

Scotland Low Emission Zone Consultation 2019-2020

Consultation Analysis Report

Transport Scotland

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Executive Summary

The Scottish Government is committed to tackling air quality issues in Scotland. To tackle these issues Scotland's Programme for Government committed to putting in place Low Emission Zones (LEZ). LEZs are a form of vehicle access regulation which sets an environmental limit on certain road spaces, to improve air quality by allowing access for certain vehicle types only if they meet the cleanest regulations (lowest emission rates), particularly at locations where there is public exposure.

To support Scotland's Programme for Government commitment, new LEZ legislation was required. This was created via the Transport (Scotland) Act, which received Royal Assent on the 15 November 2019. Part 2 of the Act conferred new powers on local authorities in relation to the creation, and civil enforcement, of LEZs by local authorities. The Act allows Scottish Ministers to set out much of the necessary substantive and procedural detail of the regime by way of Regulations.

A consultation was undertaken in 2017, prior to the Act receiving Royal Assent, to gather views on the LEZ policy making process and to shape the guiding principles being defined by the Scottish Government to help local authorities design, establish and operate LEZs in Scotland. The development of the specific LEZ Regulations under the Act required a further consultation to be undertaken and to this end the 'Scotland's Low Emission Zones: Consultation on Regulations and Guidance' was undertaken between 13th December 2019 and 24th February 2020. The consultation included 14 questions. These questions were combinations of closed and open sub-questions.

In total, 305 responses were received, all of which were 'substantive'. These were from both organisations and individuals, with 71 responses from organisations (23%) and 234 responses from individuals (77%). This report outlines the analysis of these responses: with a summary of the headlines presented below, and the detailed analysis of responses for each of the 14 questions presented in the main report.

LEZ Proposals

Emission Standards

The consultation presented proposed present-day vehicle emission standards that would be applied in Scottish LEZs. Less than half of respondents agreed with these standards (49%). 46% disagreed, with the remainder not answering the question. Across all the responses the most common theme was that emission standards should be more stringent. Of respondents that did not agree, common reasons that were identified by respondents were: questioning the effectiveness of LEZs and whether they were the right thing to do, concern about costs of scrapping older vehicles and purchasing compliant vehicles, concern about negative impacts on specific groups (disabled, low income, rural residents) and a view that there should be exemptions for vintage/classic/historical vehicles. This latter issue came up in multiple questions.

55% of respondents generally agreed with a transformative shift to zero or ultra-low emission city centres by 2030. The most common themes were a need for better public transport, concerns about the infrastructure to support electric vehicle charging, the range/ charging time for electric vehicles, and concern about vehicle replacement costs (scrapping older vehicles and purchasing compliant vehicles).

Penalty Charges

The consultation document presented proposed charges to be applied for LEZ schemes. 35% of respondents agreed with the proposed base level charges and subsequent tiers of penalty charges, but the majority disagreed (53%). Those disagreeing felt the charges were too high. Graph 1 from the consultation document was the most commonly selected surcharge curve on the grounds that it would discourage repeat contraventions. Respondents felt that the preferred approach for applying the surcharges was the approach described in the consultation document, or to use warning letters for the first few contraventions prior to the surcharges applying. The most commonly suggested period for returning to the base level charges was one month – although most did not answer this question.

Enforcement Regime

Respondents were asked whether they agreed with the general principles of the enforcement regime set out in the consultation document. 56% of respondents agreed, with 30% disagreeing and the remainder not answering the question. Respondents that agreed typically gave no supporting reasoning. The most common theme from those disagreeing was that they didn't agree with the LEZ proposals at all, and/or it was considered a revenue making scheme. In addition, some respondents felt that they needed more information or had concerns about the use of private companies for enforcement.

Exemptions

The definition of exempt vehicles elicited the strongest response:

- 74% supported the exemption of emergency vehicles.
- 72% supported the exemption of historic vehicles (vehicles which are 30 years old or more).
- 58% supported the exemption of military vehicles.
- 55% supported the exemption of vehicles for disabled persons.
- 34% supported the exemption of showman vehicles¹.

Typically, respondents felt that these vehicle types would have little impact on overall emissions or were a vehicle type that was not used very often. The previous 2017 consultation showed 83% supporting the exemption of emergency vehicles.

When asked if there should be any other LEZ exemptions, 57% of respondents either did not answer the question or indicated no additional exemptions. 7% of respondents felt that motorcycles and other motorised two wheelers should be exempt. Other respondents provided a wide variety of views.

Consultations with 'Other Persons'

Section 11 of the Transport (Scotland) Act 2019 outlines the organisations local authorities must consult when making, amending or revoking a scheme. A list of 'other persons' whom the local authorities must consult was outlined in the consultation document as well as a list of 'other persons' which would not be included for respondents to comment upon. Only 16% of respondents agreed with the list of 'other persons' whom the local authorities must consult. 48% of respondents did not agree with the list – either because they wanted to include some of those on the list of 'other persons' not intended to be included, or wanted to exclude groups already included, or wanted to add new groups. The remaining respondents

¹ 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, or used for carrying domestic animals.

did not provide a view. There was a variety of views and full details of the groups that respondents felt should be included/excluded is given in the main report and its appendices.

LEZ Enabling Procedure

The consultation document presented a flow chart outlining the steps required for enabling a LEZ scheme to come into effect and respondents were asked for their views. 51% of respondents agreed with the steps outlined and provided no further comment, 30% showed no agreement and the remainder did not answer the question. Of those respondents that disagreed they did not agree with the LEZ proposals at all, or cited that more consultation was required, particularly once the scheme design had been finalised.

LEZ Review

Respondents were asked to provide comments on the elements of the LEZ scheme they would expect a post implementation review to investigate and how they would ensure transparency and accountability. This question was largely unanswered. Where a view was expressed:

- 24% suggested the review should include investigation of air quality and emissions (such as determining any changes in air quality from before and after the implementation of the LEZ).
- 12% wanted the review to include the impacts on users of the LEZ as well as the surrounding areas, including cost/benefit analysis, impacts on local businesses and health impacts.
- 12% suggested a review of vehicle use changes/trends, such as areas of congestion, parking, public transport use, traffic displacement and fleet composition (compliant versus non-compliant vehicles).
- 11% wanted the review to assess compliance with the LEZ, including number of breaches, number of repeat offenders and the number of appeals.

To ensure transparency and accountability respondents most commonly suggested this could be achieved by publishing all data and reasoning behind decisions, as well as having reviewers declare any biased interests.

Impacts of the LEZ

Impacts on particular groups

Respondents were asked for views on what positive or negative impacts the LEZ proposals may have on particular groups of people, with particular reference to a) 'protected characteristics'², b) the very young and old and c) people facing socioeconomic disadvantages. Across all groups it was most commonly felt that there would be positive impacts due to reduced congestion and an improvement in air quality/health in city centres. Negative impacts were around the purchase costs of new compliant vehicles.

Impacts on the Environment

Views were sought on the impacts of the LEZ proposals on the environment. 55% of respondents thought that there would be impacts on the environment. 33% identified positive impacts, 11% identified negative impacts and 11% expressed both positive and

² 'Protected characteristics' are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief and sex and sexual orientation.

negative environmental impacts. Improvement in air quality was cited most frequently as a positive environmental impact of the LEZ proposal. The most frequent reason for negative environmental impacts was that air quality issues were likely to be worsened elsewhere as a result of displacement of traffic due to the LEZ.

Impacts on Business

Respondents were asked to comment on whether they thought that the LEZ proposals would be likely to increase, reduce or maintain the costs and burdens placed on business sectors. 61% of respondents anticipated an increase in the costs and burdens placed on the business sectors, 4% indicated no impact, 2% predicted a reduction in costs and burdens, and 2% indicated there would be increases and decreases. The remainder either stated 'no comment' or did not answer the question. Typically, respondents cited that the likely increase in costs and burdens would be due to the capital cost of businesses purchasing compliant vehicles, the increased transportation cost for commuters travelling to workplaces, reduction in footfall in city centres affecting business revenues, and businesses closing or moving outside of the LEZ. Where respondents thought that there would be a reduction in costs and burdens or no impact this was because the LEZ proposals increase tourism or that cities would be a better place to live.

Secondary Objectives

Views were sought on what secondary objectives should be created for LEZ schemes. 39% of respondents identified secondary objectives, predominantly: modal shift, public transport provision, planning / placemaking, public health / wellbeing and congestion reduction. 5% of respondents felt that no secondary objectives should be applied and that the proposals should just focus on achieving the primary objectives.

