed by junction geometry.   | Vehicles that cannot pass through the width restriction already turn at this point.   |
| 29   | Royal Borough of Kingston upon Thames | Concerned about exclusion of parts of the Borough and the A3 trunk road at the LEZ boundary, the potential highway safety implications at some of the junctions to be used by non-compliant vehicles to turn back   | Covered in Item 26 above. It is the need to provide suitable turn-around facilities that has led to a section of the A3 being excluded from the zone  |
| 30   | Royal Borough of Kingston upon Thames | The "escape routes" mean that the zone will penetrate well into the Borough to enable non-compliant lorries to turn back from the zone e.g. along A3 up to the Malden Roundabout, Malden Road from the Borough Boundary to the A3, and along Moor Lane/Bridge Road from the Borough Boundary to the A243. | See Item 29 above.  |

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| 31   | Slough Borough Council | While supports the inclusion of the M4 in the LEZ, would want to see and comment on the revised scheme boundaries if it were to be included.  | TfL is recommending a change to the scheme boundary at Junction 3 of the M4 rather than at Junction 4, but this would not have any effect on the roads in Slough <sup>1</sup> . Slough has reserved the right to request additional signing on their roads if problems with diverted traffic occur after commencement of the Scheme.  |
| 32   | Surrey County Council  | <p>Details the roads and each junction where there may be problems. In each case have identified an outline solution in the form of:</p> <ul style="list-style-type: none"> <li>* a boundary change (so that vehicles can turn round between the warning sign and the charging zone)</li> <li>* additional signing to advise drivers that they are approaching the charging zone</li> <li>* minor improvements to junctions so that HGV can make turns to avoid the zone</li> </ul> | In general, TfL has already designed the boundary so that vehicles have the opportunity to turn round or divert away from the zone along suitable routes. Should the Mayor confirm the Scheme Order, TfL would undertake a significant public information campaign to ensure that businesses and operators are aware of the LEZ. This would help to minimise the need for widespread advance signing, and also reduce the impact of sign clutter on the streetscape. Advance signs are being considered on the approaches to key M25 junctions but beyond this signing should only be considered where there is a specific identified need. Following the commencement of the Scheme, TfL would review the need for additional signing. |

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| 33   | Surrey County Council | A309 Hampton Court Way, roundabout provides for U Turns. Possible additional use of Hurst Road. Provide advance signs on A309 Hampton Court Way and A3050 Riverbank   | TfL consider that Hurst Road is unlikely to be used more as a result of LEZ. It could be argued that providing advance signing could actually increase the use of Hurst Road since in the absence of advance signing vehicles would continue along the boundary route to Hampton Court Road                                    |
| 34   | Surrey County Council | A307 Portsmouth Road, no room for U Turns at entry point. Vehicles could try and do a U turn if not well signed.  | A diversion route is already provided at this boundary point so U-turns would be unnecessary.  |
| 35   | Surrey County Council | C161 Effingham Road/Balaclava Road, no room for U Turns at entry point. Consider possible advanced signing at the Manor Road North junction with the A309 Kingston By Pass. Entry signing to the zone needed on Brighton and Upper Brighton Road. | A diversion route for traffic approaching along Balaclava Rd is provided by turning onto the A243 boundary route so U-turns would be unnecessary. TfL does not consider the LEZ would significantly affect existing vehicle flows in Manor Road North and Balaclava Rd. Entry signs would be provided at every boundary point. |
| 36   | Surrey County Council | D6801 Lovelace Road, no room for U Turns at entry point. Entry signing to zone needed on Brighton and Upper Brighton Road.  | A diversion route for traffic approaching along Lovelace Rd is provided by turning onto the A243 boundary route so U-turns would be unnecessary.   |
| 37   | Surrey County Council | C162 Ditton Hill Road, no room for U Turns at entry point. Entry signing to zone needed on A243   | A diversion route for traffic approaching along Ditton Hill Rd / Ditton Rd is provided by turning onto the A243 boundary route so U-turns would be unnecessary. Entry signing would be provided at every boundary point.   |



