



CORSTORPHINE COMMUNITY COUNCIL – Deputation to City of Edinburgh Council’s Transport & Environment Committee 27 January 2022

The Corstorphine Community Council wishes to make the following deputation to the City of Edinburgh Council’s (CEC) Transport and Environment Committee (TEC) as our residents are affected by -

7. Executive Decisions

7.4 LEZ
Carbon
Impact –
Report
by the
Executive
Director
of Place

Which is being discussed by Committee members at the TEC meeting on 27 January 2022.

Corstorphine Community Council’s efforts to engage in the deliberations around the proposed Low Emission Zone (LEZ) span several years and the two most recent deputations on this issue are appended at ANNEX A and ANNEX B. The City Council’s position on this proposal remains unchanged as does our principled opposition to the LEZ in its current iteration being advanced. I would make the following further comments.

- In our last deputation I asked that relevant City Council officers engage with Corstorphine Community Council before the LEZ returned to the Committee for consideration. Officers have made no attempt to do so. Indeed, the Community Council was not given any intimation that the proposed LEZ would return to the January 2022 TEC meeting. This demonstrates a contempt and disregard for the Community Council’s statutory (legal) responsibility for community planning. As the Director of Place is aware the Edinburgh Association of Community Councils (EACC) is proactively engaging with City Council officers who are acting on behalf of the Edinburgh Partnership to ensure such behaviors by officers are eradicated. This is an example of undermining the new ethos of trust we are seeking to engender.
- At the most recent meeting of the Edinburgh Partnership Board which I attended as Chair of the EACC the Leader of the City Council asked me whether the EACC would declare a Climate Emergency. This follows Merchiston Community Council having recently done so. Councillor Susan Rae then questioned our commitment to the Net Zero 2030 agenda. Achieving Net Zero 2030 in Edinburgh by 2030, a mere eight years away, is a Herculean task. It is galling to be challenged on the Community Council's commitment to this task while the City Council advocates an inadequate LEZ to address local pollution issues and that will, as previously highlighted, exacerbate an existing public health issue.



The Corstorphine Community Council will consider whether to submit an official objection to the proposed LEZ during deliberations at our next scheduled meeting on 15 February 2022. The EACC will consider declaring a Climate Emergency and whether to submit an official objection to the proposed LEZ at our scheduled meeting on 17 February 2022.

While recognising that we may have exhausted appealing to reason, we again reiterate our wish to engage with City Council officers on extending the boundary of the LEZ to encompass West Edinburgh.

STEVE KERR

Chair

Corstorphine Community Council

&

Chair

Edinburgh Association of Community Councils



·CORSTORPHINE·
Community Council



ANNEX A

CORSTORPHINE COMMUNITY COUNCIL – Deputation to City of Edinburgh Council’s Transport & Environment Committee 27 January 2022

The Corstorphine Community Council wishes to make the following deputation to the City of Edinburgh Council’s (CEC) Transport and Environment Committee (TEC) as our residents are affected by -

7. Executive Decisions
 - 7.1 [Low Emission Zone - Consultation and Development](#)

Which is being discussed by Committee members at the TEC meeting on 26 October 2021.

The Corstorphine Community Council (CCC) has made several representations to the Committee in respect of the proposed Low Emission Zone (LEZ), most recently in the consultation response at ANNEX A. The response from City Council officers to the points raised in our submission was inadequate and did not respect CCC legal role as Community representatives. In addition to engaging with the TEC Convenor & Deputy Convenor and City Council officers we have hosted the members from the relevant Scottish Parliament Committee. We have consistently argued in favour of the introduction of an LEZ and against an LEZ whose boundaries exclude West Edinburgh. At a recent meeting of the Edinburgh Association of Community councils (EACC) which I Chaired -

- City Council officers are on record conceding that the ‘ring’ around the LEZ will see increase emission levels. This includes the already highly polluted West of Edinburgh containing St. John’s Road and Queensferry Road.
- City Council officers volunteered that the decision to have a limited LEZ is not predicated on the amount of funding received from the Scottish Government. This does not seem credible given that the proposed LEZ has a reported shortfall of £400,000 to be met by the City Council.
- Further City Council officers confirmed that this is not a staged process and that the boundaries of the LEZ will not be extended in the future.

The elected representation of West Edinburgh – MP, MSP, City Councillors (irrespective of political party) and Community Councillors are unanimously opposed to an LEZ that does not extend to the West of the City. At a time when the City Council is soliciting resident support for its Net Zero 2030 Strategy it is incongruous to spurn one of the most heavily populated area of Edinburgh. And this is before the significant housebuilding that has commenced and is planned for the West.



