

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 / 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)^{1 2}.

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;

¹ Transport and Travel in Scotland 2017 Table 16 Travel Diary Table TATIS 2017.xlsx

² 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.³

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.

³ <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.