



**ENVIRONMENT POLICY DEVELOPMENT & SCRUTINY PANEL**

**LOW EMISSION ZONE FOR THE CITY OF EDINBURGH:  
WEST LOTHIAN COUNCIL'S CONSULTATION RESPONSE**

**REPORT BY HEAD OF OPERATIONAL SERVICES & HEAD OF PLANNING,  
ECONOMIC & REGENERATION**

**A. PURPOSE OF REPORT**

The purpose of this report is to outline the City of Edinburgh's Low Emission Zone (LEZ) proposals for the City and to recommend a formal response to the Council Executive.

**B. RECOMMENDATION**

It is recommended that the Panel notes the contents of the report and recommends to Council Executive that it supports the introduction of the City of Edinburgh's Low Emission Zone in principle but requests clarification to the questions outlined within Section D4 of the report.

**C. SUMMARY OF IMPLICATIONS**

<b>I Council Values</b>	Focusing on our customers' needs
	Being honest, open and accountable
<b>II Policy and Legal (including Strategic Environmental Assessment, Equality Issues, Health or Risk Assessment)</b>	<b>Policy:</b> To be completed.
	<b>Legal:</b> To be completed.  <b>Integrated impact assessment:</b> An IIA has been commissioned by City of Edinburgh Council and will continue as LEZ options are finalised. The findings of the IIA to date highlight that there will be a significant impact on the commercial vehicles sector. Similarly, residents reliant on private cars and social care providers with less financial ability to upgrade their vehicles may be impacted also.
<b>III Implications for Scheme of Delegations to Officers</b>	None.
<b>IV Impact on performance and performance Indicators</b>	None.

**V Relevance to Single Outcome Agreement**

**VI Resources - (Financial, Staffing and Property)**

**Financial:** None  
**Staffing:** None.  
**Property:** None.

**VII Consideration at PDSP**

None

**VIII Other consultations**

The South East of Scotland Transport Partnership has submitted a response on the LEZ consultation. A copy of the SEStran is contained in Appendix 3.

**D. TERMS OF REPORT**  
**Introduction**

**D1**

In June 2018, the Scottish Government introduced the Transport (Scotland) Bill to the Scottish Parliament and is currently at Stage 2. The Bill sets out provisions to enable the introduction of Low Emission Zones (LEZ) in Scotland's four largest cities. The Bill enables the creation and civil enforcement of LEZs by local authorities, and will allow the Scottish Government to set consistent national standards for a number of key aspects including, but not limited to, vehicle emissions, penalties, certain exemptions and parameters for grace periods for LEZs. It is anticipated that the Bill and associated regulations will be finalised early in 2020.

LEZs are not a new tool in tackling air pollution with the first recognised one being introduced in Sweden in 1996. There are now around 250 LEZs in cities across 15 European countries. The first and only one in the United Kingdom was introduced in London in 2008.

The UK Government has announced ambitions to end sales of new conventional petrol and diesel cars and vans by 2040 as part of efforts to tackle climate change and air pollution. The Scottish Government is aiming to end the sale of petrol and diesel vehicles by 2032 and has set out plans to introduce low emission zones in Scotland's four largest cities by 2020.

**D2 What is an LEZ?**

An LEZ is a geographical area within which polluting vehicles are not permitted. Unless otherwise exempt, polluting vehicles that enter the area are subject to a penalty. Enforcement will utilise Automatic Number Plate Recognition (ANPR) cameras, linked to a national vehicle licencing database, to detect vehicles entering an LEZ which do not comply with the minimum standards.

It is intended that local authorities will design each LEZ based on their specific, local requirements. The Transport (Scotland) Bill will give local authorities the powers to create, enforce, operate or revoke an LEZ in their area and to design the shape, size and vehicle scope of individual LEZs.

**D3 Overview of the City of Edinburgh Proposal**

The city council has published its draft proposals to roll-out a two-tier LEZ.

Edinburgh's proposed phasing approach is similar to that adopted in many other cities. The proposed boundaries of each zone are set out in Appendix 1 and have been informed by analysis of the baseline model produced by SEPA. Over the summer, the City has been undertaking a city wide traffic data collection survey to update the data and analysis in the baseline air quality model.

Cars, buses and lorries that fail to meet pollution standards will be banned from the city centre. But a separate zone for the wider city will see cars exempt from the rules, meaning that pollution-emitting vehicles will still be able to sit in queues at other key congestion hotspots across the wider city.

The LEZ for the city centre does not include Queen Street, Haymarket and Tollcross. Buses, coaches and commercial vehicles will have until the end of 2021 to meet the city centre standards, while cars will have until the end of 2024 – and the car grace period could be extended to 2025.

If approved, the citywide LEZ would require buses, coaches and commercial vehicles to meet the pollution standards by the end of 2023 and cars would be excluded.

For petrol engines, vehicles will have to meet Euro 4 standards – required for vehicles sold after January 2006. Diesel cars will have to meet Euro 6 standards – required for diesel cars sold after September 2015. Heavy diesel vehicles will need to meet Euro 6 standards – generally those registered with the DVLA after 2014.

