

Transport and Environment Committee

10.00am, Thursday, 31 March 2022

Low Emission Zone – Objections Report and Final Submission

Executive/routine	Executive
Wards	All
Council Commitments	18

1. Recommendations

- 1.1 The Transport and Environment Committee is asked to:
 - 1.1.1. Acknowledge that this report responds to the actions approved by Committee on 27 January 2022; to commence the Statutory Notice Period during which formal objections to the Low Emission Zone (LEZ) Scheme Proposal could be made and to progress Scheme development;
 - 1.1.2. Note that the Statutory Notice Period has now been completed in accordance with statutory requirements, and consideration of the objections received has been undertaken;
 - 1.1.3. Agree that after full consideration of the objections, no changes to the Scheme could be justified, therefore the objections should be set aside;
 - 1.1.4. Agree to proceed with the Scheme and submit the Final Submission to the Scottish Ministers for approval, as per statutory requirements; and
 - 1.1.5. Agree to delegate powers to the Executive Director of Place to 'Make a Low Emission Zone' should Scottish Ministers approve the LEZ, prior to 31 May 2022.

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Executive Director of Place

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Low Emission Zone – Objections Report and Final Submission

2. Executive Summary

- 2.1 This report follows up on actions approved by the Transport and Environment Committee on 27 January 2022. It provides a summary of and responses to objections received following publication of the Council's LEZ Scheme Proposal ('the Scheme'). This is a pre-requisite step before a local authority may seek approval from Scottish Ministers to 'Make a Low Emission Zone Scheme'.
- 2.2 The Statutory Notice Period was undertaken from 1 February to 1 March 2022 in accordance with the [Transport \(Scotland\) Act 2019](#) ('the Act'), [The Low Emission Zone \(Scotland\) Regulations 2021](#) and [The Low Emission Zone \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#) ('the 2021 Regulations'). Following this Statutory Notice Period, changes to the Scheme in response to the objections received may be recommended or the Council can continue with the Scheme as presented if no changes can be justified. If Committee and/or Scottish Ministers disagree with recommendations, they can request an examination of the Scheme.
- 2.3 A total of 26 objections and one note of support was received. Overall, objections generally focused on the following themes; size and location of the boundary, impacts of traffic displacement and the potential financial impacts for individuals and businesses to ensure that they could comply with the Scheme. Some objections also included concerns around the evidence base which underpins the Scheme, the consultation and engagement process, exemptions, the need for a LEZ at all, and the cost of its operation.
- 2.4 On consideration of the objections, no changes to the Scheme can be justified. However, measures to mitigate potential impacts of traffic displacement along with ensuring awareness of the funding support for upgrading vehicles and switching to more sustainable modes of travel have been reiterated. A process for assessing requests for local time-limited exemptions has also been set out.
- 2.5 Overall, therefore it is recommended that all the objections be set aside.
- 2.6 Should Committee approve the recommendations in this report, the Scheme, as summarised in Appendix C, will be submitted to Scottish Ministers for approval in order to take steps to 'Make a LEZ', as per the Act and the 2021 Regulations

- 2.7 The report also updates Committee on the potential financial impacts to the Council.
- 2.8 It is also intended that, if approved, the LEZ will constitute a significant action in the forthcoming revision of the Air Quality Action Plan to reduce nitrogen dioxide. The Council will be obliged to undertake a statutory consultation in respect of the Plan, which will aim to reduce emissions across the City. The revised Plan will be presented to Committee in summer 2022 prior to commencing consultation.

3. Background

Statutory Notice Period

- 3.1 A Statutory Notice Period to advertise the Scheme commenced on 1 February and ran for 29 days, to 1 March, just exceeding the 28 day minimum requirement as outlined in the [Transport \(Scotland\) Act 2019](#) ('the Act') and [The Low Emission Zone \(Scotland\) Regulations 2021](#) and [The Low Emission Zone \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#) ('the 2021 Regulations').
- 3.2 Over 600 on street bills were affixed at prominent positions, across streets within the proposed LEZ boundary and maintained throughout the period. Notice advertisements were published in two local newspapers and physical copies of the proposed Scheme, including relevant documentation, were also made available in the City Chambers for inspection. Appendix A contains evidence of the various methods used to publicise the Notice Period.
- 3.3 Statutory consultees were approached directly to inform them of the Notice Period, the objection process and to direct them to evidence documentation.
- 3.4 During the period, Transport Scotland's communications campaign widely advertised the national LEZ campaign in Edinburgh which included TV advertisement, digital displays and advertising on Lothian Buses.

4. Main Report

Objections

- 4.1 A total of 27 written submissions were received during the Statutory Notice Period to advertise the Edinburgh LEZ Scheme.
- 4.2 One submission was clearly in support of the Scheme with the other 26 considered as objections to the Scheme. Although some were clearly defined as objections, others were more queries of a practical and personal nature. Email responses have been provided to these enquiries, where possible.
- 4.3 One objection was a petition from an individual, however it did not meet the criteria to be recorded formally as a petition, as it did not provide full names of signatories or confirm that signatories were over 16 and lived in Edinburgh. The concerns raised by the objector include the concept of LEZs, the Scheme boundary size and

the wider issue of traffic management due to city centre development. These concerns are addressed within this report and the Objections Report (Appendix B).

- 4.4 All objections are summarised in the Objections Report at Appendix B, which will be submitted to Scottish Ministers as part of the Final Submission. General objection themes are summarised in table 1, below:

Table 1 Summary of Objection Themes	
Boundary	Need for the Scheme Operational cost Vehicle types / Emission Standards Carbon Dioxide Emissions
National and local exemptions	
Impact on Individuals and Businesses	
Evidence Base	
Consultation & Legal Process	

- 4.5 17 of the submissions represented individuals and nine were from businesses or organisations.

- 4.6 The following part of the report details the Council's response to the objections received by way of these themes, although further details on specific boundary issues are included in Appendix B.

Boundary

- 4.7 The most common theme of objection related to the Scheme boundary; predominately in relation to its size and potential future traffic displacement impacts. Comments also raised concern that individuals' and childrens' health and wellbeing could be adversely impacted due to the potential increase in polluting traffic diverting around the boundary (also see Impacts on Individuals & Businesses and Evidence Base sections.)
- 4.8 Objectors who raised a boundary issue indicated preferences for a boundary at various spatial scales, including an Extended Urban Area, and larger or smaller City Centre boundaries, compared to the Scheme boundary. Some concerns were also raised about the cumulative impact of transport and planning related development in the city and its impact on the City Centre.
- 4.9 The National Modelling Framework (NMF), which was devised to provide consistency in evidence across Edinburgh and the other cities implementing LEZ (Aberdeen, Dundee and Glasgow), showed that although there could be localised impacts in the West End area, these were short-lived. Further appraisal work concluded these concerns did not outweigh the benefit of the scheme overall.
- 4.10 Air quality modelling and assessments of pollutant concentrations by schools (including Preston Street Primary School) and nurseries provided evidence that adverse impacts were not anticipated in these areas
- 4.11 The Options Appraisal work undertaken in accordance with the National Low Emission Framework (NLEF) considered several boundary options, as presented to

Committee in June 2021. In this Appraisal, an Extended Urban Area boundary and a smaller City Centre boundary were examined. Both of these options were excluded due to evidenced air quality impacts around the Central Air Quality Management Area. Evidence indicates air quality benefits of a City Centre LEZ would extend beyond the immediate boundary. In appraising options, proportionality in Scheme design and overall benefits was a key principle in cognisance of all the Scheme's objectives and socio-economic impacts.

- 4.12 Minor alterations to the proposed city centre boundary were also explored following agreement by Committee in October 2021 to explore the Scheme's contribution to reducing greenhouse gas reduction, including changes in the west, south-east and north-east of the boundary. This work also concluded that no changes to the boundary could be justified.
- 4.13 It should also be noted that there are two objectives of the LEZ Scheme which relate directly to the implications of the LEZ boundary. These are;
 - 4.13.1 Minimise the impact from traffic displacement across the city's transport network, related to the LEZ Scheme; and
 - 4.13.2 Strategically align with the Council's sustainable transport, active travel and placemaking objectives.
- 4.14 In respect of these objectives and previously raised concerns about traffic displacement, Committee has also agreed to the development of a Network Management Strategy (NMS). Officers will continue to consider all feasible and proportionate options for the NMS and will recommend suitable changes on an evidence-driven basis. Officers will also engage with key stakeholders, including Community Councils, in the development and delivery of the NMS. The NMS would be delivered under the appropriate environmental impact legislation as per the Strategic Environmental Assessment.
- 4.15 Strategically aligning the LEZ with the Council's sustainable transport and placemaking plans will also ensure that traffic management and improving the environment within the City Centre is at the core of the LEZ.
- 4.16 A LEZ annual progress report on the operation and effectiveness of the Scheme is required by the Regulations. This will link to a robust monitoring regime that will inform the NMS and may cover public transport journey times, traffic surveys and public opinion surveys as well as the Council's well-established air quality monitoring network.
- 4.17 Other wider elements of the LEZ Scheme implementation will also assist with addressing concerns that have been raised about the boundary, as detailed below.
- 4.18 During the grace period, the communication and signage strategy will be implemented. Statutory entry/exit signs are required at the LEZ boundary and early warning signs may be placed on key routes leading to the LEZ, at the discretion of the Council. A communications and engagement campaign will focus on promotion of support funds available for adapting to the LEZ and will promote the benefits of cleaner air and use of sustainable travel.

- 4.19 In conjunction with the 2021 Regulations and associated guidance, Automatic Number Plate Recognition cameras and Mobile Enforcement Vehicles will be utilised as the basis of enforcement on the boundary. The Council's Local Enforcement Strategy, previously considered by Committee, aims to meet financial best value principles, minimise unnecessary costs where possible and be flexible, so that equipment can be adapted to meet the evolving needs of the Scheme or for different purposes as needs change over time. In the first instance synergies with the Public Space CCTV network upgrade, which is part of Smart Cities Scotland, is being explored.
- 4.20 In conclusion, the Council officers have carefully considered the objections received with respect to the boundary and have concluded that no changes can be justified given the rationale, analyses and evidence that have been used to develop the LEZ Scheme.

National and Local Time-Limited Exemptions

- 4.21 Some objectors made comments about the national exemptions; however, as these are prescribed in the 2021 Regulations; the Council has no powers to amend them.
- 4.22 Objections received around local 'time-limited' exemptions tended to relate to individuals' personal circumstances, for example in relation to accessing the LEZ for night-shift work, or the impact on those with hidden disabilities.
- 4.23 Granting local exemptions, in addition to the national exemptions, risks undermining the overall benefits of the Scheme. The Council's proposed approach to date is to ensure that local exemptions would only be issued or permitted on a case-by-case basis and only in exceptional circumstances. It is unlikely that these criteria would apply to situations of a personal nature.
- 4.24 The Scottish Government provides [LEZ Support Funds](#) to help mitigate adverse financial impacts of Scotland's LEZs for eligible applicants. The availability of these funds will help off-set the impact of the Scheme for such eligible persons. On balance, this is considered to provide a reasonable safeguard (refer to the Integrated Impact Assessment at Appendix D for more details).
- 4.25 One objection relating to a hidden disability requested that consideration of a local exemption was necessary as they did not possess a blue badge. The Council's LEZ webpage on exemptions has now been updated to link to the Council's blue badge webpage, to encourage eligible individuals to explore whether they could apply for this national LEZ exemption. All applications for blue badges will be considered according to national policy and may be applied for on the [Council's dedicated webpage](#).
- 4.26 Taking account of the objections received and previous consultation feedback, it is recommended that Council officers establish a LEZ Local Exemption Advisory Panel (LEZ-LEAP). This panel will meet quarterly as part of the Council's LEZ Delivery Group and will consider requests for local time-limited exemptions.

4.27 Overall, taking account of recommendations to establish a LEZ-LEAP, and national exemptions and support funds in place, the Council does not consider that objections relating to the proposed local exemption approach can be upheld.

Impact on Individuals & Businesses

4.28 Some of the objections received related to the impact on individuals and businesses and tended to raise issues which were financial in nature and related to the cost of complying. One objection raised a concern about the accuracy of the Integrated Impact Assessment (IIA) as it was suggested that it understates the negative air quality and health impact of the traffic diverted along the boundaries, particularly on children.

4.29 The IIA helped inform the final design of Edinburgh's LEZ by presenting potential impacts arising from its introduction. It considered a range of consequential impacts and assessed them on equality, human rights (including the rights of children and young people), the environment and climate change. The IIA utilised the NHS Lothian II A guidance as an effective mechanism for meeting requirements of the NLEF and the Equality Act 2010 (Specific Duties) (Scotland) 2014.

4.30 The IIA concluded that the LEZ has the potential to cause a range of positive and negative impacts, from improving health of society to potentially reducing access to the city centre for those who rely on private vehicle transport. The most significant impact of the LEZ will be the improvement in air quality and the resulting health benefits to residents, visitors and workers. The LEZ also has a potential positive health impact through encouraging the use of active travel and public transport for certain trips and changing existing travel behaviours.

4.31 Given the focus of the IIA to consider how protected groups are potentially differentially affected, there are instances where the LEZ could disproportionately affect some groups in society. For example, those who have a diminished ability to upgrade to a compliant vehicle due to low income, including people on benefits, single parents, or disabled people. The assessment concluded that, despite the health benefits, protected members of society can be negatively impacted by the LEZ but that these impacts can be removed or mitigated through considerate decision making at national and local level.

4.32 Nationally, the LEZ Support Fund, retrofitting schemes and exemptions outlined in the 2021 Regulations all seek to reduce negative impacts of LEZs. In addition, the locally applied 2-year grace period will help mitigate the impacts, allowing additional time for residents and businesses to adapt or comply with LEZ requirements.

4.33 Working in partnership with the Scottish Government and Transport Scotland, the Council has developed a Scheme whereby any potential negative impacts are considered to be minimised.

4.34 Overall, taking account of objections relating to impact on individuals and businesses and support funds available, the Council does not consider that objections relating to impact on individuals and businesses can be upheld.

Evidence Base and Modelling Uncertainty

- 4.35 Some objectors made comments on modelling uncertainty, one commented about the removal of monitoring equipment and a comment was also made on the accuracy of the IIA.
- 4.36 The Council has worked in close partnership with the Scottish Environment Protection Agency (SEPA), Transport Scotland and the Scottish Government to assist in the success of the National Modelling Framework (NMF), to provide the quantitative evidence for assessing criteria for LEZ development, as a standard across the whole of Scotland.
- 4.37 The four-cities NMF models have relied on accurate, high quality, local fleet composition data and up-to-date emission factors, to build a robust evidence base. The NMF approach ensured that data was collected over a sufficiently large area to inform the model build and collect detailed vehicle categorisation information. The NMF model outputs have been produced at a resolution that offers evidence derived from accurate and insightful information, which also included future prediction modelling to evaluate the impact of natural and planned improvements to the fleet.
- 4.38 The outputs and predictions made within any model are subject to uncertainty, however methods and testing can be applied to limit this, including a verification process where monitoring data is used to check the model performance.
- 4.39 SEPA worked with University of Glasgow and University of Bergamo on methods to help address model uncertainty. This utilised a statistical technique to describe the behaviour of the model and resulted in implementing methods to establish the risks posed to predictions from uncertainty with a number of factors e.g. future emissions, meteorological conditions. This formed the basis of the NMF approach, which has been peer-reviewed and consistently applied across the four cities implementing LEZs in Scotland. With the local Edinburgh model, the verification process found the model performed well.
- 4.40 In conclusion, the uncertainties have provided minimal risk to the accuracy of the results and the best available evidence has been available through the NMF process to support decision-making. Therefore, the objection cannot be upheld.
- 4.41 The concerns raised over the IIA relate to comments on health and wellbeing of children from Preston Street Primary School. This school is located on the boundary, and concerns raised suggested a stronger focus should have been placed on the rights of children in the assessment. As mentioned above, the IIA takes into account all impacted groups and in light of the modelling research carried out, the Council does not consider that the LEZ will have adverse impacts on children.
- 4.42 Further engagement has been carried out with Preston Street Primary School Parent Council and colleagues in Road Safety regarding traffic calming measures outside the school that should also provide benefit and reassurance to parents.

- 4.43 The Council has undertaken significant traffic surveys and a review of the air quality monitoring network which has predominately involved additional monitoring, to help develop the NMF modelling work and provide baseline information for assessment of any future impacts. In conjunction with partners, including SEPA and Transport Scotland, these surveys and monitoring regimes will continue, part in response to the requirement to report on the effectiveness of the LEZ, but also in response to the Council's statutory duties to review and assess air quality on an annual basis (the Local Air Quality Management regime).
- 4.44 Overall the Council does not consider that objections in respect to the evidence base and modelling, can be upheld.

Consultation, Engagement and Legal Process

- 4.45 Some of the objections raised matters related to the consultation and engagement process for the development of the Scheme. These can be broken down by referring to the consultation period, transparency of results, previous comments made by organisations that were perceived not have been addressed, disenchantment with level of engagement in affected communities, and a request for a referendum on the Scheme.
- 4.46 There was a comment made in relation to the online advertising of the Statutory Notice Period as well as the posting of the notices on the street. Despite concerns, the advertised period was one day above the minimum required by statute and the Council did not receive any late submissions. All objections or comments received were reviewed and assessed.
- 4.47 The 2021 Regulations and associated guidance were clear about the consultation process and engagement and the Council ensured the process was followed correctly, including the siting of notices (see Appendix A). A Consultation Statement as required by the 2021 Regulations was published as part of the Statutory Notice Period.
- 4.48 Overall, the Council does not consider that objections in respect to consultation, engagement and legal process, can be upheld.

Need for a LEZ

- 4.49 Some objectors raised concerns that, overall, a LEZ is not needed.
- 4.50 The commitment to deliver LEZs across the four cities was established in Scottish Government's Programme for Government 2017/18. Transport Scotland's 'LEZ Post-COVID Uncertainty' Briefing Note also reinforces the continued need for LEZs, even considering the impact of the pandemic.
- 4.51 Evidence confirming the need for a LEZ in Edinburgh has been set out in previous committee reports and as part of the Statutory Notice process. A 'Statement of Reasons – Why Edinburgh Needs a Low Emission Zone' was published as part of the Statutory Notice Period, the main elements of which can be summarised as follows:

4.51.1 Air Quality – Improving Health and Wellbeing. The Council has a statutory duty to review and assess air quality and ensure measures are implemented in areas where Air Quality Objectives are not being met. The city centre has the greatest magnitude of traffic related pollution problems and breaches of statutory objectives and the LEZ will accelerate vehicle compliance with the national emission standards to improve air quality and public health;

4.51.2 The Council declared a Climate Emergency in 2019 setting a vision for Edinburgh to be net carbon zero by 2030. Meeting this target and adapting to the impacts of climate change will require system-wide and transformational change across all sectors of the city. The LEZ will play an important role in accelerating behaviour change towards more sustainable forms of transport and cleaner vehicle technologies; and

4.51.3 Sustainable Transport – Creating an Accessible, Efficient and Active Transport network. A LEZ is a key deliverable of the CMP and will help to incentivise the use of more sustainable, low emission travel modes. The Council's target to reduce car kms by 30% by 2030 requires a whole toolkit of measures, of which a LEZ will play an important role.

4.52 Nationally, Transport Scotland in partnership with local authorities have been running the 'Get Ready for LEZs' campaign. Previous committee reports confirmed that an analysis of the Edinburgh fleet composition showed that there were significant improvements already being made in the commercial-type fleet, hence it is considered that LEZs are providing a strong incentive for lower emission vehicles, as soon as practicable.

4.53 Air Quality improvements are being realised across the City, which is having a positive benefit in reducing pollution concentrations. However, there remains pollution hot-spots in the City and in particular in the City Centre Air Quality Management Area. (Also see Other Measures to Improve Air Quality sections).

4.54 Developing a LEZ in a consistent manner with the other three largest cities in Scotland means the risk of displacement of national fleets is lower. As Scotland's capital, Edinburgh needs to be one of the leaders in delivering this important intervention.

4.55 Overall, the Council does not consider that objections in respect to no need for a LEZ, can be upheld.

LEZ funding and Impact on Council Budget

4.56 One objector considered that the funding associated with the LEZ Scheme could be better spent on other measures to improve transport and/or air quality. Also, there was acknowledgement that costs are likely to be incurred by the Council to fully implement the boundary and operate the Scheme.

4.57 Details on the financial impact to the Council are provided in the Financial Impact section of this report.

4.58 The Transport (Scotland) Act 2019 set out provisions for ministers to make grants to a local authority to meet, or help towards meeting, its costs in determining whether

to make a LEZ scheme and operating a scheme. The Council has been in receipt of grants for several years to help support Scheme development and it continues discussions with the Scottish Government about future financing.

- 4.59 It should also be noted that any monies received from penalty charges in respect of a LEZ scheme may be applied by the Council for the purposes of facilitating the achievement of the Scheme's objectives, once any operational costs are covered.
- 4.60 In February 2020, Committee noted that the Council and its regional partners received funds from Transport Scotland through the LEZ Public Transport Provision Fund (PTP) to promote modal shift and support the LEZ Scheme's objectives. In total, approximately £3.7m of PTP funds were claimed across SEStran region by the Council and regional local authorities to encourage modal shift and more sustainable transport.
- 4.61 In addition, the Scottish Government has provided a total of £1.5m in LEZ Support Funds to adapt to LEZs and generally promote modal shift and sustainable transport for over 450 microbusinesses/low-income households located within 20 kilometres of the Scheme. Funds have also been allocated for taxi retrofit.
- 4.62 In general, it is recognised that although there may be some impact to the Council's budget, the need for a LEZ is also well understood. Account should also be taken of the funding and work already in place to encourage sustainable transport.
- 4.63 Overall, the Council does not consider that objections in respect of LEZ funding or impact on Council budget, can be upheld.

Vehicle Types and Emission Standards

- 4.64 One objector considered that only diesel vehicles should be included in the scope and that it was not necessary to include other types of vehicle within the Scheme.
- 4.65 Nationally consistent emission standards for Scottish LEZs have been set for virtually all petrol and diesel vehicle classifications (e.g. buses, taxis, vans, HGVs, cars) within the LEZs (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021. It is not in the Council's remit to consider deviating from these standards and regulations.
- 4.66 For Edinburgh, the modelling and appraisal work evidenced that with the scale of the air quality exceedances in the City Centre, inclusion of all vehicle types within the Scheme (except motorcycles and mopeds as per the 2021 Regulations) was the most appropriate course of action. This would also ensure that the wider objectives of the Scheme could also be better achieved. It was recognised that with all vehicles included there would also be some benefit in communicating the Scheme in a clear and consistent manner.
- 4.67 Overall, taking account of objections relating to modelling evidence and the statutory requirements, the Council does not consider that objections in respect to vehicle types and emission standards can be upheld.

Carbon Emissions

- 4.68 Objections were raised in terms of the limited ability for the LEZ to reduce carbon (CO₂). However, it should be noted that the Scheme objectives include the statutory requirement to contribute towards meeting the greenhouse gas emissions reduction targets set out in Part 1 of the Climate Change (Scotland) Act 2009, as per Transport (Scotland) Act 2019
- 4.69 Other discretionary objectives agreed by the Council include those to ensure alignment with city, regional and national policies that encourage more sustainable transport. This approach recognises that there are limits to reducing tail-pipe CO₂ emissions via current LEZ structures, as shown by the NMF process and as reported to Committee in January 2022. However, the modelling also indicated that the Scheme would contribute to CO₂ reductions when considering the wider LEZ objectives such as encouraging mode shift to more sustainable, active travel modes.
- 4.70 Overall, the Council does not consider that objections in respect of carbon emissions, can be upheld.

Other Measures to Improve Air Quality

- 4.71 Some objectors considered that funding would be better spent on other air quality improvement measures. An objector raised concern around compliance of the Council's fleet.
- 4.72 The Local Air Quality Management framework set out in the Environment Act (1995) obliges local authorities to implement an Air Quality Action Plan (AQAP) where breaches of Air Quality Objectives are likely. The Council is currently revising the existing Plan and It is intended that, if approved, the LEZ will constitute a significant action in the forthcoming revision.
- 4.73 The Air Quality Action Plan will also include wider measures to improve air quality. Progress on these existing (and new) measures must be reported to UK and Scottish Government on an annual basis.
- 4.74 The Council will undertake a statutory consultation process on the revised Plan following its presentation to Committee in summer 2022.
- 4.75 The Council's fleet is undergoing a fleet replacement programme which will take LEZ requirements into account.
- 4.76 Overall, taking account of objections relating to modelling evidence and AQAP measures to improve air quality, the Council does not consider that objections in respect to other measures to improve air quality can be upheld.

Alignment with Taxi and Private Hire Car (PHC) licensing standards

- 4.77 One objector commented on the alignment of the LEZ Scheme with the PHC licensing standards. This may have originated from information on the Council's website that required updating, with respect to the new timescales applied to the age and emission policy for taxi and PHC licenses.

- 4.78 The LEZ Scheme and licensing standards are separate regimes and are governed by separate provisions, although throughout the development of both projects, there has been discussion and co-ordination.
- 4.79 Currently all taxi and PHCs should be of LEZ compliant standard prior to the enforcement of the LEZ commencing (June 2024).
- 4.80 In response to the comments, information on the Council's website has now been updated. Close co-ordination will continue between the two regimes, however as there are separate legal provisions, this would not constitute relevant grounds for a formal objection to the LEZ Scheme.
- 4.81 Overall, taking account of objections relating to alignment with taxi/PHC licensing, the Council does not consider that objections in respect to taxi and PHCs can be upheld.