Technological Opportunities

Respondents were invited to comment on how local authorities can maximise the technological opportunities available from the deployment of approved devices used for the LEZ enforcement. Only 26% of respondents provided suggestions for such opportunities. 13% of respondents stated that approved devices should only be used for the LEZ enforcement and technological opportunities should not be further explored citing concerns about privacy issues as the main reason. Where suggestions for maximising technological opportunities were given the most common responses were: having ANPR database connections for drivers to check compliance of their vehicles, using the LEZ enforcement technology to improve traffic management (for example using it to enforce traffic restrictions, monitor speeds and re-evaluating speed limits and use of smart lights for traffic control) and having police/DVLA ANPR database connections for other enforcement uses, such as checking road tax / insurance on the vehicles. Organisations most commonly suggested that there should be collaboration with other organisations particularly the academic sector to maximise opportunities.

Personal Data and Privacy

Regarding personal data and privacy issues, 26% of respondents expressed concerns about privacy issues associated with the LEZ proposals. 28% of respondents identified there were either unlikely to be privacy issues or there was no impact and 46% either provided no answer to the question, stated no comment or gave no clear view on the matter. The most common concerns were around data protection / management. Those with no privacy issues trusted that General Data Protection Regulations (GDPR) would be followed.

1. Introduction

1.1. Overview

Scotland is facing legal (environmental), health and social justice challenges around air pollution, where non-compliance with domestic and European air quality legislation is due predominantly to road-based emissions.

Low Emission Zones are a form of vehicle access regulation which sets an environmental limit on certain road spaces, to improve air quality by restricting access for the most polluting vehicle types), particularly at locations where there is public exposure.

To help tackle air quality issues Scotland's Programme for Government 2017 to 2018³ committed to putting in place Low Emission Zones (LEZ). To support this Programme for Government commitment, new LEZ legislation was required. This was created via the Transport (Scotland) Act 2019, which received Royal Assent on the 15 November 2019⁴. Part 2 of the Act conferred new powers on local authorities in relation to the creation, and civil enforcement, of LEZs by local authorities. The Act allows Scottish Ministers to set out much of the necessary substantive and procedural detail of the regime by way of Regulations.

A consultation was undertaken in 2017, prior to the Act receiving Royal Assent, to gather views on the LEZ policy making process and to shape the guiding principles that the Scottish Government will adopt to help local authorities design, establish and operate Scottish LEZs. The development of the specific LEZ Regulations under the Act required a further consultation to be undertaken and to this end the 'Scotland's Low Emission Zones: Consultation on Regulations and Guidance' was undertaken between December 2019 and February 2020. This report analyses and summarises the responses from this consultation.

1.2. Background to the Proposals

1.2.1. Relevant Publications

The key Scottish Government publications which underpin the LEZ proposals include:

- **The Cleaner Air for Scotland: The Road to a Healthier Future (CAFS)**, published in 2015⁵, is Scotland's Air Quality Strategy. The strategy sets out how the Scottish Government and its partners propose to reduce air pollution and fulfil Scotland's legal responsibilities as soon as possible.
- The **2017 Programme for Government** committed to putting in place four Low Emission Zones (LEZ) between 2018 and 2020 in Scotland's four main cities (Glasgow, Edinburgh, Dundee and Aberdeen) and into Air Quality Management Areas by 2023 where National Low Emission Framework appraisals⁶ support this approach. The Programme for Government commitment to put Scotland's first LEZ in place by 2018 was met with Glasgow City Council introducing a LEZ (for buses) on the 31 December 2018.

³ The Scottish Government, 2017, The Government's programme for Scotland 2017 to 2018. Available at: <https://www.gov.scot/publications/nation-ambition-governments-programme-scotland-2017-18/pages/6/>

⁴ Available at: <http://www.legislation.gov.uk/asp/2019/17/contents/enacted>

⁵ The Scottish Government, 2015, Cleaner Air for Scotland: The Road to a Healthier Future (CAFS) Available at: <https://www.gov.scot/publications/cleaner-air-scotland-road-healthier-future/>

⁶ The Scottish Environment Protection Agency (SEPA) are providing air quality modelling outputs to Scotland's four biggest cities to support their understanding of air pollution issues in each city via the National Modelling Framework (which is creating local and regional air quality models).

- An independent review⁷ of the CAFS strategy was published in August 2019 following a wide-ranging stakeholder exercise.
- The **2019 Programme for Government**⁸ committed to consulting on LEZ emission standards, including the extent to which future stricter emissions standards can contribute towards encouraging the transition towards lower and zero-carbon forms of transport.
- The **National Transport Strategy** (NTS2)⁹ sets out the Scottish Government's transport vision for the next 20 years. The aspiration of NTS2 toward air pollution is that 'the people of Scotland will be able to travel in towns and cities without concerns about air quality affecting their health.'
- The **Scottish Government Climate Change Plan 2018-2032**¹⁰ was published in 2018 and the **Climate Change (Emissions Reductions Targets) (Scotland) Act**¹¹ received royal assent on the 31 October 2019. The Act raises the ambition of Scotland's targets for reducing greenhouse gas emissions and seek to enhance Scotland's efforts in tackling climate change. Moreover, the Act acknowledge positive secondary effects around air quality, population and human health, and material assets as a result of further decarbonisation of energy generation and transport.

1.2.2. Consultation

A previous consultation was undertaken in 2017 titled 'Building Scotland's Low Emission Zones'¹². The consultation asked key questions relating to the design of LEZs in Scotland, including views on the proposed Euro emission criteria, hours of operation, enforcement and lead in times of LEZ proposals.

In total, 967 responses were received for the 2017 consultation. The key finding of the consultation were:

- There was a high level of consensus among respondents with 95.5% supporting the principle of LEZs to help improve air quality in Scotland.
- 62.3% of respondents agreed with the proposed minimum mandatory Euro emission criteria for Scottish LEZs. The proposed minimum criteria as set out in the consultation document were Euro 6 for diesel cars, Euro 4 for petrol cars and Euro VI for buses (including older retrofitted engines which would be improved to operate as Euro VI).
- The views indicated that the most popular suggestion was for LEZs to operate 24 hours, 7 days a week.
- The views provided also showed a high level of consensus with 91.6% in favour of using automatic number plate recognition (ANPR) to enforce LEZs. Those who disagreed had privacy concerns with the use of ANPR.
- 82.7% of respondents considered that emergency vehicles should be exempt.
- Most respondents, 86.3% agreed that LEZ exemptions should be consistent across all Scottish local authorities.

⁷ The Scottish Government, 2019, Cleaner Air for Scotland strategy: independent review. Available at: <https://www.gov.scot/publications/cleaner-air-scotland-strategy-independent-review/>

⁸ The Scottish Government, 2019, The Government's programme for Scotland 2019 to 2020. Available at: <https://www.gov.scot/publications/protecting-scotlands-future-governments-programme-scotland-2019-20/>

⁹ Transport Scotland, 2020, National Transport Strategy. Available at: <https://www.transport.gov.scot/our-approach/national-transport-strategy/>

¹⁰ The Scottish Government, 2018, Climate Change Plan 2018-2032. Available at: <https://www.gov.scot/publications/scottish-governments-climate-change-plan-third-report-proposals-policies-2018-9781788516488/>

¹¹ Available at: <http://www.legislation.gov.uk/asp/2019/15/contents/enacted>

¹² Available at: <https://consult.gov.scot/transport-scotland/building-scotlands-low-emission-zones/>

Over 2018 and 2019, the Scottish Government engaged with numerous stakeholders on the development of the LEZ policy. In May 2019, the Scottish Government held three workshops to seek views on preliminary options around the subject of LEZ regulations and guidance. The LEZ workshops had input from stakeholders from the private sector, public sector and third sector/non-governmental organisations (NGO) in tandem with members of the public. The findings from these workshops have helped inform the proposals presented for further consultation.

A further consultation was undertaken between December 2019 and February 2020. The purpose of the consultation was to set out the proposed arrangements and options related to the nationally consistent LEZ standards which will be outlined in regulations in tandem with guidance. The results of this further consultation are the subject of this report.