No details of the fines for drivers who break the rules have been contained within the consultation but there is likely to be different levels of penalty charge depending on, for example, the class of vehicle or whether there are repeated contraventions. In order for the LEZ to meet its ultimate aims the penalties will need to be substantial enough to change behaviour.

Edinburgh's Public consultation and stakeholder engagement took place between May and July 2019 and the findings will be reported to Edinburgh's Committee in October along with proposals for agreement for an LEZ scheme for the city.

It has been acknowledged by Edinburgh Council that the timing of the consultation has not enabled neighbouring authorities to engage with elected members during the summer recess and they have advised that the views of the neighbouring authorities will still be considered after the deadline. Both Edinburgh and Scottish Government have stressed the importance of elected member involvement on such a sensitive and significant topic.

A frequently asked questions sheet has been prepared, by Edinburgh Council, as part of the consultation (Appendix 2).

#### **D4 Implications for West Lothian / Consultation Response Points**

*(The questions and issues which will form the basis of the consultation response are shown in italics below.)*

##### **General**

West Lothian Council recognises the environmental and associated health impacts of transport emissions in the City and the need to tackle these. Many of these impacts are similar to developing ones in West Lothian but are more chronic. West Lothian has, over recent years, seen air quality becoming an issue in some of our towns and villages.

For the reasons above, the introduction of a LEZ should be supported. However, the introduction may well impact on West Lothian residents and businesses in a number of ways. It is worth noting that 75% of Edinburgh residents who responded to consultation were supportive of LEZ.

In the absence of any formal Economic Impact Assessment (EIA), it is worth referring to the London Ultra Low Emission Zone (ULEZ) EIA 2014. This suggested that in year 1 of that scheme there would be only minor-to-moderate economic disadvantage from the introduction of the ULEZ. Interestingly, the longer-term economic impact (2025 onwards) was forecast to be positive from introducing ULEZ. However, the key point is that EIA details for this proposal will be essential.

There are a number of possible local advantages from City of Edinburgh's LEZ. Firstly, for lorries or buses covering a route involving both West Lothian and Edinburgh, then they would need to meet the LEZ standard. Thus for journeys east or west through West Lothian then the emissions would be lower.

A further advantage could be that for West Lothian residents who commute to or visit Edinburgh that they will benefit from better air quality.

It could also be speculated that the LEZ may be perceived as a barrier to doing business in Edinburgh and so drive relocation and investment to surrounding areas such as West Lothian.

#### Impact of the City Centre and City Wide Boundaries

The extent of the city centre boundary is tight around the recognised city area and the wider city boundary balances an extent of partial or full city coverage. The proposal appears to strike a balance between the environmental differences around the city.

*The operational details of the scheme need further clarification, for example, will crossing the boundaries into the LEZ or driving within the area evoke a daily penalty charge for non-compliant vehicles?*

From the consultation graphics it appears that the city wide boundary is on the Edinburgh side of the City Bypass.

*Confirmation is sought on whether it is to be assumed that drivers will not be affected when travelling on the A720 City Bypass or accessing the slips off the A720 roads to head south. Will the LEZ cover the immediate South Gyle business district?*

*Confirmation is sought on whether once you have entered and parked you will get the penalty for that day and the day you cross the boundary again. If the vehicle is stationary for 3 days, then does that mean no charge?*

*Confirmation is sought on whether any residents travelling solely within the boundaries will evoke a penalty or whether it is the case that all journeys starting within a boundary but not crossing a boundary will be able to travel without penalty.*

*Confirmation is also sought that Edinburgh residents and businesses situated out with the city wide boundary will not be exempt from the scheme.*

*Confirmation of the likely penalty charge scale is sought.*

Edinburgh's City Mobility Plan has 'REGIONAL' projects as part of the policy measures but these are not detailed. It is appreciated that schemes and the associated funding strategy have still to be developed. It is crucial that the process of development and implementation of these schemes runs parallel or closely follows the introduction of the LEZ.

*Confirmation is sought on the likely regional projects as well as the funding and delivery strategy of those projects.*

It should be recognised that neighbouring authorities are contributing significantly towards the national house building programme; which is necessary to support the growing economy and jobs market for the area. Although accommodating the employment growth, much of the workforce requires to travel into Edinburgh.

*Confirmation is sought that any surplus penalty monies (after operating costs) will be used on measures that will increase modal transport shift in the neighbouring authority areas.*

#### Vehicle Cost Implications

Vehicles which do not comply with the standards and restrictions of the LEZ as outlined above, will ultimately incur cost. Private individuals, businesses and organisations will need investment to comply with the standards, or will incur penalties. Although these costs may not be so significant as more and more vehicles become more compliant and the initial impacts will lessen.

Coach and taxi companies within West Lothian may struggle to replace vehicles to meet the standards.

The council is aware that the Bus Emission Abatement Retrofit (BEAR) scheme operated by Scottish Government that supports bus operators to reduce nitrogen dioxide and particulate matter emissions of existing fleet vehicles through the installation of accredited retrofit exhaust abatement retrofit technology has, to date, been under subscribed. In 2018/19, only 13.5% of the £7.89m bus retrofit funding was taken up by operators. The difficulties with retrofit technology and funding need to be addressed.

