

Low Emissions Zone Consultation¹

Response from Spokes, September 2021

Spokes is supportive in principle of the City of Edinburgh Council introducing a Low Emissions Zone (LEZ). Levels of air pollution across Edinburgh are too high and need to be addressed urgently, particularly for the health of the most vulnerable in society such as children, elderly people, disabled people and people who have long-term respiratory conditions like asthma.

The urgency to address air pollution is heightened due to the fact that Scotland is in the midst of a respiratory pandemic, as well as in a global climate crisis. There has been a legal responsibility to meet the minimum safe levels of air pollution since 2010 - eleven years later we are still seeing dangerous levels of particulate matter across designated Air Quality Management Areas (AQMAs) around the city.

However, despite our support of a LEZ in principle, we must object to the current consulted-on proposals. We have a range of concerns about the LEZ as planned.

- The sunset period is too long - drivers won't be fined at all until 2024 - **fourteen years** after legal compliance should have been met for air quality levels.
- Restrictions are not ambitious enough - the LEZ will only apply within the city centre, which covers a tiny percentage of the overall

¹ <https://consultationhub.edinburgh.gov.uk/sfc/low-emission-zone/>

city. Living Streets Edinburgh has calculated this area to be approximately 2.5% of the city. Other areas of the city with AQMAs will be unlikely to see any benefit to air quality. Of the six declared AQMAs, only the City Centre will be tackled with these proposals. This is grossly unfair to people living in and around the St Johns Road, Great Junction Street, Glasgow Road, Inverleith Row and Salamander Street AQMAs, as well as other communities that face regular air quality issues.

- The proposed boundary runs the danger of increasing air pollution levels and generating more traffic along the peripheral roads as vehicles attempt to avoid the LEZ. We note from the June 2021 TEC report on the LEZ that the council officers state non-compliant vehicles are likely to do this, resulting in reduced air quality on the boundary streets. The fact that the area is small will make traffic displacement more likely, as the diversion distances are likely to be relatively small.
- We have concerns about implementation of the LEZ. We understand that ANPR will be used to enforce compliance along key thoroughfares, of which 16 access points will be addressed. However, the remaining 32 entry points are planned to be enforced by a single mobile unit. This seems woefully inadequate and is unlikely to deter non-compliant vehicles from accessing the city centre via non-arterial routes. This proposed enforcement strategy could ultimately increase rat running on these routes and do little to curb levels of pollution once non-compliant drivers are aware of the “loophole streets”.
- We regret the general lack of ambition with these LEZ proposals as a whole. An Edinburgh LEZ is a brilliant opportunity to knit together a range of policy objectives and transport-related behaviour change outcomes, but these proposals feel inadequate when looking at the

potential benefits an LEZ could offer. CEC should be aiming for much more than simply achieving legal compliance on levels of NO₂ within the city centre AQMA only, and using the LEZ as an opportunity to tackle other types of particulate matter such as PM₁₀, carbon emissions and vehicular domination across the entire city. These aims could be much better achieved with a city-wide LEZ, covering the full boundary of the local authority area.