1.3. Consultation Overview

The **'Scotland's Low Emission Zones: Consultation on Regulations and Guidance'** was launched on the 13th December 2019 and closed on the 24th February 2020¹³. The consultation represented another opportunity for the public and stakeholders to influence LEZ policy but with a specific focus on the development of LEZ regulations and guidance. The consultation was not about the design or implementation of any individual town or city-specific LEZ.

The consultation set out proposals for LEZ regulations and guidance that will underpin the operation and delivery of LEZs in Scotland. Views were sought on a selection of issues including the emission standards, penalty charge rate, enforcement and exemptions. The consultation also sought views on assessing the general impact of LEZ schemes on issues such as equality, privacy and the environment.

Respondents were asked 14 questions relating to the development of LEZ regulations and guidance. The questions were a combination of open and closed questions, with several questions having sub questions. A full list of questions is provided in Appendix A. This report presents the analysis of the responses to the questions. It should be noted that the findings presented in this report are specific to the consultation and do not necessarily reflect the range of views within the population as a whole, as the analysis is dependent on those members of the public and stakeholders making a choice to respond to the consultation. This report does not reflect the views of Transport Scotland or Ministers. This report does not make recommendations on policies to take forward or the format of subsequent Regulations.

1.4. Report Structure

The introduction, Section 1, has set out the background to the LEZ proposals and given an overview of the consultation.

The methodology for the analysis of the consultation responses is described in Section 2.

The results of the analysis are described in Section 3. Only "substantive responses" were received during the consultation, which are presented in Section 3. No "campaign responses" were received, so these are not discussed any further. Analysis has been undertaken for each question (and sub-question) of the consultation and results are presented separately for individual respondents and those representing organisations.

The main summary of the consultation analysis is presented in the Executive Summary.

¹³ <https://www.transport.gov.scot/consultation/scotlands-low-emission-zones-consultation-on-regulations-and-guidance/>

2. Methodology

2.1. Consultation Details

The consultation was hosted in Citizen Space on Transport Scotland's consultation hub, launching on the 13th December 2019 and closing on the 24th February 2020. Participants were able to respond to the consultation directly within the web-based Citizen Space, or via email or by post. A total of **305** responses were received. 291 of these responses were received via Citizen space, 14 by email and none by post. Responses received via email were subsequently input to Citizen Space by Transport Scotland. Some respondents provided supporting documents and comment to accompany their response. These documents were available to the analysis team and have been reviewed and cross referenced within the full data set.

Respondents were not required to answer every question and typically answered the questions where they had an interest, or they felt informed to answer. As such the total number of responses vary by each question. In addition, where respondents did not provide an answer to closed questions, any associated comments made were still considered and analysed within the report.

Respondents could indicate if they were happy to have their responses published.

- 99 respondents were happy for their individual response to be published.
- 161, while happy for the response to be published, did not want their name and/or organisation to be attributed to the response. Where this is the case these responses have been included in the overall analysis, but their individual response has either not been published, or have been anonymised. Any comments or quotes made within this report have been included in a way that maintains their anonymity.
- 45 respondents did not give permission for their individual response to be published. These respondents have been included in the overall analysis, but no reference is made to their specific comments.

2.2. Response Types

All 305 responses received were 'substantive'. These were from both organisations and individuals. The organisations responding were further broken down into the following pre-agreed categories: academic/research, business/industry, community groups, professional or trade bodies, public bodies and third sector/non-governmental organisations (NGO). The breakdown of respondent types is shown in Table 2-1. A list of organisations who responded is available in Appendix B where organisations gave permission for their details to be shared.

Table 2-1 - Summary of Respondent Types

Respondent Type	Number of Respondents*
Individual	234 (77%)
Organisation	71 (23%)
Academic/research	1 (0%)
Business/industry	17 (6%)
Community group	17 (6%)
Professional or trade body	9 (3%)
Public body	21 (7%)
Third Sector/NGO	6 (2%)
TOTAL	305 (100%) **

*Percentages calculated based on 305 respondents

**Percentages in all tables have been rounded to whole numbers so in some cases the sum of individual percentages by sub-type will not always add to 100%.

2.3. Data Processing and Analysis

A database of consultation responses was downloaded from Citizen Space in Microsoft Excel format and subsequent analysis of responses was undertaken with Excel. Where respondents had included supporting documents, these were downloaded and cross referenced in the database to ensure they were included in the analysis of responses.

Quality control was undertaken of the responses to screen for duplicate responses. No duplicate responses were found and therefore the total number of responses remained as 305. All responses were substantive and therefore there was no need to breakdown into response types (substantive/discussion/campaign). Respondents were classified as either individuals or respondents representing an organisation. The organisations further classified as an organisation type as shown in Table 2-1 above. As stated earlier further details of organisations and a breakdown by organisation type is available in Appendix B.

The 14 consultation questions included within them combinations of closed and open sub-questions. The closed sub-questions were 1a, 2a, 3a, 3b, 4 and 8. The closed sub-questions were then associated with open sub-questions allowing respondents to make free-form comments to support their views. Questions 1b, 2b, 3c, 3d, 5, 6, 7, 9, 10, 11, 12, 13 and 14 were open questions.

The responses and comments made for each open question were interrogated and coded to determine common themes in the responses. As the questions were typically asking about different aspects of LEZs the common themes vary between questions, although some universal or repeated themes were identified in the responses to all questions.

For the **closed questions** summary statistics were prepared to present the number of respondents and percentages for each option (e.g. Yes / No) and also under a 'Not Answered' category where respondents did not provide an answer to the question. All closed questions also followed on with a second open question where respondents could make comments to support their views. These open questions were coded into common themes and analysed according to the respective answer to part one of the question (e.g. Yes / No / Not Answered). Statistics for the closed questions were thus calculated based on

the number of respondents answering a certain way in the closed question, not for the overall total number of respondents.

For the **open questions** a two-step coding process was undertaken for the majority of questions. Where questions asked, for example, for views on positive or negative impacts then an initial coding step was undertaken to determine if the comment was positive or negative. The second step was to code the response into common themes and summary statistics. Where a two-step coding process was used percentages of respondents mentioning a particular theme were calculated based on the number of respondent types.

Analysis presented for each question in the section below provides summary statistics and charts for quantitative data, tables of common themes identified for each question / sub question and with accompanying text summarising key themes. A reasoning section is given for individuals and organisations where key themes are discussed. Tables of common themes identified for individuals and organisations for each question / sub question are shown in the appendices to the report. Discussion includes reference to numbers of responses and also give this as a percentage. Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

For each question tables for individuals and organisations were analysed against a common set of themes, but for ease of reading, themes with no responses have been removed from the report tables. Key themes that are discussed in the main report are highlighted in bold in the tables in the appendices. It was pre-agreed with Transport Scotland that a detailed breakdown of themes by organisation type was not required.

The final part of the consultation analysis methodology was to prepare a catalogue of references. A list of evidence sources highlighted by respondents in support of their views has been compiled and is presented in Appendix C. This lists the unique sources highlighted and a count of the number of respondents referencing each source.

3. Analysis of Responses

3.1. Question 1a: Do you agree with the proposed present-day emission standards for Scottish LEZs? If not, why not?

Question 1 was split into two parts. The first part was a closed question where a yes or no response was required to indicate whether respondents agreed with the proposed present-day emission standards for Scottish LEZs. The second part was an open question asking for the respondent to provide a reasoning for their choice.

The results of the answers for all respondents for part one of question 1a are shown in Table 3-1 and Figure 3-1 and discussed below.