West Lothian businesses could suffer to meet the LEZ's standards, meaning increased costs or difficulty in bidding for work, or operating, in Edinburgh.

#### The Displacement Effect

Around each boundary there is likely to be a displacement effect. People and motorists in general will try and reduce the need to incur additional cost, travel time and convenience. This will likely manifest itself on localised areas of pressure. Areas and streets close to public transport hubs will burden additional traffic congestion and parking problems. In some areas this may lead to an increase in vehicle emissions and, in turn, health concerns for those who currently are unaffected. Improvements in emissions in one area of the city are likely to generate an increase in traffic and emissions in another. Mitigations will be required to offset these unintended consequences.

*Confirmation and reassurance is sought that these unintended consequences will be fully considered and mitigation measures implemented as the scheme proposals develop.*

## **E. CONCLUSION**

It is recognised that environmental and health pressures associated with petrol and diesel vehicles is increasing. Scottish Government's desire to have the four major Scottish cities introducing Low Emission Zones by 2020 is a commitment to improving air quality in our most populated areas.

The City of Edinburgh's phased two tier proposal strikes an initial balance for the introduction of a LEZ. The introduction of any scheme of this type is not without its

challenges. The suggested response to the public consultation recognises this but highlights anticipated local concerns. It is hoped that the City of Edinburgh Council and Scottish Ministers recognise these concerns and work towards resolving them as they work towards finalising and approving the LEZ scheme.

## **F. BACKGROUND REFERENCES**

Consultation Hub information and City of Edinburgh Committee Report

<https://consultationhub.edinburgh.gov.uk/sfc/edinburghlez/>,  
[http://www.edinburgh.gov.uk/CET/info/8/about the low emission zone/16/about low emission zones](http://www.edinburgh.gov.uk/CET/info/8/about_the_low_emission_zone/16/about_low_emission_zones), and  
[http://www.edinburgh.gov.uk/meetings/meeting/4701/transport and environment committee#minutesDateSearchWidget](http://www.edinburgh.gov.uk/meetings/meeting/4701/transport_and_environment_committee#minutesDateSearchWidget)

Appendices/Attachments:

**APPENDIX 1** LEZ proposed boundaries

**APPENDIX 2** LEZ frequently asked questions

**APPENDIX 3** SEStran Response to Consultation

Contact Person: Graeme Malcolm, Roads & Transportation Manager, Tel. 01506 282351

E-mail: [Graeme.malcolm@westlothian.gov.uk](mailto:Graeme.malcolm@westlothian.gov.uk)

Jim Jack, Head of Operational Services, Whitehill House, Whitestone Place, Bathgate, West Lothian  
Craig McCorriston, Head of Planning, Economic & regeneration, Civic Centre, Livingston, West Lothian

Date: 3 September 2019

**City Wide Boundary**

**NEW TOWN**

**OLD TOWN**

**TOLLCROSS**

**QUARTERMILE**

**ST. LEONARDS**

**DUMBEDYKES**

**CANONGATE**

**THE UNIVERSITY OF EDINBURGH**

**EDINBURGH CASTLE**

**PALACE OF HOLYROODHOUSE**

**EDINBURGH ZOO**

**RIVER OF FORTH**

**FIRTH OF FORTH**

## **TACKLING AIR POLLUTION – EDINBURGH LOW EMISSION ZONES**

---

### **GENERAL Q+A**

#### **What is a Low Emission Zone?**

Low emission zones (LEZ) improve local air quality and reduce the impact of air pollution on human health.

LEZs set restrictions on road spaces, where vehicles that do not meet the emission standards are not permitted to enter the zone.

Allowing access to only the cleanest vehicles can help to transform towns and cities into healthier places to live, work and visit.

#### **What are the benefits of cleaner air?**

Clean air has never been more important, and the need for action never more urgent.

There is a growing body of scientific evidence that has established linking air pollution and ill health. There is also evidence of links to a wider range of health impacts, such as poor birth outcomes (pre-term birth, low birth weight), diabetes and neurological problems (dementia).

In addition, there are a number of social benefits that can be achieved through better placemaking in the capital's centre, through a focus on the reduction of traffic pollution and improving urban environments.

#### **What are the health impacts of poor air quality?**

The purpose of a LEZ is to improve health and well-being of people who live, work or visit the city, particularly those who are particularly vulnerable, the very young, older people and those with pre-existing health conditions. These conditions include lung-related illnesses e.g. asthma or chronic obstructive pulmonary disease, or circulation problems (angina, strokes, heart attacks).

Modelling by Public Health England in 2010 made estimates of the mortality burden on the population in Scotland. This work showed around 2,000 premature deaths and a total of around 22,500 life years lost across the population can be attributed to anthropogenic (man-made) fine particle pollution. In Edinburgh, this can be related to 205 premature deaths and 2,300 life-years lost.

#### **How do vehicles contribute to poor air quality?**

Pollutants caused by vehicle emissions are largely invisible, but these gases and particulates can be hazardous to human health. Transport generates over one-third of the total emissions of nitrogen oxides, the majority of these emissions are caused by road transport.