Conclusions

- 4.82 Having considered all the objections submitted, the Council does not consider or recommend that any changes to the Scheme can be justified on the grounds raised in the objections.
- 4.83 However, measures to mitigate potential impacts of traffic displacement (Network Management Strategy) along with ensuring awareness of the funding support for upgrading vehicles and switching to more sustainable modes of travel have been reiterated. A mechanism for assessing requests for local exemptions has also been set out.
- 4.84 It is therefore recommended that the objections be set aside, and steps are taken to 'Make a Low Emission Zone Scheme' as per the Act and the 2021 Regulations.
- 4.85 If Committee and/or Scottish Ministers disagree with recommendations, they can request an examination of the Scheme.
- 4.86 Further programme delays increase the risk of not achieving Scheme objectives, including achieving statutory air quality objectives to reduce emissions.
- 4.87 In term of future development, the Act and 2021 Regulations give powers to local authorities to make, amend or revoke a LEZ following all statutory steps, at any time. Any such changes would need to be evidence-led.

5. Next Steps – Final Submission

- 5.1. To 'Make a Low Emission Zone Scheme' the Council is required to present a Final Submission for approval by Scottish Ministers (refer to Appendix C). The Draft Final Submission is currently being reviewed informally by Transport Scotland. The submission covers the following aspects:
- Governance, Management & Strategy
 - Summary of Air Quality, Climate Change and Transport issues
 - Objectives

- Options Appraisal
- Operational details
- Modelling / Validation
- Consultation, Engagement and Stakeholder Input
- Costs / Funding
- Risks / Uncertainty
- Monitoring / Reporting

5.2. If the recommendations of this report are approved, officers will:

- 5.2.1. Proceed with the Scheme, as presented in the Final Submission document at Appendix C, and in cognisance of the objections report presented at Appendix B, following the Statutory Notice Period;
- 5.2.2. Proceed with the design and delivery of the Scheme, pending approval of the Final Submission to Scottish Ministers, as per statutory requirements; and
- 5.2.3. Proceed to 'Make a Low Emission Zone Scheme' based upon the Scheme, as presented in the Final Submission document at Appendix C, for introduction on 31 May 2022, in accordance with statutory requirements and subject to approval by Scottish Ministers.

6. Financial Impact

- 6.1. Grant funding has been awarded this financial year from Transport Scotland to cover capital expenditure for infrastructure required for the enforcement system and revenue to support the development and advertisement of the Scheme. The grant award did not include legal costs; however, the Council has applied to recoup these costs via the City Centre Recovery Fund (£35k estimated in total).
- 6.2. Future funding for the ongoing revenue costs for operating the LEZ Scheme is the subject of ongoing discussion with the Scottish Government, through the LEZ Leadership Group. The estimated revenue cost is £400,000 per annum once enforcement commences in 2024/25. The Scottish Government is also considering unfunded capital costs in the range of £570,000 to construct road network changes that will facilitate traffic movements around the boundary.
- 6.3. The Council will continue to apply for LEZ Grant Funding from Transport Scotland to ensure the development and implementation of the Scheme. In 2022/23 the award is likely to include funds for signage and communication/engagement.
- 6.4. The financial implications of the LEZ will be published as part of the annual LEZ progress report and in annual accounts of the Council, according to the financial year, the Act and 2021 Regulations.

7. Stakeholder/Community Impact

- 7.1. The stakeholder and community involvement in developing Edinburgh's LEZ were set out in the October 2021 and in previous reports to Committee in June 2021 and in 2019.
- 7.2. The Integrated Impact Assessment (IIA) has been finalised and is attached in Appendix D.

8. Background Reading/External References

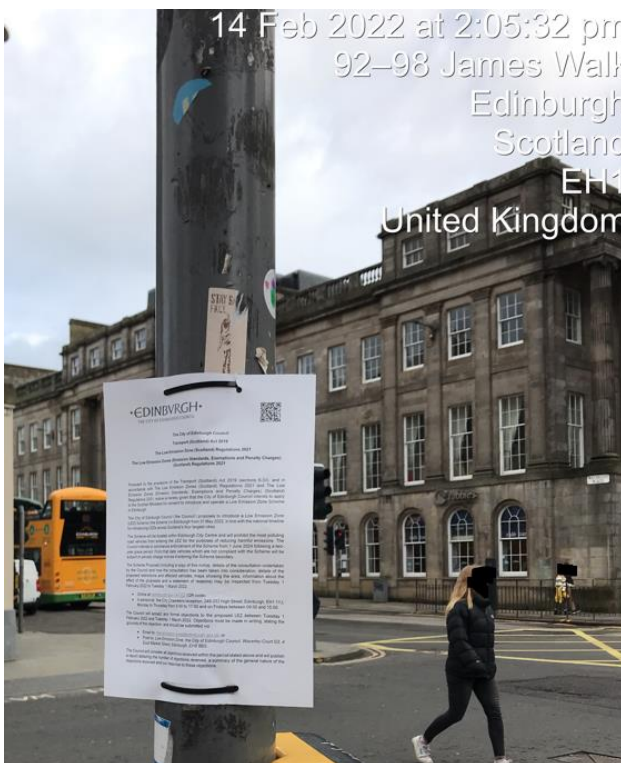
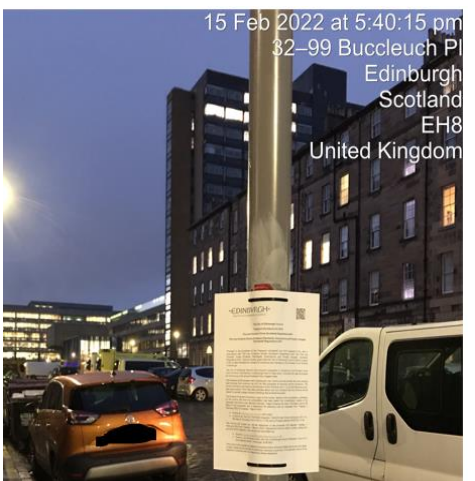
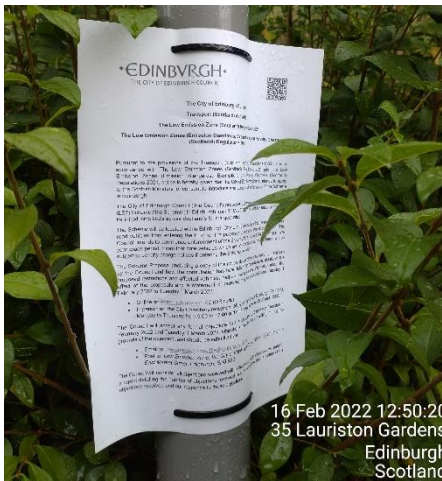
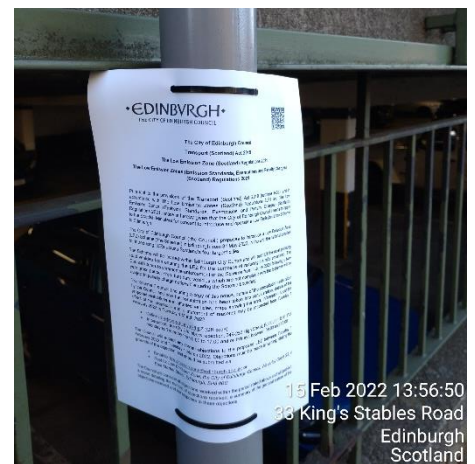
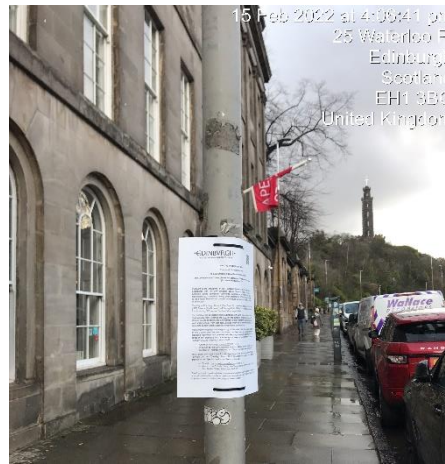
- 8.1. Transport and Environment Committee - Low Emission Zone – Carbon Impact (Item 7.4, the City of Edinburgh Council, approved subject to amendment, January 2022).
- 8.2. Transport and Environment Committee - Low Emission Zone – Consultation and Development (Item 7.1, the City of Edinburgh Council, approved subject to amendment, October 2021).
- 8.3. Transport and Environment Committee - Low Emission Zone – Preferred Scheme for Consultation (Item 7.4, the City of Edinburgh Council, approved June 2021).
- 8.4. Edinburgh Low Emission Zone Webpage (the City of Edinburgh Council).
- 8.5. Low Emission Zone Guidance (Transport Scotland, October 2021).
- 8.6. Low Emission Zone Scotland (Transport Scotland).
- 8.7. Low Emission Zone Support Funds Scotland (Energy Savings Trust/Scottish Government).
- 8.8. Post-COVID Uncertainty Summary Note (Transport Scotland).
- 8.9. Low Emission Zone - Statutory Notice Period Evidence (the City of Edinburgh Council).

9. Appendices

- 9.1. Appendix A – Statutory Notice Period Evidence.
- 9.2. Appendix B - Objections Report.
- 9.3. Appendix C – Final Scheme Submission to Scottish Ministers (Draft).
- 9.4. Appendix D – Integrated Impact Assessment.

Appendix A - Statutory Notice Period Evidence (the City of Edinburgh Council)

On Street Bills



Edinburgh Evening News Notice & 'Teaser' – 01/02/22

PUBLIC NOTICES

PLANNING NOTICES

• EDINBURGH •
THE CITY OF EDINBURGH COUNCIL

**The City of Edinburgh Council
Transport (Scotland) Act 2019
The Low Emission Zone (Scotland) Regulations 2021
The Low Emission Zones (Emission Standards,
Exemptions and Penalty Charges) (Scotland)
Regulations 2021**

Pursuant to the provisions of the Transport (Scotland) Act 2019 (sections 6-33), and in accordance with the Low Emission Zones (Scotland) Regulations 2021 and The Low Emission Zones (Emission Standards, Exemptions and Penalty Charges) (Scotland) Regulations 2021, notice is hereby given that the City of Edinburgh Council intends to apply to the Scottish Ministers for consent to introduce and operate a Low Emission Zone Scheme in Edinburgh.

The City of Edinburgh Council (the Council) proposes to introduce a Low Emission Zone (LEZ) Scheme (the Scheme) in Edinburgh from 31 May 2022, in line with the national timeline for introducing LEZs across Scotland's four largest cities.

The Scheme will be located within Edinburgh City Centre and will prohibit the most polluting road vehicles from entering the LEZ for the purposes of reducing harmful emissions. The Council intends to commence enforcement of the Scheme from 1 June 2024 following a two-year grace period. From that date vehicles which are not compliant with the Scheme will be subject to penalty charge notices if entering the Scheme boundary.

The Scheme Proposal (including a copy of this notice, details of the consultation undertaken by the Council and how the consultation has been taken into consideration, details of the proposed restrictions and affected vehicles, maps showing the area, information about the effect of the proposals and a statement of reasons) may be inspected from Tuesday 1 February 2022 to Tuesday 1 March 2022:

- Online at edinburgh.gov.uk/LEZ (QR code)
- In person at the **City Chambers reception, 249-253 High Street, Edinburgh EH1 1YJ**, Monday to Thursday from 09.00 to 17.00 and on Fridays between 09.00 and 15.00.

The Council will accept any formal objections to the proposed LEZ between **Tuesday 1 February 2022 and Tuesday 1 March 2022**. Objections must be made in writing, stating the grounds of the objection, and should be submitted via:

- Email to: low.emission.zone@edinburgh.gov.uk; or
- Post to: **Low Emission Zone, the City of Edinburgh Council, Waverley Court G3, 4 East Market Street, Edinburgh EH8 8BG.**

The Council will consider all objections received within the period stated above and will publish a report detailing the number of objections received, a summary of the general nature of the objections received and our response to these objections.

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THE CITY OF EDINBURGH COUNCIL

LOW EMISSION ZONE SCHEME

**The City of Edinburgh Council
proposes to introduce a
Low Emission Zone (LEZ) Scheme
in Edinburgh from 31 May 2022.**

**FOR MORE INFORMATION PLEASE SEE THE NOTICE IN
TODAY'S CLASSIFIED SECTION.**

ing Scotland their home. The "Welcome Hub" includes a range of resources, available in both English and Cantonese, such as information on Scottish public services, housing, and arrivals from Hong Kong, enabling them to make an important contribution to Scottish communities to the benefit of all." www.migrationscotland.org.uk/hong-kong

ion, the Strategic Projects Review recommendations focus on the design of the remaining network and maintenance, upgrade of our existing network. Scottish Government partners are providing our

The Scotsman Notice & 'Teaser' – 01/02/22

PUBLIC NOTICES

GENERAL NOTICES

• EDINBURGH •
THE CITY OF EDINBURGH COUNCIL

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The Low Emission Zone (Scotland) Regulations 2021
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LOW EMISSION ZONE SCHEME

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TODAY'S CLASSIFIED SECTION.**

lay. The Government would consider carefully' any requirements for secondary school students to wear face coverings to out face masks classrooms to wear them

have called for the requirement for secondary school students to wear face coverings to

By **JEMMA CR**

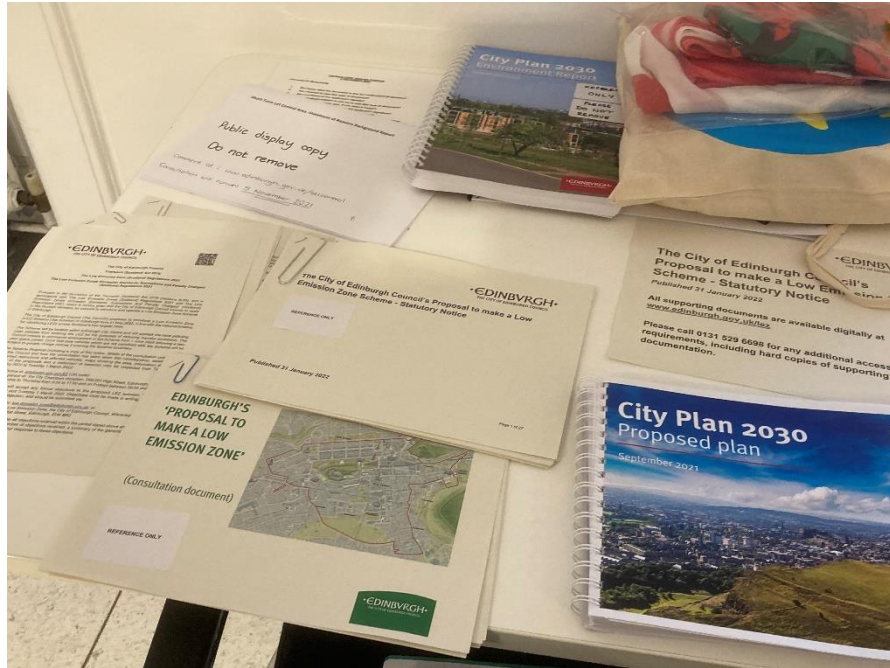
The UK government is "again" at mandatory face coverings for front social care workers of the less serious variant. Ministers are under pressure

UK government

By **JEMMA CR**

The UK government is "again" at mandatory face coverings for front social care workers of the less serious variant. Ministers are under pressure

The City of Edinburgh Council, City Chambers



Statutory Notice Period: Proposal to make a Low Emission Zone Scheme Webpages (the City of Edinburgh Council) – live throughout Period

A summary of the Statutory Notice Period was available during the Period, and linked from the main edinburgh.gov.uk/lez homepage. Summary of the following subjects was made available on the [dedicated Statutory Notice Period webpage](#):

- About the legal process
- Objections process
- Legal powers to make low emission zones

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Statutory Notice Period: Proposal to make a Low Emission Zone Scheme

1 About the legal process 2 [Supporting evidence for Statutory Notice Period](#)

Developing the Low Emission Zone

MORE BACKGROUND >

About the legal process

As part of Statutory Notice period, a Proposal Document sets out the details of our preferred Low Emission Zone Scheme in Edinburgh ('the Scheme') and explains how the Scheme will operate. The Proposal sets out:

- location and area of the Scheme
- objectives of the Scheme

In addition a sub-page provided all [Supporting evidence for Statutory Notice Period](#), as summarised below:

Evidence Item(s)	Publication Date
Statutory Notice	January 2022
Statement of Reasons	
Consultation Statement	
On-street Bill	
Consultation Document	May 2021
SEPA Air Quality Modelling Reports	2018-2021
Traffic Modelling Reports	2019-2021
Consultation Analyses	2019-2021
Impact Assessments	2021
Options Appraisal Report	May 2021
Transport and Environment Committee Reports	2018-2022

Edinburgh Low Emission Zone – Objections Report

March 2022

Introduction

On 27 January 2022, the Transport and Environment Committee agreed to proceed with the Statutory Notice Period for the City of Edinburgh Council's ('the Council') Low Emission Zone (LEZ) Scheme Proposal. The Low Emission Zones (Scotland) Regulations 2021 ('the 2021 Regulations') require the publication of the Scheme Proposal to be undertaken after completing the statutory consultation process but before submitting the proposal to the Scottish Ministers for approval. The Statutory Notice Period must run for at least 28 days and be publicised widely in accordance with Regulation 3 of the 2021 Regulations, to enable formal objections to be made.

The Council's Statutory Notice Period ran for 29 days from 1 February 2022 to 1 March 2022 and was publicised in accordance with the 2021 Regulations.

As required under Regulation 4 (4) of the 2021 Regulations, a report must be prepared and published detailing:

1. The number of objections received;
2. A summary of the general nature of the objections received; and
3. The local authority's response to the objections received.

This report fulfils the requirements of Regulation 4 (4) the 2021 Regulations.

1. Number of Objections Received

During the 29-day notice period the Council received 26 objections and one note of support.

Objections were raised by the Edinburgh Association of Community Councils, West End Community Council, New Town Broughton Community Council, a joint submission from Corstorphine and Murrayfield Community Council, Preston Street Primary School Parent Council and Living Streets. In addition, 3 businesses and 17 individuals also submitted objections.

Edinburgh Low Emission Zone – Objections Report

A petition was received from an individual, but this did not meet the Council's criteria to be recorded formally as a petition. The petition did not provide full names of signatories or confirm that signatories were over 16 and lived in Edinburgh. As a result, the petition was recorded as 1 objection from an individual.

2 & 3. Summary of Objections Received and the Council's Responses

Following the Statutory Notice Period, the Council has reviewed and assessed all the objections received. The Council has observed that the nature of the objections can be summarised under a number of key themes.

These themes are summarised in this section of the report, together with the Council's response to the matters raised by the objections:

- Boundary
- National and Local Time-Limited Exemptions
- Impact on Individuals & Businesses
- Evidence Base and Modelling Uncertainty
- Consultation, Engagement and Legal Process
- Need for a Low Emission Zone
- LEZ funding and Impact on Council Budget
- Vehicle Types and Emission Standards
- Carbon Emissions
- Other Measures to Improve Air Quality
- Alignment with Taxi and Private Hire Car (PHC) licensing standards

Several the objections made reference to more than one of these themes, others were more specific and related to a practical issue or implication which was personal to the individual objector.

Edinburgh Low Emission Zone – Objections Report

Boundary

The most common theme of objection related to the Scheme boundary; predominately in relation to its size and potential future traffic displacement impacts, as well as a concern that it may have a detrimental impact on individuals and children's health and wellbeing due to the potential increase in polluting traffic diverting around the boundary. See also Impacts on Individuals & Businesses and Evidence Base sections.

Objectors who raised an issue with the boundary indicated preferences for a boundary at various spatial scales, including an Extended Urban Area, and larger or smaller City Centre boundaries, compared to the Scheme boundary. Some concerns were raised about the cumulative impact of transport and planning related development in the city and its impact on the City Centre.

The National Modelling Framework (NMF), which was devised to provide consistency in evidence across Edinburgh and the other cities implementing LEZ (Aberdeen, Dundee and Glasgow), showed that although there could be localised impacts in the West End area, these were short lived. Further appraisal work concluded that these concerns did not outweigh the benefit of the scheme overall. Air quality modelling and assessments of pollutant concentrations by schools (including Preston Street Primary School) and nurseries provided evidence that adverse impacts were not anticipated in these areas.

The Options Appraisal work undertaken in accordance with the National Low Emission Framework considered several boundary options, presented to the Council's Transport and Environment Committee ('the Committee') in June 2021. In this Appraisal, an Extended Urban Area boundary and a smaller City Centre boundary were examined. Both of these options were excluded due to evidenced air quality impacts around the Central Air Quality Management Area and there is evidence that indicates air quality benefits of a City Centre LEZ would extend beyond the immediate boundary. In appraising options proportionality in Scheme design and Scheme benefits was a key principle, in cognisance of socio-economic impacts and all Scheme objectives

Minor alterations to the proposed city centre boundary were also explored following agreement by the Committee in October 2021 to explore the Scheme's contribution to reducing greenhouse gases. Boundary changes in the West End and south-east were found to lead to significant increases in the length of diversion route for non-compliant traffic and did not resolve displacement impacts. Extending the boundary in the north east to include Calton Hill would have negligible carbon impact, according to the National Modelling Framework (NMF). The evidence presented indicated that no changes to the boundary could be justified.

It should also be noted that there are two objectives of the LEZ Scheme which relate directly to the implications of the LEZ boundary. These are:

Edinburgh Low Emission Zone – Objections Report

- Minimise the impact from traffic displacement across the city's transport network, related to the LEZ Scheme; and
- Strategically align with the Council's sustainable transport, active travel and placemaking objectives.

In respect of these objectives and previously raised concerns about traffic displacement, Committee has also agreed to the development of a Network Management Strategy (NMS). Officers will continue to consider all feasible and proportionate options for the NMS and will recommend suitable changes, on an evidence-driven basis. Officers will also engage with key stakeholders, including Community Councils, in the development and delivery of the NMS. The NMS would be delivered under the appropriate environmental impact legislation as per the Strategic Environmental Assessment. Strategically aligning the LEZ with the Council's sustainable transport and placemaking plans will also ensure that traffic management and improving the environment within the City Centre is at the core of the LEZ.

A LEZ annual progress report is required by the Regulations on the operation and effectiveness of the Scheme. This will link to a robust monitoring regime that will inform the NMS and may cover public transport journey times, traffic surveys and public opinion surveys as well as the Council's well-established air quality monitoring network.

Other wider elements of the LEZ Scheme implementation will also assist with addressing concerns that have been raised about the boundary, as detailed below.

During the grace period the developing communication and signage strategy will be implemented. Statutory entry/exit signs are required at the LEZ boundary and early warning signs may be placed on key routes leading to the LEZ, at the discretion of the Council. A communications and engagement campaign will focus on promotion of support funds available for adapting to the LEZ and promoting the benefits of cleaner air and use of sustainable travel.

In conjunction with the 2021 Regulations and associated guidance, Automatic Number Plate Recognition cameras and Mobile Enforcement Vehicles will be utilised as the basis of enforcement on the boundary. The Council's Local Enforcement Strategy, previously considered by Committee, aims to meet financial best value principles, minimise unnecessary costs where possible and be flexible, so that equipment can be adapted to meet the evolving needs of the Scheme or for different purposes as needs change over time. In the first instance synergies with the Public Space CCTV network upgrade, which is part of Smart Cities Scotland, is being explored.

Edinburgh Low Emission Zone – Objections Report

Detailed commentary of concerns raised regarding the boundary:

Three Community Councils objected to the LEZ on the basis that the boundary was considered to be too small and should be larger. Corstorphine Community Council, Murrayfield Community Council and the Edinburgh Association of Community Council's (EACC) indicated that the Extended Urban Area boundary was preferred, while New Town and Broughton Community Council indicated that a larger City Centre boundary was preferred, to include Calton Hill.

West End

The West End Community Council, Living Streets Edinburgh and other individual objectors raised concerns relating to displacement impacts of the Scheme boundary proposal in the West End. The area has long-standing and historic traffic patterns and serves key routes within the city centre, despite its residential character and forms part of the Central Air Quality Management Area. An individual also raised a concern about diverting traffic onto Moray Feu setted streets which is part of the World Heritage Site.

Detailed analysis of façade modelling showed that new exceedances are expected at the façade at Palmerston Place. However, the future scenario (after LEZ fully embedded) does not indicate any exceedances in this area, or at most facades across the entirety of the boundary. This is likely to be due to less non-compliant traffic needing to use the diverted route, as well as vehicle standards generally improving. The analysis also found similar results for sensitive receptors such as schools and nurseries.

The West End Community Council raised additional concerns about cumulative traffic impact from changes in the traffic network in the West End (e.g. Trams and CCWEL) that they feel have not been recognised and addressed.

North East

The New Town and Broughton Community Council as well as other objectors raised concerns about displacement impacts around Calton Hill, and that the boundary should be redrawn in this area.

South East

Preston Street Primary School Parents Council and other objectors raised concerns about the potential displacement impacts outside Preston Street Primary School, and that the mitigation measures proposed are not sufficient to protect the health and wellbeing of children.

Edinburgh Low Emission Zone – Objections Report

One objector stated that the boundaries are poorly sited and will have a detrimental impact on the health, wellbeing and the rights of children due to the increased polluting traffic diverted.

Mitigation Measures:

Officers will continue to consider all feasible and proportionate options via the LEZ Network Management Strategy (NMS). The NMS is designed to mitigate potential displacement impacts and will continue to recommend suitable changes, on an evidence-driven basis.

Central to the NMS is to monitor and evaluate displacement impacts strategically around the entire boundary following an evidence-led approach, before specific solutions can be identified.

Consultation and engagement highlighted additional areas at/near to the boundary for which enhanced monitoring and evaluation could be utilised to inform the process of identifying potential solutions, as outlined below. Convincing evidence and wider stakeholder support for such solutions is required

Mitigation measures across all areas, including the West End, north-east and south-east, alongside previously identified measures will be further developed, following an evidence-led approach and with stakeholder support.

West End Mitigation

The West End (generally but not exclusively streets between the A8 at Haymarket Terrace and A90 at Queensferry Road) has been cited as an area of concern. The area has long-standing and historic traffic patterns and serves key routes within the city centre, despite its residential character. Potential displacement impacts of LEZ in this location should be considered strategically and in relation to wider complexities of citywide network management.