Of the 305 respondents:

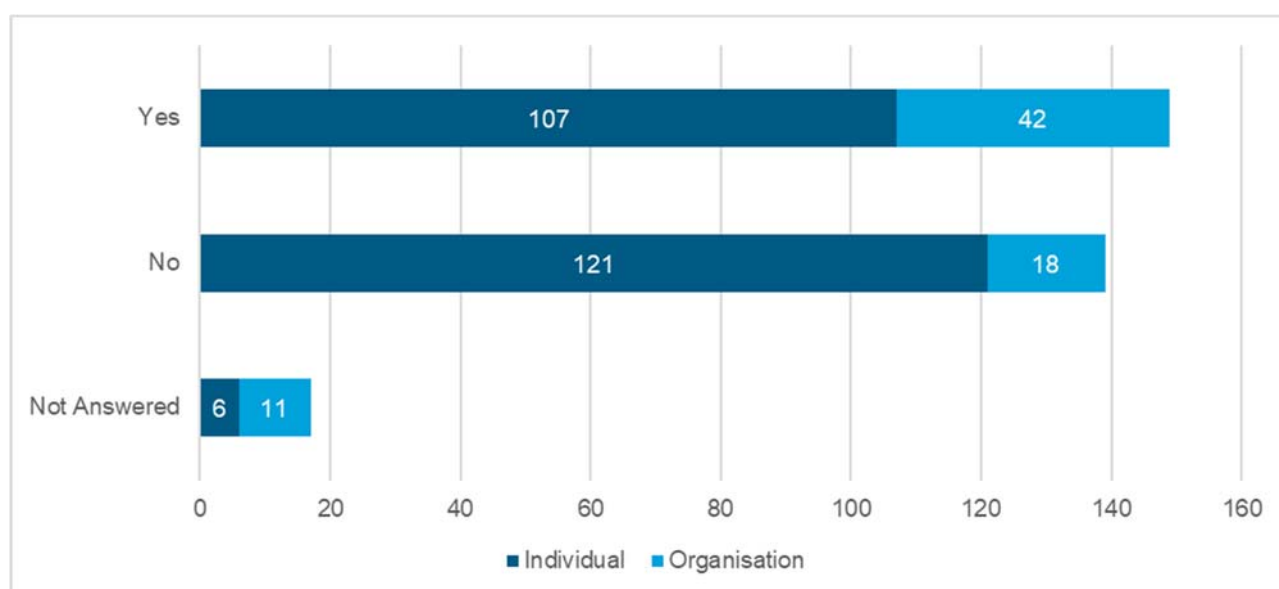
- A total of 149 (49%) respondents agreed with the proposed present-day emission standards for Scottish LEZs.
- 139 (46%) of respondents did not support the proposed present-day emission standards for the LEZs.
- 17 (6%) of respondents did not provide an answer for the question.
- More individuals did not support the proposed LEZ emission standards than did, while twice as many organisations supported than did not.

Table 3-1 - Q1a Split by Respondent

Response	Individual	Organisation	Total
Yes	107 (35%)	42 (14%)	149 (49%)
No	121 (40%)	18 (6%)	139 (46%)
Not Answered	6 (2%)	11 (4%)	17 (6%)
Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-1 - Q1a Summary Split by Respondent



The second part of Question 1a asked respondents to provide a comment explaining their response to their agreement or disagreement with the proposed present-day LEZ standards. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and all themes are reflected in the analysis.

3.1.1. Reasoning – Individuals

A summary of themes identified in the responses of individuals is shown in Appendix D in Table D-1.

Yes – agreement with proposed present-day LEZ standards

Of the 107 (46% of 234) individual respondents who agreed to the present-day emission standards for the LEZs, most of the respondents (96, 90%) did not provide any further comment or reasoning.

Where a response was provided the following key themes were identified to support their choice (shown in Table D-1):

- 4 (4%) agreed but would like more stringent measures applied to tackle the air quality problem.
- 3 (3%) agreed but would like the exclusion of vintage / classic / historical vehicles.
- Other themes were each mentioned by 1 (1%) of individual respondents.

No - disagreement with proposed present-day LEZ standards

Of the 121 (52% of 234) individual respondents who did not agree with the proposed present-day emission standards, the following key themes were identified:

- 33 (27%) would like the exemptions for vintage / classic / historical vehicles;
- 31 (26%) have a concern over the cost of scrapping older vehicles and having to purchase new vehicles as well as penalising older vehicles;
- 30 (25%) questioned the effectiveness of LEZs and whether they provide a solution to air quality problems and/or if they are required;
- 19 (16%) respondents would like more stringent measures applied to tackle the air quality problem; and
- 19 (16%) are concerned the proposed measures will target and unfairly penalise a specific societal group (disabled, low income, rural residents).

A common reasoning for those individual respondents who disagreed with the proposed LEZ emission standards involved historical vehicles. Respondents felt classic, vintage, and historical vehicles constitute an important part of Scottish heritage and society and were concerned LEZs would penalise this specific group of vehicles.

Respondents who voiced concerns for scrapping older cars suggested using an incentive to encourage sustainable investment in compliant vehicles and/or suggested a staged approach to facilitate the change of vehicles over time to meet emission standards.

Not Answered

Out of the 234 individual respondents, 6 (3% of 234) did not provide a response nor any further comment.

3.1.2. Reasoning – Organisations

A total of 42 (59% of 71) organisational respondents agreed with the present-day standards and 18 (25%) did not agree. 11 (15%) of the organisational respondents did not provide a response to the question.

The responses split by organisation type are shown below in Table 3-2 and Figure 3-2.

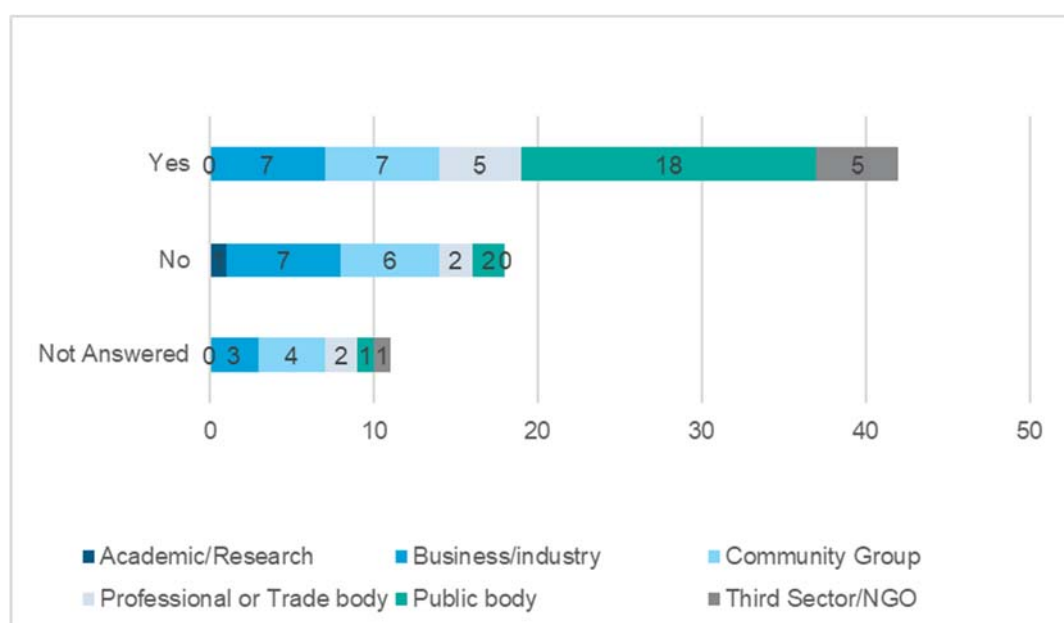
As seen in Table 3-2, the largest proportion of organisation respondents in agreement with the proposed present-day standards came from public bodies (18, 25%). Most organisation respondents who disagreed with the proposed standards were from business and industry (7, 10%) and community groups (6, 8%).

Table 3-2 - Q1a Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public Body	Third Sector/ NGO	Total
Yes	-	7 (10%)	7 (10%)	5 (7%)	18 (25%)	5 (7%)	42 (59%)
No	1 (1%)	7 (10%)	6 (8%)	2 (3%)	2 (3%)	-	18 (25%)
Not Answered	-	3 (4%)	4 (6%)	2 (3%)	1 (1%)	1 (1%)	11 (15%)
Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-2 - Q1a Summary of Split by Organisation Type



A summary of themes identified in the responses of organisations is shown in Appendix D in Table D-2.

Yes – agreement with proposed present-day LEZ standards

Of the 42 (59% of 71) organisation respondents who agreed to the present-day emission standards for the LEZs, the following key themes were identified:

- 14 (33%) agreed but would like more stringent measures applied to tackle the air quality problem;
- 5 (12%) agreed but were concerned the proposed standards target the wrong vehicles and/or the Euro standards do not reflect real life emissions;
- 3 (7%) question the effectiveness of LEZs and/or don't believe they solve air pollution problems; and
- 16 (38%) did not provide a reasoning or comment for their decision.

Other themes were each mentioned by 2 (5%) or less individual respondents. These themes are shown in Appendix D in Table D-2.

