

BUILDING SCOTLAND'S LOW EMISSION ZONES

Response from Transform Scotland
to Scottish Government consultation

Tuesday 28 November 2017

1. Do you support the principle of LEZs to help improve Scottish air quality? Please be as specific as possible in your reasoning.

LEZs are an important measure for improving public health and social justice:

- We support LEZs as an important measure for controlling levels of harmful pollution and as a result the improvement of public health.
- We also support LEZs as a tool for achieving greater social justice, given the disproportionate levels of exposure to pollution by low-income groups.

With specific regards to transport:

- We support LEZs as one of a number of measures to achieve a modal shift towards public transport, walking and cycling and away from private cars.
- We support LEZs as an opportunity to focus investment on implementing lower emission public transport services in congested, polluted areas.
- We support LEZs as an additional measure to drive a transition to less polluting vehicle technologies.

All of this is based on the assumptions that spending commitments for the facilitation and promotion of LEZs will not negatively impact upon existing budgets for the investment in active travel and public transport.

2 Do you agree that the primary objective of LEZs should be to support the achievement of Scottish Air Quality Objectives? If not, why not?

Yes

3a Do you agree with the proposed minimum mandatory Euro emission criteria for Scottish LEZs?

We agree with the proposed emissions criteria. What is more important is for immediate action in meeting the existing standards rather than the decades of procrastination and prevarication that has characterised Scottish Government and Scottish Local Authority approach to the protection of human health.

3b Do you agree with the proposal to use the NMF modelling in tandem with the NLEF appraisal to identify the vehicle types for inclusion within a LEZ?

We have no detailed views on this matter. We would however point you to the remarks made by our member organisation, Friends of the Earth Scotland, on this matter.

3c Should emission sources from construction machinery and/or large or small van refrigerated units be included in the LEZ scope, and if so should their inclusion be immediate or after a period of time?

No views.

4 What are your views on adopting a national road access restriction scheme for LEZs across difference classes of vehicles?

Yes.

5 What are your views on the proposed LEZ hours of operation, in particular whether local authorities should be able to decide on LEZ hours of operation for their own LEZs?

We support the Government's proposals that LEZs "operate continuously, 24 hours a day, seven days a week, all year round".

6 What are your views on Automatic Number Plate Recognition enforcement of LEZs?

We are in favour, not least because this kind of technology could also be utilised for other traffic management measures, such as road pricing.

7a What exemptions should be applied to allow LEZ to operate robustly? Please be as specific as possible in your reasoning.

- Emergency services should be exempt, but should be encouraged to comply with limits.
- Low-frequency bus services, at least initially.
- Blue badge holders could be given an initial exemption but with a deadline set for compliance.

7b Should exemptions be consistent across all Scottish local authorities?

Yes, to ensure minimum standards and protect road users from confusion and, potentially, fines.

8 What are your views on LEZ lead-in times and sunset periods for vehicle types shown in Table 2?

The proposals look reasonable to us; the key criteria should be the time required by public transport providers to retrofit/replace their fleet.

9 What are your views about retrofitting technology and an Engine Retrofitting Centre to upgrade commercial vehicles to cleaner engines, in order to meet the minimum mandatory Euro emission criteria for Scottish LEZs?

We are content with the proposals.

10 How can the Scottish Government best target any funding to support LEZ?

- Grants for bus companies for retrofitting/replacing their fleet, given the financial cost of such measures and the importance of buses for reducing congestion (Begg 2017: 18ff and 4f).
- Any funding for e-mobility should cover electric bicycles.

11 What criteria should the Scottish Government use to measure and assess LEZ effectiveness?

The principal criteria should be whether LEZs lead to a reduction in breaches of emission limits (i.e. reduction of PM and NOx levels).

Secondary criteria might include:

- Total volume of motorised traffic. This will allow Local Authorities to determine whether excluding non-compliant vehicles results in fewer vehicles altogether, or simply in a higher number of compliant vehicles. This is important because around 40% of particulate matter is caused by friction (tires, brakes, clutch) and resuspension.
- Separate the total number of vehicles into emissions classes in order to determine the impact of LEZs on different types of road users. This will also allow the fine-tuning of emission standard requirements (cf. traffic modelling/scenarios for Glasgow in section 2.12 of the consultation document).
- Numbers of diesel vehicles in order to monitor the shift from diesel to other types of fuel.
- Traffic volumes around LEZs in order to determine the extent to which pollution has been shifted elsewhere.
- Occupancy rates of cars within LEZs in order to generate emissions per passenger data (as mentioned in consultation document with reference to Begg 2017).

12 What information should the Scottish Government provide to vehicle owners before a LEZ is put in place, during a lead-in time and once LEZ enforcement starts?