Officers recommend exploring potential solutions in the West End, considering that further traffic modelling assessments and stakeholder support would be required before design and implementation and that there are other significant projects planned in this area, such as the under City Centre West-East Link (CCWEL) active travel scheme under construction.

LEZ will collaborate with CCWEL to collect further traffic modelling evidence to inform any future potential impacts the Scheme will have on the road network. Evidence from future traffic modelling and surveys could be used to determine a separate project, using instruments such as Experimental Traffic Regulation Orders (ETROs).

Edinburgh Low Emission Zone – Objections Report

An interim solution for Tollcross Junction is being costed in the first instance, to provide a logical and effective diversion route for non-compliant traffic. Measures being costed include, re-alignment of kerbs/resizing of island, repositioning of bollard and signal heads and carriageway patch. It is recognised that a major overhaul of Tollcross Junction is required in the long term.

Changes to Morrison Street are being costed to provide a logical and effective diversion route for non-compliant traffic. Measures being costed include redesign of junction at Morrison Link/Morrison Road, redesign of junction at Torphichen Street/Morrison Street/Gardner's Crescent and road markings on Morrison Street to permit two-way traffic. Any changes would consider other requirements such as for loading and taxi rank access.

LEZ will continue engagement with Tollcross Primary School and other stakeholders in the area around planned Active Travel measures, in relation to LEZ delivery timelines.

North-East Mitigation

The NMS will take on board key concerns about displacement impacts around Calton Hill and Holyrood Park.

A signposted diversion route will be made around the whole Scheme boundary. In the north-east this will follow London Road and Abbeyhill/Abbeymount to mitigate potential displacement impacts through residential areas on Calton Hill.

South-East Mitigation

At Preston Street Primary School mitigations will be explored to address concerns relating to safety, improving amenity for school children and parents following lessons learned by Travelling Safely measures already in place.

Preliminary analysis has outlined various potential measures including but not limited to; permanent widening of pavements around the school, prioritisation of traffic signalling around school pick up/drop off times to pedestrians, additional traffic calming measures and others.

Such measures will be delivered as part of the Road Safety programme, in collaboration with the LEZ.

Conclusion:

In conclusion, the Council officers have carefully considered the objections received with respect to the boundary and have concluded that no changes can be justified given the rationale, analyses and evidence that have been used to develop the LEZ Scheme.

Edinburgh Low Emission Zone – Objections Report

National and Local Time-Limited Exemptions

Some objectors made comments about the national exemptions; however, these are prescribed in the 2021 Regulations and the Council has no powers to amend them.

Objections received around 'local time-limited exemptions' tended to relate to individuals' personal circumstances, for example in relation to accessing the LEZ for night-shift work, or the impact on those with hidden disabilities.

Granting local exemptions, in addition to the national exemptions, risks undermining the overall benefits of the Scheme. The Council's proposed approach to local exemptions is expected to ensure that local exemptions would only be issued or permitted on a case-by-case basis and only in exceptional circumstances. It is unlikely that these criteria would apply to situations of a personal nature.

The Scottish Government provides [LEZ Support Funds](#) to help mitigate adverse financial impacts of Scotland's LEZs. The availability of these funds will help off-set the impact of the scheme for persons falling into this category. On balance, this is considered to provide a reasonable safeguard.

One objection relating to a hidden disability requested that consideration of a local exemption was necessary as they did not possess a blue badge. The Council's LEZ webpage on exemptions has now been updated to link to the Council's blue badge webpage, to encourage eligible individuals to explore whether they could apply for this national LEZ exemption. All applications for blue badges will be considered according to national policy and may be applied for on the [Council's dedicated webpage](#).

Taking account of the objections received and previous consultation feedback, it is recommended that Council officers establish a LEZ Local Exemption Advisory Panel (LEZ-LEAP). This panel will meet quarterly as part of the Council's LEZ Delivery Group, and will consider requests for local time-limited exemptions.

Overall, taking account of recommendations to establish a LEZ-LEAP, and national exemptions and support funds in place, the Council does not consider that objections relating to the proposed local exemption approach can be upheld on this basis.

Edinburgh Low Emission Zone – Objections Report

Impact on Individuals & Businesses

Some of the objections received related to the impact on individuals and businesses and tended to raise issues which were financial in nature and related to the cost of complying. One objection raised a concern about the accuracy of the Integrated Impact Assessment (IIA) as it was suggested that it understates the negative air quality and health impact of the traffic diverted along the boundaries, particularly on children.

The IIA helped inform the final design of Edinburgh's LEZ by presenting potential impacts arising from its introduction. It considered a range of consequential impacts and assessed them on equality, human rights (including the rights of children and young people), the environment and climate change. The IIA utilised the NHS Lothian Integrated Impact Assessment guidance as an effective mechanism for meeting requirements of the NLEF and the Equality Act 2010 (Specific Duties) (Scotland) 2014.

The IIA concluded that the LEZ has the potential to cause a range of positive and negative impacts, from improving health of society to potentially reducing access to the city centre for those who rely on private vehicle transport. The most significant impact of the LEZ will be the improvement in air quality and the resulting health benefits to residents, visitors and workers. The LEZ also has a potential positive health impact through encouraging the use of active travel and public transport for certain trips and changing existing travel behaviours.

Given the focus of the IIA to look at how protected groups are potentially differentially affected, there are instances where the LEZ could disproportionately affect some groups in society. For example, those who have a diminished ability to upgrade to a compliant vehicle due to low income, including people on benefits, single parents, or disabled people. The assessment concluded that, despite the health benefits, protected members of society can be negatively impacted by the LEZ but that these impacts can be removed or mitigated through considerate decision making at national and local level.

Nationally, the LEZ Support Fund, retrofitting schemes and exemptions outlined in the 2021 Regulations all look to reduce negative impacts of LEZs. In addition, the locally applied 2-year grace period will help mitigate the impacts, allowing additional time for residents and businesses to adapt or comply with LEZ requirements.

Working in partnership with Scottish Government and Transport Scotland, the Council has developed a Scheme where any potential negative impacts of the LEZ are considered to be minimised.

Edinburgh Low Emission Zone – Objections Report

Overall, taking account of objections relating to impact on individuals and businesses and support funds available, the Council does not consider that objections relating to impact on individuals and businesses can be upheld.

Evidence Base and Modelling Uncertainty

Some objectors made comments on modelling uncertainty, one commented about the removal of monitoring equipment and a comment was also made on the accuracy of the IIA.

The Council has worked in close partnership with the Scottish Environment Protection Agency (SEPA), Transport Scotland and the Scottish Government to assist in the success of the National Modelling Framework (NMF), to provide the quantitative evidence for assessing criteria for LEZ development, as a standard across the whole of Scotland.

The four-cities NMF models have relied on accurate, high quality, local fleet composition data and up-to-date emission factors, to build a robust evidence base. The NMF approach ensured that data was collected over a sufficiently large area to inform the model build and collect detailed vehicle categorisation information. The NMF model outputs have been produced at a resolution that offers evidence derived from accurate and insightful information, which also included future prediction modelling to evaluate the impact of natural and planned improvements to the fleet.

The outputs and predictions made within any model are subject to uncertainty, however methods and testing can be applied to limit this.

SEPA worked with University of Glasgow and University of Bergamo on methods to help address model uncertainty. This utilised a statistical technique to describe the behaviour of the model and resulted in implementing methods to establish the risks posed to predictions from uncertainty with a number of factors e.g. future emissions, meteorological conditions. This formed the basis of the NMF development and evidence-led approach, which has been consistently applied across the four cities implementing LEZs in Scotland.

In conclusion, the uncertainties have provided minimal risk to the accuracy of the results and the best available evidence has been available through the NMF process to support decision-making. Therefore, the objection cannot be upheld.

Edinburgh Low Emission Zone – Objections Report

The concerns raised over the IIA relate to comments on health and wellbeing of children from Preston Street Primary School. This school is located on the boundary, and concerns raised suggested a stronger focus should have been placed on the rights of children in the assessment. As mentioned above, the IIA takes into account all impacted groups and in light of the modelling research carried out, the Council does not consider that the LEZ will have adverse impacts on children.

Further engagement has been carried out with Preston Street Primary School Parent Council and colleagues in Road Safety regarding traffic calming measures outside the school that should also provide benefit and reassurance to parents.

The Council has undertaken significant traffic surveys and a review of the air quality monitoring network which has predominately involved additional monitoring, to help develop the NMF modelling work and provide baseline information for assessment of any future impacts. In conjunction with partners, including SEPA and Transport Scotland, these surveys and monitoring regimes will continue, part in response to the requirement to report on the effectiveness of the LEZ, but also in response to the Council's statutory duties to review and assess air quality on an annual basis (the Local Air Quality Management regime).

Overall the Council does not consider that objections in respect to the evidence base and modelling, can be upheld.

Consultation, Engagement and Legal Process

Some of the objections raised matters related to the consultation and engagement process for the development of the Scheme. These can be broken down by referring to the consultation period, transparency of results, previous comments made by organisations that were perceived not have been addressed, disenchantment with level of engagement in affected communities, and a request for a referendum on the Scheme.

There was a comment made in relation to the online advertising of the Statutory Notice Period as well as the posting of the notices on the street. Despite concerns, the advertised period was one day above the minimum required by statute and the Council did not receive any late submissions. All objections or comments received were reviewed and assessed.

The 2021 Regulations and associated guidance were clear about the consultation process and engagement and the Council ensured the process was followed correctly, including the siting of notices (See Appendix A). A Consultation Statement as required by the 2021 Regulations was published as part of the Statutory Notice Period.

Overall, taking account of objections relating to the consultation, engagement and the legal process, the Council does not consider that objections in respect to vehicle types and emission standards can be upheld.

Edinburgh Low Emission Zone – Objections Report

Need for a LEZ

Some objectors raised concerns that, overall, a LEZ is not needed.

The commitment to deliver LEZs across the four cities was established in Scottish Government's Programme for Government 2017/18. Transport Scotland's 'LEZ Post-COVID Uncertainty' Briefing Note also reinforces the continued need for LEZs, even considering the impact of the pandemic.

Evidence confirming the need for a LEZ in Edinburgh has been set out in previous committee reports and as part of the Statutory Notice process. A 'Statement of Reasons – Why Edinburgh Needs a Low Emission Zone' was published as part of the Statutory Notice period, the main elements of which can be summarised as follows:

- Air Quality – Improving Health and Wellbeing. The Council has a statutory duty to review and assess air quality and ensure measures are implemented in areas where Air Quality Objectives are not being met. The city centre has the greatest magnitude of traffic related pollution problems and breaches of statutory objectives and the LEZ will accelerate vehicle compliance with the national emission standards to improve air quality and public health;
- The Council declared a Climate Emergency in 2019 setting a vision for Edinburgh to be net carbon zero by 2030. Meeting this target and adapting to the impacts of climate change will require system-wide and transformational change across all sectors of the city. The LEZ will play an important role in accelerating behaviour change towards more sustainable forms of transport and cleaner vehicle technologies; and
- Sustainable Transport – Creating an Accessible, Efficient and Active Transport network. A LEZ is a key deliverable of the CMP and will help to incentivise the use of more sustainable, low emission travel modes. The Council's target to reduce car kms by 30% by 2030 requires a whole toolkit of measures, of which a LEZ will play an important role.

Nationally, Transport Scotland in partnership with the local authorities have been running the 'Get Ready' for LEZs campaign. Previous committee reporting confirmed that an analysis of the Edinburgh fleet composition showed that there were significant improvements already being made in the commercial-type fleet, hence it is considered that LEZs are providing a strong incentive for lower emission vehicles, as soon as practicable.

Edinburgh Low Emission Zone – Objections Report

Air Quality improvements are being realised across the City, which is having a positive benefit in reducing pollution concentrations. However there remains pollution hot-spots in the City and in particular in the City Centre Air Quality Management Area. See also Other Measures to Improve Air Quality sections.

Developing a LEZ in a consistent manner with the other three largest cities in Scotland means the risk of displacement of national fleets is lower. As Scotland's capital, Edinburgh needs to be one of the leaders in delivering this important intervention.

Overall, taking account of objections relating to the need to address poor air quality, climate change and sustainable transport, the Council does not consider that objections in respect to need for a LEZ can be upheld.

LEZ funding and Impact on Council Budget

One objector considered that the funding associated with the LEZ Scheme would be much better spent on other measures to improve transport and/or air quality. Also, there was acknowledgement that costs are likely to be incurred by the Council to fully implement the boundary and operate the Scheme.

The Transport (Scotland) Act 2019 set out provisions for ministers to make grants to a local authority to meet, or help towards meeting, its costs in determining whether to make a low emission zone scheme, making a scheme and operating a scheme. The Council has been in receipt of grant for several years to help development of the Scheme and continues discussions with the Scottish Government about future financing.

It should also be noted that any monies received from penalty charges in respect of a LEZ scheme may be applied by the Council for the purposes of facilitating the achievement of the Scheme's objectives, once any operational costs are covered.

In February 2020, Committee noted that the Council and its regional partners received funds from Transport Scotland through the LEZ Public Transport Provision Fund (PTP) to promote modal shift and support the LEZ Scheme's objectives. In total, approximately £3.7m of PTP funds were claimed across SEStran region by the Council and regional local authorities to encourage modal shift and more sustainable transport.

Edinburgh Low Emission Zone – Objections Report

In addition, the Scottish Government has provided a total of £1.5m in LEZ Support Funds to adapt to LEZs and generally promote modal shift and sustainable transport for over 450 microbusinesses/low-income households located within 20 kilometres of the Scheme. Funds have also been allocated for taxi retrofit.

In general, it is recognised that although there may be some impact to the Council's budget, the need for a LEZ is also well understood. Account should also be taken of the funding and works already in place to encourage sustainable transport.

Overall, taking account of objections relating to funding support, the Council does not consider that objections in respect to finance impact to the Council can be upheld.

Vehicle Types and Emission Standards

One objector considered that only diesel vehicles should be included in the scope and that it was not necessary to include other types of vehicle within the Scheme.

Nationally consistent emission standards for Scottish LEZs have been set for virtually all petrol and diesel vehicle classifications (e.g. buses, taxis, vans, HGVs, cars) within the Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021. It is not in the Council's remit to consider deviating from these standards and regulations.

For Edinburgh, the modelling and appraisal work showed that with the scale of the air quality exceedances in the City Centre, the decisions to include all the different vehicle types within the Scheme (except motorcycles and mopeds as per the 2021 Regulations) was the most appropriate course of action. This would also ensure that the wider objectives of the Scheme could also be better achieved. It was recognised that with all vehicles included there would also be some benefit in communicating the Scheme in a clear and concise manner.

Overall, taking account of objections relating to modelling evidence and the statutory requirements, the Council does not consider that objections in respect to vehicle types and emission standards can be upheld.

Edinburgh Low Emission Zone – Objections Report

Carbon Emissions

Objections were raised in terms of the limited ability for the LEZ to reduce carbon (CO₂), however it should be noted that the objectives of the scheme include the statutory requirement to ensure there are reductions in greenhouse gas emissions, as per Transport (Scotland) Act 2019.

Other discretionary objectives agreed by the Council include those to ensure alignment with city, regional and national policies that encourage more sustainable transport. This approach recognises that there are limits to reducing tail-pipe CO₂ emissions via current LEZ structures, as shown by the NMF process and as reported to Committee in January 2022. However, the modelling also indicated that the Scheme would contribute to CO₂ reductions when considering the wider LEZ objectives such as encouraging mode shift to more sustainable, active travel modes.

Overall, taking account of objections relating to modelling evidence, the Council does not consider that objections in respect to carbon emissions can be upheld.

Other Measures to Improve Air Quality

Some objectors considered that funding would be better spent on other air quality improvement measures. An objector raised concern around compliance of the Council's fleet.

The Local Air Quality Management framework set out in the Environment Act (1995) obliges local authorities to implement an Air Quality Action Plan (AQAP) where breaches of Air Quality Objectives are likely. The Council is currently revising the existing Plan and It is intended that, if approved, the LEZ will constitute a significant action in the forthcoming revision.

The Air Quality Action Plan will also include wider measures to improve air quality. Progress on these existing (and new) measures must be reported to UK and Scottish Government on an annual basis.

The Council will undertake a statutory consultation process on the revised Plan following its presentation to Committee in summer 2022.

The Council's fleet is undergoing a fleet replacement programme which will take LEZ requirements into account.

Edinburgh Low Emission Zone – Objections Report

Overall, taking account of objections relating to modelling evidence and AQAP measures to improve air quality, the Council does not consider that objections in respect to other measures to improve air quality can be upheld.

Alignment with Taxi and Private Hire Car (PHC) licensing standards

One objector commented on the alignment of the LEZ Scheme with the PHC licensing standards. This may have originated from information on the Council's website that required updating, with respect to the new timescales applied to the age and emission policy for taxi and PHC licenses.

The LEZ Scheme and licensing standards are separate regimes, although throughout the development of both projects, there has been discussion and co-ordination.

Currently all taxi and PHCs should be of LEZ compliant standard prior to the enforcement of the LEZ commencing (June 2024).

In response to the comments, information on the Council's website has now been updated. Close co-ordination will continue between the two regimes, however as there are separate legal provisions, this would not constitute relevant grounds for a formal objection to the LEZ Scheme.

Overall, taking account of objections relating to alignment with taxi/PHC licensing, the Council does not consider that objections in respect to taxi and PHCs can be upheld.

Conclusions

Having considered all the objections submitted, the Council does not consider or recommend that any changes to the Scheme can be justified on the grounds raised in the objections.

However, measures to mitigate potential impacts of traffic displacement (Network Management Strategy) along with ensuring awareness of the funding support for upgrading vehicles and switching to more sustainable modes of travel have been reiterated. A mechanism for assessing requests for local exemptions has also been set out.

Edinburgh Low Emission Zone – Objections Report

Summary of Objections - Reference Table

The following table sets out a summary of each of the objections, whether they were from an individual, business or organisation, and the general themes that were raised as part of each objection:

Objection Categorised as Individual, Business or Organisation	Summary of Objection	Theme(s)
1 (Individual)	<p>Concern that residents are given little or no thought.</p> <p>Concern over Council continuing to grant planning applications which will produce car traffic which will lead to more restrictions on residents of the city centre.</p> <p>Concern about Scotrail running older trains into Waverley Station.</p> <p>Suggestion that all residents want is the city cleaned up and to stop having fireworks.</p>	Wider issue of traffic management due to city development
2 (Business)	<p>Most polluted roads outwith the proposed LEZ.</p> <p>Concerned over cost of compliant vehicles, and overall financial implications for business.</p> <p>Call for overall scheme to be scrapped, disagrees with focus on green policies.</p> <p>Concern over transparency of consultation results, believes there is no support for scheme.</p>	Impact on business/ Overall Scheme/ Evidence Base/ Consultation
3 (Business)	<p>Objecting on belief that Private Hire Car (PHC) licensing conditions are not aligned with LEZ scheme. Detrimental to PHC drivers.</p>	Alignment with PHC licensing

Edinburgh Low Emission Zone – Objections Report

	Believes that communication between departments has not been efficient.	
4 (Individual)	Resident understands the benefits of LEZ but objects on a personal level due to cost of purchasing a compliant vehicle, because public transport isn't a personal option.	Financial Impact on individual
5 (Individual)	<p>Objecting on grounds that child has a hidden disability but requires access to a vehicle. Current car is not compliant, and objector believes there is no entitlement for a blue badge which would allow for a national exemption. Asks for a local exemption.</p> <p>Also objects as LEZ boundary covers multiple streets in objectors permit parking zone making less parking places accessible as vehicle is non-compliant.</p> <p>Asks for permit zones to be remapped so permit holders can access many spaces outwith LEZ.</p>	Exemptions/ Boundary-Alignment with Resident Parking Permit Zones
6 (Individual)	Concern over commuting into proposed Zone at unsociable hours as no public transport available. Current vehicle is non-compliant, requests shift workers be given an exemption.	Exemptions
7 (Individual)	Concern over commuting into proposed Zone at unsociable hours as no public transport available. Current vehicle is non-compliant, requests shift workers be given an exemption.	Exemptions
8 (Individual)	<p>Believes LEZ is a good thing in broader term but personally needs private vehicle for commuting and it doesn't meet standards. There will be lots of public transport operators affected by this, believes they should be classed as essential workers and obtain a local exemption. Cannot use public transport due to unsociable hours.</p> <p>Asks for alternative parking facilities for public transport workers that operate at Edinburgh Waverley Train Station.</p>	Exemptions
9 (Individual)	Does not agree with this zone at all. There are other ways and means to reduce emission in the city other than effectively preventing the poor from entering the city centre.	Financial Impact

Edinburgh Low Emission Zone – Objections Report

10 (Business)	<p>Objection on grounds that the car park is within the boundary, encouraging motorists to park outwith the boundary, meaning there will be congestion on surrounding streets.</p> <p>There is also a concern that being within the boundary will deter car drivers from visiting and have a financial impact on the businesses within the business centre. Business feels there could be opportunity for car club at this location but car park in boundary would be problematic.</p> <p>Concern that greening of fleets will be slower than council modelling implies due to reduction in buying the new vehicles. The expected reduction in NOx emissions attributed to vehicle fleets will be slower than anticipated. If slower to change harmful emissions will persist for longer.</p>	Boundary-Size and Traffic Management/ Financial Impact on business/ Evidence Base
11 (Individual)	Objects to overall scheme as believe it's not needed, and it's not an appropriate time due to major roadworks/construction in the city centre.	Overall Scheme/ Wider issue of traffic management due to city centre development
12 (Individual)	<p>Objection due to ongoing works throughout the city's streets which disturb traffic flow.</p> <p>Concerns over Council fleet emissions.</p>	Wider issue of traffic management due to city development/ Council's transport emissions
13 (Individual)	<p>Objecting as residents living in the city centre are already penalised through parking permit emission conditions. Personal vehicle registered in March 2015 only has 98g CO2 emissions.</p> <p>Purchased car due to low CO2 emissions, believes should not be solely based on NOx emissions.</p> <p>Requests that support is given to encourage residents to reduce emissions, but they should be given exemption.</p>	Exemptions/ Carbon Emissions
14 (Individual)	<p>In general concerns were raised from the objector about the effects of the LEZ and vehicle details, crown vehicles and failure to comply with legislation.</p> <p>Objector believes such a decision should be taken via a referendum. There were general concerns that the Scheme was not needed because of declining</p>	Overall Scheme/ Boundary-Traffic Management/ Evidence Base/ Operational Cost/ Consultation/ Exemptions/ Carbon Emissions/ Vehicle Types

Edinburgh Low Emission Zone – Objections Report

	<p>pollution in any case (with no interventions), plus, it will not improve traffic flows, increase congestion and funding would be better spent elsewhere. The objector was also concerned about no other measures being taken to increase (improve) traffic flows and reduce congestions.</p> <p>Concern was raised about the uncertainty in the modelling process involved in development the Scheme, including the range of variables and accuracy of the modelling data (both traffic and air quality).</p> <p>In terms of the specifics of the scheme, concern was raised about increases in pollution at locations on the boundary due to displaced traffic. It was also suggested that vehicle types to be included should be diesel-powered vehicles only (especially diesel only cars and commercial vehicles including buses and coaches).</p> <p>The financial impacts of the scheme were also a concern insofar that those less financially able will need allowances to visit the city centre. Concern was raised about the cost implications to the Council of the Network Management Strategy works, as well as the gap in funding in terms of the ongoing revenue costs. There was a suggestion that funding would be better spent on repairing the current infrastructure or alternative pollution reducing measures which will have a greater impact, or for example better filtration on cremations.</p> <p>The objector also raised concern about the LEZ failing to address reductions in CO2 emissions and that through the structural installations that would be required to implement the scheme and the works required for the network management strategy, additional pollution would be caused and this had not been assessed.</p> <p>There was some concern that the proposed legislation incorrectly details which vehicles should be excluded i.e. crown vehicles and that the Council incorrectly applied timescales for the statutory notice period.</p>	
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Edinburgh Low Emission Zone – Objections Report

<p>15 (Organisation - Edinburgh Association of Community Councils)</p>	<p>Support for a LEZ.</p> <p>Opposition to a LEZ with the currently proposed boundaries - a city wide boundary is favoured.</p> <p>Concerns raised about the accuracy of modelling and assumptions made.</p> <p>Opposition to the premature removal of monitoring equipment.</p> <p>Concern that the LEZ only benefits the city centre. The streets in the suburban communities have had the highest level of emissions with the consequent detrimental effect on public health. Perversely it is the residents in these communities which will see no benefit from the proposed Edinburgh LEZ.</p> <p>Request for the Council to return the issue of an Edinburgh LEZ to the Scottish Government to facilitate a LEZ that meets residents needs and expectations.</p>	<p>Boundary Size/ Evidence Base/ Consultation</p>
<p>16 (Organisation - Corstorphine and Murrayfield Community Council)</p>	<p>Support for a LEZ.</p> <p>Opposition to a LEZ with the currently proposed boundaries - a city wide boundary is favoured.</p> <p>Concerns raised about the accuracy of modelling and assumptions made.</p> <p>The streets in the suburban communities have had the highest level of emissions with the consequent detrimental effect on public health.</p> <p>Request for the Council to return the issue of an Edinburgh LEZ to the Scottish Government to facilitate a LEZ that meets residents needs and expectations.</p>	<p>Boundary Size/ Evidence Base/ Consultation</p>
<p>17 (Organisation - Preston Street Primary Parent Council)</p>	<p>Concerns that the scheme boundary will encourage the most heavily polluting vehicles to divert around two sides of Preston Street Primary School. This will negatively impact the health of children and staff at the school.</p> <p>Concerns that the scheme fails to protect children at Preston Street Primary School from the life-threatening effects of air pollution and increases the risk</p>	<p>Boundary Size/ Preston Street Primary School</p>