No – disagreement with proposed present-day LEZ standards

Of the organisation respondents who did not agree with the proposed present-day emission standards (18, 25% of 71), the following key themes were identified:

- 6 (33%) respondents would like more stringent measures applied to tackle the air quality problem;
- 6 (33%) respondents were concerned the standards target the wrong vehicles and/or the Euro standards do not reflect real life emissions;
- 4 (22%) respondents questioned the effectiveness of LEZs and/or don't believe they solve air pollution problems; and
- 4 (22%) had a concern over the cost of scrapping older vehicles and having to purchase new vehicles as well as penalising older vehicles.

Other themes were each mentioned by 2 (11%) or less individual respondents. These themes are shown in Appendix D in Table D-2.

Not Answered

Out of the 71 organisation respondents, 11 (15% of 71) did not provide a response as to whether they agreed or disagreed with proposed present-day LEZ standards. Of these 6 (55%) did not provide any further comment.

3.2. Question 1b: What are your views on Scotland making a transformative shift to zero or ultra-low emission city centres by 2030? Please be as specific as possible in your reasoning.

Question 1b is an open question which asked respondents to give views on the shift to zero or ultra-low emission city centres by 2030. 268 respondents provided a comment. Initial coding was undertaken to determine whether the respondents' views indicated they were in general agreement or disagreement with the proposals. The results are shown in Table 3-3 and Figure 3-3 and discussed below. Of the total 305 respondents:

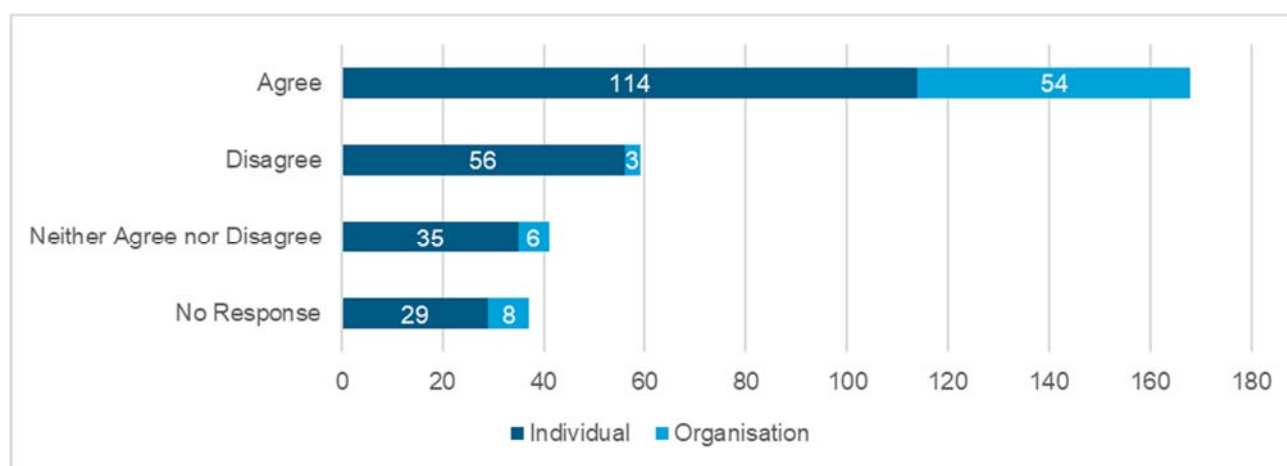
- 168 (55%) were in general agreement with the proposed zero/ultra-low emission zones in city centres by 2030 although many agreed with concerns or clauses.
- 59 (19%) disagreed with the proposals.
- 41 (13%) did not give a clear agreement or disagreement.
- 37 (12%) did not provide a response.

Table 3-3 - Q1b Split by Respondent

Response	Individual	Organisation	Total
Agree	114 (37%)	54 (18%)	168 (55%)
Disagree	56 (18%)	3 (1%)	59 (19%)
Neither Agree nor Disagree	35 (11%)	6 (2%)	41 (13%)
Not Answered	29 (10%)	8 (3%)	78 (12%)
Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-3 - Q1b Summary of Split by Respondent



The second part of Question 1b asked respondents to provide a comment explaining their views on the proposed shift towards zero or ultra-low emission zones in Scottish city centres. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one key theme in their comment and all themes are reflected in the analysis.

3.2.1. Reasoning – Individuals

A summary of themes for individuals is shown in Appendix D in Table D-3.

Agree

Of the 114 (49% of 234) individual respondents who agreed with the proposed shift towards zero or ultra-low emission zones in city centres by 2030, many had concerns. The following key themes were identified as the reasonings:

- 25 (11%) would like better public transport provided or suitable alternatives such as park and rides;
- 20 (9%) had a concern over the lack of infrastructure to support such a scheme.
- 20 (9%) would like more stringent measures applied to tackle the air quality problem (such as bringing the date forward for zero emission zones).
- 18 (8%) would like exemptions for classic/vintage/historical vehicles.
- 12 (5%) have a concern over the cost of scrapping older vehicles and having to purchase new vehicles as well as penalising older vehicles.

Disagree

Of the 59 (25% of 234) individual respondents who did not agree with the proposed zero or ultra-low emission zones, the following primary themes were mentioned:

- 17 (7%) believe the scheme would be implemented for political reasons or stated political objections.
- 15 (6%) questioned the effectiveness of zero or ultra-low emission zones and/or the science behind it.
- 14 (6%) had a concern over the lack of infrastructure to support such a scheme.
- 12 (5%) were concerned with the cost to the individual if the scheme were to go ahead.
- 11 (5%) are concerned the proposed measures will target and unfairly penalise a specific societal group (disabled, low income, rural residents).

Neither Agree nor Disagree

A group of respondents did not provide clear agreement or disagreement with the proposals to implement a zero or ultra-low emission zones in Scottish city centres by 2030 but did provide comments. The following key themes were identified in this group of responses:

- 8 (3%) had a concern over the lack of infrastructure to support such a scheme.
- 7 (3%) were concerned with the timescale to implement and suggested a phased approach.
- 6 (3%) respondents each would like better public transport provided, want exemption for classic / vintage / historical vehicles, and are concerned about the environmental impact of electric vehicles.

3.2.2. Reasoning – Organisations

As seen in Table 3-4, the largest proportion of organisation respondents in agreement with the proposed zero or ultra-low emission city centres by 2030 were from the public body sector (19, 27%) and business and industry (14, 20%).

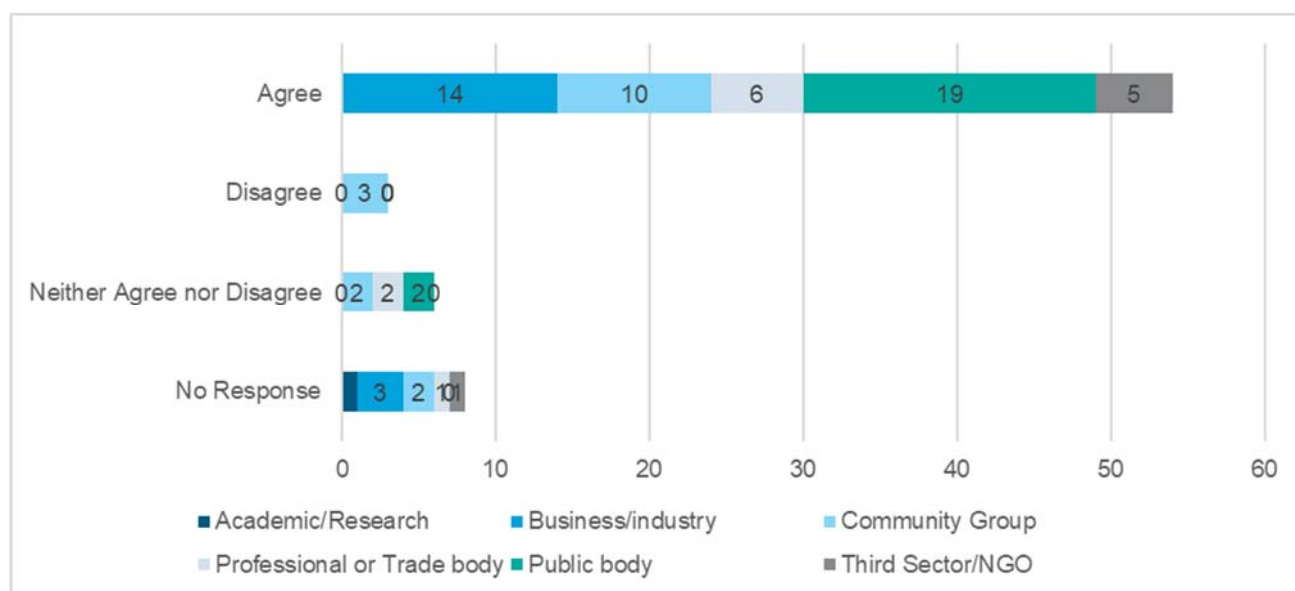
The organisation respondents who disagreed with the proposed standards were from the community group sector (3, 4%), and the respondents who fell into the neither agree nor disagree response category were from the community group sector (2, 3%), professional or trade body sector (2, 3%) and public body sector (2, 3%).