It would be a dereliction of duty to our residents if CCC did not vigorously oppose the LEZ in its current iteration. Consequently, we will record an official objection to the proposed LEZ and work with colleagues and other interested and concerned partners to lobby for an LEZ that makes sense.

We are keen to work with City Council officers on a revised and extended LEZ and sincerely hope the Committee will direct them to do so.

STEVE KERR

Chair

Corstorphine Community Council

&

Chair

Edinburgh Association of Community Councils



ANNEX B

Corstorphine Community Council submission to the consultation on Edinburgh's Proposed Low Emission Zone

Introduction

Corstorphine Community Council (CCC) represents the views and concerns of residents in the Corstorphine area of Edinburgh. It is one of the largest community councils in the city, covering the areas of Carrick Knowe, Forrester, Gyle, Maybury and the historic Corstorphine village. We would like to respond to City of Edinburgh Council's (CEC) Low Emissions Zone (LEZ) consultation, as its contents and themes have the potential to improve the local area for residents.

Residents in the Corstorphine area have ongoing concerns about poor air quality, congestion, and traffic domination. CCC and residents would like Corstorphine to be a safe, friendly, and inviting place to live but too often elevated levels of traffic make getting around difficult, especially for vulnerable people in the community, including families with small children, elderly people, and people with disabilities. Poor air quality in our community disproportionately impacts the young and old and those with pre-existing medical conditions and disabilities.

CCC has the unenviable task of dealing with one of the most polluted streets in Scotland. St Johns Road in Edinburgh is a huge air pollution hotspot, evidenced by multiple years of data and an active AQMA. It has regularly received the annual top spot on the "most polluted streets" list. The community must deal with health impacts, detriment to the local environment and economic impacts as the current mechanisms in place to deal with air quality are inadequate

The Community Council hosted a visit by the Scottish Parliament's Environment, Climate Change and Land Reform Committee. The Committee who was producing a report on poor air quality in Scotland singled out Corstorphine to the exclusion of other areas nationally for attention and comment as St. John's Road had the unwanted epithet of 'the most polluted street in Scotland.' During their visit, the Committee interviewed residents who had contracted health issues such as respiratory complaints due to living in proximity to St. John's Road. Recommended follow up work involving investigating such cases with local health centres did not take place.

The Community Council has also hosted representatives of the City Council's Transport and Environment Committee at one of regular monthly meetings to discuss action on pollution issues, particularly around the proposed LEZ for Edinburgh. The passionately felt message that was delivered was that any LEZ for Edinburgh must include the West encompassing St. John's Road and Queensferry Road.

CEC has a legal and moral duty to combat air pollution. LEZs have been shown to be the most effective way to mitigate air pollution from transport by UK Government research.¹ LEZs are sixty times more effective than a scrappage scheme and are the quickest and most cost-effective way to tackle the problem.

Air pollution is a public health issue that needs to be addressed urgently. Poor air quality is an equality and social justice issue. There is a positive relationship between air quality and social deprivation, with the poorest communities more likely to be disproportionately impacted.²

Air pollution is mostly contributed by road traffic. In 2020 in Edinburgh, half of the city's population used a private car as their main form of transport,³ and single occupancy journeys accounted for over two thirds of all car journeys. Data shows that more than half of all car trips were 5km or less, and 20% of all journeys were 1km or less.⁴ For most people, these short distances can be easily managed by foot, bus, and cycle.

1. https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Technical_Report_Amended_9_May_2017.pdf
2. Building Scotland's Low Emissions Zones – A Consultation, Transport Scotland, 2017



3. <https://www.edinburgh.gov.uk/downloads/file/29314/edinburgh-by-numbers-2020>
4. Transport and Travel in Scotland 2016, (26 September 2017)

Elevated levels of car use in Corstorphine not only contribute to poor air quality, but cause detriment through noise pollution, reduction of community cohesion, reduced street safety, congestion, social isolation and all the corresponding negative economic impacts. It is vital that CEC prioritises modal shift away from private vehicles and towards more efficient and healthier modes of transport. The roll out of LEZs can support modal shifts to less polluting transport modes.

The decisions taken from this consultation can significantly contribute to Corstorphine residents' quality of life, and implemented well, they can support several CEC and Scottish Government policies, including CEC's City Centre Transformation and City Mobility Plan, the Active Scotland Delivery Plan, the Climate Change Plan and a range of associated carbon reduction targets, the National Walking Strategy, the National Biodiversity Route map, and the Cycling Action Plan for Scotland.