Edinburgh Low Emission Zone – Objections Report

	<p>of death or injury due to the heavily traffic-dominated landscape around the school.</p> <p>The scheme will reduce the capacity to introduce schemes that reduce traffic and improve playground provision and pedestrian space.</p> <p>Call for scheme to be reconsidered to be more ambitious by including key roads approaching the city centre and ensuring that Preston Street Primary is within the boundary.</p> <p>The Council has declared a climate emergency and has committed to a net zero strategy by 2030. A wider LEZ scheme would go further toward meeting this ambition, without being at the expense of the health of the children at Preston Street Primary.</p>	
<p>18 (Organisation - New Town Broughton Community Council)</p>	<p>Welcome LEZ not in current format. The boundary should be increased to, include the designated Town Centres and areas such as Broughton Street, which form such an important element in the development of 20-minute neighbourhoods</p> <p>More consideration has been given to providing convenient diversionary routes than maximising the health benefits for people living in Edinburgh.</p> <p>Pollution levels have been considered on an absolute basis without any consideration of the number of people that will be exposed.</p> <p>Concerns that there is no recognition of the risks to pedestrians from vehicular emissions in areas outside of the LEZ; some of which have very high levels of walking including children walking to school.</p> <p>Calton Hill boundary should be redrawn to include Regent Road to ensure non complaint vehicles remain on arterial routes.</p> <p>London Road boundary should be redrawn to follow the south side of London Road. As a major arterial route, London Road would be a more appropriate diversion.</p>	<p>Boundary Size/ Boundary-Traffic Management/ Evidence Base/ Enforcement/ Carbon Emissions/ West End</p>

Edinburgh Low Emission Zone – Objections Report

	<p>Randolph Crescent/Great Stuart Street/Ainslie Place should be included in the LEZ as they are not suitable for diversion routes. If the boundary remains as currently proposed further measures should be developed.</p> <p>Insufficient detail is provided on the mitigating actions or measures to minimise traffic displacement.</p> <p>The current plans are focussed on reducing levels NOx pollution. Should include carbon.</p> <p>Other measures should be included such as wider roll out of EV infrastructure.</p> <p>Concerned that the enforcement approach is inadequate.</p>	
19 (Individual)	<p>Concerns that the city centre boundary alone may displace polluting vehicles to other areas of the city and exacerbate existing air quality problems. This will increase NOx pollution, around Preston Street Primary School. This will worsen health outcomes for children and staff.</p> <p>Concern that children at the school will learn less effectively, will become ill more frequently and have shorter lives. Children who also suffer deprivation will experience the above more severely than their wealthy counterparts.</p> <p>Staff at the school will also become ill more frequently.</p> <p>Increased traffic will make the roads around the school more dangerous for children.</p> <p>The plan is dangerously inadequate to address carbon output. It displaces traffic to residential areas.</p>	Boundary Size/ Boundary-Traffic Management/ Impact/ Preston Street Primary School/ Carbon Emissions
20 (Individual)	<p>Support for scheme not in current form.</p> <p>Concerns that the scheme boundary will encourage the most heavily polluting vehicles to divert around two sides of Preston Street Primary School. This will negatively impact the health and wellbeing of children and staff at the school as this is not an appropriate diversion route.</p>	Boundary-Traffic Management/ Preston Street Primary School

Edinburgh Low Emission Zone – Objections Report

<p>21 (Individual)</p>	<p>Objecting due to the proposed scheme being too small to improve air quality across the city</p> <p>Concerned that the diversion route will increase pollution in those streets, problematic for Moray Feu which is in World Heritage Site</p> <p>Believes Calton Hill should be included in the LEZ to prevent rat running, and Leith/Corstorphine should be included as areas of high pollution</p> <p>Believes whole urban area of city should be in LEZ</p> <p>Also concerned about lack of consultation with communities in developing proposed LEZ.</p>	<p>Boundary-Size/ Boundary-Traffic Management/ Consultation/ West End</p>
<p>22 (Individual)</p>	<p>The LEZ will add to the existing traffic problems in the residential streets of the West End resulting in an increase in traffic volumes traffic noise, and pollution.</p> <p>Concerned that the Council did not consider other transport related projects that are being constructed around the West End. Displacement of traffic is causing a rat run through residential streets</p> <p>Concern that the LEZ impact assessment focused on Palmerston Place and Chester Street, so mitigations will be limited to these streets only. Concerned also that there is no defined mitigation plan that will focus on the west end and put residents before traffic.</p> <p>There is a specific west end impact due to tram, City Centre West to East Link (CCWEL) and LEZ so needs unique focus on mitigations. Asks for consideration of a Low Traffic Neighbourhood (LTN) for West End.</p>	<p>Boundary-Size and Traffic Management/ Wider issue of traffic management due to city centre development/ West End</p>
<p>23 (Individual)</p>	<p>Concerns that the boundaries are poorly sited and will have a detrimental impact on the health, wellbeing and the rights of children due to the increased polluting traffic diverted.</p> <p>Concern that the IIA is inaccurate and understates the negative air quality and health impact of the traffic diverted along the boundaries, particularly on children attending Preston Street Primary School, or playing in greenspaces (e.g. the Meadows) alongside the boundary streets (e.g. Melville Drive).</p>	<p>Boundary-Size/ Boundary-Traffic Management/ Evidence Base/ Preston Street Primary School</p>

Edinburgh Low Emission Zone – Objections Report

	<p>Concern that the boundaries further entrench traffic patterns passing around and through key greenspace, educational and play areas (e.g. Preston Street Primary, the Meadows) making future modifications to remove all or most of the traffic from these routes in the future more difficult.</p> <p>Requesting for the scheme to be paused at this stage, a full Children’s Rights and Wellbeing Impact Assessment (CRWIA) carried out and boundaries extended and redrawn to remove the most polluting traffic from areas where children attend school or are known to play.</p> <p>Concern that specific measures to mitigate against negative health impacts of the children of Preston Street Primary are not acceptable or adequate. There is no scientific air quality evidence that widened pavements would be enough to protect the health and wellbeing of children and they would like to know where the evidence to support this has been sourced.</p>	
<p>24 (Organisation - West End Community Council)</p>	<p>Concerns that the LEZ will add to the existing traffic problems and pollution in the West End. Concerns over traffic displacement onto residential streets, and impact on Boundary streets (e.g. Palmerston Place and Chester Street).</p> <p>Concerns that cumulative traffic impact from changes in the traffic network in the West end (g trams and CCWEL) are not been recognised and addressed.</p> <p>Concern that there is no defined mitigation plan to deal with the displacement of traffic to West End residential streets. A more defined and detailed mitigation plan covering all streets in the West End needs to be developed. Propose the introduction a low traffic neighbourhood (LTN) in the West End.</p> <p>Concern that consultation notices were only located on boundary streets, those on surrounding streets not given same opportunity to raise an objection.</p>	<p>Boundary-Traffic Management/ Enforcement/ Consultation/ Wider issue of traffic management due to city centre development/ West End</p>
<p>25 (Organisation - Living Streets)</p>	<p>Objects due to previous comments during consultation not been addressed or fully considered. Some of the issues (lack of effective enforcement) were completely ignored and others (displacement of traffic into predominantly</p>	<p>Boundary-Size/ Boundary-Traffic Management/ Enforcement/ Consultation/ West End/ Carbon Emissions</p>

Edinburgh Low Emission Zone – Objections Report

	<p>residential areas) are dismissed on the basis that it is too difficult to make changes to the current arrangements.</p> <p>Believe this is counter to Scottish government focus on community empowerment.</p> <p>Organisation believes that the boundaries of the LEZ should be increased.</p> <p>Need to see clearly defined plans for mitigation measures on residential streets.</p> <p>The current plans are focussed on reducing levels NOx pollution. Other forms and sources of pollution need to be both more closely monitored and reduced, in particular the levels of particulate pollution and continued use of temporary diesel generators within the LEZ</p> <p>Concerns about impact at west end.</p> <p>Concerned about enforcement and the use of ANPR with only 16 fixed cameras and one mobile unit to cover the other.</p> <p>33 entry routes – worried this will undermine compliance and force non-compliant vehicles onto residential routes.</p>	
26 (Individual)	<p>Objects due to concerns over air quality outwith LEZ zone. Fail to see how designating an area of the city as out of bounds to non-complaint vehicles 24/7 is a worthwhile tool to improve public health.</p> <p>Edinburgh is already abound with multiple road closures collectively responsible for increased emissions.</p>	Boundary-Size/ Wider issue of traffic management due to city centre development

The City of Edinburgh Council's Proposal to Make a Low Emission Zone Scheme: Final Submission to Scottish Ministers

Pursuant to the provisions of the

[Transport \(Scotland\) Act 2019](#) and in accordance with

[The Low Emission Zones \(Scotland\) Regulations 2021](#) and

[The Low Emission Zones \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#)

Reporting Body

Local authority name: The City of Edinburgh Council

Date of approval by local authority:

Date of submission to Scottish Ministers:

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Introduction

Pursuant to the provisions of the [Transport \(Scotland\) Act 2019](#) ('the Act'), and in accordance with [The Low Emission Zones \(Scotland\) Regulations 2021](#) and [The Low Emission Zones \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#) ('the Regulations') notice is hereby given that the City of Edinburgh Council ('the Council') intends to apply to the Scottish Ministers for consent to introduce and operate a Low Emission Zone (LEZ) Scheme ('the Scheme') in Edinburgh.

Following a robust option generation, appraisal and testing process, using the National Low Emission Framework (NLEF) and National Modelling Framework (NMF), LEZ Guidance ('the Guidance') and informed by ongoing engagement with members of the public and stakeholders, the Council has determined the optimum Low Emission Zone (LEZ) for Edinburgh. This is referred to as 'the Scheme'.

A map of the proposed Edinburgh LEZ is shown in Figure 1 below.

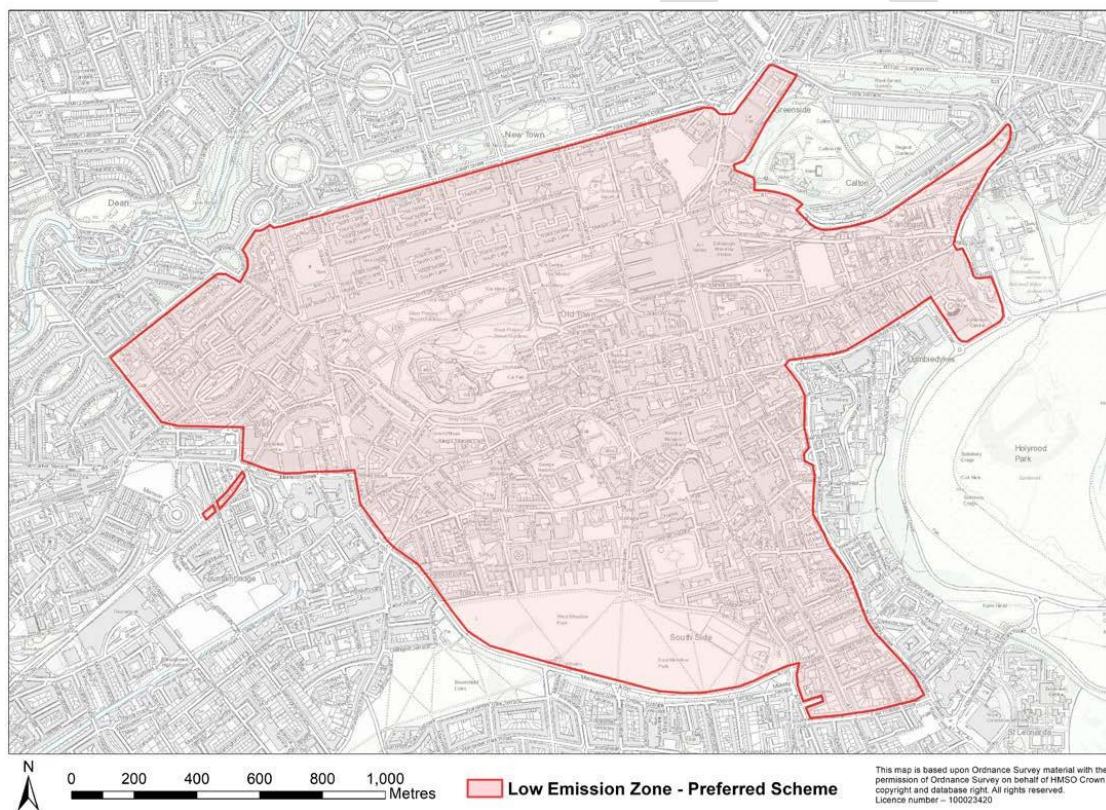


Figure 1. LEZ Boundary

Table 1 denotes the boundary of the Scheme. All roads within the Scheme boundary are listed below. Roads or road sections that are defined as 'special' or 'private', as defined in section 151(1) of the Roads (Scotland) Act 1984, cannot be specified within the Scheme according to the Act. Roads that cannot be specified as part of the LEZ, are defined as 'not specified' and are denoted with an asterisk (*)

Table 1. Roads within Scheme boundary

Road specified within Scheme Boundary	Detail
Abbeyhill Crescent	Full length
Alva Street	Full length
Atholl Crescent	Full length
Atholl Crescent Lane	Full length
Bakehouse Close	Full length
Bernard Terrace	Full length
Blackfriars Street	Full length
Blair Street	Full length
Boroughloch	Full length
Borthwick's Close	Full length
Boyd's Entry	Full length
Bread Street	Full length
Bread Street Lane	Full length
Brighton Street	Full length
Bristo Place	Full length
Bristo Port	Full length
Brown's Close	Full length
Brown's Court	Full length
Buccleuch Place	Full length
Buccleuch Place Lane	Full length
Buccleuch Street	Full length
Buccleuch Terrace	Full length
Bull's Close	Full length
Calton Hill	Full length
Calton Road	Full length
Cambridge Street	Full length
Cambridge Street Lane	Full length
Campbell's Close	Full length
Candlemaker Row	Full length
Canning Street	Full length
Canning Street Lane	Full length
Canongate	Full length
Castle Street	Full length
Castle Terrace	Full length
Castlehill	Full length
Cathedral Lane	Full length
Chalmers Close	Full length
Chalmers Street	Full length
Chambers Street	Full length
Chapel Street	Full length
Charlotte Lane	Full length
Charlotte Square	Full length
Chuckie Pend	Full length
Clerk Street	Full length
Clyde Street North Lane	Full length
Coates Crescent	Full length
Cockburn Street	Full length
Coinyie-House Close	Full length
Cooper's Close	Full length
Cornwall Street	Full length

Cowan's Close	Full length
Cowgate	Full length
Cowgatehead	Full length
Cranston Street	Full length
Crichton Street	Full length
Crichton's Close	Full length
Davie Street	Full length
Drummond Street	Full length
Dunbar's Close	Full length
Dyer's Close	Full length
East Adam Street	Full length
East Crosscauseway	Full length
East Fountainbridge	Full length
East Market Street	Full length
Elder Street	Full length
Forrest Hill	Full length
Forrest Road	Full length
Forsyth's Close	Full length
Frederick Street	Full length
Galloway's Entry	Full length
Gentle's Entry	Full length
George IV Bridge	Full length
George Square	Full length
George Square Lane	Full length
George Street	Full length
Gifford Park	Full length
Gilmour Street	Full length
Gladstone Court	Full length
Glen Street	Full length
Glenfinlas Street	Full length
Grassmarket	Full length
Grindlay Street	Full length
Grindlay Street Court	Full length
Gullan's Close	Full length
Guthrie Street	Full length
Haddon's Court	Full length
Hammermen's Entry	Full length
Hanover Street	Full length
Hardwell Close	Full length
Hastie's Close	Full length
Heriot Bridge	Full length
High Riggs	Full length
High School Wynd	Full length
High School Yards	Full length
High Street	Full length
Hill Place	Full length
Hill Square	Full length
Hill Street	Full length
Hill Street North Lane	Full length
Hill Street South Lane	Full length
Hope Park Crescent	Full length
Hope Park Terrace	Full length
Hope Street	Full length
Howden Street	Full length
Hunter Square	Full length

Hunter's Close	Full length
Hutton Road	Full length
Hyndford's Close	Full length
Infirmary Street	Full length
Inglis Court*	Full length
Jeffrey Street	Full length
Johnston Terrace	Full length
Keir Street	Full length
Kennedy Walk	Full length
King's Stables Lane	Full length
King's Stables Road	Full length
Lady Lawson Street	Full length
Lady Wynd	Full length
Lamb's Close	Full length
Lauriston Gardens	Full length
Lauriston Park	Full length
Lauriston Place	Full length
Lauriston Street	Full length
Lawnmarket	Full length
Leith Street	Full length
Little King Street	Full length
Lochend Close	Full length
Lonsdale Terrace	Full length
Lothian Road	From Bread Street-Morrison Street Junction to Shandwick Place-Princes Street Junction
Lutton Place	Full length
Manor Place	Full length
Market Street	Full length
Marshall Street	Full length
Meadow Lane	Full length
Melville Street	Full length
Melville Street Lane	Full length
Merchant Street	Full length
Meuse Lane	Full length
Montague Street	Full length
Morrison Link	Full length
Mound Place	Full length
Multrees Walk	Full length
Nether Bakehouse	Full length
New Assembly Close	Full length
New Johns Place	Full length
New Skinner's Close	Full length
New Street	Full length
Nicolson Square	Full length
Nicolson Street	Full length
Niddry Street	Full length
Niddry Street South	Full length
Nightingale Way	Full length
North Bank Street	Full length
North Bridge	Full length
North Castle Street	Full length
North Charlotte Street	Full length
North St Andrew Lane	Full length
North St Andrew Street	Full length

North St David Street	Full length
Old Fishmarket Close	Full length
Old Infirmary Lane	Full length
Old Tolbooth Wynd	Full length
Oxford Street	Full length
Panmure Place	Full length
Parliament Square	Full length
Pollock's Close	Full length
Potterrow	Full length
Princes Street	Full length
Queensferry Street	From Randolph Crescent-Randolph Place Junction to Shandwick Place
Queensferry Street Lane	Full length
Ramsay Garden	Full length
Ramsay Lane	Full length
Randolph Lane	Full length
Randolph Place	Full length
Rankeillor Street	Full length
Reekies Court	Full length
Regent Road	From Roundabout outside St Andrew's House to Princes Street-Leith Street Junction
Register Place	Full length
Reid's Close	Full length
Richmond Lane	Full length
Richmond Place	Full length
Riego Street	Full length
Robertson's Close	Full length
Robertson's Court	Full length
Rose Street	Full length
Rose Street North Lane	Full length
Rose Street South Lane	Full length
Roxburgh Place	Full length
Roxburgh Street	Full length
Rutland Court	Full length
Rutland Court Lane	Full length
Rutland Square	Full length
Rutland Street	Full length
Shandwick Place	Full length
Simon Square	Full length
Simpson Loan	Full length
South Bridge	Full length
South Charlotte Street	Full length
South Clerk Street	Full length
South College Street	Full length
South Gray's Close	Full length
South St Andrew Street	Full length
South St David Street	Full length
Spittal Street	Full length
Spittal Street Lane	Full length
St Andrew Square	Full length
St Giles Street	Full length
St James Place	Full length
St John Street	Full length
St Mary's Street	Full length

St Ninian's Row	Full length
St Patrick Square	Full length
St Patrick Street	Full length
Stafford Street	Full length
Stevenlaw's Close	Full length
Sugarhouse Close	Full length
Teviot Place	Full length
The Mound	Full length
Thistle Street	Full length
Thistle Street North East Lane	Full length
Thistle Street North West Lane	Full length
Thistle Street South East Lane	Full length
Thistle Street South West Lane	Full length
Tron Square	Full length
Upper Bow	Full length
Vennel	Full length
Victoria Street	Full length
Walker Street	Full length
Warden's Close	Full length
Waterloo Place	Full length
Waverley Bridge	Full length
West Adam Street	Full length
West Approach Road	From Morrison Link Junction to Lothian Road
West Bow	Full length
West College Street	Full length
West Crosscauseway	Full length
West Nicolson Street	Full length
West Port	Full length
West Register Street	Full length
West Register Street Lane	Full length
West Richmond Street	Full length
William Street	Full length
William Street North East Lane	Full length
William Street North West Lane	Full length
William Street South East Lane	Full length
William Street South West Lane	Full length
Young Street	Full length
Young Street North Lane	Full length
Young Street South Lane	Full length

Road not specified within Scheme boundary	Detail
Archibald Place*	Full length
Boroughloch Square*	Full length
Castle Esplanade*	Full length
Charles Street*	Full length
Charles Street Lane*	Full length
Charteris Place*	Full length
Chester Street Mews*	Full length
College Wynd*	Full length
Geddes' Entry*	Full length
Gilmour's Entry*	Full length
Gray's Court*	Full length

Hamilton's Folly Mews*	Full length
Inglis Court*	Full length
Kincaid's Court*	Full length
Morgan Lane*	Full length
Nether Craigwell*	Full length
Porteous' Pend*	Full length
Quarry Close*	Full length
Reid's Court*	Full length
St James Square*	Full length
Stafford Street Lane*	Full length
Thistle Court*	Full length
Webster's Land*	Full length
Windmill Lane*	Full length
Windmill Street*	Full length

Grace Period and Operation

The Scheme will be introduced on 31 May 2022 and operate 24 hours a day, 7 days a week, all year round. This is the default position for all LEZs in Scotland, according to the Guidance.

It is proposed that a two-year grace period will start on the day the LEZ is introduced (31 May 2022) and end on 31 May 2024. Enforcement against non-compliant vehicles will commence from 1 June 2024.

The Act allows for the LEZ, or part of the LEZ to be temporarily suspended in emergency situations, such as an accident on the wider road network that requires all vehicles to be temporarily diverted through the Scheme area (but only where vehicles follow prescribed diversionary routes). The Act also allows for the LEZ, or part of the LEZ, to be temporarily suspended for events.

In both instances, to encourage compliance and meet Scheme objectives, suspensions will only be granted in exceptional circumstances and would be reviewed on a case-by-case basis.

Local 'Time-limited' Exemptions

Local exemptions are to be limited to ensure the objectives of the Scheme are met. However it is recognised that there may be exceptional circumstances where an exemption would be allowed.

The acceptability of a local exemption request is proposed to be determined on a case by case basis via the establishment of a LEZ Local Exemption Advisory Panel, which will meet quarterly, or as required, as part of the LEZ governance structure.

Enforcement, Penalty Charges & Offences

The Council will conduct all LEZ enforcement in accordance with the Act and the Regulations.

The registered keeper of a vehicle, or persons liable other than the registered keeper, can be subject to a penalty charge if they drive within the Scheme boundary in a non-compliant vehicle, in accordance with sections 5-6 of the Low Emission Zones (Emission Standards, Exemptions and Penalty Charges) (Scotland) Regulations 2021.

Determining a vehicles emission standard, will be on the basis of a record produced by an approved device and comparison with DVLA data, according to the Act and Regulations.

Automatic Number Plate Recognition (ANPR) cameras will be used as the basis for LEZ enforcement, in line with Scotland's other LEZs.

The Council can issue a Penalty Charge Notice (PCN) to the registered keeper of a non-compliant vehicle driving within the Scheme boundary during its hours of operation. A PCN will be issued for each contravention detected, up to once per vehicle per day. A PCN must be served within 28 days of the offence detection. The PCN must be paid within 28 days of issue of the PCN (this is called the 'payment period'), or within 14 days of issue for a discounted rate. The PCN should be posted to the registered keeper of the vehicle.

Penalty rates, discounts and surcharges are set by to vehicle category, according to Schedule 4 of The Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021). See table 2, below:

Table 2. Penalty Charge Notice (PCN) rates, by vehicle class and tier

Vehicle category	Initial Penalty Charge	Subsequent Penalty Charges			
	1	2	3	4	5
Light passenger vehicle (including cars)	£60	£120	£240	£480	£480
Minibus	£60	£120	£240	£480	£960
Bus and coach	£60	£120	£240	£480	£960
Light goods vehicles	£60	£120	£240	£480	£480
Heavy goods vehicle	£60	£120	£240	£480	£960
Special Purpose Vehicles (SPV)	£60	£120	£240	£480	£480

The initial penalty charge for all non-compliant vehicles across all vehicle categories is set at £60, with a payment period set at 28 days from the date the penalty charge notice is served. The penalty charge rate is reduced by 50% if paid within 14 days. The penalty rate doubles for each subsequent contravention (i.e. the same person with the same vehicle driving within the same LEZ) within a 90 day period, such as up to £480 for light passenger vehicles or £960 for heavy goods vehicle. If contraventions occur more than 90 days apart, the initial contravention penalty charge rate would be applied to both contraventions. The purpose of the surcharge resetting after 90 days is to ensure that those who regularly contravene the LEZ are penalised appropriately.

If a PCN remains unpaid after the expiry of the 28-day payment period (and no representation is received) the Council can issue a 'charge certificate'. A charge certificate increases the penalty charge amount by 50%. If the increased charge is not paid within 14 days, the Council can recover the charge certificate (and penalty charge) as an enforceable debt.

Representations in respect of penalty charges may be made, via a formal appeals process, to challenge a PCN. Appeals will be in accordance with Section 8 of the Low Emission Zones (Emission Standards, Exemptions and Penalty Charges) (Scotland) Regulations 2021.

Contravention of the Scheme is a civil matter. However, regulation 12 of the Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021 states that a criminal offence occurs if a person interferes with the operation of a LEZ scheme. A person will commit a criminal offence if, with the intention of avoiding payment of a PCN, or if acting with intent to avoid being identified as having failed to pay a penalty charge, the person:

- Interferes with an approved device
- Interferes with a LEZ traffic sign
- Obscures a registration plate
- Makes or uses false documents

A person guilty of an offence under regulation 12 is liable on summary conviction to a fine not exceeding level 5 on the standard scale (which equates to £5000). In these circumstances, the Council will liaise with Police Scotland where there is suspicion that a criminal offence has been committed.