Table 3-4 - Q1b Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Agree	-	14 (20%)	10 (14%)	6 (8%)	19 (27%)	5 (7%)	54 (76%)
Disagree	-	-	3 (4%)	-	-	-	3 (4%)
Neither Agree nor Disagree	-	-	2 (3%)	2 (3%)	2 (3%)	-	6 (8%)
No Response	1 (1%)	3 (4%)	2 (3%)	1 (1%)	-	1 (1%)	8 (11%)
Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-4 - Q1b Summary of Split by Organisation Type



A summary of key themes for organisations is shown in Appendix D in Table D-4.

Agree

Of the 54 (76% of 71) who agreed with the proposed shift towards zero or ultra-low emission zones in city centres by 2030, the following key themes were identified:

- 20 (28%) would like better public transportation or suitable alternatives such as park and rides.
- 14 (20%) had a concern over the cost of scrapping older vehicles and having to purchase new vehicles as well as penalising older vehicles.
- 13 (18%) suggest more stringent measures should be applied to tackle the air quality problem.
- 13 (18%) were concerned there is a lack of infrastructure to support ultra-low emission zones and electric vehicle technology.

- 12 (17%) respondents were unsure of the time goal and concerned for implementing by 2030 or suggest a phased approach.

Other themes were each mentioned by 9 (13%) or less organisation respondents. These themes are shown in Appendix D in Table D-4.

Disagree

Of the 3 (4% of 71) of organisation respondents who did not agree with the proposed shift towards zero or ultra-low emission zones in city centres by 2030, the following key themes were identified:

- 2 (3%) were concerned there is a lack of infrastructure to support ultra-low emission zones and electric vehicle technology; and
- 2 (3%) were unsure of the time goal and concerned for implementing by 2030, suggest a phased approach.

Other themes were each mentioned by 1 (1%) or less of organisation respondents. These themes are shown in Appendix D in Table D-4.

Not Answered

Out of the 71 organisation respondents, 8 (11% of 71) did not provide a response to this question.

3.3. Question 2a: Which of the proposed national LEZ exemptions do you agree with? Please be as specific as possible in your reasoning.

Question 2a is a two-part question. The first part is a closed question which gives a choice of five vehicle groups proposed for exemption from the LEZs. Respondents were asked to choose which they agreed with in the first part of the question. The second part of the question is an open question asking for the respondent to provide a reasoning for their choice.

The results for part one are shown in Table 3-5 and Figure 3-5.

Of the 305 respondents:

- 226 (74%) supported the exemption of emergency vehicles.
- 219 (72%) supported the exemption of historic vehicles.
- 176 (58%) supported the exemption of military vehicles.
- 169 (55%) supported the exemption of vehicles for disabled persons.
- 105 (34%) supported the exemption of showman vehicles.
- 12 (4%) did not provide an answer for this question.

Table 3-5 - Q2a Split by Respondent

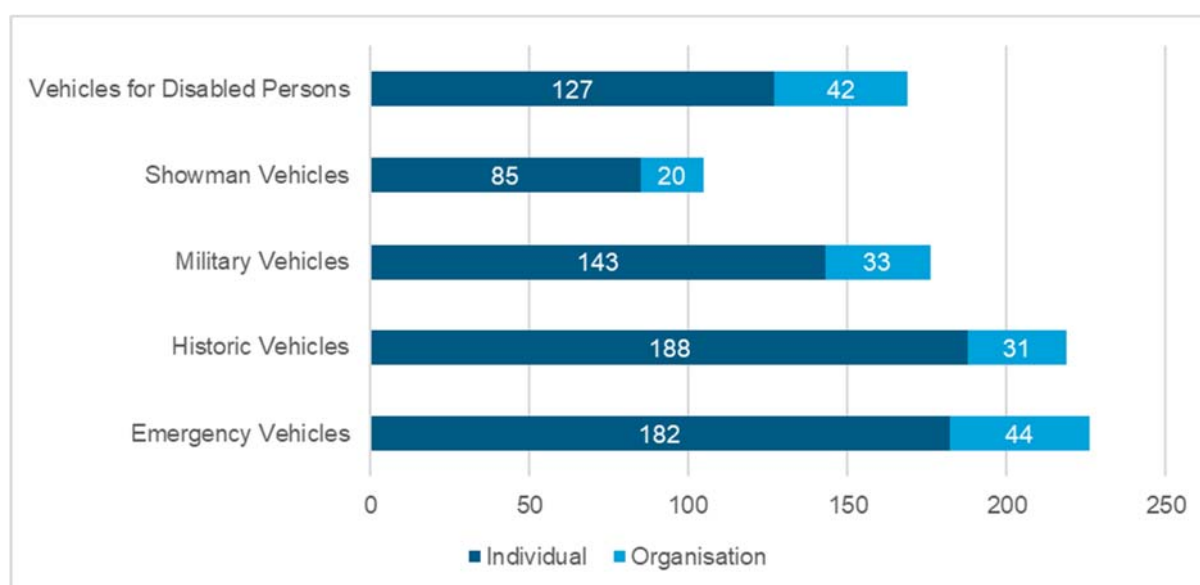
Response	Individual	Organisation	Total
Emergency Vehicles	182 (60%)	44 (14%)	226 (74%)
Historic Vehicles	188 (62%)	31 (10%)	219 (72%)
Military Vehicles	143 (47%)	33 (11%)	176 (58%)
Showman Vehicles	85 (28%)	20 (7%)	105 (34%)
Vehicles for Disabled Persons	127 (42%)	42 (14%)	169 (55%)
Total respondents	234	71	305

Note that respondents were asked to identify all exemptions that they felt should apply so the total count of responses is more than the number of respondents.

Percentages have been calculated based in 305 respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-5 - Q2a Summary of Split by Respondent



The second part of Question 2a asked respondents to provide a comment to explain their response to the proposed exemptions. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment.

3.3.1. Reasoning – Individuals

Of the 234 respondents the following key themes were identified as to why specific vehicles should be exempt:

- 78 (33%) provided no common/no clear view for their choice.
- 77 (33%) agreed with the exemptions as the vehicles were considered to have little impact on overall emissions and/or were rarely used.
- 56 (24%) of individual respondents wanted exemptions as the vehicles were considered to have social importance and/or be part of cultural heritage.
- 27 (12%) agreed the specified vehicles provided an essential service.

- 24 (10%) of respondents supported the exemptions as the vehicles were considered to be difficult to convert and/or upgrade.

A total of 9 (4%) respondents did not believe any exemptions should be permitted.

A summary of themes for individuals is shown in Appendix D in Table D-5.