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| 38   | Surrey County Council | B280 Fair Oak Lane j/w Malden Rushett and Leatherhead Road, no room for U Turns at junction entry point to zone, need signing to help vehicles away from the area. It is suggested that the start of the zone on the A243 be extended to the roundabout at the junction with Bridge Road and Hook Road. Provide advance signs ahead of the start of the zone around junction 9 of the M25. | <p>Traffic is not likely to make a difficult U-turn when the easier left and right turn is available. TfL considers the route away from the zone and back to the main road network is simple and diversion route signing would be an unnecessary visual intrusion.</p> <p>Moving the boundary to the Bridge Road roundabout could reduce traffic on the B280 but TfL is keen to include Chessington World of Adventures within the LEZ.</p> <p>TfL is in discussion with the Highways Agency about advance inforatory signing of the LEZ on motorways approaching the M25 and on the M25 itself.</p> |
| 39   | Surrey County Council | B2032 Chipstead Valley Road, very tight turn at Chipstead Road junction with Lion Green Road.  | <p>TfL recommends a boundary change in this area to account for the recently completed Coulsdon Bypass. Traffic approaching along the A23 would be encouraged to U-turn at the new Coulsdon bypass southern roundabout so very little non-compliant traffic from this direction would reach Chipstead Valley Road via Lion Green Road. (This route would however need to remain available as the escape route for traffic approaching London along Chipstead Valley Rd.)</p>   |

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| 40   | Surrey County Council | A23 Brighton Road, London LEZ will need good advanced signing - no U Turn at entry to LEZ Zone lay by. Surrey County Council has Congestion Charging information boards. Suggested that LEZ information is also shown in this lay by. Plenty of advanced signing required on A23 at roundabouts ahead of Coulsdon in particular. Also provide advanced signing close to junction of M23/M25. | TfL recommends a boundary change in this area to account for the recently completed Coulsdon Bypass. Traffic approaching along the A23 would be encouraged to U-turn at the new Coulsdon bypass southern roundabout. The Congestion Charging lay-by sign, just inside the London boundary on the A23 would be modified to display some LEZ information. TfL is in discussion with the Highways Agency about advance inforatory signing of the LEZ on motorways approaching the M25 and on the M25 itself.   |
| 41   | Surrey County Council | C72 Church Lane, leads into Ditches Lane (all in London Authority) - signed as unsuitable for Heavy Goods Vehicles.  | Noted.  |
| 42   | Surrey County Council | B2030 Banstead Road/Coulsdon Road, U Turn at roundabout on Chalcon Road is tight, alternative avoidance of entry to the zone at Banstead Road junction with Stites Lane is very tight and uncontrolled. Advance signing required.  | TfL recommends a boundary change to address this issue. The boundary would be altered to follow the northern / eastern sides of B276 Marlpit Lane and Coulsdon Road before rejoining the existing boundary line on Stites Hill Road. This means that Marlpit Lane, Coulsdon Rd (south of Marlpit Lane) and Stites Hill Road would not be within the zone and would form the boundary route. Non-compliant vehicles approaching along Banstead Road would now use Coulsdon Rd and Marlpit Lane and then onto A23 as a diversionary route rather than Stites Hill Road. |

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| 43   | Surrey<br>County<br>Council | GLA Stites Hill Road is outside the London LEZ boundary - the left turn onto Coulsdon Road is very tight. Some form of turning area is required in the vicinity of this entry point. | TfL is recommending a boundary change to address this issue. The boundary would be altered to follow the northern / eastern sides of B276 Marlpit Lane and Coulsdon Road before rejoining the existing boundary line on Stites Hill Road. This means that Marlpit Lane, Coulsdon Rd (south of Marlpit Lane) and Stites Hill Road would not be within the zone and form the boundary route. Non-compliant vehicles approaching along Stites Hill Road would now turn right onto Coulsdon Rd and then left onto Marlpit Lane and then onto A23 as a diversionary route rather than making the difficult left turn. |