Certain vehicles (and groups of vehicles) are exempted nationally from Scotland's LEZs according to [The Low Emission Zones \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#). These vehicle types and groups, are summarised in table 3, below.

Table 3. National Exemptions

Vehicle type	Description
Emergency vehicles	<p>The vehicle is being driven by any person who is:</p> <ul style="list-style-type: none"> • undertaking their duty as a constable; • providing a response to an emergency at the request of the Scottish Ambulance Service Board; • exercising the functions of the Scottish Ambulance Service Board, the Scottish Fire and Rescue Service, Her Majesty's Coastguard or the National Crime Agency.
Naval, military or air force vehicles	Vehicles being used for naval, military or air force purposes.
Historic vehicles	<p>The vehicle was manufactured or registered under the Vehicle Excise and Registration Act 1994 for the first time at least 30 years ago;</p> <p>The vehicle is no longer in production; and</p> <p>The vehicle has been historically preserved or maintained in its original state and has not undergone substantial changes in the technical characteristics of its main components.</p>
Vehicles for disabled persons	<p>The vehicle is being driven by any person who is in receipt of a badge (a blue badge) that has been issued under Section 21(2) of the Chronically Sick and Disabled Persons Act 1970,</p> <ul style="list-style-type: none"> • a passenger in the vehicle has been issued with a badge under that Section of that Act; or • a badge for the vehicle has been issued under Section 21(4) of that Act; or • a reduction in annual rate of vehicle excise duty applies because the vehicle is being used by a disabled person in receipt of personal independence payment at the standard rate; or <p>Vehicles registered with a 'disabled' or 'disabled passenger vehicles' tax class e.g. the vehicle is exempt from payment of vehicle excise duty under paragraph 19(1) or 20(1) of schedule 2 of the Vehicle Excise and Registration Act 1994 (exemptions from excise duty for vehicles used by disabled persons).</p>

Vehicle type	Description
Showman vehicles	Vehicles described as either “showman’s goods vehicle” or “showman’s vehicle” according to Section 62(1) of the Vehicle Excise and Registration Act 1994. Note: these are highly specialised vehicles used for the purposes of travelling showmen, where the vehicle is used during the performance, used for the purpose of providing the performance or used for carrying performance equipment.

Section 17 of the Act includes that local authorities may grant and renew ‘time-limited exemptions’, in respect of a vehicle or type of vehicle for the purpose of section 6(1)(b), by reference to the vehicle’s use. The maximum period for which a ‘time-limited exemption’ may be granted is a period of 1-year. However, to encourage compliance and to meet Scheme objectives, exemptions will only be granted in exceptional circumstances and would be considered on a case-by-case basis.

Network Management

The Council is developing a Network Management Strategy (NMS). Its purpose is to ensure effective and efficient traffic operation around the boundary and try to mitigate any potential impacts. It will identify specific measures at locations around the boundary such as junction reconfigurations, optimising signals staging, improved signage and better links to the Urban Traffic Control system and will be developed in partnership with communities. The NMS will seek to build on previous engagement/suggestions by communities as much as possible. Developing a complementary signage strategy will also form part of the NMS to help redirect non-compliant traffic in advance of the city centre, reducing potential displacement impacts.

A LEZ annual progress report is required by the Regulations, on the operation and effectiveness of the scheme. This will be informed by a robust monitoring regime that will inform the NMS and may cover public transport journey times, traffic surveys and public opinion surveys as well as the Council’s well-established air quality monitoring network. Traffic monitoring to measure traffic displacement will be undertaken both prior to and during the scheme’s operation in 2024 to ensure it is evidence-led and responsive.

Traffic monitoring to measure traffic displacement will be undertaken both prior, to and during the Scheme’s operation in 2024 to ensure the NMS is evidence led and responsive.

Strategy

Introduction

Scottish Government's Programme for Government in 2017/18 made a commitment to introduce Low Emission Zones (LEZs) with local authorities in Scotland's four largest cities (Aberdeen, Dundee, Edinburgh and Glasgow) following recommended assessment methodologies outlined in the Cleaner Air for Scotland Strategy (CAFS) – the National Low Emission Framework. The Transport (Scotland) 2019 Act was thereafter the key delivery drivers for Low Emission Zones in Scotland. The Council's coalition administration's Commitment 18 seeks to improve Edinburgh's air quality and reduce carbon emissions, as well as explore the implementation of Low Emission Zone(s).

Overall, the Council is committed to delivering a sustainable future for the city and its citizens, as outlined in the recently published City Mobility Plan (CMP) and the 2030 Climate Strategy. The Final LEZ scheme is supported by these Plans. In addition, the developing new Local Development Plan – 2030 City Plan – also takes account of the Edinburgh LEZ Scheme. In terms of the Local Air Quality Management regime, the Final LEZ Scheme supports the actions the Council are taking to improve poor air quality. Further details are provided below.

Planning and Transport Strategies

Edinburgh's Low Emission Zone sits under the City Mobility Plan (CMP), Edinburgh's 10-year local transport strategy and aligns with the Edinburgh City Centre Transformation project (ECCT). Together these projects aim to improve health, wellbeing, placemaking and connectivity and have a key focus on prioritising sustainable travel choices to support the city's 2030 net zero carbon target, reducing the need for private car use and creating more pleasant environments for people to live, work and enjoy leisure time.



Figure 2. LEZ is a key deliverable of the City Mobility Plan, the Council's local transport strategy to 2030.

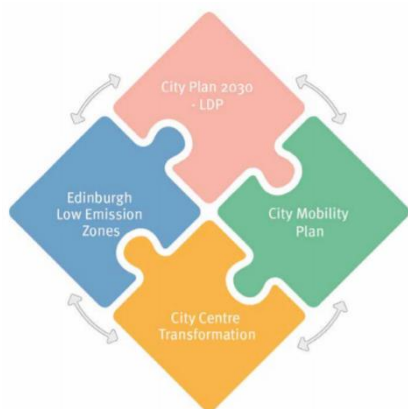


Figure 3. The relationship between Low Emission Zone(s), City Mobility Plan, Edinburgh City Centre Transformation and the developing 2030 City Plan.

The Council continues to support a range of policies and measures that will encourage modal shift away from private car use, including, an Active Travel Action Plan, provision of Park and Ride, Controlled Parking and Priority Parking Areas. A number of policies in the City Mobility Plan will reinforce this work, see figure 2.

To be truly effective, the implementation of LEZ will be supported by policies and interventions across the whole of Edinburgh as part of a toolkit of measures. The proposal has therefore also been developed in close collaboration with the preparation of the proposed local development plan – 2030 City Plan.

Local Air Quality Management and Cleaner Air for Scotland

LEZs are recognised by the City as an established tool across Europe to reduce harmful emissions from transport by restricting access to urban areas for the most polluting vehicles. LEZs are therefore an important tool to help improve public health by accelerating the use of cleaner vehicles and encouraging behaviour change, alongside other measures.

Air quality monitoring and management activities in Scotland is primarily driven by the 2008 ambient air quality directive (2008/50/EC), which was incorporated into Scottish law through the Air Quality Standards (Scotland) Regulations 2010. At a local level, The Environment Act 1995 and Regulatory Reform (Scotland) Act 2014 sets out the Local Air Quality Management (LAQM) regime to assist Local Authorities in achieving air quality standards and objectives to protect human health.

The Cleaner Air for Scotland (CAFS) strategy, released in 2015, sets out how Scottish Government and its partner organisations propose to further reduce air pollution to protect human health and fulfil Scotland's legal responsibilities as soon as possible. The strategy includes commitments to ensure a consistent approach to the appraisal, design and implementation of Low Emission Zones (LEZ) through the application of the National Low Emission Framework (NLEF), in conjunction with the National Modelling Framework (NMF).

The Council's statutory duty under the requirements of the Local Air Quality Management (LAQM) regime ensures air pollution across Edinburgh is reviewed and assessed annually. Where air quality is deemed to be in breach of statutory objectives, the Council is also obliged to produce an Air Quality Action Plan with the aim of reducing pollution. Despite improvements in air quality since the introduction of the Plan (updated in 2010), there remain locations where the Air Quality Objective for annual mean NO₂ are not being met, especially in the Central AQMA. While the number of exceedances of the objective has decreased, the proposed LEZ is to be introduced to accelerate the required compliance.

The Council's 2021 Air Quality Annual Progress Report, recently approved by Scottish and UK Governments, says the implementation of the LEZ should be a priority for the Council over the next year. The Council will also complete a revision of the NO₂ Air Quality Action Plan, in conjunction with the City Mobility Plan and the Scottish Government's clean air strategy - Cleaner Air for Scotland 2. The LEZ Final Scheme for Edinburgh will form a major aspect of the Air Quality Action Plan.

Addressing the Climate Emergency

The Council declared a Climate Emergency setting a vision for Edinburgh to be net zero by 2030. Delivering net zero emissions by 2030 and adapting to the impacts of climate change will require system-wide and transformational change across all sectors of the city. The CMP and 2030 Climate Strategy and Implementation Plan represent substantial programmes of work to deliver reductions in CO₂ emissions. Delivery of actions to manage demand, decarbonise transport and accelerate modal shift will require support from key partners, including citizens, businesses, communities, Transport Scotland, Scottish and UK Governments.

The 2030 Climate Strategy Implementation Plan sets out a framework for assessing and measuring progress towards the strategy's comprehensive outcomes. It supports the development of a Low Emission Zone, which will help reduce pollution across the whole city, not just within the zone, which the Final LEZ Scheme aims to do. The Plans also commits the Council to continue to work with Scottish Government to look at opportunities for promoting zero carbon city centres within the LEZ structure.

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Governance

The LEZ Scheme for Edinburgh has been developed with partners adhering to strict governance structure as detailed in figure 4.

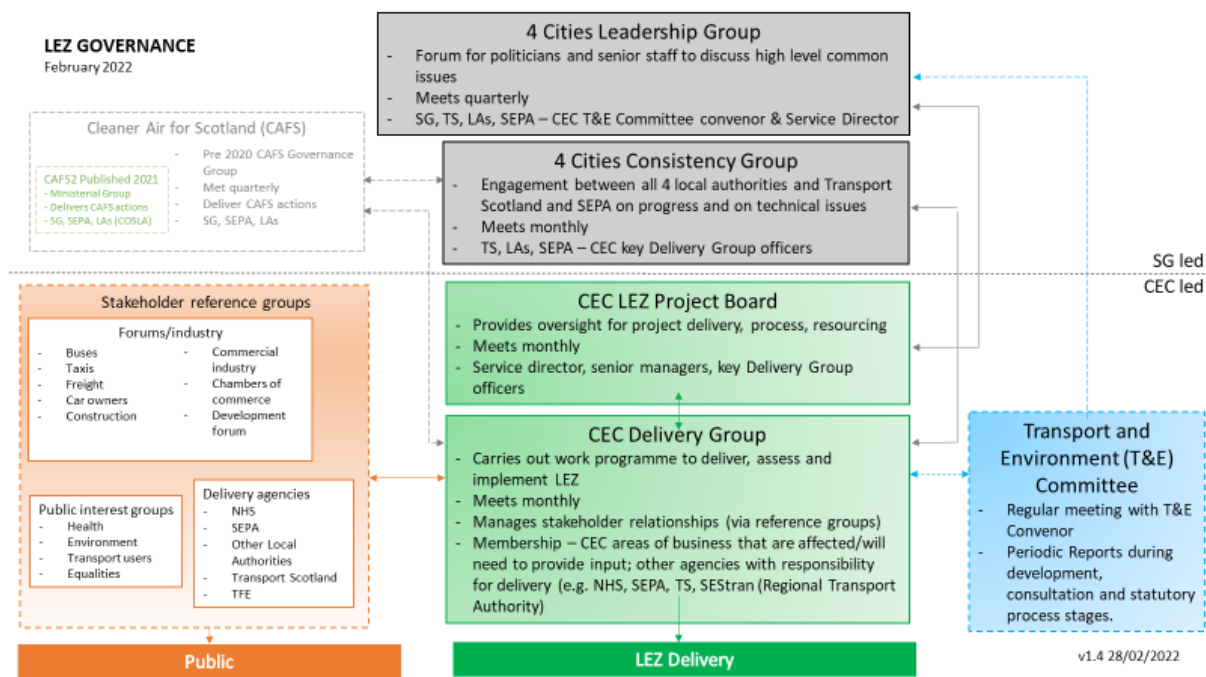


Figure 4. LEZ Governance Structure

The Council's Transport and Environment Committee ('the Committee') is the overarching decision-making body within the Council in terms of the LEZ Scheme. It has responsibility for approving the Council's actions for city growth and place planning, relating to transport.

The convener of the Committee represents the Council at the LEZ Leadership Group, which was set up to oversee the introduction of LEZs in Scotland. The Committee has approved progress of the LEZ at various stages through the consideration of the following report, which can be found on the Council's [LEZ evidence webpage](#) and are summarised in table 4, below.

Table 4. LEZ reports to Transport and Environment Committee

Year	Month	Report Name
2018	May	Developing Low Emission Zones in Edinburgh
2019	February	Connecting our Cities, Transforming our Places
	May	Tackling Air Pollution – Low Emission Zone
	October	Edinburgh's Low Emission Zones – update
2020	February	Edinburgh Low Emission Zone - regulations and guidance consultation response and programme update
2021	June	Low Emission Zone Preferred Scheme for Consultation

	October	Low Emission Zone Consultation and Development
2022	January	Low Emission Zone Carbon Impact
	March	Low Emission Zone Final Submission

The Council is also represented on the national LEZ Consistency, Enforcement and Communications Working Groups, along with representatives of Transport Scotland and the other LEZ cities

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Summary of Air Quality, Climate Change and Transport Issues

Air pollution is a serious concern for public health, with greatest impacts on the more vulnerable members of society including: the very young and the elderly or those with existing health conditions such as asthma, and other respiratory and cardiovascular diseases. Road transport is a significant contributor to air pollution. Poor air quality is associated with around 200 attributable deaths in Edinburgh and around 22,500 lost life years across the Scottish population annually, with health impacts costing an estimated £15 billion per year across the UK.

The Council's statutory duty under the requirements of the Local Air Quality Management (LAQM) regime (Environment Act 1995, as amended) ensures air pollution across Edinburgh is reviewed and assessed annually. In response to this, the Council has declared five Air Quality Management Areas (AQMAs) due to exceedances of the national Air Quality Objectives for Nitrogen Dioxide (NO₂) and one AQMA for Particulate Matter (PM₁₀). Road transport emissions are significant contributors to poor air quality, especially for the pollutant NO₂.

The Council is also obliged to produce an Air Quality Action Plan with the aim of reducing pollution. Despite improvements in air quality since the introduction of the Plan (updated in 2010), there remain locations where the Air Quality Objective for annual mean NO₂ are not being met, especially in the Central AQMA. While the number of exceedances of the objective has decreased, the proposed LEZ is to be introduced to accelerate the required compliance.

The Council declared a Climate Emergency in 2019 setting a vision for Edinburgh to be net carbon zero by 2030. Meeting this target and adapting to the impacts of climate change will require system-wide and transformational change across all sectors of the city.

The CMP and 2030 Climate Strategy implementation plans represent substantial programmes of work to deliver reductions in CO₂ emissions. Delivery of actions to manage traffic demand, decarbonise transport and accelerate a shift to the use of the most sustainable modes of travel (particularly walking, cycling and public transport) will require support from the Council's key partners, including citizens, businesses, communities, Transport Scotland, Scottish and UK Governments.

The LEZ will play an important role in accelerating behaviour change towards more sustainable forms of transport and cleaner vehicle technologies by restricting access to particular vehicles.

The Council is committed to transforming Edinburgh's transport systems into one that is truly sustainable, accessible and efficient. Edinburgh's 10-year transport strategy – the CMP - sets a programme for project delivery towards reaching the net zero target. A LEZ is a key deliverable of the CMP, alongside the Edinburgh City Centre Transformation programme (ECCT) that will prioritise active travel and public transport as desirable and practical travels option across the City Centre.

Behaviour change towards sustainable travel and addressing the Climate Emergency, will be accelerated with financial incentives. The Scottish Government are providing grant funding to the most impacted individuals and businesses by the LEZ. National funding includes provision for public transport infrastructure for local authorities directly affected as well as neighbouring authorities. National funding is also provided for transport operators to retrofit their bus, coach and taxi fleets as well as for eligible low-income households and micro businesses located within 20km of a proposed LEZ.

The Council's ambitions for a fully sustainable transport system is evidenced across its current programme of works, such as major capital investments in transport infrastructure (Trams to Newhaven, active travel etc.), expansion of parking enforcement and rollout of electric vehicle chargers, to name but a few. A LEZ, alongside a suite of other tools, will help improve health and wellbeing, placemaking and connectivity, improving the environment for those who live, work and visit Edinburgh.

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LEZ Objectives

The Scheme's objectives are summarised in Table 5. The table also details proposed measures that consider the effective implementation of the LEZ. See also Monitoring and Reporting

Table 5. LEZ Objectives and Proposed Measures

LEZ Objective	Measure
a) Contribute towards meeting the air quality objectives prescribed under Section 87(1) of the Environment Act (1995).	Downward NO ₂ trend to meet statutory objections (annual mean below 40µg/m ³)
b) Contribute towards reduction of emissions in fulfilment of Part 1 of the Climate Change (Scotland) Act 2009	Transport-related emission reduction (tCO ₂ e). Progress measure towards the Council target of net zero carbon emissions by 2030
c) Minimise the impact from traffic displacement across the city's transport network, related to LEZ scheme	A Network Management strategy to ensure efficient operation across LEZ scheme will include measures such as public transport journey time analysis, traffic surveys and monitoring public feedback
e) Strategically align with Council sustainable transport, active travel and placemaking objectives	LEZ integration strategy, with City Centre Transformation (CCT) projects, the City Mobility Plan (CMP) and Local Air Quality Management statutory regime
d) Strategically align with national funding provision policies, supporting individual and business adaptation	Uptake of LEZ Support Funds and other retrofit funds (Transport Scotland, Energy Savings Trust)

LEZ Appraisal

Introduction

The Council is committed to delivering a sustainable future for the city and its citizens, as outlined in the recently published City Mobility Plan (CMP) and the 2030 Climate Strategy. The Council's Commitment 18 seeks to improve Edinburgh's air quality and reduce carbon emissions, as well as explore the implementation of Low Emission Zone(s). The Local Air Quality Management regime, as defined under the Environment Act 1995, has been successful in reviewing and assessing air quality throughout Edinburgh and therefore providing an understanding of the problems, which are predominately associated with traffic related nitrogen dioxide concentrations. While this work has also led to improvements in air quality, there are still a number of areas where measured concentrations remain above the legal objectives, with the city centre being a key hot-spot.

Initial Assessment

Design of the final Scheme has been informed by a process of appraisal and analysis of various options and impact assessments.

The Cleaner Air for Scotland Strategy (2015) introduced the National Low Emission Framework (NLEF), which is an evidence-based appraisal process to assist local authorities consider transport-related actions to improve local air quality, where transport is identified as the key contributor to air quality problems. The NLEF also provides the framework to ensure the Scottish Environmental Protection Agency (SEPA) supports local authorities throughout the assessment and decision-making process, by the development of the National Modelling Framework (NMF) local model. As a result, the Edinburgh model developed by SEPA represents a standardised approach to modelling for the appraisal process.

Data gathering and analysis has been extensive under these frameworks, while working in partnership with the Scottish Environmental Protection Agency (SEPA), Transport Scotland, the regional transport authority (SEStran), neighbouring local authorities and other key stakeholders. In addition, regular collaboration with the other three cities implementing LEZs, Aberdeen, Dundee and Glasgow, has helped to try and ensure a consistent approach to how LEZs operate in Scotland.

Key principles underpinning the LEZ appraisal process, in addition to consideration of the Scheme objectives, are detailed here:

- Improve air quality - a strong and robust evidence-base via the NLEF, NMF in relation to statutory air quality objectives and air quality progress within AQMAs.
- Evidence-based, targeted approach – as above and taking account of the COVID19 impact analysis.
- Feasibility and deliverability – ensuring Scheme is delivered according to key design principles (including providing a logical diversion route for non-compliant traffic) considering equalities impacts (including for the Covid-19 pandemic), financial costs and public understanding and engagement with the Scheme.
- Strategic Placemaking & Sustainable Transport - aligning with ECCT and other CMP projects to contribute to reductions in carbon emissions and improve health and

wellbeing by supporting active travel and public transport infrastructure plans and strategies.

Three options were fully appraised for a LEZ scheme in Edinburgh, as detailed below;

- Option 1 – City Centre LEZ – based on the boundary as proposed for the consultation undertaken in 2019, with minor adjustments. The boundary itself included the West End, Queen Street and the New Town, Picardy Place, Abbeyhill, Pleasance, Meadows and Tollcross. It included all vehicle types
- Option 2 – City Centre LEZ – a revised City Centre boundary with smaller geographical area than Option 1, to exclude the West End and use Lothian Road and North/South Charlotte Street. All vehicle types included.
- Option 3 – City Centre and Extended Urban Area LEZs which included either one of the above City Centre LEZs plus the addition of a boundary covering HGVs, LGVs, Minibus, Buses & Coaches in a wider urban area, roughly within the City Bypass.

Modelling of total CO₂ emissions was also undertaken. This indicated some limitations to CO₂ reduction, with fossil-fuelled vehicles prescribed by the legislation, however reductions were predicted when applying a scenario considering reductions in traffic as part of the Council's wider measures to encourage and facilitate modal shift to more sustainable options, manage demand, and reduce the need to travel. This ties in with the Schemes wider objectives of aligning with the Council's sustainable transport policies and national funding provisions.

Consultation and engagement have been essential parts in developing the Scheme. The preferred option was subject to public consultation and stakeholder engagement in summer 2021. Full details on consultation can be found in the 'Consultation, Engagement and Stakeholder Input' section (below).

Conclusions from the appraisal work identified the City Centre area as having the greatest magnitude of traffic related pollution problems and breaches of statutory objectives. A City Centre LEZ would support action towards compliance with the air quality objectives and a strong evidence-base highlighted the Central Air Quality Management Area (AQMA) as the focus for targeted interventions.

The LEZ City Centre Option 1 was preferred for delivering air quality improvement since it includes a wider population and a larger portion of the City Centre, including greater coverage of the Central AQMA. This would also support positive behaviour change (modal shift from private car) and contribute towards the objective to reduce greenhouse gases emissions, tying in with the Council's wider strategies and policies. The scheme aligns well with the delivery of the City Centre Transformation programme.

Based on the modelling work and the consultation process, to help achieve compliance with NO₂ and continue general compliance with Particulate Matter (PM)₁₀ and PM_{2.5} Air Quality Objectives, the LEZ will apply to all vehicle types, apart from motorcycles and mopeds and those subject to a national exemption outlined in the Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021.

Vehicles Included in Scope

Based on the modelling work and the consultation process, to help achieve compliance with NO₂ and continue general compliance with Particulate Matter (PM)₁₀ and PM_{2.5} Air Quality

Objectives, the LEZ will apply to all vehicle types, apart from motorcycles and mopeds and those subject to a national exemption outlined in the Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021.

Local Exemptions

Local exemptions are to be limited to ensure the objectives of the Scheme are met.

Grace Periods

The legislation supporting LEZs stipulates that there must have a minimum of a one-year grace period.

The consultation sought people's views on grace period and the inclusion of a grace period was also considered during appraisal process as it forms a statutory requirement of the Scheme. The appraisal identified a further one-year period would be necessary in order to support the economic recovery relating to COVID-19 impacts. This time would also facilitate transport infrastructure changes that are required for the boundary to function efficiently and allow for a review of any road construction considerations.

Therefore, a two-year grace period is proposed applying to residents and non-residents.

To understand the full impacts of the Scheme on individuals and groups, an Integrated Impact Assessment was completed. Its findings highlight the need to ensure support for groups that are most affected, and that time is given (grace period) to ensure stakeholders are well informed and have time to prepare, prior to the enforcement of the LEZ.

The decision to apply 2-year grace periods is driven by feedback obtained through consultation and stakeholder engagement as to how quickly those affected by the introduction of the LEZ in being able to become fully compliant. In addition, the unprecedented impact of the COVID-19 pandemic on society, including the wider environment and economy, needs to be considered. The 2-year grace periods would be applicable to all vehicle types from the same date to ensure consistency and ease of enforcement and wider communications.

Strategic Environmental Assessment

A Strategic Environmental Assessment screening process highlighted the need for the LEZ to be assessed as a part of the wider Edinburgh City Centre Transformation programme and City Mobility Plan work. The SEA work concluded that the cumulative impacts of introducing the LEZ along with other policies and strategies, such as the City Mobility Plan and Edinburgh City Centre Transformation, would generally be positive. An area of concern highlighted in the SEA was the potential for negative impacts on air quality as a result of traffic displacement.

Network Management Strategy

Modelling of future scenarios predicted any negative air quality impacts around the boundary of the LEZ related to any traffic displacement would be short-lived. Nevertheless, the Council is developing a road Network Management Strategy to ensure that the traffic network functions effectively following the implementation of the LEZ to manage any displacement impacts.

Modelling / Validation

The Scottish Government's Cleaner Air for Scotland strategy (CAFS) introduced both the National Modelling Framework (NMF) and the National Low Emissions Framework (NLEF). The aim of the NMF is to provide evidence for Local Authorities to inform their decision-making process for implementing a Low Emission Zone (LEZ).

Throughout the development of the LEZ, SEPA have supported the Council with the provision of detailed air quality modelling ('Air Quality Evidence Report' – Edinburgh), presentations and on-line visualisation tools to inform the selection of the LEZ options.

