

BUILDING SCOTLAND'S LOW EMISSION ZONES – A CONSULTATION: DRAFT RESPONSE BY CAMBUSLANG COMMUNITY COUNCIL

QUESTIONS	ANSWERS
Question 1 Do you support the principle of LEZs to help improve Scottish air quality?	YES. While the evidence on efficacy is slightly contradictory between individual schemes operating in different countries, the results (2017 analysis) from across a large number of LEZs in Germany are convincing with reductions achieved in both NOx and PM10 (including NO2 and black carbon).
Question 2 Do you agree that the primary objective of LEZs should be to support the achievement of Scottish Air Quality Objectives?	YES.
Question 3a Do you agree with the proposed minimum mandatory Euro emission criteria for Scottish LEZs?	YES.
Question 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?	INSUFFICIENT INFORMATION AVAILABLE. The information presented on the NMF and NLEF suggests that these tools are still at an early stage of development. It is confusing that examples are presented of 'bus-only' LEZs when this option is NOT proposed by the Scottish Government. Also, the robustness of such modelling needs to be verified by comparison of predictions with measured data.
Question 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?	YES. If practical, these should be included from the start of any schemes.

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Question 4 What are your views on adopting a national road access restriction scheme for LEZs across different classes of vehicles?	SUPPORT WITH CAVEATS. A national 'road access restriction' scheme is preferable to a 'road charging' one, but clearly consideration might have to be given to a limited number of justifiable exemptions e.g. commercial vehicles operated by approved charities.
Question 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?	SUPPORT WITH CAVEATS. The Scottish Government's preference for LEZs to be operated 24/7 all-year-round is difficult to justify considering the large diurnal, hebdomadal and seasonal variations in traffic-related air pollutants concentrations. Local authorities should be allowed to set their own 'LEZ operational hours' taking into account local traffic and related air quality patterns. These operational hours should be independently (re)assessed annually with an obligation for local authorities to take into account 'best results' from all localities in LEZ schemes.
Question 6 What are your views on Automatic Number Plate Recognition enforcement of LEZs?	SUPPORT. As suggested, the ANPR method offers the best chance of ensuring comprehensive compliance as opposed to a manual system using the police and/or wardens. More comprehensive data would also be accessible on traffic/engine mix.

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Question 7a What exemptions should be applied to allow LEZs to operate robustly?	DEPENDS ON OTHER DECISIONS. A large number of possibilities have been outlined in this section. Before consideration of such potential exemptions, the question of LEZ operational hours would need to be settled. Some exemptions would possibly not be necessary if operational hours were not too restrictive.
Question 7b Should exemptions be consistent across all Scottish local authorities?	NO. Each LEZ operating authority should be relatively free to determine exemption criteria. However, cross-authority collaboration on this should be encouraged.
Question 8 What are your views on LEZ lead-in times and sunset periods for vehicle types shown in Table 2?	SUPPORT. From existing LEZ schemes, there appears to be general agreement that a minimum 4-year lead-in period is needed which is reasonable. As far as sunset periods are concerned, a minimum of 3 years should be allowed post LEZ start for non-compliant, non-commercial vehicles owned by persons residing within the LEZ. The sunset period for all commercial vehicles should be no more than 2 years considering that owners would be aware of the new regulations for a much more extended period (i.e. lead-in included) to plan for vehicle upgrade or change to ensure compliance.
Question 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?	SUPPORT. This would be a vital component of the implementation strategy and reduce significantly the overall economic cost of implementing the LEZs. To that end, consideration should be given to cost control measures and 'MOT style' checks to ensure performance of retrofitted technology. Effective penalties should also be in place for discourage disconnection or bypassing technology for engine performance or fuel economy reasons.

