

## CITY OF EDINBURGH COUNCIL

29 AUGUST 2024

## DEPUTATION REQUESTS

Subject	Deputation
<b>3.1 In respect of Item 7.9 on the agenda</b> – Edinburgh Workplace Parking Levy – referral from the Transport and Environment Committee	Spokes (written submission attached)
<b>3.2 In respect of Item 7.11 on the agenda</b> – Low Emission Zone Summer 2024 Update – referral from the Transport and Environment Committee	New Town and Broughton Community Council (written submission attached)
<b>3.3 In respect of Item 8.15 on the agenda</b> – Motion by Councillor Rust – Colinton Dell Footpath	Dell Road Residents Group (verbal)

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We wish to briefly note our continued support for the introduction of a workplace parking levy in Edinburgh. We urge councillors to proceed with WPL because it is a demand management policy which we know can work and provide a much needed income source to support other measures to improve sustainable transportation in the city.

Edinburgh has set an ambitious target of reducing car-kilometres driven by 30% by 2030. Achieving this will have multiple major health and economic benefits for people who live in, work in or visit Edinburgh.

We are not aware of any city in the world that has achieved anything close to a 30% reduction in car-kilometres without introducing demand management policies, such as congestion pricing or workplace parking levies.

In order to achieve the 2030 target, you will need to convince, and enable, people to drive less in 2030 than they did in 2020, a year in which for several months it was literally a criminal offence to leave the house without a legitimate reason.

WPL is a policy which studies have shown to work and which, due to the work already done by officers, could be implemented in Edinburgh relatively soon.

Even with no further delays, it will have taken at least six years to bring WPL from scoping to implementation. If you reject it this week, and are at all serious about the 30% reduction target, you will need to replace it with some other demand management policies.

Achieving the 30% car-kilometre reduction target will also require enabling more people to make more journeys using sustainable modes of transport - whether by walking, wheeling, cycling or using public transport. That enablement work requires funding, and WPL would provide some of this in line with a "Polluter Pays" principle.

The WPL proposals are estimated to provide over £10 million per year. That is money which could be spent making Edinburgh a safer and more appealing place to get around by cycling, for example by reinstating the cycle hire scheme or building approximately 10 km of high quality cycleways every year.

Please therefore proceed today with WPL. If that isn't possible, then please ensure that it is not taken completely off the table until alternative demand management policies, capable of achieving the 30% car-kilometre target, are developed.

Finally, we continue to urge the Council to seek powers from the Scottish government for a wider, [premises](#), levy, such that all premises with over a certain number of customer parking spaces are subject to the levy - for example, car-based shopping and leisure facilities. This would encourage such businesses to support better public and sustainable transport alternatives and to re-use some of their parking acreage for more productive purposes.

David French  
Spokes planning group



## **Deputation to the City of Edinburgh Council on 29 August 2024 regarding item 7.11 Low Emission Zone Summer 2024 Update**

The New Town and Broughton Community Council has consistently, in its representations to the Council, both supported the principle of an LEZ but at the same time highlighted concerns about the chosen boundary and the impact of displacement of traffic, in particular non-compliant vehicles, to residential streets on the periphery of the LEZ. We remain concerned that despite assurances that these issues would be addressed once the LEZ was fully implemented that there is too little evidence of any progress. The report to Council does not provide any update on the status of the Network Management Strategy that was included in the final Submission to Scottish Ministers. This strategy was stated as being required “to ensure the effective and efficient traffic operation around the boundary and try to mitigate any potential impacts.” **We urge the Council to provide an update on the status of this promised strategy.**

The SEPA report that was included in the report to the Transport and Environment Committee meeting in June 2021 showed that its modelling forecast an increase in atmospheric pollution in several streets just outside the LEZ. Despite these concerns which were also raised recently by some members of the Transport and Environment Committee at their meeting on 15 August 2024, there remains a lack of clarity about the extent of any monitoring that is taking place. A simple question at the Transport and Environment Committee meeting about how many monitors are in place both inside and on the boundary of the LEZ could not be answered. Some of the streets identified by SEPA as being likely to have increased pollution still do not have any monitors installed and therefore it is not clear how the Council will be able to determine and mitigate any adverse impacts of the LEZ. **We urge the Council to review its monitoring arrangements to ensure that they do provide the required coverage.**

It is regrettable that the report provided to the Council does not provide sufficient information regarding current and any additional planned monitoring. It would appear from the responses provided at the Transport and Environment Committee

that there will be no publicly available data regarding changes to traffic and atmospheric pollution until 2026. **We recommend that the Council provides more timely information regarding its monitoring plans and results on its LEZ website to provide the necessary reassurance to residents in affected streets.**

One of the other issues we have highlighted previously is the absence of fixed detection cameras on many (32 of 48) of the routes into the LEZ. As a consequence, there is a possibility of non-compliant vehicles continuing to enter the LEZ without being detected. Clearly effective enforcement is a critical deterrent to reduce the continued use of non-compliant vehicles within the LEZ. While we understand that there is a reluctance to make public the location of the ANPR cameras, it is surely important for Councillors and the public to know that the planned enforcement equipment is now operational. We were advised that the Council would have one mobile ANPR camera vehicle that would operate on these access routes without a fixed camera and within the LEZ. **No update is provided in the report about whether this mobile unit is operational nor indeed whether all of the planned 16 fixed units are working.**

Peter Williamson

Chair, New Town and Broughton Community Council

27 August 2024