Modelled NO₂ concentrations were provided to support the development of LEZ and provide evidence to support the implementation of the Council's LEZ option. Traffic modelling was carried out by Jacobs, predicting changes in vehicle flows and fleet compositions. Traffic model outputs have been used to calculate pollutant emissions and air quality concentrations associated with the implementation of the LEZ options. Calculated changes in Particulate Matter (PM₁₀) emissions are also presented.

SEPA is supporting Council throughout the assessment and the decision-making process, through the development of the National Modelling Framework (NMF) local model. The local model utilises ADMS-Urban, a recognised system that is used around the world for modelling all aspects of air pollution across urban areas.

This air dispersion modelling is supported by traffic modelling undertaken using the Council's strategic VISUM model suite.

Traffic Modelling

Traffic modelling was undertaken in VISUM 18. The Base models were those previously created in support of the Edinburgh Tram Final Business case and were last fully recalibrated in spring 2017. Highway demands make use of November 2016 traffic count data collected on behalf of SEPA, however data was checked against 2019 traffic data, also collected under the NMF, and it was determined no significant changes were required.

Four alternative scenarios were considered:

- Base
- Original City Centre LEZ
- Original City Centre LEZ + City Centre Transformation schemes (Option 1 above)
- Alternative City Centre LEZ + City Centre Transformation schemes (Option 2 above).

Two forecast years were assessed – 2019 and 2023. The applied future year fleet mix is an estimate, based on available SEPA / Department for Transport data. Fleet forecasts tend to be optimistic and so the 2023 model represents a likely 'future year scenario', post 2023.

All vehicles with an origin or destination within the city centre were assumed to be compliant with LEZ legislation. In addition, non-compliant vehicles which would previously have routed through the city centre would route around the LEZ boundary instead. Virtually no non-compliant vehicles were assumed to cross the boundary. In part, this is a model simplification; however, it also reflects the deterrent nature of the LEZ Scheme.

Buses were coded as fixed routes in the model and were assumed to be 100% compliant within the city centre, considering the majority of services route through the City Centre.

Various other proposals, due to be implemented in the Edinburgh city centre by or shortly after implementation of the LEZ were captured in the modelling.

Air Pollution Dispersion Modelling

The aforementioned LEZ Options were tested using the Local NMF model and the potential outcomes in relation to changes in air quality concentrations associated with the LEZ implementation were considered.

The introduction of a LEZ in Edinburgh city centre will significantly reduce NO_x and PM₁₀ emissions from vehicles, which will result in lower pollutant concentrations within the LEZ. It is predicted that there will be a reduction of NO_x emissions from traffic sources by 55% (equivalent to 25-30 tonnes/year), when compared to 2019 levels. For areas that are not in the LEZ, it is predicted that NO_x emissions from traffic sources will decline by 15%, when compared to 2019 levels. Overall, NO_x emissions across the model domain will decline by 20% (or 72 tonnes/year), when compared to 2019 levels.

On several roads within the LEZ, NO_x emissions are predicted to decline by over 50%. On Princes Street NO_x emissions are predicted to decline by over 75%.

The NMF process coupled with feedback from the previous consultation process, highlighted significant impacts that could arise with the Option 1 boundary, especially in relation to air quality on Palmerston Place and Chester Street on the western part. Traffic on these streets would increase and the proportion of non-complaint vehicles would also increase, as vehicles choose to divert rather than enter the zone. This led to consideration of the Revised Boundary Option 2. A detailed NMF analysis of the City Centre boundary options was undertaken.

The analysis indicated that in the long-term (future scenario) the impact on Palmerston Place and Chester Street is not sustained. This is likely to be due to less non-compliant traffic needing to use the diverted route, as well as vehicle standards generally improving.

Option 2 (revised boundary) which includes Lothian Road/Charlotte Square as the main western boundary, showed that existing air quality issues on Lothian Road would be exacerbated and that in the future scenario, these issues would not be resolved. This indicates that it would take a much longer time to resolve the existing air quality problems on Lothian Road.

Consideration of residential and commercial addresses along those streets most impacted streets by the two boundary options highlighted a greater amount of residential and commercial properties with Option 2. These streets are also busy urban centres with a significant amount of shops and retail. The negative impact of Option 2 boundary could therefore be more significant.

Detailed analysis of façade modelling showed that new exceedances are expected at the façade at Palmerston Place. However, the future scenario (after LEZ fully embedded) does not indicate any exceedances in this area, or at most facades across the entirety of the boundary. The analysis also found similar results for sensitive receptors such as schools and nurseries.

Carbon Impact

The LEZs Scheme's role in contributing to reductions in greenhouse gas emissions derived from transport, primarily carbon dioxide ('CO₂', 'carbon') was also considered. CO₂ emission modelling was completed via the evidence-led NMF, which confirms that the enforcement of the vehicle emission standards will not directly reduce CO₂ emissions significantly.

Contributions to reducing CO2 emissions will be achieved via the Scheme's discretionary objectives.

Overall, a direct reduction of 0.04% CO2 was predicted from the results of the NMF analysis. Scenario testing which considered the implementation of additional demand management measures, such as those aligned to the LEZ wider objectives, resulted in great reductions – up to 5.4% CO2 reductions, when compared to the baseline.

The analysis showed the importance of ensuring the LEZ is implemented as a part of a suite of measures to tackle climate change.

COVID-19 Impact Considerations

The unprecedented changes in living and working patterns from the impact of COVID-19 are likely to have had a significant, but as yet unquantified, effect on airpollution.

In Scotland, during the main Covid-19 pandemic lockdown period in 2020, air pollution (NO2) levels declined. Transport Scotland commissioned a study to assess Covid-19 impact on plausible futures scenarios (with varying traffic demand and vehicle compliance levels) against the NMF model assessments for the four Scottish Cities. The assessment work for Edinburgh found proposals were robust to variations in network conditions that may occur in a post-Covid-19 world. The study also concluded LEZs are still required to improve air quality and protect public health in the City Centre

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Consultation, Engagement and Stakeholder Input

Initial Consultation 2018-2019

In summer 2018 joint consultation on the CMP, LEZ, and CCT was undertaken to understand views and opinions on all three projects. The consultation, 'Connecting our City, Transforming our Places' sought views on options for both a city centre and an extended urban LEZ boundary.

Between May and July 2019, the Council publicly consulted on proposals for a Low Emission Zone (LEZ) including a City Centre boundary applying to all vehicle types and an Extended Urban Area boundary applying to commercial vehicles (buses, coaches, taxi and private hire, light and heavy goods vehicles).

The consultation also set out proposals for when enforcement would start, normally after a grace period following the implementation date. It was proposed that the City Centre boundary would be introduced with a short 1-year grace period for commercial vehicles, including buses and coaches, 4 years for cars and an additional year for residents. It also proposed that the Extended Urban Area boundary would have a 3-year grace period.

Results from the consultation found broad support for the vehicle types to be included in the boundaries, that further refinement of the boundaries (particularly the City Centre boundary) should be considered, and that there were mixed views on the length of time proposed before enforcement should commence.

Public support for action to improve air quality was noted during this consultation. This was also demonstrated by consultations undertaken by Transport Scotland in 2017 and 2019/20.

Overall, findings from the Council's consultation in 2019 found that cleaner air is important to all, but there were mixed views as to the suitability of the LEZ and its specific aspects. General public and commercial groups agreed that they wanted clean air across Edinburgh, albeit with differing priorities for how to deliver this. Themes discussed included the cost of LEZ compliance; impact on life in Edinburgh (clean air benefits versus, cost of goods/services); and looking at a larger, city and regional scale initiative to tackle systemic issues (traffic flow, public transport, etc).

A draft Integrated Impact Assessment was developed at the time as well, to establish the wider impacts of the proposals especially on commercial fleet operators. The findings of this work highlighted the need to ensure operators are well informed and have time to make changes to their fleets and operations in advance of LEZ enforcement.

The next stage was to address the implications of the feedback received from public consultation, alongside the findings from the impact assessment, in developing the Scheme further. In addition, recommended assessment methodologies outlined in the Cleaner Air for Scotland Strategy (CAFS) and the new LEZ regulations would have to be taken into account.

Following this consultation, the boundary and grace proposals were re-assessed to ensure alignment with objectives and public/stakeholder opinion. Following consultation, the city urban boundary was dropped and the proposed grace period for all vehicles (for residents and non-residents) has been amended to two years, which differs from the 2019 proposal, where a one year grace period was proposed for commercial-type vehicles (HGVs, LGVs, buses and minibuses, coaches and taxis), with a proposal of four years for cars.

Further development of a preferred LEZ Scheme following the 2019 public consultation was paused after Scottish Government and the four main Scottish Cities implementing LEZs agreed to delays, due to the Covid-19 pandemic.

Statutory Consultation 2021

In June 2021, the Council approved a preferred Low Emission Zone Scheme which was subject to further consultation.

Consultation took place from 28 June to 20 September 2021 seeking views on a City Centre LEZ, to include all vehicle types, except motorcycles and mopeds and those subject to a national exemption outlined in the Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021. The LEZ would be implemented on the 31st May 2022. Enforcement would commence on 1 June 2024, after a 2-year grace period for all vehicles and groups. There was to be no local exemptions to the scheme.

Section 11 of the Act, in tandem with the Regulations, provides a list of the organisations that local authorities must consult with when making, amending or revoking a LEZ scheme. These organisations and groups were considered as statutory consultees and were approached directly and invited to comment during the 2021 consultation. Statutory consultees approached included the following:

- Scottish Environment Protection Agency (SEPA);
- Nature Scot (formerly Scottish Natural Heritage);
- Such persons as the authority considers represent the interests of;
 - The road haulage industry,
 - The bus and coach industry,
 - The taxi and private hire car industry,
 - Local businesses, and drivers, likely to be affected by the proposal,
- Such other persons as the authority considers appropriate;
- Local authorities neighbouring the authority that is delivering the
- scheme,
- Regional Transport Partnerships;
- NHS Health Boards.

The consultation invited comment on key aspects of the LEZ Scheme, including the overall Scheme as proposed, the boundary, the grace period approach and length and local exemption approach. It also sought to gauge levels of awareness about support funding available.

A consultation document detailing the Scheme in full was provided to all statutory consultees and published on the Council's website.

In addition to the statutory consultees, over 500 organisations (public, private, third sector, various sizes) were contacted and invited to take part in the consultation.

A public questionnaire received over 5,000 responses from individuals. Communications and engagement, including the opportunities to share feedback on the Scheme, were made via various formats including: virtual meetings, social media (~2 million 'impressions', i.e. the number of times posts have been viewed), bus shelter and large format digital displays on some key routes in the city, letter drops to all householders and businesses within the proposed LEZ (~19,000 properties), radio advertising (~1.2m population), emails to all active

parking permit holders in Edinburgh (~25,000 drivers), all supported by information on the Council's LEZ webpages.

Following the period of statutory consultation, on the preferred Scheme in 2021, the Council undertook a full analysis exercise of the feedback from all stakeholders (statutory and non-statutory consultees). The Council has taken account of feedback from all stakeholders since the inception of the project, including from the earlier consultation exercise in 2019, when reaching the final Scheme design. Details of the extent and scope of the responses and representations is set out below.

Key stakeholders (including statutory consultees) presented a range of views on the scale of a future Scheme, but in general supported the principle of a LEZ.

Boundary and grace period changes could not be justified in terms of the feedback, as this was not in keeping with the Scheme's objectives. Justification and mitigation are detailed below.

Overall, the impacts from the Scheme are considered to be reasonable and proportionate having regard to the overall benefits.

In summary, the final design of the Scheme did not change significantly following the statutory consultation, however thematic analysis suggests that concerns were mostly centred on displacement (traffic and air quality) impacts, the need for local exemptions and that the LEZ may disproportionately impact on low income households and microbusinesses. In response, to consultation and engagement with key stakeholders, the Council acted on feedback received, such as the detailing and next steps around developing the Network Management Strategy in collaboration with key stakeholders, and in terms agreeing an approach to determining local exemptions.

Statutory Notice Period

A Statutory Notice Period advertised the Scheme Proposal for a period of 29-days, from 1 February to 1 March, in exceedance of the 28-day minimum requirement as outlined in the [Transport \(Scotland\) Act 2019](#) ('the Act') and [The Low Emission Zone \(Scotland\) Regulations 2021](#) and [The Low Emission Zone \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#) ('the Regulations').

Over 600 on street bills were affixed to street ends in prominent positions, across all affected street within the Scheme Proposal boundary. It was noted that a significant number of bills were vandalised and/or removed during the Period, which were duly noted and replaced at the half-way point of the Period by contractors. Notice advertisements were published in two local newspapers: The Scotsman and Edinburgh Evening News during the Period. Physical copies of documentation were also made available in the City Chambers during the Period.

During the Period, a summary of the objections process and all evidence relating to development of the Scheme Proposal was made available on the Council's webpages, including the following evidence relating to the Council's Proposal to Make a Low Emission Zone Scheme.

Statutory consultees were approached directly to inform them of the Period and signposted them to the evidence documentation.

During the Period, Transport Scotland's communications campaign widely advertised the national LEZ campaign in Edinburgh and included the following: TV advertisement on STV, digital displays, advertising on Lothian Buses etc.

A total of 26 objections and one note of support was received during the Statutory Notice Period. Overall, objections generally focused on the following themes; size and location of the boundary, impacts of traffic displacement and the potential financial impacts for individuals and businesses to ensure that they could comply with the Scheme. Some objections also included concerns around the evidence base which underpins the Scheme, the consultation and engagement process, exemptions, the need for a LEZ at all, and the cost of its operation.

In response to all representations received, the Council has refined some of the intended operational details for the Scheme, including around Network Management Strategy (NMS) and establishment of a LEZ Local Exemptions Advisory Panel (LEZ-LEAP).

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Grace Periods

A grace period of two years will begin on the date the LEZ is introduced and will apply to all vehicles (residents and non-residents). This will allow time for those with non-compliant cars time to adjust, it will also allow time for any transport infrastructure changes or road construction considerations that are required for the LEZ to function efficiently.

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Wider Considerations

Integrated Impact Assessments

An Integrated Impact Assessment (IIA) helped inform the final design of Edinburgh's LEZ by presenting potential impacts arising from its introduction. As set out in this NLEF Report, the LEZ will restrict non-compliant vehicles from entering a defined area in the city and the IIA considered a range of consequential impacts including access, health, and financial impacts. The IIA utilised the NHS Lothian Integrated Impact Assessment guidance as an effective mechanism for meeting requirements of the NLEF and the Equality Act 2010 (Specific Duties) (Scotland) 2014. The IIA approach is consistent with Transport Scotland's approach to the IIA for the LEZ Regulations with the approach tailored to reflect relevant supporting guidance for Edinburgh's LEZ.

Through the IIA, the likely impacts of the LEZ introduction on the following groups were assessed:

- People with protected characteristics (e.g. age, gender, disability, ethnicity, religion);
- Those vulnerable to falling into poverty (e.g. unemployed, single parents, homeless people, carers and vulnerable families)
- Geographical communities (e.g. urban, rural, and business communities) The impacts on each group were organised by the key IIA themes:

The impacts on each group were organised by the key IIA themes:

- Equalities and Human Rights
- Environmental
- Economic

The IIA concluded that the LEZ has the potential to cause a range of positive and negative impacts, from improving health of society to potentially reducing access to the city centre for those who rely on private vehicle transport. The most significant impact of the LEZ will be the improvement in air quality and the resulting health benefits to residents, visitors and workers. The LEZ also has a potential positive health impact through encouraging the use of active travel and public transport for certain trips and changing existing travel behaviours.

Given the focus of the IIA to look at how protected groups are potentially differentially affected, there are instances where the LEZ could disproportionately affect some groups in society. For example, those who have a diminished ability to upgrade to a compliant vehicle due to low income, including people on benefits, single parents, or disabled people. Those on lower incomes may experience reduced access to locations and in turn the goods, services, or employment opportunities available to them. Community transport providers rely on cars and minibuses that may be subject to a LEZ, therefore the services they provide to a range of protected groups (such as youth groups and those receiving care) may be affected.

The assessment concluded that, despite the health benefits, protected members of society can be negatively impacted by the LEZ but that these impacts can be removed or mitigated through considerate decision making at national and local level. For example, Transport Scotland's LEZ Mobility Fund, retrofitting schemes and exemptions outlined in the Regulations all look to reduce negative impacts of LEZs. The proposed 2-year grace period for the Edinburgh LEZ will also mitigate the impacts, allowing additional time for residents and businesses to comply with LEZ requirements.

Strategic Environmental Assessment

A Strategic Environmental Assessment screening process highlighted the need for the LEZ to be assessed as a part of the wider Edinburgh City Centre Transformation programme and City Mobility Plan work. The SEA work concluded that the cumulative impacts of introducing the LEZ along with other policies and strategies, such as the City Mobility Plan and Edinburgh City Centre Transformation, would generally be positive. An area of concern highlighted in the SEA was the potential for negative impacts on air quality as a result of traffic displacement

In Scotland, during the main Covid-19 pandemic lockdown period in 2020, air pollution (NO₂) levels declined. Transport Scotland commissioned a study to assess Covid-19 impact on plausible futures scenarios (with varying traffic demand and vehicle compliance levels) against the NMF model assessments for the four Scottish Cities. The assessment work for Edinburgh found proposals were robust to variations in network conditions that may occur in a post-Covid-19 world. The study also concluded LEZs are still required to improve air quality and protect public health in the City Centre.

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Costs / Funding

LEZ Grant Funding

The Council has applied to Transport Scotland for grant support towards the development of a Low Emission Zone since 2018. The Council will continue to apply for future grant support from Transport Scotland.

Table 6. Transport Scotland Grant Award - Summary

Financial Year	Revenue	Capital
2018/19	£111,800.00	N/A
2019/20	£195,000.00	
2020/21	£120,000.00	
2021/22	£140,000.00	£900,000.00*
* Capital grant award is a contribution and may be claimed beyond the 2021/22 financial year		

Future grant applications may be made to support the progress of key LEZ development activities, according to grant eligibility criteria – see table 7.

Table 7. LEZ development activities, by type

Revenue	Capital
<ul style="list-style-type: none"> • Air quality/traffic modelling • Communications and engagement • Impact assessments • Monitoring and evaluation • Project management • Legal 	<ul style="list-style-type: none"> • Enforcement cameras – fixed and mobile • Enforcement camera installation • Back-office system • Design/contract management • Signage • Network Management Strategy

Revenue Impact

Future funding for the ongoing revenue costs for operating the LEZ Scheme is the subject of ongoing discussion with the Scottish Government, through the LEZ Leadership Group. The estimated revenue cost is £400,000 per annum once enforcement commences in 2024/25. The Scottish Government is also considering unfunded capital costs in the range of £570,000 to construct road network changes that will facilitate traffic movements around the boundary.

The financial implications of the LEZ will be published as part of the annual LEZ progress report and in annual accounts of the Council, according to the financial year and 2021 Regulations.

The Council is progressing detailed revenue modelling, in partnership with Transport Scotland and the four cities implementing LEZs. Key assumptions will be agreed across the cities and the Council will test scenarios to project revenue implications of potential behaviour change impacts of the Scheme.

LEZ Public Transport Provision Fund

In [February 2020](#), Committee noted that the Council and its regional partners received funds from Transport Scotland through the LEZ Public Transport Provision Fund (PTP) to promote modal shift and support the Scheme's objectives. In total, approximately £3.7m of PTP funds

were claimed across South East of Scotland Transport Partnership (SEStran) region by the Council and regional local authorities to develop: a mobility hub (Brunton Hall) including EV chargers, Park and Rides, bus shelters, bus prioritisation measures and new bus lane enforcement cameras, among other measures.

In addition, Scottish Government has provided over £1.5m in [LEZ Support Funds](#) to promote modal shift and reduce emissions, for over 450 microbusinesses/low-income households located within 20km of the Scheme and to retrofit taxis.

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Risks and Uncertainty

A Risk Register has been continually updated throughout LEZ Scheme development to inform decision making. Table 8 details potential risks and uncertainties identified relating to the Proposed Scheme, open as at March 2022. Mitigating actions for each open risk have been identified in table 8.

Table 8. Risk register, as at March 2022

Ref	Risk	Impact	Likelihood	Score	Mitigation	Impact	Likelihood	Score
1.0	Scheme is not delivered by May 2022, due to political decision-making timelines	5	4	20	Final Submission of the Scheme and objections report from Statutory Notice Period is presented to Committee, alongside all supporting evidence.	5	3	15
1.1	Insufficient funds to cover LEZ revenue/maintenance costs	5	4	20	Ongoing discussion with Scottish Government through LEZ Leadership Group	5	3	15
1.2	TRO/RSOs required at as part of Network Management Strategy (NMS) delay LEZ implementation, due to hearing	5	4	20	Scheme delivery programme updated to account for TRO/RSO lead-ins.	5	3	15
1.3	Scheme is subject to Examination	5	4	20	Robust case for change has been established via the NLEF process and LEZ developed has been informed by public and stakeholder engagement, consultation and statutory notice period. Objections received have all been responded to and/or addressed.	5	3	15
1.4	Public do not support or understand Scheme operational details, objectives and impact	5	4	20	Deliver communications campaign throughout grace period, informed by behaviour change study. Baseline for monitoring/evaluating LEZ success and identify public views, knowledge and potential misunderstandings.	4	3	12
1.5	Scottish Ministers amend or reject the Scheme, requiring Committee to reconsider options	5	4	20	Council engaging continually with Transport Scotland during LEZ development. Development processes followed according to LEZ Regulations and Guidance.	4	3	12
1.6	Council is required to redirect funds from other projects, to deliver the LEZ Network Management Strategy (NMS)	4	5	20	Raised with Scottish Ministers, via LEZ Leadership Group. The Council will apply for LEZ Grant Funding in 2022/23 for contributions towards NMS.	4	3	12
1.7	Impact of Scheme on individuals	4	4	16	Integrated Impact Assessment (IIA) outlined potential impacted	4	3	12

					<p>individuals' groups, which informed LEZ appraisal and development.</p> <p>LEZ Support Funds, provided by Scottish Government, are available to eligible applicants to encourage compliance and promote modal shift.</p> <p>Council will promote the Support Funds via media channels and through communications campaigns and will assess awareness, via monitoring/evaluation.</p> <p>LEZ national exemptions are in place for identified impacted groups, including blue badge holders.</p> <p>Two year grace period provided to allow more time to adapt and prepare for LEZ.</p>			
1.8	Impact of Scheme on businesses	4	4	16	As above.	4	3	12
1.9	Impact of Scheme on bus/coach operators	4	4	16	<p>LEZ retrofit funds, provided by Scottish Government, for eligible vehicles to become compliant</p> <p>Council will continue to promote the Retrofit Funds via media channels and engagement with stakeholders.</p>	4	3	12
1.10	Impact of Scheme on taxi/private hire operators	4	4	16	As above	4	3	12
1.11	Potential traffic displacement around boundary	4	4	16	<p>Scheme Network Management Strategy (NMS) provides identified measures to mitigate modelled traffic impacts, including junction changes and signage.</p> <p>Monitoring/evaluation at identified sensitive locations, in partnership with key stakeholders during grace period and from enforcement.</p> <p>Anticipate undertaking monitoring/evaluation of behaviour change in response to LEZ</p> <p>Discretionary objectives of the scheme agreed to ensure alignment of the Scheme with the Council's wider transport and placemaking policies</p>	4	3	12
1.12	TRO/RSOs required at as part of Network Management Strategy	4	4	16	Scheme delivery programme updated to account for TRO/RSO lead-ins	4	3	12

	(NMS) delay LEZ implementation.							
1.13	Enforcement back-office system is subject to a cyberattack	4	4	16	Follow all Council IT security policies and ensure systems are procured to highest standards available.	4	3	12
1.14	Data from enforcement system is not handled in accordance with correct procedures	4	3	12	Compliance with legislation, guidance and internal procedures. All data to be stored and (where required) transferred in a secure manner. All data and data management processes shall be compliant with the requirements of GDPR, the Data Protection Act 2018 and will be subject to Data Protection Impact Assessment(s). Any staff handling data to be trained in data protection	4	2	8
1.15	Enforcement system - procurement not complete on time/to specification	4	3	12	Procurement via identified routes to market and in-line with other projects' procurement processes (Smart Cities). Advanced implementation and testing to be completed to ensure robust system in place by 1 June 2024.	4	2	8
1.16	Enforcement system – operation	4	3	12	Flexibility in the enforcement strategy allows effective deterrent that can adapt to changes in behaviour and progress towards objectives	4	2	8
1.17	Enforcement system - DVLA and Transport Scotland agreements, exemptions systems etc. not in place by June 2024	4	3	12	Systems are required to be in place by summer 2023 in time for Glasgow's LEZ enforcement. Risk shared with Transport Scotland	4	2	8
1.18	Insufficient staff resource to progress key project deliverables	4	3	12	Project lead identified in 2021/22. To seek consultancy support (and funding) or internal role re-allocations, when appropriate.	4	2	8
1.19	Public transport operators react to LEZ by reducing services or increasing costs	4	3	12	LEZ retrofit funds, provided by Scottish Government, for eligible vehicles to become compliant. Lothian buses to be 100% compliant by end of 2022.	4	2	8
1.20	Macro-economic and COVID impacts, in relation to LEZ	4	3	12	Options appraisal considered proportionality of environmental benefits verses socio-economic disbenefits. A city centre boundary with a 2-year grace period was identified as optimal option to give time for adaptation to the Scheme.	4	1	4
	Scheme does not achieve objectives, including for air quality	5	2	10	Monitoring/evaluation to continually assess against Scheme objectives.. Adjust Scheme as necessary to achieve objectives	5	1	5

Mitigation

See Risks and Uncertainty section, above

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Monitoring and Reporting

Monitoring and reporting on the performance and effectiveness of the LEZ will take place in accordance with the Transport (Scotland) Act 2019 and associated LEZ Guidance.