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| 44   | Surrey County Council | A22 Godstone Road, start of zone is London Authority - no U Turn at start of zone, would need signing in advance of roundabout at junction B2208. Request that the start of the LEZ zone be extended into the GLA to provide a suitable U turn facility - alternatively it would be necessary to construct a suitable lorry turning area. Suggests that there are advanced warning signs at junction 8 of M25. | TfL was also asked to look at the A22 boundary point by the London Borough of Croydon. TfL recommends a boundary change to allow for a U-turn opportunity for non-compliant vehicles approaching along the A22. Vehicles would now be permitted to continue along A22 Godstone Road as far as Purley Cross where they could U-turn. This would remove the use of Hayes Lane as a diversionary route. The HA is being consulted on the use of advance signs on the M25 itself at both junctions 8 & 6 and TfL would also like to agree a suitable position for an advance sign on Surrey's roads in advance of the M25, ideally on Reigate Hill and the Godstone Bypass. |

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| 45   | Surrey County Council | D457 Heisers Road (Skid Hill Lane). Heisers Road links into Skid Hill Lane (all London Authority), no U Turn available at entry to London LEZ. Requests that as there are no U Turn facilities available at the start of the LEZ Zone that the start of the zone be extended to the A2022 where there is a roundabout that could provide for U Turning. | The County Council's suggested boundary amendment would result in quite a large exclusion from the zone. The approaches and diversion route itself are very minor roads and TfL considers that the LEZ would have little effect on traffic movements. TfL has noted Surrey's comments that the existing diversion route, along Park Road has now been closed to traffic. TfL therefore recommends a boundary change to allow non-compliant traffic approaching from Skid Hill Lane to U-turn via Henry's Drive, Fairchildes Avenue, Comport Green, Homestead Way, back to Henry's Drive and away from London via Skid Hill Lane. These are all roads of an equivalent standard to the original approach road. |
| 46   | Surrey County Council | D446 Ricketts Hill Road, approach from Church Hill Road into Ricketts Hill Road signed as 'Unsuitable for Heavy Goods Vehicles', actual zone starts at a roundabout at end of Sunningvale Avenue - could increase use of Lusted Hall Lane.  | TfL considers that these are very minor roads where the LEZ would have little effect on traffic movements.  |
| 47   | Surrey County Council | C238 Bedfont Road - Map 106 & 107. Long Lane Industrial Area is located just south of its junction with Bedfont Road. There are also industrial units located along the eastern part of Bedfont Road. The only access to this area will be via the LEZ as the Stanwell Area is covered by a 7.5T.   | It is understood that lorries currently access the industrial areas via Heathrow roads to avoid the Stanwell 7.5T ban. The LEZ is planned to include public roads within Heathrow and so it would not be possible to access these industrial areas in a non-compliant vehicle over 7.5T without paying the charge.  |

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|------|-----------------------|---|--|
| 48   | Surrey County Council | C239 Long Lane - Map 107. Long Lane south of the industrial area has a 6'-6" width restriction located just to the north of Short Lane. Advance signing at Long Lane/Bedfont Road junction.                           | A sign at the Long Lane / Bedfont Rd junction to indicate to lorries from the industrial areas to turn left onto Bedfont Rd away from the zone may be beneficial. TfL would therefore review the need for additional signage following the possible implementation of the Scheme. It is likely that the drivers of lorries using these industrial areas would very quickly become familiar with the scheme boundary and in any case, if they do mistakenly turn right towards Stanwell Rd they can easily U-turn at the Stanwell Rd / Bedfont Rd roundabout. |
| 49   | Surrey County Council | C230/233 Vicarage Road/Groveley Road - Map 102. C233 Groveley Road between A244 Cadbury Road and Vicarage Road has a 7.5 tonne environmental weight restriction. Advance signing to be located at A308/M3 junction 1. | TfL considers the problem of additional vehicles on Vicarage Rd and Groveley Rd is not likely to be significant as a result of the LEZ. Signing at A308 / M3 Junction 1 may have the opposite effect and encourage use of these roads. In the absence of signing, M3 traffic would continue onto Country Way to the boundary at the Nall Head Rd roundabout. At this point, the small minority of non-compliant vehicles are most likely to U-turn back towards the M3.  |