Emissions are improving but not at the expected rate, considering the improving engine emission standards in recent years. The highest level air pollution is found in cities and towns. As most of Scotland's population lives and works in urban environments, transport emissions are the most important source of air pollution affecting human health.



### **What's happening across Scotland?**

The Scottish Government has committed to working with local authorities to have LEZs in place in Edinburgh, Glasgow, Dundee and Aberdeen by 2020.

The Transport (Scotland) Bill was introduced to the Scottish Parliament in June 2018 and is currently progressing through the Parliamentary process. This will provide legislation that enables the creation and civil enforcement of low emission zones.

The Transport Bill will allow the Scottish Government to set nationally consistent standards to apply across Scotland. This is expected to cover issues such as the emissions standards for vehicles, penalty rates, exemptions for specific vehicles, and enforcement.

### **What decisions will Local Authorities make?**

Local Authorities will design each low emission zone based on their specific, local requirements. The Bill will give local authorities the powers to create, enforce, operate or revoke a low emission zone in their area and to design the shape, size and vehicle scope of individual low emission zones.

### **Who will be affected?**

Owners of vehicles which do not meet the minimum emission standards proposed in the Transport Bill.

The standards as proposed are Euro 4 for petrol engines and Euro 6/VI for diesel engines. The use of Euro standards in this manner is commonplace across European LEZs.

The current proxy for Euro standards is to use vehicle age as a guide to the corresponding Euro classification, as follows:

- Euro 4 standard for petrol engines was introduced in January 2005, with any new vehicles sold after January 2006 having to meet this standard,
- Euro 6 standard for diesel cars was introduced in September 2014, with any new vehicle sold after September 2015 having to meet this standard.
- Euro VI emission standards for heavy diesel vehicles - generally those registered with the DVLA after 2014.

### **How will people reliant on vehicles be affected?**

LEZ's only restrict polluting vehicles that do not meet minimum emission standards. People and businesses that are reliant on driving vehicles in the zones will need to operate compliant vehicles.

The proposed grace periods allow time for vehicle owners to upgrade them. In the city centre, commercial vehicles have until the end of 2021 and cars until the end of 2024. For the citywide boundary, commercial vehicles will have until the end of 2023.

### **What time of day will LEZs operate?**

The proposal is for low emission zones to operate 24/7, 365 days a year. The [national regulations](#) allow local authorities the flexibility to set operational hours based on the specific requirements of each zone. However, to ensure we're making the necessary reduction in pollution, Edinburgh's LEZs are proposed to operate 24/7.

### **Will there be any exemptions?**

Exemptions are being considered at a national level. The Transport (Scotland) Bill which was introduced to the Scottish Parliament on the 8 June 2018 will allow Scottish Ministers to make regulations that lay out the details of how LEZs will operate, including on issues such as exemptions. Transport Scotland is considering what exemptions to incorporate into regulations and are currently engaging with stakeholders on a national basis.

It is anticipated that the Council may be able to make provision for time-limited exemptions for vehicles not covered by the blanket exemption but there are particular circumstances in which it ought to be exempt for a limited period.

### **How will LEZs be enforced?**

Unless otherwise exempt, non-compliant vehicles that enter/travel within the LEZ are subject to a penalty.

Enforcement will utilise Automatic Number Plate Recognition (ANPR) cameras, linked to a national vehicle licensing database, to detect vehicles entering a LEZ which do not comply with the minimum standards. A similar system already operates for enforcing bus lanes in Edinburgh.

### **Can I upgrade my vehicle to be compliant?**

Some vehicles (such as buses or taxis) can be retrofitted to enable compliance with emissions standards. In general, the cost of retrofitting cars tends not to be justified.

Retrofitting refers to the use of technologies that can help bring older Euro class vehicles up to the new required levels of adherence when it comes to NOx and CO2 emissions. This effectively makes the vehicle Euro 6 / VI standard.

Further detail about the bus retrofit programme can be found [here](#).

### **What will the penalties be?**

Penalty rates will be set nationally. It is anticipated there will be different levels of penalty charge depending on, for example, the class of vehicle or whether there are repeated infringements. The charges will be defined by regulations and they are expected to be set at such a level to support a high level of compliance.

### **How will drivers know when they are entering a LEZ area?**

Roadside signage will be installed to let drivers know when they are entering a LEZ. Positioning of signs will take account of the need to indicate alternative routes to avoid the LEZ.

### **Will LEZs reduce congestion?**

LEZs are designed to improve air quality through limiting the use of the most polluting vehicles within the zone. The introduction of LEZs will encourage people to consider how they travel in the affected cities with the potential for more people to choose public transport or active travel.

## TACKLING AIR POLLUTION – EDINBURGH LOW EMISSION ZONES

---

### EDINBURGH SPECIFIC Q+A

#### Why is The City of Edinburgh Council progressing LEZs?

Like other Local Authorities in Scotland, we are taking steps towards protecting citizens from the harms of poor air quality, based on [UK legislation](#)

The Scottish Government has committed to work with local authorities in Edinburgh, Glasgow, Dundee, and Aberdeen to implement LEZs by 2020.