Part 5 (1) of the Low Emission Zones (Scotland) Regulations 2021 contains provisions requiring that a local authority operating a scheme must for the duration of the scheme (a) keep proper accounts, as required by proper accounting practices, for that scheme showing the costs of (as the case may be) proposing, making and operating the scheme and how the gross and net revenue of the scheme is calculated, (b) prepare, in respect of each financial year, a statement of account based on the accounts referred to in paragraph (1)(a) and, if applicable, paragraph (2) in such form as is required by proper accounting practices, and (c) publish the statement of account, in such manner as is required by proper accounting practices, in the annual accounts of the authority for the financial year, with a copy of this statement of account required to be included with the annual report required under Section 29 of the Transport (Scotland) Act 2019.

In accordance with the Act, the Council will prepare an annual report on the operation and effectiveness of the LEZ, share this with Ministers and publish on our website. In accordance with the Guidance this will cover, as a minimum:

- The scheme size, boundary location, vehicle scope, date of scheme introduction and grace period start/end dates;
- A summary of the operation and effectiveness of the scheme including an assessment of: the costs of proposing, making and operating the scheme; the number and details of penalties issued; the number of appeals received and a summary of their outcomes; gross and net revenue gathered by the authority from the operation of the scheme; details of how the revenue has been used to facilitate the achievement of the scheme's mandatory and discretionary objectives; and
- Any modifications to the scheme in the past 12 months.

In accordance with the Act and The Low Emission Zone (Scotland) Regulations 2021, the Council will keep and publish annual accounts in connection with the LEZ for the duration of a scheme's operation, with a 'statement of accounts' published in the Council's annual accounts. This will identify:

- The costs of proposing, making and operating the scheme and the calculation method and actual figures related to gross and net revenue and expenditure of the scheme, to include all of the costs incurred for, or in connection with, planning, procuring, implementing, maintaining, repairing, improving, administering, managing, enforcing and promoting the scheme;
- Any grant provisions provided by Scottish Ministers in relation to the LEZ scheme.

In particular, the performance of the LEZ in reducing levels of air pollution, alongside concurrent interventions, will be monitored and reported via the Local Air Quality Management (LAQM) process and published within Edinburgh's Air Quality Annual Progress Reports. These will continue to detail pollution levels recorded at automatic monitoring sites and diffusion tube locations. It is noted though that the APR reports on monitoring taken over the 'calendar year', and that trends may only be evident over a number of years rather than year on year.

Conclusions

The Council has identified a preferred LEZ boundary for Edinburgh (Figure 1) following a robust option appraisal process in accordance with the cleaner Air for Scotland Strategy and the National Low Emission (NLEF), and supported by the detailed traffic and air quality modelling of the National Modelling Framework (NMF), public and stakeholder engagement, relevant impact assessments, and alternative futures scenario planning.

The Council intends to formally introduce the LEZ on 31st May 2022. A 2-year grace period will apply from this date to both residents and non-residents of the LEZ, meaning that enforcement will take place from 1st June 2024.

The LEZ will operate for 365 days a year, 24 hours a day. In accordance with the legislation, the LEZ may be suspended for the duration of events of local or national significance. Although none are anticipated at present, these will be determined on a case by case basis in consultation with Scottish Ministers as they arise. The LEZ may also be suspended in emergency situations, such as when an incident on the wider road network requires vehicles to be temporarily diverted through the LEZ, but only where vehicles follow prescribed diversionary routes.

The LEZ will apply to all vehicle types specified in the Regulations and identified in the Introduction to this submission. Vehicles will be permitted access to the LEZ on the basis of their exhaust emissions standard, in accordance with the mandatory nationally consistent emission standards for Scottish LEZs identified in the Regulations.

Edinburgh's LEZ will not apply to motorcycles and mopeds given the limited contribution these make to NOx emissions.

Section 17 of the Act includes that local authorities may grant and renew 'time-limited exemptions', in respect of a vehicle or type of vehicle for the purpose of section 6(1)(b), by reference to the vehicle's use. The maximum period for which a 'time-limited exemption' may be granted is a period of 1-year. However, to encourage compliance and to meet Scheme objectives, exemptions will only be granted in exceptional circumstances and would be considered on a case-by-case basis. It is not possible at this stage to foresee the full range of such occasions, however a mechanism will be put in place by the Council prior to the end of the grace period for ad-hoc exemptions of this nature, although the Council expects these to be very rare circumstances.

Should the Council believe a vehicle is in contravention of the LEZ, it will serve a Penalty Charge Notice (PCN) on the registered keeper, in accordance with the Regulations. Enforcement will commence following the end of the 2-year grace period and will be via Automatic Number Plate Recognition (ANPR) cameras. Penalty charges will be issued in accordance with the Regulations, described in the Introduction.

Section 4 Integrated Impact Assessment

Summary Report Template

Each of the numbered sections below must be completed

Interim report		Final report	x	(Tick as appropriate)
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1. Title of proposal

Edinburgh Low Emission Zone

2. What will change as a result of this proposal?

This report provides an update to the IIA which was undertaken in June 2021 and subsequently updated in October 2021. This update incorporates the finding of the recent objection period. This IIA is supplemented by a detailed impact assessment and fleet analysis for the Edinburgh Travel to Work Area, providing more detail on the baseline and impacts of the proposed scheme.

Following on from initial consultation in 2019, the preferred LEZ scheme was advertised for 12 week public consultation from 28 June to 20 September 2021. As part of this process, further engagement was held with key stakeholders, both statutory and non-statutory, to ensure the LEZ is successful at achieving its objectives.

A Statutory Notice Period to advertise the Scheme Proposal commenced on 1 February and ran for 29 days, to 1 March, in exceedance of the minimum requirement as outlined in the [Transport \(Scotland\) Act 2019](#) ('the Act') and [The Low Emission Zone \(Scotland\) Regulations 2021](#) and [The Low Emission Zone \(Emission Standards, Exemptions and Penalty Charges\) \(Scotland\) Regulations 2021](#) ('the Regulations').

In 2015, the Scottish Government made a commitment to significantly improve Scotland's air quality through the 'Cleaner Air for Scotland' strategy, where Low Emission Zones (LEZ) were identified as a potential tool within the strategy. LEZs are to be introduced across Glasgow, Edinburgh, Dundee and Aberdeen between February 2022 and May 2022. Plans to implement LEZs were temporarily paused due to the COVID-19 outbreak, but work has since restarted.

The air quality standard the LEZs are based on are the Euro emissions standards. To enter/exit/operate within a LEZ in Scotland, a diesel vehicle will need to be Euro 6 (generally those registered from September 2015) and a petrol vehicle Euro 4 (generally those registered from January 2006).

Vehicles that do not meet the emission standard set for a LEZ will be penalised for entering the zone. A penalty charge will be payable by the vehicle's registered keeper when a non-compliant vehicle enters the LEZ. The initial penalty charge for all non-compliant vehicles is set at £60, reduced by 50% if it is paid within 14 days. A surcharge is also proposed whereby the penalty amount doubles with each subsequent breach of the rules detected in the same LEZ. The penalty charges are capped at £480 for cars and light goods vehicles (LGVs), and £960 for buses and heavy goods vehicles (HGVs). Where there are no further breaches of the rules detected within the 90 days following a previous violation, the surcharge rate is reset to the base tier of charge i.e. £60.

The proposed boundary is the originally proposed City Centre boundary as presented in 2019 for consultation with minor amendments. The Extended Urban Area (formally named 'Citywide') boundary, as presented in 2019, has been excluded from the proposal following options appraisal. The proposed grace period for all

vehicles (for residents and non-residents) is two years, which differs from the 2019 proposal, where a one year grace period was proposed for commercial-type vehicles (HGVs, LGVs, buses and minibuses, coaches and taxis), with a proposal of four years for cars. Enforcement of the LEZ begins in 2024 after the grace period expires.

Exemptions apply consistently across all Scottish LEZs, as set out in the Regulations. The following exemptions must be applied to the LEZ at all times:

Vehicle type of classification Description	Vehicle type of classification Description
Emergency Vehicles	For or in connection with the exercise of any function of: -the Scottish Ambulance Service -the Scottish Fire and Rescue Service, -Her Majesty's Coastguard, and -the National Crime Agency.
Military Vehicles	-Vehicles belonging to any of Her Majesty's forces; or used for the purposes of any of those forces
Historic Vehicles	-Vehicles which are 30 years old or older.
Vehicles for Disabled Persons	-Vehicles registered with a 'disabled' or 'disabled passenger vehicles' tax class; and/or -Vehicles being used for the purposes of the 'Blue Badge Scheme'
Showman Vehicles	-Highly specialised vehicles used for the purposes of travelling showmen, where the vehicle is used during the performance, used for the purpose of providing the performance or used for carrying performance equipment

Several grants and loans are available which are funded Transport Scotland and administered by the Energy Saving Trust, to supports individuals and businesses affected by the LEZ. Currently, the funds are closed to new applicants for the current financial year, but it is anticipated that further funds will be made available in the 2022/23 financial year. Interested individuals may register their interest for future funds on the Energy Saving Trust webpages.

- **Low Emission Zone Support Fund and Travel Better funding** – Offers a grant of £2000 for low-income households to take older, more polluting vehicles off the road. To be eligible, households must meet all the following criteria; be on specific means tested benefits (listed below), own a non-compliant car (which has been owned by them for at least 12 months with no outstanding finance), and live within a 20km radius of a planned LEZ.

The list of eligible benefits are as follows:

- Attendance Allowance
- Carer's Allowance
- Child Tax Credit; Council Tax Benefit (excluding 25 per cent discount)
- Disability Living Allowance
- Employment and Support Allowance
- Income-based Job Seeker Allowance
- Income Support; Pension Credit
- Personal Independence Payment
- Universal Credit
- Working Tax Credit.

Eligible households which have successfully claimed, can also apply for a further £1,000 Travel Better funding for sustainable travel alternatives. Eligible travel measures include bus passes, train season tickets, new and used bikes, as well as car club membership and credits.

- **Low Emission Zone Support Fund for Businesses** - Micro businesses and sole traders can apply for a £2,500 grant towards the safe disposal of vehicles that do not meet the zone standards. Businesses must meet all the following criteria; have an operating site within 20km of the planned zone, own a non-compliant vehicle (they must have owned the vehicle for at least 12 months and utilised it for business operational purposes) and meet the definition of a micro business (employ nine or fewer full-time employees and have a turnover of £632,000 or less, or a balance sheet of up to £316,000 in the preceding and current financial year).
- **Low Emission Zone Retrofit Fund** - Provides micro businesses and sole traders, who operate within 20km of the planned LEZ, with support to retrofit their existing non-compliant vehicles with Clean Vehicle Retrofit Accreditation Scheme (CVRAS) approved solutions that meet the minimum proposed standards of the LEZ. Businesses must meet all the following criteria; meet the definition of a microbusiness (employ nine or fewer full-time employees and have a turnover of £632,000 or less, or a balance sheet of up to £316,000 in the preceding and current financial year), must not be VAT registered, must own a non-compliant vehicle which is no more than 13 years old (they must have owned it for at least 12 months), and the vehicle must operate at least weekly in the planned LEZ. In addition, the vehicle must also have an approved CVRAS retrofit solution available for the exact make and model and be one of the following:
 - Wheelchair accessible taxi
 - Light commercial vehicles – vehicles designed to carry goods that weight less than 3.5 tonnes
 - Heavy goods vehicles – vehicles designed to carry goods that weigh 3.5 tonnes or more
 - Refuse collection vehicles – vehicles specially designed to collect and transport solid waste.

Grants are available to cover up to 80% of the cost of a retrofit solution as follows:

- Up to £5,000 per light commercial vehicle and wheelchair accessible taxi installing retrofit exhaust after-treatment systems.
 - Up to £10,000 per wheelchair accessible taxi installing re-powering technology.
 - Up to £16,000 per heavy goods vehicle or refuse collection vehicle.
- **The Bus Emissions Abatement Retrofit (BEAR) Programme** – Four rounds of funding have been awarded to bus and coach operators to support the costs of installing retrofit technology to improve diesel emissions to a Euro VI standard or better, or to convert buses to electric drivetrains. This funding has been available to licensed bus and coach operators, local authorities and community transport operators located in or that operate on routes within Scotland's cities identified for LEZ's and/or one of Scotland's AQMAs. The most recent round closed to new applicants on 26 August 2021, where successful applicants could access grant funding towards both primary and ancillary costs up to a maximum of £1,995,000 per bidder.

Eligible vehicles were required to meet the following criteria:

- buses and coaches operating under a Public Service Vehicle (PSV) operator licence or used for voluntary, community or other non-profit making purpose
- less than 13 years old at time of application
- a remaining service life of at least 5 years in Scotland
- conforming to Euro IV or V emission standards from factory

A number of other grants and schemes are also available to individuals and businesses wishing to switch to more sustainable travel modes, which could be used to support those affected by the LEZ. Currently, the funds are closed to new applicants for the current financial year, but it is anticipated that further funds will be made available in the 2022/23 financial year:

- **eBike Loan** - Interest-free loans to help individuals purchase a new electric bike, family cargo or ecargo bike, or adaptive bike. A wide range of models and adaptations are available including tricycles, tandems, hand cycles and recumbent cycles.
- **Used Electric Vehicle Loan** - The interest-free Used Electric Vehicle Loan offers up to £20,000 to cover the cost of purchasing a used electric car or up to £5,000 for the purchase of a used electric motorcycle or moped. The loan has a repayment term of up to five years.

- **Electric Vehicle Loan** - Interest-free loans of up to £28,000 to cover the cost of purchasing a new, pure electric vehicle or up to £10,000 to cover the cost of purchasing a new electric motorcycle or moped. The loan has a repayment term of up to six years.
- **Domestic charge point funding** - Energy Saving Trust and the Office for Zero Emission Vehicles currently offers applicants £350 towards the cost of a home charge point and Energy Saving Trust will provide up to £250 further funding on top of this, with an additional £100 available for those in the most remote parts of Scotland.
- **eBike Business Loan** - Interest-free loans of up to £30,000 are available to support organisations that want to reduce the carbon impact of their transport and travel arrangements with new and more efficient alternatives. The loan covers new pedal-assisted electric bikes (up to £3,000 per bike), new cargo bikes (up to £6,000 per bike) and new adapted cycles.
- **Low Carbon Transport Business Loan** - Interest-free loans of up to £120,000 are available to Scottish businesses. The loans can be used to meet the cost of a wide range of sustainable measures to lower business transport carbon footprint including: pure electric vehicles cars (up to £28,000) and vans (up to £35,000) for each new electric vehicle, new electric motorcycles or scooters (up to £10,000 for each vehicle), new electric / plug-in hybrid HGVs, minibuses, coaches and buses (overall cap of £120,000).
- **Business charge point funding** - Funding to help organisations install electric vehicle (EV) charging infrastructure on their premises. Funding is currently available for charge points for sole use by occupiers, staff and visitors.
- **Switched on Taxi loan** - Interest-free loans of up to £120,000 are available to enable owners and operators of hackney cabs or private hire taxis to replace their current vehicle with an eligible ultra-low emission vehicle.
- **Used Electric Vehicle Loan for Business** - The interest-free Used Electric Vehicle Loan offers businesses in Scotland up to £20,000 to cover the cost of purchasing a used electric car, up to £20,000 for a used electric or plug-in hybrid electric van, up to £5,000 for a used electric motorcycle or moped.

3. Briefly describe public involvement in this proposal to date and planned

To ensure the LEZ is successful at achieving its objectives, two sets of consultation/engagement exercised have been undertaken with key stakeholders, both statutory and non-statutory.

Between May and July 2019, the Council publicly consulted on LEZ proposals in Edinburgh to explore key scheme aspects including: different boundaries at city centre and city-wide scales and various grace period options based on population and vehicle type and purpose. The consultation approach included an online survey (which received 2,793 responses), a series of sessions with key stakeholders, written responses from stakeholder groups and members of the public, engagement with primary school children and engagement with neighbouring local authorities.

Following on from initial consultation in 2019, the preferred LEZ scheme was advertised for a 12 week public consultation from 28 June to 21 September 2021. The consultation invited comment on key aspects of the LEZ scheme, including: overall scheme as proposed, city centre boundary, grace period approach and length, no local exemption approach and awareness of support funding available. An online questionnaire was presented to the general public and other stakeholders in 2021. The questionnaire received 4,976 individual responses. In addition to individuals who completed the questionnaire, 75 responses were received on behalf of organisations. An additional 26 written responses were received on behalf of organisations. Statutory stakeholders were approached directly and invited to comment on proposals, in accordance with the Transport (Scotland) 2019 Act. Multiple engagement workshops and meetings were hosted by the Council and written submissions received across all stakeholder groups.

Additionally, as part of the IIA undertaken in 2020, in-depth interviews were undertaken with business owners, business and trade representative organisations and community transport providers.

To provide input specifically to the IIA, meetings were held in May/June 2021 with representatives from the Edinburgh Access Panel and Inclusion Scotland, as well as Officers working on the Council's Poverty Action Plan.

A Statutory Notice Period to advertise the Scheme Proposal commenced on 1 February and ran for 29 days, to 1 March, in exceedance of the minimum requirement as outlined in the Act and the Regulations. Over 600 on street bills were affixed at prominent positions, across streets within the LEZ boundary and maintained throughout the period. Notice advertisements were published in two local newspapers and physical copies of the Scheme Proposal and relevant documentation were also made available in the City Chambers for inspection. Appendix A contains evidence of the various methods used to publicise the notice period.

Statutory consultees were approached directly to inform them of the Notice Period and to direct them to evidence documentation.

During the Period, Transport Scotland’s communications campaign widely advertised the national LEZ campaign in Edinburgh which included TV advertisement, digital displays and advertising on Lothian Buses.

4. Is the proposal considered strategic under the [Fairer Scotland Duty](#)?

Yes

5. Date of IIA

A full scoping meeting on the original proposals was held in 24/06/2019. As a considerable amount of time has passed since the previous IIA was carried out and changes have been made to the proposed scheme, a second meeting was held on 20/05/21.

6. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)

Name	Job Title	Date of IIA training
Suzanne Hunter	Transport Officer	01 Nov 2018
Shauna Clarke	Environmental Health Officer	
Greg McDougal	Transport Officer	

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Data on populations in need	Census 2011	The City of Edinburgh has one of the fastest growing populations of any city in the UK. Although the city has a lower share of its

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>The National Records of Scotland 2017 and 2018</p> <p>DfT, April 2019</p> <p>Jacobs, Edinburgh Low Emission Zone Integrated Impact Assessment, 2020</p>	<p>population over 65 years of age (12%), the wider city region has a significantly higher share (22%) than Edinburgh and Scotland (19%).</p> <p>Based on 2011 Census Data, the wards with the highest number of health conditions (including Deafness, Blindness, Physical, mental health conditions, learning disabilities etc.) were Portobello/Craigmillar and Liberton/Gilmerton wards. Both had 31% of their total reporting health conditions. The City Centre had the lowest proportion (22%).</p> <p>According to The National Records of Scotland 2017 mid-year estimate, 15% of inhabitants in Edinburgh reported a limiting long-term health problem or disability that limited their day-to-day activities</p> <p>The total number of vehicles in the City of Edinburgh with Disabled Tax Code (Class code 78) was 7,000 and the total number of vehicles in the City classed as Disabled Passenger Carrying Vehicles were about 100.</p> <p>Higher proportion of disabled tax vehicles are present in Portobello/Craigmillar ward and Liberton/Gilmerton ward located along the south eastern side of Edinburgh.</p>
Data on service uptake / access	<p>Census 2011</p> <p>Transport Scotland, 2019, Scottish Transport Statistics (No 32-37) Editions 2012 to 2018</p> <p>Transport Scotland, 2019, Scottish Transport Statistics, 2018 (No 37)</p> <p>DVLA (2018). Number of licensed vehicles at the end of the quarter by bodytype, fuel type and estimated euro status, Edinburgh City UA.</p> <p>AECOM, 2014. Van travel trends in Great Britain, prepared for RAC foundations,</p> <p>RHA, Clean Air Zones and HGVs – factsheet (BVRLA,FTA, NFDA and RHA,</p> <p>Scottish Government, 2018, Businesses in Scotland</p>	<p>Car use in Edinburgh is the joint lowest of all Scottish cities. In 2010 of the 191,000 people living and working in Edinburgh, 63,500 commuted to work by car and a further 63,300 commuted by car from other local authority areas.</p> <p>LGVs are the fastest growing vehicle category in Scotland, up by 26% over the past ten years, to reach 294,000 vehicles in 2018. This trend is also evident across Great Britain where every tenth vehicle on the road is an LGV. Small enterprises represent over 90% of businesses in Edinburgh. 63% of companies rely upon vehicles, most likely LGVs, to deliver goods or drive to clients to provide a service.</p> <p>In the UK, 53% of LGVs are privately owned and 47% are commercially owned, however it is likely that many privately owned LGVs are also used for business purposes. For company-owned LGVs, most vehicle kms travelled are for collecting or delivering goods (35%), while for privately owned LGVs, most vehicle kms travelled are for travelling to and from work.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>Clean Air Zones and HGVs – factsheet, 2019 (BVRLA,FTA, NFDA and RHA)</p> <p>Transport Scotland, 2019, Scottish Transport Statistics (No 32-37) Editions 2012 to 2018)</p> <p>National Atmospheric Emissions Inventory (2018), Vehicle fleet composition projections</p> <p>DVLA database on vehicles registered in the Edinburgh TTWA</p>	<p>On average LGVs are 6.6 years old in Scotland. The vast majority of LGVs (96%) are fuelled by diesel.</p> <p>The sectors that are most dependent on LGVs vehicles are construction; wholesale and retail trade; accommodation and food service activities; and transportation and storage. There are around 6,025 business across Edinburgh that fall within these sectors.</p> <p>Below is traffic survey data obtained in February 2020 for Euro VI vehicles or better (compliant vehicles);</p> <ul style="list-style-type: none"> • HGVs: 76-95% Euro VI or better • Buses & coaches: 61% operators - excluding Lothian Buses Lothian Buses commitment to be 100% LEZ compliant by the end 2021. • LGV: 48% Euro VI or better (increase from 7% in 2016) <p>It is predicted that in 2023, the number of non-compliant vehicles in Edinburgh Travel to work area will be:</p> <ul style="list-style-type: none"> • ~16,000 cars • ~3610 LGV • ~120 HGV • ~120 bus <p>By 2029 it is predicted that all vehicle types will be compliant with current LEZ emissions standards due to natural fleet turnover, furthermore, for most types this is expected to be achieved by 2025.</p> <p>Transport Scotland has been monitoring transport trends during the COVID-19 outbreak. This information provides a snapshot of travel across main modes. For the period 19 - 25 April 2021, compared against a pre-pandemic baseline, we saw:</p> <ul style="list-style-type: none"> • Walking journeys up by 15% • Cycling journeys up by 10% • Concessionary bus journeys down by 55% • Rail journeys down by 80% • Ferry journeys down by 75% • Air journeys down by 80% • Car journeys down by 20%
Data on socio-economic disadvantage e.g. low income, low wealth, material	Scottish Index of Multiple Deprivation (SIMD)	Transport accessibility is lowest around the periphery of the city, for example, Niddrie, Baberton, Clermiston and Granton. Many of these are areas of high deprivation as ranked by the SIMD.