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Question 10 How can the Scottish Government best target any funding to support LEZ implementation?	<p>DEPENDS ON OTHER DECISIONS. Given the current budget constraints of local authorities, clearly additional funding for implementing and operating LEZs will have to come from the Scottish Government in one form or another. At this stage asking ‘how much will be required’, is like asking ‘how long is a piece of string’! Apart from the geographical extent of each LEZ, many other issues will have to be quantified before the requirements can be estimated e.g. which vehicle owners with legitimate reasons for entering an LEZ should be subsidised for vehicle upgrade or replacement.</p>
Question 11 What criteria should the Scottish Government use to measure and assess LEZ effectiveness?	<p>USE EXISTING AIR QUALITY MONITORING CRITERIA. The proposal to build on the existing network of air quality monitoring stations in the proposed LEZs and contiguous localities is sensible. The robustness of the modelling process needs to be tested thoroughly as some of the benefits of the LEZ - according to the results on reduced pollutant concentrations from schemes in operation on the continent – might be somewhat marginal (<5%).</p>
Question 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?	<p>CONSULTATION WITH THE COMMUNITY – NOT JUST VEHICLE OWNERS - IS CRITICAL. The various measures proposed in the ‘Communications’ section are comprehensive. It will be important to define the ‘catchment population’ which includes those residing in the LEZ area and contiguous localities, and also in other nearby localities with significant traffic flows to and from the LEZ. It will also be important to engage with, and where appropriate fund, local (grass-roots) bodies such as Community Councils, campaigning groups and interested voluntary organisations to ensure that important messages reach as wide an audience as possible.</p>

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Question 13 What actions should local or central government consider in tandem with LEZs to address air pollution?	LEZ NEED TO BE PART OF WIDER STRATEGY. Air quality depends on a multiplicity of factors, and measures will be required to address problems which potentially may arise in locations outside of any designated LEZs. Apart from transport-related origins of many pollutants (NOx - 39% of total; PM10 - 16%; PM2.5 - 35%; SO2 - 3%; NH3 - 2%; CO - 30%), minimising those arising from agricultural, industrial and domestic sources need to be considered and appropriate actions – advisory or regulatory - initiated.
Question 14 How can LEZs help to tackle climate change, by reducing CO2 emissions in tandem with air pollution emissions?	LEZ NEED TO BE PART OF WIDER STRATEGY. The national climate change objectives are hardly likely to be affected significantly by the establishment of 4 geographically limited LEZs in Scotland. More wide-scale interventions will be required e.g. improved, efficacious fuel additives and catalytic converters, and large scale shift to electric vehicles.
Question 15 What measures (including LEZs) would make a difference in addressing both road congestion and air pollution emissions at the same time?	LEZ NEEDS TO BE PART OF WIDER TRAFFIC CONGESTION STRATEGY. Traffic management measures to reduce congestion should include a system for notifying motorists in real time (through on-board GPS systems, possibly) of en route congestion points and, where practical, give advice on alternative routes. Wider use of smart traffic light systems and enforcement of laws on engine idling at traffic lights, junctions and outside schools. Also care should be taken to ensure that the growing trend of introducing 20mph zones in cities does not give rise to negative consequence of increased NOx pollution.

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Question 16 Do you have any other comments that you would like to add on the Scottish Government's proposals for LEZs?	MUCH STRONGER ENCOURAGEMENT FOR A SWITCH AWAY FROM CAR TRAVEL. Further consideration should be given to incentivising travel by public transport and via active travel. In addition within inner city areas, especially LEZs, a large scale expansion on pedestrian only precincts should be planned and implemented along with free 'hop-on-hop-off' public transport. Provision for cycling should be upgraded with 'cycling superhighways' on all commuting routes, and school catchment areas.
Question 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?	IMPACTS ON HEALTH ARE MOST RELEVANT. This question does, in general, not appear to be particularly relevant to the issues under consideration. The LEZ measures proposed ought to benefit all groups if these can be successfully implemented. However, the benefits should be greatest to groups suffering from health conditions related to asthma, bronchitis and other lung diseases; many of the poorer people in our society live on or close to busy and congested roads / junctions.
Question 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?	INSUFFICIENT INFORMATION TO ANSWER. The answer to this question will depend on the results of the planned Regulatory and Business Assessment. Mere speculation at this stage would not be helpful.

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Question 19 What impacts do you think LEZs may have on the privacy of individuals?	IMPACTS UNCLEAR. Likewise, it is planned to undertake a Privacy Impact Assessment. At this stage the full range of LEZ interventions is not settled, so again any comments must be viewed as speculative. The introduction of any public monitoring system, particularly when linked to legal/regulatory systems, always calls into question whether there is adequate justification for any associated infringement of individual privacy.
Question 20 Are there any likely impacts the proposals contained in this consultation may have upon the environment?	POTENTIALLY VERY POSITIVE. The Environment Impact Assessment will need to consider the impact of all the specific LEZ technical measures it is proposed to implement. Given that most of these are aimed at improving the overall environment – especially air quality – it is likely that positive impacts will significantly outweigh the negative ones.