| Item | Respondent                | Representation   | TfL Response  |
|------|---------------------------|--|---|
| 50   | London Borough of Croydon | Regarding Deposited Plan sheet 44, would question the need to include Farleigh Dean Crescent in the zone given it is a cul-de-sac serving 12 houses. If it is within the zone then signing will be needed but may be difficult to locate given restricted footways.  | TfL considers that including cul-de-sacs provides the benefits of maintaining a robust boundary for improving driver understanding and achieving a consistent approach to the scheme as well as providing some protection to the residents of the cul-de-sacs. The borough's point about restricted footways has been considered and suitable locations have been identified for signs. |
| 51   | London Borough of Croydon | Regarding Deposited Plan sheet 46, extensive signing will be needed to cover the following side roads off Feathered Lane: Courtwood Lane, the slip road serving properties in Featherbed Lane and Falconwood Road, Pixton Way, Holmbury Grove. There will also need to be signing at Selsdon Park Road, Gravel Hill and Kent Gate Way. | Noted   |

| Item | Respondent                | Representation   | TfL Response |
|------|---------------------------|--|--------------|
| 52   | London Borough of Croydon | Regarding Deposited Plan sheets 48 and 49, extensive signing will be required to cover the following side roads off Old Farleigh Road: Sandpiper Road, Birdwood Grove, Lynne Close, Hawthorn Crescent, Woodland Gardens, Greystone Close, Benhurst Gardens, Sundale Avenue, Dulverton Road. There will then need to be signing at the signalled junction of Addington Road to enforce the zone eastwards in Addington Road and northwards in Farley Road. Vehicles in Old Farleigh Road cannot turn left at the crossroads and need to use the slip road just before the junction and this needs to be taken account in the signing proposals. | Noted        |
| 53   | London Borough of Croydon | Regarding Deposited Plan sheets 49 and 50, extensive signing will be required for all the side roads to the north of Addington Road as follows: Byron Road, Upper Selsdon Road, Ferris Close, Mountwood Close, Habledown Road, Church Way and Sanderstead Hill and Rectory Park at the roundabout.   | Noted        |
| 54   | London Borough of Croydon | Regarding Deposited Plan sheets 50 and 51, side roads to the west of Limpsfield Road will need signing as follows: All Saints Drive, Village Way, Marshall Close, Mitchley Hill.   | Noted        |



| Item | Respondent                      | Representation  | TfL Response   |
|------|---------------------------------|---|--|
| 55   | London<br>Borough of<br>Croydon | Regarding Deposited Plan sheets 53 to 57, this option to allow the vehicles to travel along Godstone Road as far as Station Approach/Hayes Lane is not acceptable and consideration should be given to having the boundary further south at Whyteleafe or Caterham Bypass roundabout. The scheme as proposed will require signing of Devon Close and Garston Lane, and will divert non compliant vehicles along Hayes Lane which is not suitable for this type of traffic being very narrow in places. It will also require the signing of a number of side roads around Park Road and Hayes Lane as follows: Bakers Road, Oaks Way, Foxley Road, Firs Road, Wattendon Road, Steyning Close, Pondfield Road (both ends), Driftwood Road, Highwood Close, Frobisher Close, Old Lodge Lane and Waterhouse Lane. | It is not possible to have the boundary as far south as Whyteleafe as this is outside the GLA Area. After further investigation, TfL accepts that Hayes Lane is not a suitable diversionary route for traffic from the A22. TfL therefore recommends changing the boundary so that traffic approaching on the A22 is able to U-turn at Purley Cross. |