To what extent are you in favour of the Edinburgh LEZ as proposed?

We find ourselves in the position of being entirely supportive of the introduction of an LEZ and adamantly opposed to the current proposal. It is telling that the Community Council and our elected representatives from both local and national legislatures have had differing views on measures that have been introduced by the City Council over the last two years. However, there is unanimity on the view that an LEZ is desirable and should encompass the West of Edinburgh.

The city centre LEZ is too small. Ideally the Community Council would like to see one LEZ boundary which covers the city boundary of Edinburgh and includes private cars as well as all other vehicle types.

The concern of the city centre LEZ that CEC proposes is that private vehicles are displaced from the city centre and further contribute to air quality issues on surrounding streets as they negotiate the city centre LEZ boundaries.

The CEC Air Quality Evidence Report demonstrates this risk - figure 25 in the report shows where private vehicles are currently causing between 40% to 67% of total NO_x emissions.⁵ The illustration shows just how detrimental private diesel car use is for air quality in and around the city centre. The report also shows the impact city-wide from private diesel cars in figures 16, 22 and 28 in particular - these vehicles' contribution to air pollution is significant and needs to be addressed as a priority. A city centre LEZ as proposed by CEC will not solve this problem.

The CEC Air Quality Evidence Report is clear in its findings:

Non-Bus Commercial vehicles and Cars create a similar level of air quality impact, particularly within the Central AQMA. Whilst this analysis has been performed for NO_x rather than NO₂, it does indicate which sources are likely to be responsible for high NO₂ concentrations in the city.
Air Quality Evidence Report, p2

We note that the Air Quality Evidence Report has been removed from the CEC website - is there a reason for its removal? It was previously accessible [on this link](#) and we feel it is an important body of evidence which should help inform decisions for the LEZ going forward.

5. Air Quality Evidence Report - Edinburgh, p 31.



As well as the above, why a city centre only system has been proposed is unclear to CCC and its residents, who are quite rightly disappointed that this LEZ proposal will do little to curb levels of air pollution in the local community. The city centre LEZ is likely to do little to mitigate the current toxic levels of air pollution that is experienced regularly in Corstorphine, as it does not restrict polluting vehicles from using roads in our local area.

An Edinburgh LEZ should be aiming for much more than simply achieving legal compliance on levels of NO2. Local authorities set their own objectives and all the Transport Bill (in its current form) says is that local authorities' objectives "*must include an objective of contributing towards meeting the air quality objectives prescribed under section 87(1) of the Environment Act 1995.*"⁶ There is nothing stopping CEC having broader, longer-term aims on air quality, whilst also having the one objective stipulated in the Bill.

To what extent are you in favour of the boundary for the LEZ in Edinburgh as proposed?

We do not support and think that there should be a city-boundary LEZ in its stead. The proposed LEZ boundaries do not consider the residential and commercial development to the west of the city (Cammo, West Craigs, Garden District, Crosswinds etc),⁷ which will undoubtedly increase traffic and air pollution for residents and workers in the area. CCC would like the LEZ boundary to take these new developments into consideration as part of its implementation.

At a recent meeting of the Edinburgh Association of Community Councils, City Council officers attending the meeting conceded that emission levels in the areas in the 'ring' created around the proposed LEZ boundary would increase. For all the reasons stated above we cannot support the proposed boundary for the LEZ as this will exacerbate health and environment issues that are already unacceptable.

6. [https://www.parliament.scot/S5_Bills/Transport%20\(Scotland\)%20Bill/SPBill33AS052019.pdf](https://www.parliament.scot/S5_Bills/Transport%20(Scotland)%20Bill/SPBill33AS052019.pdf) P.4 + 5. 9 Subsection. (1) (c) and subsection (4)
7. <https://www.edinburghnews.scotsman.com/our-region/edinburgh/10-000-new-homes-in-pipeline-for-west-of-edinburgh-1-4900344>



To what extent are you in favour of this approach which applies the grace period equally to residents, non-residents, and all vehicle types?

We are supportive of this approach.

Which of the following best fits your views on the length of the grace period?

We feel that the grace period is too long because legal compliance of air quality should have been met in 2010. We are already eleven years behind the curve - it is not acceptable that the residents and visitors of Edinburgh should be waiting until 2024 to see legal air quality levels met, especially when we are in the middle of a respiratory pandemic.

Overall, to what extent are you in favour of this local exemption approach?

We support the proposed exempted vehicles.

Steve Kerr
Chair
Corstorphine Community Council