The City of Edinburgh Council has committed to 'improve Edinburgh's air quality and reduce carbon emissions [and] explore the implementation of low emission zones' ([Commitment 18](#)).

In [May 2018](#), the Council agreed a comprehensive approach to LEZs as a step towards protecting Edinburgh's citizens from the harms of poor air quality

#### Why does Edinburgh need LEZs?

Edinburgh has declared six Air Quality Management Areas ([AQMA](#)s), five are for traffic related (NO<sub>2</sub>), and are located around the city centre, West End, Corstorphine, Inverleith Row, Great Junction Street, and Newbridge. Road transport is primarily responsible for NO<sub>2</sub> concentrations at the roadside. The other AQMA is for fine particulates (PM10), which relate to industrial activities and other sources around Salamander Street in Leith.

The trend in these areas is positive and we are seeing reductions in pollution with time. However, some areas, particularly in the city centre, are not improving quickly enough and are expected to remain in exceedance of legal limits.

Edinburgh needs to introduce LEZs to restrict the pollution from vehicles to help improve air quality and achieve compliance with legal standards.

#### What evidence is there to support the introduction of LEZs?

Edinburgh's LEZs have been developed in association with the Scottish Environment Protection Agency (SEPA) to support detailed understanding of the air quality issues in Edinburgh.

Working with Council officers, SEPA has developed a baseline model to help identify the emissions levels that different types of vehicles contribute across Edinburgh. This was documented by SEPA in the November 2018: 'Air Quality Evidence Report - Edinburgh'

This work finds that the most extensive area of roadside traffic pollution is in and around the city centre, where concentrations of NO<sub>2</sub> are at their highest, when compared to other areas of the City.

On-going work will continue to inform the detail of low emission zone proposals including: air quality modelling, transport modelling, integrated impact assessment work, commercial fleet analysis and further engagement with key stakeholder groups. The results of this work will be made publicly available in the future.

#### What are Edinburgh's plans?

The proposals include a LEZ which applies both to **the city centre for all vehicles**, and **city wide for only commercial vehicles** (buses, coaches, heavy goods vehicles, light goods vehicles, vans, taxis, and private hire cars).

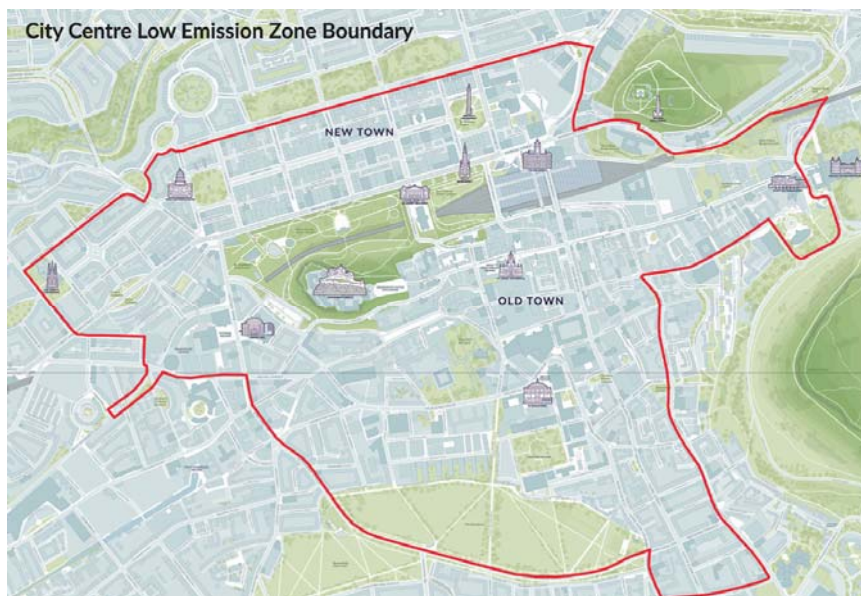
LEZ development is a key aspect linked to a number of strategies aiming to enhance placemaking and connectivity in Edinburgh, including [City Mobility Plan](#) (Edinburgh's strategic direction for transport) and [Edinburgh City Centre Transformation](#) (a strategy setting out interventions to radically reshape the city centre)

### Where will the LEZ City boundary be?

We are proposing a city centre LEZ that applies to all vehicles. A city centre LEZ applying to all vehicles, introduced over a short period of time, would have the benefit of tackling the highest concentrations of air pollution in a densely populated area.

The proposed City Centre LEZ is bounded by

- North - St Colme Street and Queen Street;
- East - Leith Street, Regent Road, Abbeyhill, Horse Wynd, Holyrood Road, the Pleasance and St Leonards
- South - East and West Preston Street, Melville Drive, Earl Grey Street, Morrison Street, West Approach Road and Torphichen Street
- West Palmerston Place, Chester Street, Drumsheugh Gardens, Queensferry Street, Randolph Crescent, Great Stuart Street and Ainslie Place.