3.3.2. Reasoning – Organisations

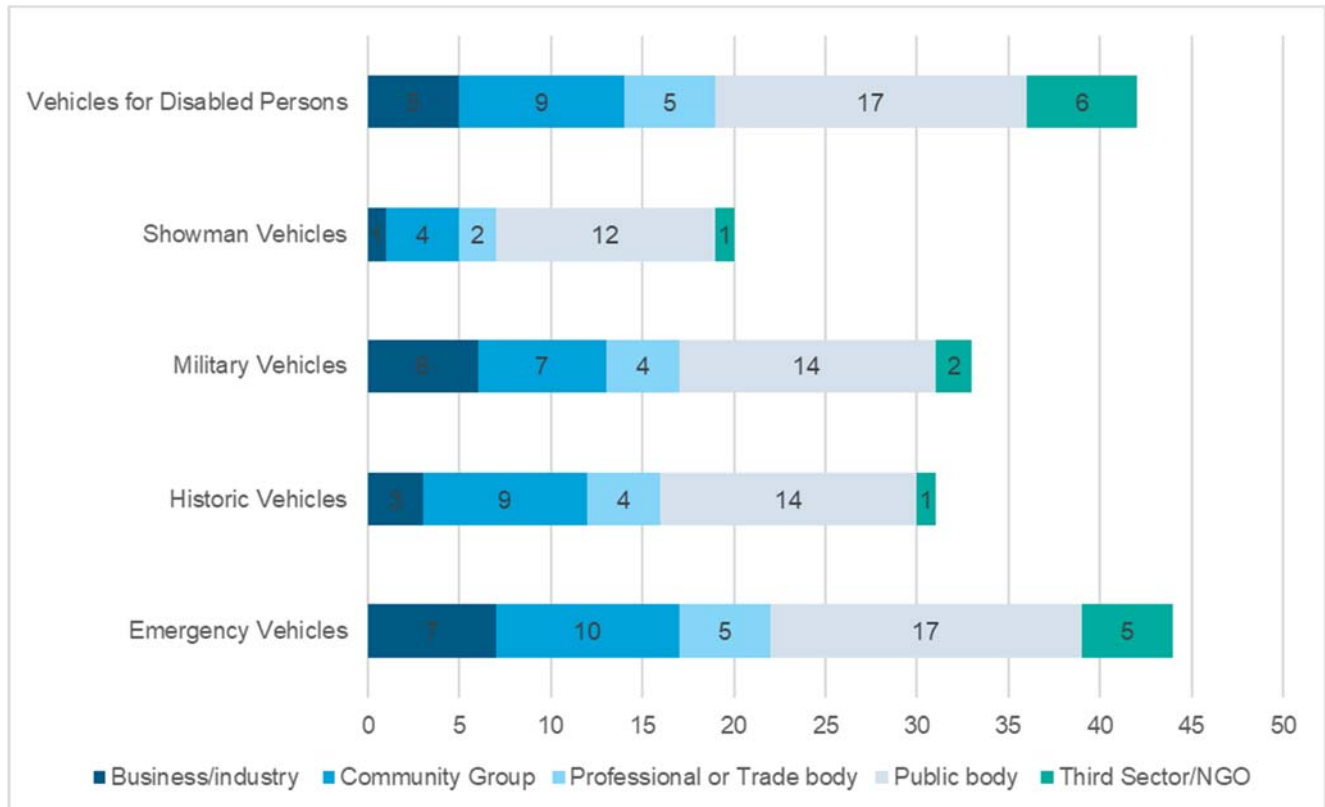
The responses split by organisation type are shown below in Table 3-6 and Figure 3-6. The majority of organisation respondents in agreement with the proposed exemptions were from the public body sector.

Table 3-6 - Q2a Split by Organisation Type

Exemption Category	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/NGO	Total
Emergency Vehicles	-	7 (10%)	10 (14%)	5 (7%)	17 (24%)	5 (7%)	44 (62%)
Historic Vehicles	-	3 (4%)	9 (13%)	4 (6%)	14 (20%)	1 (1%)	31 (44%)
Military Vehicles	-	6 (8%)	7 (10%)	4 (6%)	14 (20%)	2 (3%)	33 (46%)
Showman Vehicles	-	1 (1%)	4 (6%)	2 (3%)	12 (17%)	1 (1%)	20 (28%)
Vehicles for Disabled Persons	-	5 (7%)	9 (13%)	5 (7%)	17 (24%)	6 (8%)	42 (59%)
Total*	170 (71 total number of respondents used for percentage calculations)						

* Some respondents identified more than one exemption. The total number of exemption agreements is therefore more than the 71 organisation respondents; however, 71 was used to determine the percentage of organisations agreeing to a specific exemption. Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-6 - Q2a Summary of Split by Organisation Type



Of the 71 organisation respondents, the following key themes were identified:

- 13 (18%) provided no comment/no clear view for the choice.
- 12 (17%) supported the exemptions as they did not think a specific group should be penalised (i.e. disabled groups, low income households, classic car groups).
- 11 (15%) agreed the specified vehicles provide an essential service.
- 10 (14%) agreed with the exemptions as the vehicles were considered to have little impact on overall emissions and/or were rarely used.
- 10 (14%) supported the exemptions as the vehicles were considered to be difficult to convert and/or upgrade.
- 9 (13%) supported the exemptions to allow for a phased approach to upgrade vehicle fleets.
- 9 (13%) did not provide an answer for the question.

A total of 5 (7%) of respondents did not believe any exemptions should be permitted.

A summary of themes for organisations are shown in Appendix D in Table D-6.

3.4. Question 2b: Are there any other LEZ exemptions you could propose? If so, what should these exemptions be and why?

Question 2b was split into two parts. The first part is an open question which asks respondents to provide any additional LEZ exemptions they would propose. The second part of the question is also an open question and asks respondents to provide a reasoning for their choice.

The key responses for all respondents are shown in Table 3-7 and Figure 3-7.

Of the 305 respondents:

- 117 (38%) did not provide a response to the question.
- 59 (19%) did not suggest any additional exemptions.
- 20 (7%) supported the exemption of motorcycles / two-wheeled vehicles / scooters / mopeds.
- 8 (3%) supported the exemption of residents of the LEZ, classic cars, and breakdown recovery vehicles.

All other responses were mentioned by 5 (2%) or less respondents and are not included in this section of the report. A full list is provided in Appendix D in Table D-7.

Table 3-7 - Q2b Split by Respondent

Response	Individual	Organisation	Total
No additional exemptions	43 (14%)	16 (5%)	59 (19%)
Motorcycles / two wheeled vehicles / scooters / mopeds	19 (6%)	-	20 (7%)
Residents of LEZ	6 (2%)	2 (1%)	8 (3%)
Classic cars	7 (2%)	1 (0%)	8 (3%)
Breakdown recovery vehicles	2 (1%)	3 (1%)	8 (3%)

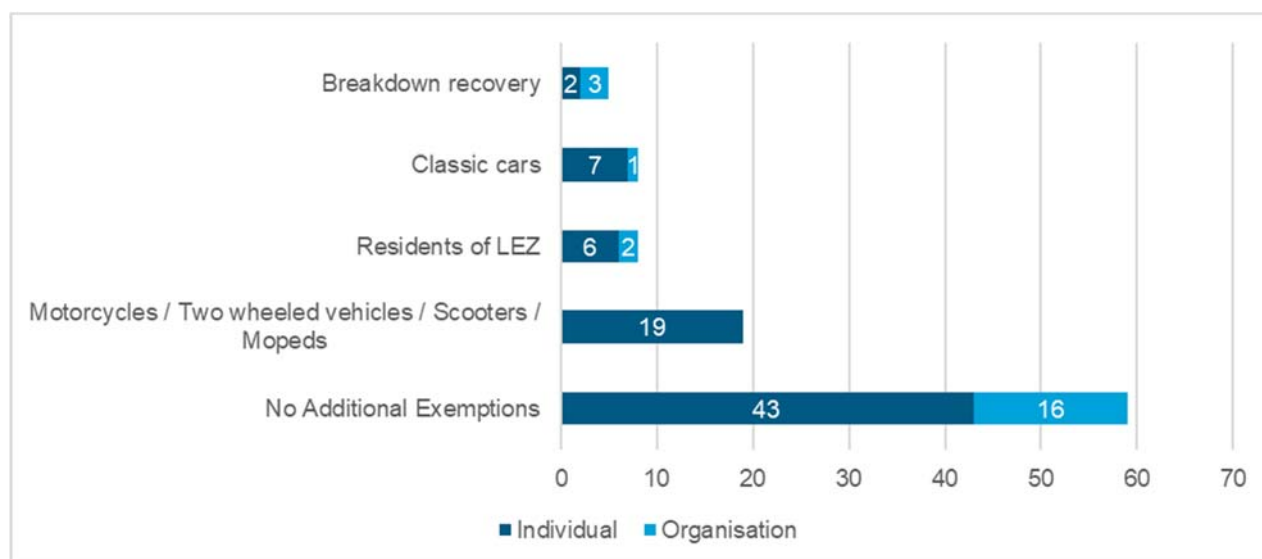
Percentages based on 305 respondents

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Of the 234 individual respondents, 43 (18% of 234) did not support any further exemptions, while 19 (8% of 234) supported the exemption of motorcycles and other two-wheeled vehicles.

Of the 71 organisation respondents, 16 (23% of 71) did not provide any additional exemptions for the LEZ and all other exemptions were mentioned by less than 3 (4% of 71) of the respondents.

Figure 3-7 - Q2b Summary of Split by Respondent



The second part of question 2b asked respondents to provide an explanation as to why they supported their proposed exemptions. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and all themes are reflected in the analysis.