| Item | Respondent                      | Representation  | TfL Response  |
|------|---------------------------------|---|---|
| 56   | London<br>Borough of<br>Croydon | Regarding Deposited Plan sheet 58, signing will be needed to prevent non compliant vehicles entering the restricted areas of Coulsdon Road, Homefield Road and Stites Hill Road. This could prove problematic given restricted or lack of footways. | TfL is recommending a boundary change which also addresses this issue. The boundary would be altered to follow the northern / eastern sides of B276 Marlpit Lane and Coulsdon Road before rejoining the existing boundary line on Stites Hill Road. This means that Marlpit Lane, Coulsdon Rd (south of Marlpit Lane) and Stites Hill Road would not be within the zone and would form the boundary route. Non-compliant vehicles approaching along Stites Hill Road would now turn right onto Coulsdon Rd and then left onto Marlpit Lane and then onto A23 as a diversionary route. |

| Item | Respondent                | Representation  | TfL Response  |
|------|---------------------------|---|---|
| 57   | London Borough of Croydon | Regarding Deposited Plan sheets 63 and 64, no consideration is taken with regard to the new Coulsdon relief road, which has recently opened. It would seem unreasonable to allow non-compliant vehicles leaving the M23/25 to be able to travel all the way to Coulsdon and then have to follow a long route to leave the area. The new road has a roundabout at its southern end that could be used to turn vehicles approaching from the south along Brighton Road (A23). As proposed signing would be required for the following side roads: Ullswater Crescent off Marlitt Lane, Brighton Road north of Lion Green Road, Chipstead Valley Road east/Woodcote Grove Road/Woodman Road at the junction with Lion Green Road and Barrie Close, Linden Avenue, Woodstock Road, Reid Close and Sandown Road off Chipstead Valley Road. | In response to Croydon's comments, TfL is recommending a boundary change in this area to account for the recently completed Coulsdon Bypass. Traffic approaching along the A23 would be encouraged to U-turn at the new Coulsdon bypass southern roundabout.  |
| 58   | London Borough of Croydon | Consider that the boundary needs to be reviewed to find more suitable locations for vehicles to turn without having to follow a long diversion, which in itself will cause more emissions. For a vehicle travelling along Old Farleigh Road to have to then divert along Addington Road to the Limpsfield Road roundabout and back again cannot be considered acceptable.   | TfL considers Old Farleigh Rd to be generally local in nature and the effect of the LEZ on traffic flows would be minimal. Local traffic would very quickly learn the implications of the boundary. The diversion, albeit quite long, is provided for the very small amount of non-local, non-LEZ compliant traffic that may find its way onto Old Farleigh Rd. |

## O2: Borough-specific signage issues

| Item | Respondent                              | Representation  | TfL Response  |
|------|---|---|---|
| 59   | London Borough of Richmond upon Thames  | <p>We have considerable concerns relating to the impact of signage required along the route, and the associated visual clutter and impact that this can have. In conjunction with Lorry Weight Restriction Signage that already exists along Hampton Court Road, Thames Street, and Upper Sunbury Road, it is considered that new signage could have a detrimental impact on the appearance of the adjacent neighbourhood and understanding and compliance in general. Signage associated with the lorry weight restriction would need to be retained and any new signage would need to be compatible both visually and in terms of the message contained within existing signage. Avoidance of excessive signage is desirable.</p> | <p>In many cases signs for the London Lorry Control Scheme (LLCS) and in some cases other lorry controls and parking controls would be at similar points to the locations sought for LEZ signs. There is always a difficult balance between providing the required driver information for a robust and enforceable scheme and avoiding visual clutter. TfL consider that the benefits of maintaining a robust boundary for improving driver understanding and achieving a consistent approach to the scheme outweigh the disbenefits of additional signing. TfL is very keen to minimise the visual impact of new signing as far as possible, whilst maintaining satisfactory notification to drivers. TfL would seek sign solutions that are as sensitive as possible to the streetscape by, for example, combining existing signing with the new signs.</p> |
| 60   | Royal Borough of Kensington and Chelsea | <p>Believe there will be no need for LEZ-related signage within the borough.</p>  | <p>There would be no entry or advance signs for the LEZ within the Royal Borough of Kensington &amp; Chelsea. There may be a need for a limited number of repeater signs although at present it is considered that repeater signs would be limited to the Transport for London Road Network.</p>  |