### Where will the City-wide boundary be?

To address pollution in areas beyond the city centre (in particular [Air Quality Management Areas](#)) we are proposing a **city-wide LEZ** applying to **all commercial vehicles** (buses, coaches, HGVs, LGVs, vans, taxis, and private hire cars).

A City-wide LEZ would be defined by the City Bypass, Maybury Road, Cramond Brig, Old Dalkeith Road, The Wisp, the A1 and Milton Road East. It would exclude the City's rural western settlements and Edinburgh International Airport. Cars will not be affected by the City-wide boundary.



### When will enforcement start?

Grace periods have been factored in to allow the owners of vehicles time to prepare, with an extended grace period for residents living in LEZ areas. For some people, moving away from vehicle ownership may be a good option meaning they walk, cycle, use public transport more, or make greater use of car clubs or taxis.

Within the city centre boundary, the grace period for buses, coaches and commercial vehicles would be until the end of 2021 and to the end of 2024 for cars. Buses, coaches and commercial vehicles will have until 2023 to comply with the city-wide boundary. Cars will not be affected by the city-wide boundary.

The table below outlines the grace periods.

Edinburgh LEZ Scheme		
City centre boundary		
Vehicle type	Grace Period	Extended Grace Period
Bus / coaches	1 year (End of 2021)	
Commercial vehicles	1 year (End of 2021)	
Cars	4 years (End of 2024)	1 year (End 2025)
City wide boundary		
Vehicle type	Grace Period	Extended Grace Period
Bus / coaches	3 years (End of 2023)	
Commercial vehicles	3 years (End of 2023)	

### **Why aren't the grace periods shorter?**

Improving air quality and ensuring we are moving towards legal compliance in our Air Quality Management areas, is our utmost priority. In order to implement the LEZ scheme, it is important that we consult with the public and those affected to get their views and help further shape decisions including grace periods.

We welcome feedback on the proposed grace periods, and depending on the outcomes of the consultation, grace periods may be revised.

### **What about the impact on commercial vehicles?**

Edinburgh's LEZ proposals may be a challenge for some businesses to meet. Compliance with emission standards of commercial fleet in operation in Edinburgh is relatively low and is having a significant impact on our air quality issues. However, there is a critical need to take action to address poor air quality.

Everyone has a role in helping improve air quality and the Council has its own fleet management plans in place to ensure our vehicles comply with LEZs.

We welcome feedback on the proposed grace periods, and depending on the outcomes of the consultation, grace periods may be revised.

### **What support is being given to different commercial vehicle sectors?**

As part of the LEZ proposals, as well as through the [City Mobility Plan](#) and [Edinburgh City Centre Transformation](#), The City of Edinburgh Council is engaging with the commercial vehicle community to address their needs and gather feedback to help further shape the LEZ proposals.

The Council has a number of actions with businesses to improve air quality in place already. These include working with bus companies to improve fleets, supporting sustainable [travel planning](#), and utilising the [Edinburgh ECO Stars](#) programme to improve commercial fleets.

Work is also underway to improve the taxi fleet in Edinburgh to introduce a surcharge on parking permits for of diesel cars, and investment in [electric vehicle infrastructure](#).

The 2018/19 Programme for Government has indicated programmes of work including hardship grants. Details of these programmes will be available later in 2019.

### **Why aren't cars included in the City-wide boundary?**

This is an aspect of the LEZ proposals that we are seeking feedback on. The most extensive area of roadside traffic pollution is in and around the city centre, where concentrations of NO<sub>2</sub> are at their highest, when compared to other areas of the City.

Commercial vehicles contribute more to overall emissions per vehicle, as they have large engines and repeat more trips across an area. Across the city, commercial vehicles make up one quarter of trips but are responsible for two thirds of the pollution.

Diesel cars are a significant contribution to pollution across the city. However, through the LEZ proposals, we expect that we will be able to effectively reduce emissions without affecting all cars.

Complementary measures being progressed through the [City Mobility Plan](#) and [Edinburgh City Centre Transformation](#) will focus on reducing the need for people to rely on their cars for travel into and around Edinburgh.