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
deprivation, area deprivation.		
Data on equality outcomes	<p>Hands Up Scotland Survey 2019: National Summary Report</p> <p>Transport Scotland, Transport and Travel in Scotland, 2017</p> <p>Sustrans, Bike Life, Sustrans, 2019</p>	<p>A survey undertaken 2019, found that 25.5% of school pupils in Scotland stated they normally travelled to school using only private motorised mode of travel compared with 47.8% who normally use active modes.</p> <p>Women were more likely than men to walk or catch the bus to work and men were more likely to cycle to work or travel by rail.</p> <p>In Scotland twice as many men as women cycle once or twice a week for transport. In addition, people in lower income households were more likely to walk or take the bus whereas people in higher income households were more likely to drive.</p> <p>7.5% of commuters living in Edinburgh cycle to work with over 15.3 million trips made by bike in 2017.</p> <p>In the city black and minority ethnic (BAME) communities, women and over 65s are underrepresented when it comes to cycling.</p>
Research / literature evidence	Yes	<p>The Edinburgh LEZ is being progressed in close alignment with several strategies aiming to enhance placemaking and connectivity in Edinburgh, including:</p> <p>City Mobility Plan National Transport Strategy Strategic Transport Projects Review National Planning Framework Regional Transport Strategy Edinburgh City Vision 2050 2030 Sustainability Strategy City Plan 2030 Edinburgh City Centre Transformation</p>
Public / patient / client experience information	<p>An online survey Carried out in 2019 (2,793 responses received).</p> <p>An online survey carried out in 2021 (5051 responses received)</p> <p>Two series of sessions (undertaken in both 2019 and 2021) with key stakeholder including the representatives from the taxi and private hire car sectors, the bus and coach sectors, and with freight sectors</p>	<p>Findings from the consultation in 2019 showed that cleaner air is important to all, but there were mixed views as to the suitability of the LEZ and to its specific aspects. General public and commercial audiences agree, albeit with differing priorities. For all however, vital questions to consider are the cost of LEZ compliance to them; the cost to life in Edinburgh (clean air, goods/services); and looking at a bigger, city and regional picture to tackle underlying issues (traffic flow, public transport, etc).</p> <p>In the 2019 questionnaire, the main issues voiced were worry about increased traffic and pollution in</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>though the Council's ECO Stars scheme</p> <p>Engagement with wider general stakeholder groups (including health and environmental, and wider interest groups, community councils, and residents).</p> <p>Written responses from stakeholder groups and members of the public. Four stakeholder workshops (attendees including the representatives from the taxi and private hire car sectors, the bus and coach sectors, and with freight sectors though the Council's ECO Stars scheme).</p> <p>Engagement with 60 primary school children</p> <p>Engagement with neighbouring local authorities in the South East Scotland region.</p> <p>Meetings were held in May/June 2021 with representatives from the Edinburgh Access Panel and Inclusion Scotland, as well as Officers working on the Council's Poverty Action Plan.</p> <p>Weekly Poll – Low Emission Zone (Blue Badge Exemptions), Disability Equality Scotland 2021.</p> <p>A Statutory Notice Period to advertise the Scheme Proposal commenced on 1 February and ran for 29 days, to 1 March, in exceedance of the minimum requirement as outlined in the Act and the Regulations.</p>	<p>neighbouring streets/parks; the desire to make the area larger; and to include New Town/up to Ferry Road. Worries were voiced about the financial effect on businesses and individuals. Comments were mainly about considering exemptions, like motorbikes/scooters, buses/public transport, private cars, deliveries/ tradesmen</p> <p>Twelve percent of those who completed the 2021 online questionnaire said they had a physical or mental health condition or illness lasting or expected to last 12 months or more that limits their daily activities. Of those who stated they did, 17% were Blue Badge holders and 3% own a vehicle with adaptations for disabled users.</p> <p>The 2021 consultation found that Support for the LEZ and its details is very mixed, but this appears to have less to do with the principle of being able to breathe better air, and more to do with the practical implications for people within and also travelling to the zone, as well as the specific practical details of the proposal. Similar concerns to those in the 2019 consultation were voiced.</p> <p>Analysis of objections submitted as part of the Statutory Notice period found that the most common objection theme is related the Scheme boundary; predominately in relation to its size and potential future traffic displacement impacts, as well as the fact that it may have a detrimental impact on individuals and children's health and wellbeing due to the potential increase in polluting traffic diverting around the boundary. Some objectors made comments about the national exemptions; however, these are prescribed in the regulations; the Council has no powers to amend them. Objections received around 'local time-limited exemptions' tended to relate to individuals' personal circumstances, from accessing the LEZ for night-shift work to the impact on those with hidden disabilities.</p> <p>Results from the Weekly Poll – Low Emission Zone (Blue Badge Exemptions) show that an overwhelming majority of respondents believed that the Low Emission Zone exemption application for Blue Badge holders must be available in a variety of accessible formats. This will ensure that applications embed inclusive communication principles and are available in a format that matches the communication strengths and preferences of each individual. There was recognition that not all Blue Badge holders will be able to access an online application, due to factors related to digital exclusion. This includes lacking</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		digital skills or confidence to get online, as well as limited resources and money to pay for devices or internet access. Respondents highlighted the importance of having a paper version of the application, which is also available in a variety of different accessible information formats, such as Braille, Easy Read, large text and plain text. A call centre was identified as another alternative for people who face digital exclusion, as well as the ability to complete a face-to-face application. A number of respondents believed that Low Emission Zone exemptions must align very closely with the existing Blue Badge application process.
Evidence of inclusive engagement of people who use the service and involvement findings	As above	As above
Evidence of unmet need	As above	As above
Good practice guidelines	Yes	<p>The Transport (Scotland) Act 2019</p> <p>The Low Emission Zones (Scotland) Regulations 2021</p> <p>National Transport Strategy (NTS)</p> <p>Cleaner Air for Scotland (CAFS) Strategy</p> <p>National Low Emissions Framework (NLEF)</p> <p>Inclusive Communication Hub: www.inclusivecommunication.scot</p>
Carbon emissions generated / reduced data	<p>Jacobs, Edinburgh Low Emission Zone, Revised Fleet Composition, Traffic Modelling Report, February 2021</p> <p>SEPA, Air Modelling Results, March, 2021</p>	<p>Scottish Government is monitoring the impact of COVID 19 social distancing and lockdown actions, which includes air quality. Evidence will continue to be collected on carbon emissions/air quality by the Council and Scottish Government as lock down measures are relaxed.</p> <p>A series of transport modelling tests have been undertaken to assess the impact of the LEZ on travel patterns across the city. Outputs from this have been provided to SEPA to undertake supporting air quality impact analysis. Further detail can be found in the Transport Modelling Report by Jacobs and in SEPA's report on Air Modelling.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Environmental data	<p>Scottish Government, Cleaner Air for Scotland: The Road to a Healthier Future, 2015</p> <p>Public Health England, Estimating Local Mortality Burdens associated with Particulate Air Pollution, 2014.</p> <p>City of Edinburgh Council, Air Quality Annual Progress Report (APR) for City of Edinburgh Council, 2019</p> <p>SEPA, The Clearer Air for Scotland – National Modelling Framework, Air Quality Evidence Report – Edinburgh, November 2018</p> <p>City of Edinburgh Council, 2019 Air Quality Annual Progress Report (APR)</p>	<p>Poor outdoor air quality can result from contamination of the outdoor atmosphere by gaseous and particulate pollutants.</p> <p>Based on modelling, the estimated mortality burden on the population in Scotland in 2010 showed that there were around 2,000 premature deaths and a total of around 22,500 life years lost across the population which can be attributed to anthropogenic (man-made) fine particle pollution. In Edinburgh, this can be related to 205 premature deaths and 2,300 life-years lost.</p> <p>The Scottish Environment Protection Agency (SEPA) provided robust evidence of traffic pollution exceeding accepted levels in Edinburgh</p> <p>Edinburgh has five AQMAs due to NO₂ legal limit exceedances mainly due to road traffic; the sixth AQMA relates to fine particulates (PM₁₀) exceedance of the legal limit. These readings are recorded using monitoring stations around Edinburgh at different roadside placements (pavement level, lamppost, building façade etc). Road transport is primarily responsible for NO₂ concentrations at the roadside.</p> <p>The Council's Air Quality Annual Progress Report in 2019, reported a continuing trend towards compliance with legal limits. However, exceedances remained across the city, with the Central AQMA having the highest concentration of sites that exceed legal limits.</p>
Risk from cumulative impacts		<p>Cumulative impacts may come about as a result of the City Mobility Plan, Edinburgh City Centre Transformation and City Plan 2030 policies which are being developed in parallel with LEZ. Cumulative impacts will likely to be positive in relation to traffic and congestion management and active travel investment under City Mobility Plan and Edinburgh City Centre Transformation policies, and sustainable land use strategy as set out in emerging City Plan 2030. Cumulative impacts from this work will be included in due course once impact assessments of these policies/proposals have been undertaken.</p>
Other (please specify)		
Additional evidence required		

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	
Positive	Affected populations
The LEZ will discourage the most polluting vehicles from enter/exit/operating within the LEZ. This will reduce emissions and improve air quality and in turn have a positive effect on health on everyone, particularly of those most at risk of respiratory illness including older people/pensioners and children (including unborn children). This is the most significant positive impact of the LEZ and will have health and wellbeing benefits for a large population of residents, workers, and visitors to the area over a long period of time; therefore, the magnitude of the effect is substantial.	All, particularly children, pregnant women, disabled people and older people.
The LEZ is likely to encourage a modal shift from cars to public transport and active travel. This will result in air quality improvements, as well as benefitting the health of individuals from increased activity levels.	All
Reduction in vehicles within the boundary may improve access to services for those travelling by modes other than private car, including public transport or active travel	All, particularly relevant to those who are unemployed/on low income/people on benefits and those with mobility impairments who rely on public transport
Negative	
<p>Bus operators may increase the price of bus tickets as a result of the increased costs to their operations arising from the need to replace or upgrade buses, so they are compliant with the LEZ. For some bus passengers the increase in price may make the journey unaffordable and result in them foregoing their journey. This may affect people's ability to engage in activities and access services or places of work, which in turn will affect their wellbeing/social activity.</p> <p>Mitigation: <i>This effect will not be applicable to holders of free travel passes including older people/pensioners, disabled and subsidised travel; therefore, the effect on most of the impacted population will be mitigated. The Council will continue to engage with bus operators to determine their proposed reactions to the LEZ. If bus operators make use of funding for upgrading and retrofitting vehicles (such as the Energy Savings Trust's BEAR retrofit fund), they may not have to increase the price of tickets. The funding options available will be clearly communicated to Transport Providers.</i></p>	Unemployed, people on benefits, single parents, homeless people, carers, part-time workers, students, young people, disabled people who rely on public transport, staff vulnerable to falling into poverty.
<p>Bus operators may remove non-profitable routes in response to LEZ related costs to upgrade fleet. This may negatively impact those who rely on those services to engage in activities and access services or places of work, which in turn will affect their wellbeing/social activity.</p> <p>Further work/mitigation: <i>The Council will continue to engage with bus operators to determine their proposed reactions to the LEZ. If bus operators make use of funding for upgrading and retrofitting vehicles (such as the Energy Savings Trust's BEAR retrofit fund), they may not have to remove</i></p>	Unemployed people, people on benefits, single parents, homeless people, carers, part-time workers, students, young people, disabled people, staff vulnerable to falling into poverty.

<p>services. The funding options available will be clearly communicated to Transport Providers.</p>	
<p>Non-English speaking people or people with low literacy/numeracy may experience negative impacts if they do not understand the implications of the LEZ. Impacts may affect permanent residents who don't understand the changes but it could also affect temporary overseas visitors who do not hold a British driving licence and are unable to speak English. The impact on overseas visitors is likely to be more prevalent when visitor numbers are higher for large cultural events.</p> <p>Mitigation: <i>The communications strategy ensures that all impacted groups are reached where possible. Clear communications will be provided around LEZ implementation across different media in plain English, a range of languages as well as Braille. The Council also offers an Interpretation and Translation service, which provides interpreters and translations in different languages including British Sign Language. Equalities groups will be encouraged to disperse information on the proposals to their members.</i></p>	<p>People with low literacy/numeracy, tourists, minority ethnic people (including non-English speakers).</p>
<p>People with a disability who do not use public transport or rely on carers who own a non-LEZ compliant vehicle and cannot afford to upgrade, may choose to forego their journey into the City Centre. This will potentially adversely affect their opportunity to access community and leisure facilities and have a negative impact on their social activity.</p> <p>Mitigation: <i>This impact can be mitigated through exemption for disabled tax class and Blue Badge holders. The LEZ support fund could also help disabled drivers and carers who are on means tested benefits (which includes Carer's Allowance and Disability Living Allowance) and meet the other 4 criteria to upgrade or retrofit their vehicle. Those affected could also apply for the electric vehicle loan to purchase a new or used compliant electric vehicle. Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p>	<p>Disabled people and carers.</p>
<p>Minibuses providing community transport services (care providers, youth groups, school groups, elderly care providers) could be negatively impacted. Any impacts experienced by those providing care support for vulnerable people may also adversely affect those receiving care.</p> <p>Mitigation: <i>Community transport providers were eligible to claim funding from the Bus Emissions Abatement Retrofit (BEAR) programme. LGV owners can also apply for other schemes such as the Low Carbon Business Loans to purchase new electric vehicles. The Council will engage with Community Transport Providers to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.</i></p>	<p>Older people/pensioners, children, disabled people, care providers, youth groups, school groups.</p>
<p>People who use their own cars which are fitted with adaptive features (such as swivel chairs) to access community and leisure facilities within the City Centre may not be able to afford the cost of transferring the adaptive features onto LEZ compliant cars as the costs range between £500 to £30,000. This in turn potentially can adversely affect their social activity/ day to day activity.</p> <p>Mitigation: <i>Mitigated through exemption for disabled tax class and Blue Badge holders. Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare. To reduce potential impacts on disabled drivers who do not qualify for a Blue Badge – consideration will be given to individual time limited exemptions from LEZ Regulations, in accordance with Section 17 of the Transport (Scotland) Act 2019, for people with disabilities</i></p>	<p>Disabled people and carers.</p>

<p><i>not recognised by the Blue Badge Scheme, but who may be at a substantial disadvantage (under Section 20 of the Equality Act).</i></p>	
<p>Private Hire Vehicle and Taxi/Black cab owners on the H2S (Home to School) contract with City of Edinburgh Council to transport school children with a non-compliant LEZ vehicle may not be able to afford to upgrade their vehicle. This may impact on the H2S services offered by the Council and potentially affect school children.</p> <p>Mitigation: <i>The Council has an existing licensing regime to improve emissions standards of PHV and Taxi/Black cab which may help reduce the impact but a residual negative impact on children is possible. The Council will align this regime with the LEZ to ensure mitigation of potential impacts. Taxi owners can also make use of the funding for upgrading and retrofitting vehicles, or apply for the Switched on Taxi loan to replace their vehicle with an ultra low-emission vehicle. The funding options available will be clearly communicated to Transport Providers</i></p>	<p>Children and disabled children</p>
<p>There is a potential for people who currently use their own cars to access leisure facilities for employment and recreation to be negatively impacted if they perceive there to be personal security concerns with public transport or active travel modes. As a result, passengers may forego their journey into the City Centre, particularly at night.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p>	<p>All, particularly minority ethnic people, disabled people, non-binary, Transgender, women, those involved in the criminal justice system, older people.</p>
<p>There are around 25 locations for religious congregation and places of worship that are located within the City Centre. If most of the visitors live outside of the City Centre and are reliant on cars, their activity may be adversely affected if they forego their journey.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p>	<p>People with different religious belief/ faith</p>
<p>Users of the Travellers site and Travelling Showman sites in Edinburgh may own non-compliant vehicles and therefore will face fines when entering the LEZ.</p> <p>Mitigation: <i>This can be mitigated through exemptions as showman's vehicles are included within the national exemption of the LEZ implementation. There are no traveller sites in the boundary so access would not be impacted by the LEZ. Travelling Showman sites are sometimes situated in the city centre. To make the Travelling groups aware, targeted engagement will take place with the Travelling and Travelling showmen communities to make them aware of the proposals.</i></p>	<p>Minority ethnic group (Travellers)</p>
<p>For some people it may not be financially viable to upgrade their vehicle. This may prevent people from having control of their social and work environment</p>	<p>Low income households, people on benefits,</p>

<p>as well as reduce the equality of opportunity to access services (such as the Department for Work and Pensions, Citizens Advice Bureau etc) or employment opportunities. Some affected may not be in receipt of means tested benefits so would not be exempt.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable).</i></p> <p><i>As part of the Council's Adaptation and Renewal Programs, the Wellbeing and Equalities priority includes an outcome to introduce 20 minute neighbourhoods. This would provide opportunities for people to access services, facilities and workplaces within a 20 minute walk or wheel of their homes which would reduce the need to travel by car.</i></p> <p><i>The City Mobility Plan includes a policy to review the city's bus network to improve inclusion, accessibility, integration and reduce congestion in the city centre. In addition, the ALEO reform proposals will create a single company to deliver future public transport services in Edinburgh, which would realise a number benefits for users. Improving public transport will encourage people to use it to access the services they need rather than private car.</i></p> <p><i>Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare. Targeted engagement will take place with the affected communities.</i></p>	<p>unemployed, vulnerable families, older people, pensioners, low income carers, single parents and students.</p>
<p>Rural/semi-rural communities that require frequent access to LEZ areas (e.g. work, leisure, education) may be negatively impacted as a result of the financial implications of penalty charges or the cost of upgrade/replacement of their private vehicle.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits incomes and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p> <p><i>The Council will ensure the LEZ project aligns with the Councils strategic policies on commuting. The City Mobility Plan includes a policy to review the city's bus network to improve inclusion, accessibility, integration, and reduce congestion in the city centre. In addition, the ALEO reform proposals will create a single company to deliver future public transport services in Edinburgh, which would realise a number of benefits for users. Improving public transport will encourage people to use it to access the services they need rather than private car. In addition, measures such as introducing a Mobility as a Service system and enhancing existing or introducing new park and ride/choose facilities to enable car commuters to access low emission public transport or active modes prior to entering a LEZ will assist.</i></p>	<p>Rural/semi-rural communities</p>
<p>Those who lease cars using the Motability scheme may find that their lease does not expire until after the LEZ scheme is implemented and their vehicle is not compliant.</p> <p>Mitigation: <i>The Council has engaged with the Motability scheme provider to establish the age of the vehicles for lease. The scheme provider confirmed</i></p>	<p>Disabled people</p>

<p><i>that the majority of vehicles for lease are new or nearly new (the oldest vehicles are 5 years old) which means that all vehicles would be compliant with LEZ standards.</i></p>	
<p>The LEZ may result in the displacement of traffic to areas surrounding the boundary. In particular, concerns were raised in the 2021 consultation about Preston Street Primary being on the boundary and the impact on school children. The Edinburgh assessment work shows that there is potential for localised impact on some boundary streets e.g. Palmerston Place and Chester Street. Traffic on these streets would increase and the proportion of non-complaint vehicles would also increase. In turn this may result in increased traffic and a reduction of air quality of those areas which could impact those living on the boundary streets. Modelling analysis indicates that in the long-term (future scenario) the impact on Palmerston Place and Chester Street is not sustained. This is likely to be due to less non-compliant traffic needing to use the diverted route, as well as vehicle standards generally improving.</p> <p>Mitigation: <i>To reduce the impact of traffic displacement on the boundary streets, mitigation measures are being developed through the network management strategy and will include measures such as junction improvements, road changes, optimised signal and improved signing. These will be reviewed regularly to ensure LEZ demand is accommodated. Monitoring of air quality has been increased in the predicted worse affected areas and further consideration will be given to future monitoring as the Scheme decision is progressed. It is proposed that pavements are permanently widened around Preston Street Primary School for safety, active travel and to lessen LEZ impacts.</i></p>	<p>All, particularly those living on the boundary streets suffering from chronic respiratory illness and young children</p>

Environment and Sustainability including climate change emissions and impacts	
Positive	Affected populations
<p>Implementing LEZ will improve vehicle standards which in turn will bring air quality improvements and health & wellbeing improvements, particularly those population groups which are most sensitive to poor air quality such as those suffering from chronic respiratory illness and young children.</p>	<p>All, particularly those suffering from chronic respiratory illness and young children.</p>
<p>Interventions that reduce local air pollution are also likely generate a positive effect on reducing factors contributing to climate change through reduced greenhouse gas emissions.</p>	<p>All</p>
<p>LEZ is likely to promote sustainable forms of transport via modal shift from cars to buses, shared cars, bicycles or walking, which in turn will have a positive impact on air quality. This may also have a positive effect on the health and well-being of people due to physical activity (cycling/walking) and exposure to outdoor spaces.</p>	<p>All</p>
<p>Quieter (alternatively fuelled) vehicles and reduced traffic flows caused by modal shift towards public transport and active travel, are likely to lead to a reduction in inner-city background noise. Lower noise pollution is anticipated to have health and productivity benefits.</p>	<p>All</p>
<p>There are potential benefits from a reduction in air pollution deposition on habitats through reduced traffic.</p>	<p>All</p>

Fewer vehicular trips into urban areas covered by a LEZ and increases in the use of sustainable modes should provide opportunities to improve the quality of public spaces/public realm for non-car users.	All
Negative	
<p>The LEZ may result in the displacement of traffic to areas surrounding the boundary. The Edinburgh assessment work shows that there is potential for localised impact on some boundary streets e.g. Palmerston Place and Chester Street. Traffic on these streets would increase and the proportion of non-complaint vehicles would also increase. In turn this may result in increased traffic and a reduction of air quality of those areas. Modelling analysis indicates that in the long-term (future scenario) the impact on Palmerston Place and Chester Street is not sustained. This is likely to be due to less non-compliant traffic needing to use the diverted route, as well as vehicle standards generally improving.</p> <p>Mitigation: <i>To reduce the impact of traffic displacement on the boundary streets, mitigation measures are being developed through the network management strategy and will include measures such as junction improvements, road changes, optimised signal and improved signing. These will be reviewed regularly to ensure LEZ demand is accommodated. Monitoring of air quality has been increased in the predicted worse affected areas and further consideration will be given to future monitoring as the Scheme decision is progressed.</i></p>	All, particularly those living on the boundary streets suffering from chronic respiratory illness and young children
<p>A shift towards compliant vehicles would lead to redundant non-compliant vehicles being removed from the fleet. The scrappage of these surplus vehicles may cause environmental harm if not disposed of correctly (e.g. battery disposal).</p> <p>Mitigation: <i>Consult with local waste management facilities in addition to relevant stakeholders (e.g. Zero Waste Scotland) regarding waste management strategies to ensure vehicle components are disposed/recycled sustainably that minimise environmental impact.</i></p>	All

Economic including socio-economic disadvantage	
Positive	Affected populations
Increased economic activity for a number of sectors: second hand car traders, vehicle scrappage, vehicle leasing operators, active-travel distributors/repairers, and public transport operators through increased patronage.	Business communities, staff
Decreased traffic and cleaner atmosphere in the city may lead to higher quality of public spaces in the city. This could lead to more opportunities for businesses as more people are attracted to the city/city centre due to less polluted area becoming more attractive.	Business communities, staff

<p>The development of the retrofitting and Low Emission Vehicle (LEV) industries as a result of the LEZ may create employment opportunities throughout the supply chain. Jobs involving the manufacture, maintenance, and sales/operation of lease or rental vehicles should be created.</p>	<p>Business communities, staff</p>
<p>A reduction in inner-city congestion will impact the efficiency of the public transport network. Reduced congestion should lessen delays, lower the time taken for public transport (i.e. buses) to complete their routes, and improving the efficiency of travel for both commuters and leisure seekers and encouraging mode shift.</p>	<p>All</p>
<p>Potential benefit to restaurants/cafes within LEZ areas due to improvements in air quality may encourage increase patronage.</p>	<p>Business communities, staff</p>
<p>Improved air quality may make areas within LEZs more pleasant places to work particularly for those working outdoors (e.g. market traders, street cleaners etc) including staff of restaurants/cafes with outdoor seating areas.</p>	<p>Business communities, staff</p>
<p>Negative</p>	
<p>Decreased access to the city centre due to the LEZ vehicle standards may cause certain members of society (lower income households) to be dissuaded from applying for a job in the city. This will have a negative effect on the size and diversity of the potential workforce in Edinburgh.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare. Wider Council policies on parking are designed to dissuade people from parking in the City Centre and use more sustainable modes of transport.</i></p>	<p>Unemployed, people on benefits, single parents, homeless people, carers, part-time workers, students, young people, disabled people, staff vulnerable to falling into poverty.</p>
<p>Vehicle users, especially LGV, bus, and HGV, have relatively long turnover periods, requiring users to change earlier than anticipated. The need to purchase compliant vehicles and sell/scrap their non-compliant vehicle means that the users will incur additional financial cost.</p> <p>Mitigation: <i>Businesses can make use of schemes such LEZ Support Fund to dispose of non-compliant vehicles, the Low Emission Retrofit Fund to upgrade their existing vehicles, or the Low Carbon Transport Business Loan to purchase electric vehicles. CEC will engage with Businesses to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.</i></p>	<p>Business communities</p>
<p>Small and medium sized enterprises who rely on LGVs to deliver goods or drive to clients to provide a service could be disproportionately affected due to the level of non-compliance (non-compliance rates are 48%) and the economic impacts associated with the commercial-type vehicles sector. This may negatively impact business owners, particularly small enterprises which represent over 90% of business in Edinburgh.</p> <p>Mitigation: <i>Businesses can make use of schemes such LEZ Support Fund to dispose of non-compliant vehicles, the Low Emission Retrofit Fund to upgrade their existing vehicles, or the Low Carbon Transport Business Loan to purchase electric vehicles. CEC will engage with Businesses to</i></p>	<p>Business communities</p>

<i>effectively communicate LEZ proposals and on potential impact to help them prepare for the change.</i>	
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9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

Where contractors are used, as part of the Council’s procurement process due regard is required to be given to all equalities and right, environmental and sustainability impacts when undertaking work on behalf of the Council.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

A range of communication tools will be used to reach out to all types of people regardless of their age, disability or language etc. Direct communication has been and will continue to be undertaken with stakeholders in the form of written communication, meetings, workshops and messages will be issued through the Council’s social media channels. We will contact equalities organisations to distribute information to members. Formats will be designed to be understood by a range of population groups.

The Council also offers an Interpretation and Translation service, which provides interpreters and translations to people who cannot speak English, have problems understanding English, or have a sight or hearing loss. The translations and interpretations are available in a wide range of different languages including British Sign Language, Braille, Large print and Audio.

11. Is the policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a [Strategic Environmental Assessment](#) (SEA) will be required and the impacts identified in the IIA should be included in this.

Strategic Environmental Assessment screening in 2019 highlighted the need for the LEZ to be assessed as a part of the wider Edinburgh City Centre Transformation programme and City Mobility Plan work. The SEA concluded that the cumulative impacts of introducing the LEZ along with other policies and strategies, such as the City Mobility Plan and Edinburgh City Centre Transformation, would generally be positive.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Continue to engage with bus operators to determine their proposed reactions to the LEZ.	George King	ongoing	May 2022
Continue to implement communications strategy to ensure that all impacted groups are reached where possible	George King	ongoing	May 2022
Provide clear communications around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.	George King	ongoing	May 2022
Engage with Community Transport Providers to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.	George King	ongoing	May 2022
Communicate clearly the funding options available to Transport Providers. This is also a national action for Transport Scotland.	George King	ongoing	May 2022
Targeted engagement will take place with affected communities/population groups.	George King	ongoing	Complete
Ensure appropriate mitigation measures are implemented and monitored, to reduce the impact of traffic displacement on the boundary streets	George King	ongoing	May 2022
Consult with local waste management facilities in addition to relevant stakeholders (e.g. Zero Waste Scotland) regarding waste management strategies to ensure vehicle components are disposed/recycled sustainably that minimise environmental impact.	George King	ongoing	May 2022

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

The period of statutory engagement and consultation included engagement with the affected groups, as well as an online public consultation survey. During the engagement process, questions on equalities formed part of the public questionnaire to obtain views and to ensure a representative sample of the impacted populations were reached.

While working with Transport Scotland and the Energy Savings Trust, the Council will continue to monitor the uptake of LEZ Support Funds and other related retrofit funds.

16. Sign off by Head of Service

Name - Gareth Barwell

Date – 16/03/22.

17. Publication

Completed and signed IIAs should be sent to strategyandbusinessplanning@edinburgh.gov.uk to be published on the IIA directory on the Council website www.edinburgh.gov.uk/impactassessments