| Item | Respondent                            | Representation   | TfL Response  |
|------|---------------------------------------|--|---|
| 61   | London Borough of Croydon             | Before any scheme is approved an extensive survey of existing signage is required as well as detailed designs of the new signs and locations.  | Noted. The London Borough of Croydon would have the opportunity to comment on the detailed designs of the new signs   |
| 62   | Royal Borough of Kingston upon Thames | The location of the large entry signs must take account of residential amenity. Malden Rushett is a case in point.   | Noted.  |
| 63   | Royal Borough of Kingston upon Thames | Where there are more than one safe and adequate turning area along a stretch of road, signs should be installed at the first possible turning point to encourage non-compliant vehicles to turn back to reduce pollution along that road. For instance the roundabout at the junction of Bridge Road and Moor Lane must be used rather than Bridge Road/Hook Road/Leatherhead Road/Mansfield roundabout. | TfL agrees with the point made by the Royal Borough of Kingston upon Thames. The first possible turning point within London has been selected to maximise the area covered by the zone.<br>The smaller roundabout at the junction of Bridge Rd and Moor Lane has been investigated but analysis showed the roundabout would be too small to allow for the turning of larger vehicles. |
| 64   | Surrey County Council                 | A309 Kingston By Pass, U Turn provided at Ace of Spades roundabout. It is assumed that the A3 will be well signed.   | TfL is investigating advance signing where visibility to boundary point signs is inadequate or an exceptional case can be made. The A3 would be reviewed on this basis.   |

| Item | Respondent            | Representation   | TfL Response  |
|------|-----------------------|--|---|
| 65   | Surrey County Council | B284 Chessington Road, U Turn provided at the roundabout Bridge Road j/w Leatherhead Road and Hook Road. Advance signing needed.     | It is assumed the Council is requesting an advance sign on the B284 Chessington Rd northwestbound to encourage non-compliant drivers to turn right onto Ruxley Lane and hence remain on B284. TfL agrees that there may be some merit in this suggestion to prevent drivers continuing to the Bridge Rd / Hook Rd / Leatherhead Rd Junction, only to U-turn. Many vehicles would already be compliant with the emissions standards at the time the LEZ is proposed for implementation, and should the Mayor confirm the Scheme Order, TfL would undertake a significant public information campaign to ensure that businesses and operators are aware of the LEZ. Given these circumstances, TfL believes that it would be prudent to await till after the possible implementation of the Scheme before considering whether a sign would be appropriate at this location. |
| 66   | Surrey County Council | A240 Kingston Road, Tolworth Towers roundabout needs to be well signed. Advanced signing needed on approach to Tolworth Towers (A3). | TfL is investigating advance signing where visibility to boundary point signs is inadequate or an exceptional case can be made. The A3 would be reviewed on this basis.   |
| 67   | Surrey County Council | A24 London Road, no U Turn provided at the junction. Clear signing of the zone needed.   | A diversion route is already provided at this boundary point so U-turns would be unnecessary. The boundary points would be clearly signed.  |