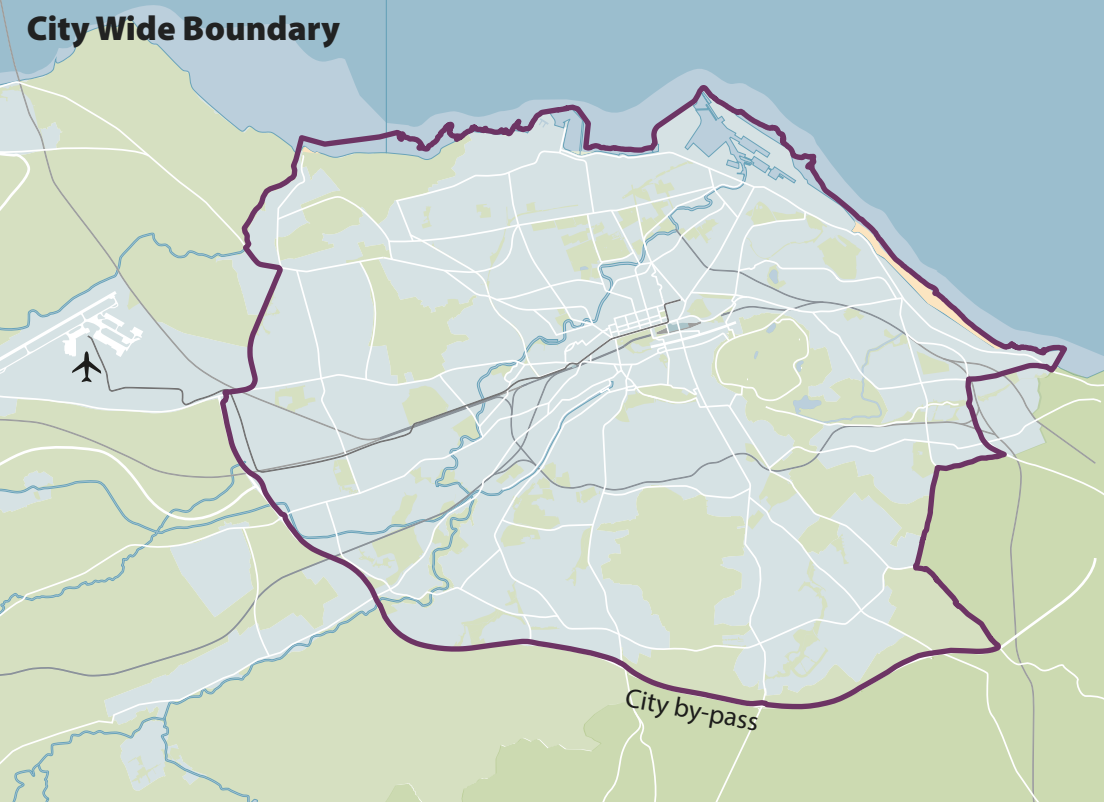
**What are the next steps for the LEZ plans?**

A public consultation and series of stakeholder engagement workshops will be held. The findings will inform a further report which will go to the Transport and Environment Committee in October, 2019.

In line with the National commitments, Edinburgh is on track to have a LEZ in place by the end of 2020.



**City Wide Boundary**



City by-pass



12 July 2019

John Inman  
Service Manager  
The City of Edinburgh Council  
Waverley Court  
4 East Market Street  
Edinburgh  
EH8 8BG

Dear John,

**EDINBURGH LOW EMISSION ZONE CONSULTATION – Response by SEStran**

Please find attached our response to the above consultation. We felt that the format of the online facility would not allow the more comprehensive response which we feel is merited.

You'll be aware that our fundamental duty as a statutory regional partnership is to produce and implement, as funds and collaborations permit, a Regional Transport Strategy (RTS).

We have now begun the process of updating and re-writing the RTS. We are currently at the stage of identifying main issues to be addressed and it is clear the introduction of a LEZ within the City of Edinburgh will be of regional significance and will therefore be a key feature of the new RTS.

We are, of course, supportive of your proposals which will bring many welcome benefits to the residents of the city. We would, however, contend that the implementation of a LEZ and mitigation of its impacts, should also be addressed at a strategic regional level.

In order to help inform the RTS rewrite process and to facilitate further discussion with our partner authorities on the implications of the introduction of a LEZ into the city, we intend to convene a meeting with appropriate representatives in the near future and would like to invite you, and your colleagues, to be involved.

To conclude, SEStran welcomes the LEZ with proper considerations for the wider impacts in the region. The Council's proposals to improve the air quality in the city are ambitious and encouraging, and it is hoped that SEStran's comments on the LEZ proposals are informative and useful in helping the Council implement its proposals. Nevertheless, SEStran would like to emphasise that a regional approach must be taken to properly implement the LEZ and mitigate the inevitably wide-ranging implications in accessing Edinburgh as a major concentration of education, employment and leisure.

Please respond to my letter by contacting Julie Vinders ([julie.vinders@sestran.gov.uk](mailto:julie.vinders@sestran.gov.uk) / 0131 524 5158) for further discussion.

Kind regards,



Jim Grieve  
Partnership Director

12 July 2019

## **SEStran Comments on the Low Emission Zone for City of Edinburgh**

SEStran welcomes the proposal to introduce a Low Emission Zone (LEZ) to improve the air quality in Edinburgh. While SEStran generally supports the concept of a LEZ, it must be considered that a LEZ is merely a tool to improve the air quality of a particular area and should not be considered in isolation as an end in its own right. A LEZ must be accompanied by additional measures and interventions to mitigate the potentially negative impact a LEZ can have. A lot of people travel to and from Edinburgh for work and educational purposes or for leisure. (Approximately 35% of employees working in Edinburgh live out with the city and commute in)<sup>1 2</sup>.

Edinburgh is the economic centre for the South East of Scotland and contributes significantly to the Scottish economy. SEStran acknowledges the challenge that exists in tackling poor air quality while stimulating economic growth.

To ensure economic growth is disconnected from an increase in the emission of air pollutants, an appropriate strategy of mitigation measures must be in place to provide capacity in alternative travel options. SEStran recognizes that the City of Edinburgh Council is working on a number of initiatives to improve the connectivity in the City and encourage sustainable travel.

