

EDINBURGH LOW EMISSIONS ZONE CONSULTATION

<https://consultationhub.edinburgh.gov.uk/sfc/edinburghlez/>

RESPONSE FROM SPOKES, JULY 2019

The Council introduces the LEZ consultation by referring to the City Centre Transformation consultation, which found 75% agreement that restricting access for the most polluting vehicles to the city centre and wider city should be considered as a way to control and improve air quality.

The Transformation proposals themselves are radical and we have strongly welcomed them¹, albeit with detailed comments and reservations. However we are concerned that the LEZ proposals do not live up to the same level of ambition, and will contribute less to the Transformation than should be the case.

Furthermore, the Council has now declared a climate emergency, and whilst LEZs are intended primarily to reduce toxic emissions there are many clear links between LEZ and climate policies – not least that when an LEZ encourages change of mode to walking, cycling, public transport, or encourages a non-transport solution, this also reduces or even eliminates climate emissions too.

We give detailed comments below, but our major concerns are...

- ◆ Cars, even older, more polluting cars, won't be restricted at all until the start of 2025
- ◆ Even then, restrictions will apply only within the tiny city centre boundary
- ◆ The city centre boundary is too small – this may encourage re-routing of journeys whereas a larger zone would give drivers a greater incentive to use alternative modes, alternative destinations, or alternative non-travelling means of achieving their purpose.

RESPONSES TO SELECTED QUESTIONS IN THE CONSULTATION

Part 1 - City Centre LEZ

Q4 City Centre LEZ boundary

- The boundary is small and may therefore provide drivers with no incentive to consider changing mode or destination, or using an online or other solution rather than travelling
- As a consequence of the above, there may be additional traffic (and pollution) in streets surrounding this central zone
- Areas with known very high pollution levels – notably St John's Road – deserve to receive maximum LEZ benefits by being in the toughest zone, but this is not the case.

¹ http://www.spokes.org.uk/wp-content/uploads/2019/07/1907-Edinburgh-City-Centre-Transformation_-_Proposed-Strategy-Response-from-Spokes.pdf

- Whilst Cowgate does lie in the city centre zone, it is a pollution trap and needs special treatment. Furthermore it is marked for pedestrian and cyclist priority in the Transformation proposals, and indeed is shown as cyclistroute on the main Transformation map. For all these reasons, this very narrow and constrained street should be free of motor traffic.

Q5 City Centre - vehicle types to be covered

- All

Q6 City Centre – grace periods

- The grace period of 1-year for public and commercial transport seems reasonable
- The grace periods for cars – 4 or 5 years – are too long

Q7 City Centre LEZ - impact

- We expect that the combined outcome of the Transformation and LEZ, once in place, will be a City Centre which is more pleasant to be in and which attracts more people, arriving by foot, bike, bus and tram. The sooner this happens the better, and so both policies should be implemented at as early a date as possible, and in particular with initial actions visible to the public soon.
- However, we are concerned² that if fossil fuel vehicles (FVs) are merely replaced by EVs, then whilst tailpipe emissions will disappear there will remain both toxic emissions (e.g. tyre wear) and climate emissions (embedded in vehicle and battery construction) and from any electricity generated by non-renewables. Furthermore, the 'place' and congestion benefits of cutting down on traffic intensity will not be achieved. Council should therefore be serious about its promised '**e-mobility**' policy rather than solely 'EV' policy: in particular *all* publicity, incentives and policies on FV->EV should incorporate publicity, incentives and policies on modal shift. See Minutes of 7.12.17 TEC³ [section 8, decision no.6 promising a *fully integrated e-mobility action plan*].

Part 2 – City-wide LEZ

Q8 City-wide LEZ boundary

- Agree

Q9 City-wide LEZ – vehicle types

- It is essential that the zone applies to all vehicle types, including cars, though more generous grace periods than for the city centre LEZ would be necessary [see Q10 below]
- Toxic pollution is known to be hazardous to health, with more and more evidence highlighting the unseen dangers. The Council must aim higher than merely achieving legal compliance with current standards.

Q10 City-wide LEZ – grace periods

- The proposed 3 years for public transport and commercial vehicles could be reduced somewhat – particularly given that only 1 year is deemed feasible for the city centre.
- There could be grace periods of different lengths according to the age or pollution-quotient of different vehicles. e.g. two or perhaps three different grace periods for cars of different vintages, with a particularly short grace period for the most polluting vehicles.

2 <https://www.theguardian.com/environment/2017/aug/04/fewer-cars-not-electric-cars-beat-air-pollution-says-top-uk-adviser-prof-frank-kelly>

3 http://www.spokes.org.uk/wp-content/uploads/2018/02/171207-Minutes_07.12.17.pdf