| Item | Respondent            | Representation   | TfL Response   |
|------|-----------------------|--|--|
| 68   | Surrey County Council | A232 Ewell Road, no U Turn provided at the junction. Clear signing of the zone needed.   | A diversion route is already provided at this boundary point so U-turns would be unnecessary. The boundary points would be clearly signed.   |
| 69   | Surrey County Council | A217 Brighton Road, roundabout provides U Turns. Advanced signing required ahead of roundabout - additional advanced signing needed near to junction 8 of M25. | Agreed. TfL would seek to work with Surrey to provide such an advance sign.  |
| 70   | Surrey County Council | B2218 Sutton Lane, signs needed to avoid confusion. Advanced signing required.   | Many vehicles would already be compliant with the emissions standards at the time the LEZ is proposed for implementation. Should the Mayor confirm the Scheme Order, TfL would undertake a significant public information campaign to ensure that businesses and operators are aware of the LEZ. The point of entry itself would be signed and vehicles have the opportunity to turn left onto Downs Rd from Sutton Lane to avoid the charge. Given these circumstances, TfL believes that it would be prudent to wait till after the possible implementation of the Scheme before considering whether a sign would be appropriate at this location. |

| Item | Respondent            | Representation  | TfL Response  |
|------|-----------------------|---|---|
| 71   | Surrey County Council | A3044 Stanwell Moor Road - Map 108. No problems envisaged as zone commences on Southern Perimeter Road and access can be gained north of roundabout along the A3044 Stanwell Moor Road (LB Hillingdon) - Map 108, advanced signing at A3044/Airport Way roundabout. | To minimise visual clutter, TfL does not propose advance signing at every approach and would only consider advance signing in exceptional circumstances where the likelihood of diversions is heightened or on particularly busy roads. There are plans for advance signing from the M25 at junction 14 so additional advance signing on the Airport Way roundabout would not be considered unless a specific need becomes apparent after commencement of the Scheme.   |
| 72   | Surrey County Council | D3323 Northumberland Close - Map 107. Court Farm and Blackburn Trading Estates located in Northumberland Close. Advanced signing needed at Northumberland Close/Bedfont Road junction.  | Many vehicles would already be compliant with the emissions standards at the time the LEZ is proposed for implementation, and should the Mayor confirm the Scheme Order, TfL would undertake a significant public information campaign to ensure that businesses and operators are aware of the LEZ. The point of entry itself would be signed and vehicles have the opportunity to turn left onto Downs Rd from Sutton Lane to avoid the charge. Given these circumstances, TfL believes that it would be prudent to wait until after the possible implementation of the Scheme before considering whether a sign would be appropriate at this location. |



| Item | Respondent                  | Representation  | TfL Response   |
|------|-----------------------------|---|--|
| 73   | Surrey<br>County<br>Council | A308 Staines Road East - Map 101. Zone boundary along north side of A308 within GLA boundary. Turning available at Hampton Court. Advanced signing to be located at A308/M3 junction 1. | TfL does not consider that there would be significant diversionary effects brought about by the introduction of the LEZ. Many vehicles would already be compliant with the emissions standards at the time the LEZ is proposed for implementation, and should the Mayor confirm the Scheme Order, TfL would undertake a significant public information campaign to ensure that businesses and operators are aware of the LEZ. For this reason and to minimise visual clutter, TfL do not propose advance signing at every approach and would only consider advance signing in exceptional circumstances where the likelihood of diversions is heightened or on particularly busy roads. TfL does not consider that this location represents an exceptional situation. Should the Mayor approve the Scheme, TfL would continue to be monitored after Scheme commencement and a signing solution can be investigated and installed quickly if appropriate. |

