

Response by New Town and Broughton Community Council to City of Edinburgh Consultation on Proposed Low Emission Zone

The New Town and Broughton Community Council (NTBCC) welcomes the Council's plans to move forward with introducing a Low Emissions Zone (LEZ) in Edinburgh but we are concerned that the current proposals are not sufficiently ambitious and will have a serious detrimental impact for some residents, particularly those that live outside the boundaries of the currently proposed City Centre LEZ. **We strongly believe that the boundaries of the LEZ should be increased in order to benefit a larger proportion of the residents of Edinburgh.**

The area of the proposed LEZ currently covers only 2.5% of the City and excludes many areas of the City with the greatest density of residents. It will also not include the designated Town Centres and areas such as Broughton Street, which form such an important element in the development of 20-minute neighbourhoods outlined in the recently approved City Mobility Plan. In setting the boundaries of the LEZ, more consideration has been given to providing convenient diversionary routes for non-compliant vehicles than maximising the health benefits for people living in Edinburgh. Pollution levels have been considered on an absolute basis without any consideration of the number of people that will be exposed to that pollution. We are particularly concerned that there is no recognition of the risks to pedestrians from vehicular emissions in areas outside of the proposed LEZ; some of which have very high levels of walking including children walking to school.

There are three sections of the currently proposed boundary within the NTBCC area where we believe that further consideration is required before the plans are finalised. These are as follows:

1. **Calton Hill** – currently the boundary of the LEZ does not include Regent Road from its junction with Abbey Mount and Easter Road until it becomes Waterloo Place. This creates an anomaly in that non-compliant traffic is allowed to enter Regent Road but cannot exit this road without turning around outside St Andrews House and returning from where it

had entered. It is recommended that the boundary should be redrawn to include Regent Road to ensure that non-compliant vehicles do remain on major arterial routes as recommended by Transport Scotland. This would also ensure greater protection of the green space surrounding Calton Hill, which is such an important area for walking. A further benefit of this change would be to reduce the number of access points to the LEZ and thus facilitate effective enforcement.

2. **London Road** – currently the boundary in the north east of the LEZ is shown following a series of residential streets to the south of London Road. It is suggested that the boundary is redrawn to follow the south side of London Road so that London Road from its junction with Leith walk until its junction with Easter Road becomes the boundary of LEZ. As a major arterial road, London Road should be clearly designated as the primary diversionary route in this part of the city. As a result Blenheim Place, Royal Terrace, Carlton Terrace, Regent Terrace and associated Mews would all fall within the boundaries of the LEZ. This again will have benefits in simplifying the enforcement regime in this part of the city and discouraging the use of residential streets by non-compliant vehicles.
3. **Randolph Crescent/Great Stuart Street/Ainslie Place** – currently traffic entering the City from the north west that wants to access the east of the City will use these streets to access Queen Street. Queen Street is proposed to be one of the primary diversionary routes for non-compliant vehicles thus resulting in an increase in such vehicles using these streets. This part of the City is not only within the World Heritage Site but also forms part of the New Town Conservation Area. There are already significant issues from noise and vibration created by the volume of traffic including HGV and PSV using these mainly setted streets. The exclusion of these streets from the proposed LEZ and thus increased use by non-compliant vehicles will add to these issues. It does not appear that the use of these streets meets the guidance being developed by Transport Scotland for diversionary routes. It is recommended that if the boundary remains as currently proposed that further measures to mitigate the consequences of increased traffic are clearly defined including bans on certain types of vehicles using these streets.

The report that was considered by the Transport and Environment Committee at their 17 June 2021 meeting states non-compliant vehicles will increasingly use the roads immediately outside the LEZ resulting in increased pollution on these routes. The SEPA forecast attached to the report shows an increase in atmospheric pollution on Queen Street, London Street and Abbeyhill; all areas on the edge of the proposed LEZ. We note that the Council has included an objective to “minimise the impact from traffic displacement across network, related to LEZ scheme”. Insufficient detail is provided on the mitigating actions that will be taken or how achievement of this objective will be measured. Before a final decision is taken on introducing a LEZ, it is critical that there are clear plans in place to limit the negative impact of displaced traffic to reassure residents living near the LEZ.

The current plans are focussed on reducing levels NOx pollution from vehicles within a small part of the City to meet **current** legislative limits. In our view, this goal does not go far enough. 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. We would like to see the Council setting more ambitious and wide ranging targets for reducing pollution given the accepted health benefits of such a reduction. **This is the time for bold action that supports the Council’s plans to encourage walking, wheeling and cycling across the City.**

Despite the title of a ‘low emission zone’, the proposals do not address the need to reduce carbon dioxide emissions. Plans that only address pollution are essentially backward looking, whereas we should be looking forward to a future where fossil-fuel vehicles are completely eliminated. As well as ensuring that non-compliant vehicles are not used in the LEZ, there needs to be a greater effort to reduce overall emissions. We note that there is no mention of encouraging the use of electric vehicles in the proposals. We would have expected to see a commitment to accelerate the roll out of electric vehicle charging points. While we understand the reasons for seeking a reduction in private car usage this should not be to the exclusion of encouraging people to switch to more environmentally friendly vehicles. The wider availability of EV charging points would encourage this change of use, which would be positive for both the environment and economy.

Finally, we note that the enforcement regime will be based on the use of automatic number plate recognition (ANPR) cameras. From our review of Appendix 7 of the report presented to the 17 June 2021 Transport and Environment Committee meeting, we note that the recommended approach is to install these cameras on only 16 routes of the identified 48 entry points to the City centre LEZ. **One mobile unit will cover the other 32 entry routes.** Given that the LEZ is intended to operate 24/7, we are concerned that this approach will affect the levels of compliance required for the LEZ to achieve the intended reduction in atmospheric pollution and health benefits for those living and working within the City centre. We are further concerned that this approach will encourage the drivers of non-compliant vehicles to use the non-arterial routes to avoid detection thus increasing traffic further in the many residential streets bounding the proposed LEZ. We believe that to achieve the required compliance for the success of the LEZ, it is critical that enforcement is rigorously applied. There have been too many Council transport-related initiatives (e.g. 20mph speed limits, parking and loading restrictions, prohibition of idling stationary vehicles) that have foundered due to lack of effective enforcement. **We do not believe that the currently proposed arrangements are adequate.**

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