- Context (EU, UK, Scotland), rationale, objectives, expectations.

- Emissions categories and access to stickers (if applicable).
- Location, maps, signage.
- Key dates (for phasing in the regime) and methods of enforcement for each location.
- Description of monitoring (data collection and storage) and enforcement methods.
- Promotion of e-mobility (infrastructure, grants if applicable).

13 What actions should local or central government consider in tandem with LEZs to address air pollution?

We support the various interventions listed in the consultation papers as suitable complementary measures. However, Local Authorities and the Government should also put in place measures to:

- Reduce the need to travel (e.g. by allowing more staff to work flexible hours or from home).
- Reduce the volume of traffic in polluted areas through the implementation of road traffic demand measures, such as parking control, access restrictions; and economic instruments such as Workplace Parking Levies or road pricing.
- Increased fines for and enforcement of kerbside pollution offences by stationary vehicles (idling).

14 How can LEZs help to tackle climate change, by reducing CO2 emissions in tandem with air pollution emissions?

They will help in so far as:

- Reductions in traffic volumes would also be expected to lead the reduction of carbon emissions.
- A modal shift from private vehicle use to walking, cycling and public transport would also lead to a reduction in carbon emissions.
- The replacement of fossil fuel-powered vehicles by cleaner vehicles and fuels will also lead to a reduction in carbon emissions.

15 What measures (including LEZs) would make a difference in addressing both road congestion and air pollution emissions at the same time?

Please see our answers to questions 13 and 14.

16 Do you have any other comments that you would like to add on the Scottish Government's proposals for LEZs

The general underlying message should be that LEZs are about improving public health and reducing social justice disparities.

We believe that the objective of LEZs can best be achieved if there is an overall trend towards fewer private vehicles, as well as low-emission public transport and active travel. LEZs will achieve very little if affected areas end up with the same, or higher, numbers of vehicles (i.e. a situation where gains from lower emissions per vehicle are neutralised or surpassed by a higher total due

to rising numbers of vehicles) or alternative routes are used by non-compliant vehicles become new pollution hotspots.

We strongly support the Government's position that "bus-only LEZs are not being proposed in this consultation for any location in Scotland". Indeed, we would emphasise that the priority for LEZ policy should specifically be the reduction in private vehicle journeys, as this priority has the wider co-benefits of reduced congestion, more efficient land use in towns and city centres, improved public health and improved road safety. Given the role of buses in providing the vast majority of Scottish public transport journeys, it would be grievously counterproductive and damaging to focus LEZ policy on measures that would reduce the extent of the Scottish bus network.

17 What impacts do you think LEZs may have on particular groups of people, with particular reference to the 'protected characteristics' listed in paragraph 5.2? Please be as specific as possible in your reasoning.

A measure that leads to less dependence on private car use and greater opportunity for the use of sustainable transport should be expected to benefit young and older cohorts of the population in so far as these groups are more dependent on sustainable transport.

With regards to sex, a measure that leads to improved opportunity for walking and for bus travel would disproportionately benefit females, as they are disproportionately dependent on these modes of transport.

With regards to disability, we see no negative impacts in so far as we are supportive of the provision of suitable exceptions for those with disabilities. There may of course be benefits to people with certain disabilities (e.g. those on foot but with mobility problems), should LEZs bring about a reduction in traffic volumes.

18 Do you think the LEZ proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible in your reasoning.

Reductions in private vehicle use as the result of the implementation of LEZs will improve the financial viability of bus services.

Increases in shares of walking and cycling will have extensive monetizable economic benefits due to improved public health.

Of course there will be one-off costs for those who have to acquire less polluting vehicles, but that is one of the specific outcomes that should be intended as a result of LEZ policy. The Scottish Government should be putting in place incentives for individuals and organisations to choose less polluting technology, and as such it is appropriate for this approach to be taken also in this instance.

19 What impacts do you think LEZs may have on the privacy of individuals? Please be as specific as possible in your reasoning.

We have no detailed views on this matter.

20 Are there any likely impacts the proposals contained in this consultation may have upon the environment? Please be as specific as possible in your reasoning.

We see only beneficial environmental impacts from the introduction of LEZs.

Firstly, LEZs present an opportunity to benefit the environment by cutting toxic air pollutants. Secondly, LEZs also provide an opportunity to reduce carbon emissions and therefore reduce Scotland's contribution to climate change.

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Scotland's alliance for sustainable transport

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We campaign for walking, cycling and public transport to be the easiest and most affordable options for everyone. Our diverse membership brings together public, private and third sector organisations from across Scotland. We are a registered Scottish charity (SC041516).