**Q2: Traffic diverting around London**

| Item | Respondent            | Representation  | TfL Response  |
|------|-----------------------|---|---|
| 74   | Surrey County Council | C217 Old Farleight Road, HGVs avoiding zone may increase use of A2022 Teddington Road and Limsfield Lane - no U Turn at junction.   | Teddington Road and Limsfield Lane is the designated diversion route for non LEZ compliant vehicles approaching London along Old Farleigh Road. TfL does not expect a large number of diverting vehicles on this approach.  |
| 75   | Surrey County Council | D447 Rag Hill Road runs into Tatsfield lane which forms the boundary of the zone - vehicles coming from the South may turn into Rag Hill Road to avoid zone from A233.  | TfL does not consider that there would be significant diversionary effects brought about by the introduction of the LEZ. TfL consider that the small number of non-compliant vehicles approaching along Parkwood Road is unlikely to use Rag Hill Road as a diversionary route. This direction is signed as 'Unsuitable for Heavy Vehicles' and the road status is apparent to drivers. |
| 76   | Surrey County Council | A30 London Road/Staines Road - Map 105. B3003 Clockhouse lane is not within the zone, including the section north within LB Hounslow. The A30 Great South West Road and A315 Staines Road and Bedfont Road are within the zone. Traffic may use Clockhouse Lane. Advanced signing needed. | TfL would develop an advance sign to help encourage non-compliant vehicles approaching along the A30 to U-turn rather than use Clockhouse Lane.   |

| Item | Respondent            | Representation  | TfL Response   |
|------|-----------------------|---|--|
| 77   | Surrey County Council | B3003 Clockhouse Lane - Map 105. Not within the zone. Clockhouse Lane has a 7.5 tonne environmental weight restriction (northbound only). This site is very sensitive and any increase will lead to an adverse reaction from residents. Advance signing at B3003. | Although Clockhouse Lane is subject to a 7.5T environmental weight restriction northbound, TfL need to maintain this as a possible diversion route for LEZ affected vehicles less than 7.5T. TfL would develop an advance sign to help encourage non-compliant vehicles approaching along the A30 to U-turn rather than use Clockhouse Lane. |
| 78   | Surrey County Council | B377 Feltham Road - Map 103. Additional traffic may use A244 Chertsey Road/Cadbury Road as diversion away from zone.  | TfL does not consider that the LEZ would result in significant additional traffic on Chertsey Rd / Cadbury Rd / Feltham Rd. Should the Mayor approve the LEZ Scheme Order, TfL would review the need for additional signage after implementation of the Scheme.  |
| 79   | Surrey County Council | A244 Cadbury Road - Map 103. Additional traffic may use B377 Feltham Road as diversion away from zone. Advanced signing located on A308 at Cadbury Road junction.   | See Item 78 above.   |

**Q3: Use of unsuitable roads ('rat-running') to avoid enforcement cameras**

| Item | Respondent            | Representation   | TfL Response  |
|------|-----------------------|--|---|
| 80   | Surrey County Council | D2311 Northey Avenue, could lead to rat running vehicles in the area?                | TfL does not consider that the LEZ would generate additional rat-running effects. London bound vehicles unaware of the LEZ boundary are more likely to continue to the point of the boundary itself rather than using Northey Avenue.                             |
| 81   | Surrey County Council | A2022 Croydon Lane, may encourage use of Carshalton Road. Advanced signing required. | Carshalton Road is the permitted diversion route for non-LEZ compliant vehicles but a significant increase as a result of LEZ is not expected as TfL anticipate most vehicles would be compliant, choose to pay the charge or stay away from the area completely. |
| 82   | Surrey County Council | B278 Rectory Lane/Carshalton Road, may encourage use of Croydon Lane                 | See Item 81 above.  |

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<sup>1</sup> Under paragraph 9(7) of Schedule 23 to the GLA Act, consent from the Secretary of State for Transport is required if a trunk road or motorway is to be included in the LEZ and TfL is negotiating as to this consent. His approval is required on issues affecting trunk roads and motorways including where the boundary of the LEZ is drawn, the signage and enforcement on trunk roads and motorways. TfL has agreed to fund the cost of signing of the proposed LEZ, including reimbursement of the Secretary of State's costs in installing and maintaining signs. Agreement from the Secretary of State on the inclusion of trunk roads and motorways within the LEZ would be required before the Mayor can confirm the Scheme Order, which includes these roads. The negotiations are well advanced, and TfL anticipates that agreement can be reached before the date proposed for the Mayor to make his decision on the Order.