### **A Regional strategy is needed to mitigate impacts of LEZ and provide appropriate alternative travel solutions.**

Regional Impact Issues associated with the introduction of a LEZ:

- Impact on regional trips commuting, tourism, freight etc to and from the city centre;
- Demand management:
  - While the LEZ has potential to reduce the number of cars in the city, it is not designed to do so and the people who can afford it, will simply buy a cleaner vehicle (perhaps a bit sooner than they would have done without the LEZ in place);
  - There is therefore an opportunity to use the LEZ to reduce the number of vehicles in the city centre by providing appropriate and attractive transport alternatives, such as active travel facilities and infrastructure, shared mobility, and good public transport;
- Displacement impacts out with Edinburgh resulting from the wider city zone;
- Potential of reduced access to employment for low income commuters who can't afford a more modern car;
  - Equality issue: Those who cannot afford to buy a cleaner vehicle, however, will perhaps increasingly depend on the public transport network to access employment and education. Particularly in areas of transport poverty, the LEZ might pose an equalities issue and potentially restrict access to facilities and services for people living in these areas.

### **Freight Impacts**

- City wide strategy is needed – as movements of HGV & LGV vehicles will have cross boundary regional impact;

---

<sup>1</sup> Transport and Travel in Scotland 2017 Table 16 Travel Diary Table TATIS 2017.xlsx

<sup>2</sup> Census 2011 data Table AT\_009\_2011

- Combination of policy development and incentives for providers to ensure buy in and operational implementation from providers;
- Consolidation hubs (regional/micro/mobile) and First/last mile solutions;
- Explore opportunities for technological solutions that can also be integrated/combined with LEZ technology;
- Impact on small and medium sized enterprises: businesses with small profit margin might struggle to purchase cleaner vehicles and might potentially lose business in the city as a result. This is perhaps an opportunity to switch from van to cargo-bike but a LEZ on its own will not achieve this;
- Need to carry out a detailed assessment of the necessary infrastructure, operational financial and contractual requirements to ensure buy-in and commitment for future consolidation solutions. See SEStran work on SURFLOGH.<sup>3</sup>

### **Bus Based Public Transport**

- Timescales for implementation of zone will impact on bus operators with the potential to increase short/medium term costs;
- Manufacturing capacity to retrofit vehicles given that 4 LEZs are being introduced at same time;
- Bus based commuting into city centre from outlying areas may be affected by the proposed LEZ areas. Will bus based public transport options to the city centre from outlying areas be reduced because of the need to upgrade fleet? Potential fare increases will make public transport less attractive and affordable. Discussions is needed with bus operators providing services to City Centre; and
- Air quality issues in towns out with City of Edinburgh could be affected by vehicle displacement away from routes serving the city centre.

### **Grace Periods**

- The current city centre scheme proposes a longer grace period for residents compared to non-residents: this poses a potential equalities issue as residents of Edinburgh normally have a range of transport options (public transport network covers most part of the city);
- Non-residents, however, and particularly those who cannot afford to live in the city, often have fewer transport options and they are potentially significantly more impacted by the LEZ. Therefore, the grace period should not discriminate between residents and non-residents. In addition, and again, the introduction of a LEZ offers an opportunity to reduce the number of cars in the city, as long as its implementation is accompanied with additional strategic interventions to provide viable transport alternatives and incentives;
- Residents should be encouraged to use alternative travel modes, but this must be accompanied with additional measures, such as the provision of car-sharing, bike-sharing etc. A LEZ on its own will simply encourage people to buy a cleaner vehicle while the number of cars driving through the city could potentially remain the same (or even increase if bus fares go up, etc.).

### **Exemptions**

- There will be several exemptions that will be developed through the emerging regulations and which will be applied at a national level. However, there is no information available on what local exemptions will apply to the Edinburgh LEZ;
- SEStran would suggest that time focused exemptions be the preferred mechanism rather than try and identify specific user groups as this would result in increased complexity.

<sup>3</sup> <https://www.sestran.gov.uk/projects/surflogh>

## Regional Mitigation Issues

It is considered that a regional approach (strategy) is needed to deliver and maximise the benefits of a LEZ for Edinburgh and the surrounding regions.

In addition to the impacts within Edinburgh City there are significant cross boundary travel and transport issues that are affected by the proposed LEZ; which must also consider the proposed development growth that will continue to increase demand for commuting trips into Edinburgh from the surrounding area following the introduction of a LEZ.

Continuing growth within Edinburgh will increase the demand for services and the associated demand for goods and associated freight transport.

Some measures to mitigate key impacts identified include:

- Measures to improve cross boundary public transport journey times;
- Increased park and ride provision;
- Coordinated delivery at a regional level of park and ride public transport infrastructure;
- Public transport costs;
- Integrated multi modal hubs to raise the profile of new and existing public transport network, the provision of shared mobility and associated active travel infrastructure;
- Improved orbital public transport routes around outer zone;
- Coordination of freight consolidation;
- Development of low carbon freight hubs;
- A720 City Bypass – development and improvement through for example orbital bus route.