3.4.1. Reasoning – Individuals

Of the 234 individual respondents:

- 95 (41%) did not provide a response to the question.
- 76 (32%) provided an exemption suggestion but did not include a reason for their choice.
- 19 (8%) suggested the proposed exemption had little impact on overall emissions and/or had a low environmental impact.
- 12 (5%) suggested that a temporary exemption be available for a specific event.
- 11 (5%) suggested the proposed exemption as the cost to upgrade or replace vehicles would be too great.
- 11 (5%) suggested the proposed exemption as a way to reduce congestion.

All other themes were mentioned by less than 7 (3%) of respondents. A summary of key themes for individuals is shown in Appendix D in Table D-8.

3.4.2. Reasoning – Organisations

The responses for the most frequently proposed exemptions are split by organisation type are shown below in Table 3-8 and Figure 3-8. A full list is provided in Appendix D in Table D-9.

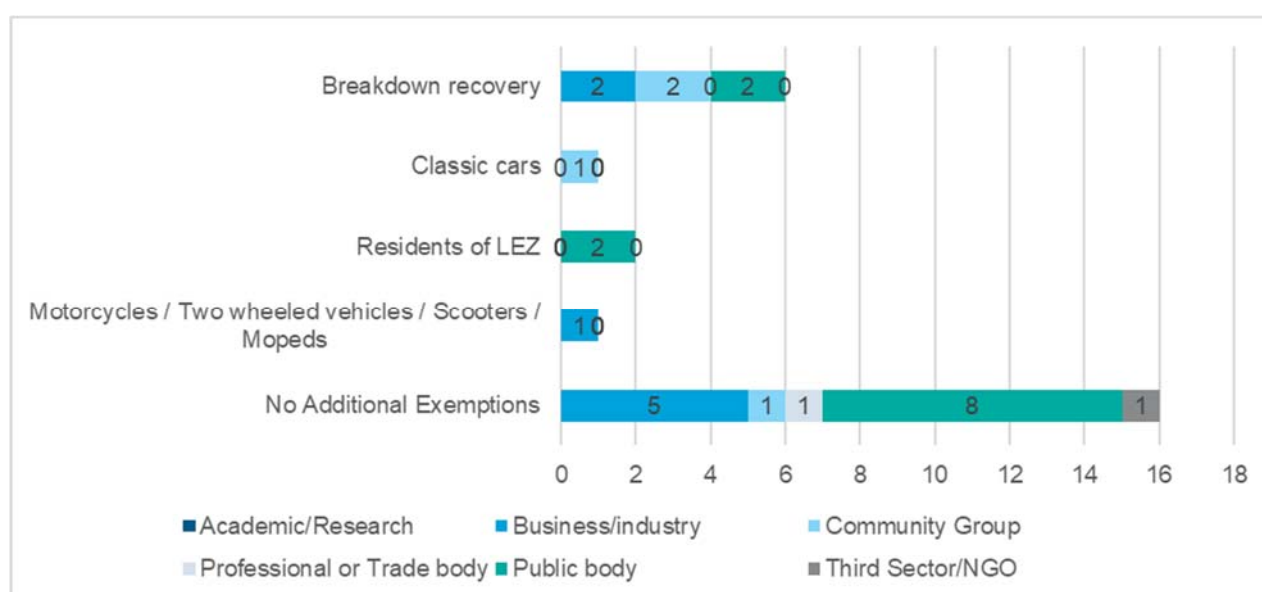
The majority of organisation respondents supported no additional exemptions and belonged to a public body (8, 11%) or the business and industrial (5, 7%). The second most common response was supporting the exclusion of breakdown recovery vehicles from penalty charges which was supported by respondents from the business and industry (2, 3%), community groups (2, 3%), and public bodies (2, 3%).

Table 3-8 - Q2b Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
No Additional Exemptions	-	5 (7%)	1 (1%)	1 (1%)	8 (11%)	1 (1%)	16 (23%)
Motorcycle / two wheeled vehicles / scooters / mopeds	-	1 (1%)	-	-	-	-	1 (1%)
Residents of LEZ	-	-	-	-	2 (3%)	0 (0%)	2 (3%)
Classic cars	-	-	1 (1%)	-	-	-	1 (1%)
Breakdown recovery	-	2 (3%)	2 (3%)	-	2 (3%)	-	6 (8%)
Total*	49 (71 total number of respondents used for percentage calculations)						

*Total reflects all organisation responses whereas those for specific proposed exemptions represent a subset of the key responses (the complete list of responses is in Appendix D); percentages were determined using the total number of organisations included in the consultation (71). Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-8 - Q2b Summary of Split by Organisation Type



A summary of key themes for organisations is shown in Appendix D in Table D-10.

Of the 71 organisation respondents, the following key themes were identified:

- 22 (31%) did not provide a response to the question.
- 16 (23%) provided an exemption suggestion but did not include a reasoning for their choice.
- 13 (18%) suggested the proposed exemption as the cost to upgrade or replace vehicles would be too great.

- 9 (13%) suggested the proposed exemption should have a grace period or phased approach to compliance to allow the vehicle fleets to be upgraded.
- 6 (8%) suggested the proposed exemption had little impact on overall emissions and/or had a low environmental impact.
- 6 (8%) suggested the proposed exemption on the basis they provided an essential service.

All other themes were mentioned by less than 5 (7%) respondents.

3.5. Question 3a: Do you agree with the proposed base level and subsequent tiers of penalty charges for each vehicle type as outlined in Table 5? Please explain your answer.

Question 3a had two parts, the first part was a closed question requiring a yes or no response to indicate whether the respondent agreed with the vehicle types, base level penalty rate and increasing tiers of penalty charges as proposed in Table 5 of the consultation document. The second part of Question 3a was an open question allowing respondents to provide a comment to explain their answer.

The results for part 1 are shown in Table 3-9 and Figure 3-9. Of the 305 respondents;

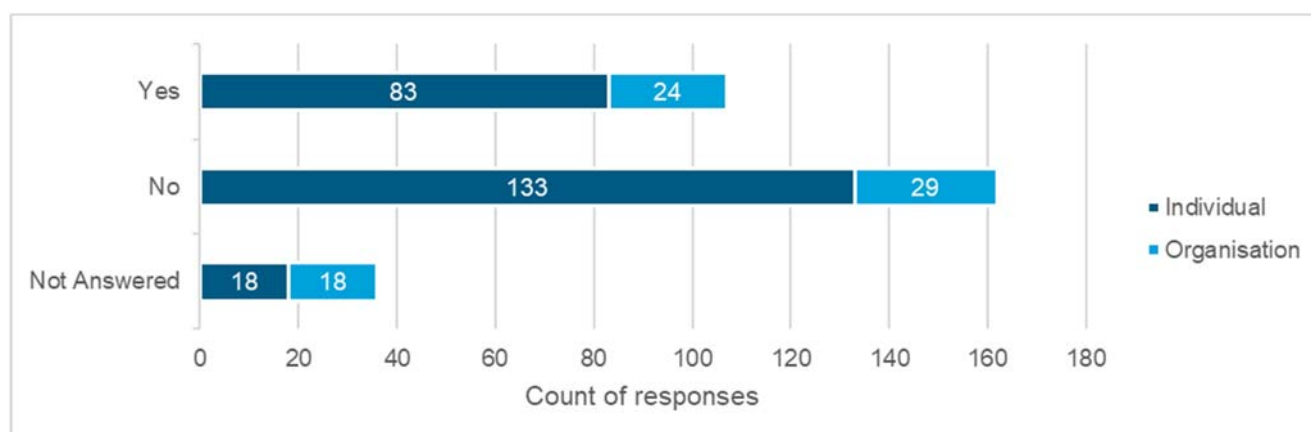
- 162 (53%) did not agree with the vehicle types, proposed base level penalty charges and subsequent increasing tiered penalty charges.
- 107 (35%) confirmed that they agreed with the levels proposed in Table 5 of the consultation document.
- 36 (12%) did not provide an answer for the question.

Table 3-9 - Q3a Split by Respondent

Response	Individual	Organisation	Total
Yes	83 (27%)	24 (8%)	107 (35%)
No	133 (44%)	29 (10%)	162 (53%)
Not Answered	18 (6%)	18 (6%)	36 (12%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-9 - Q3a Summary of Split by Respondent



3.5.1. Reasoning – Individuals

The second part of Question 3a allowed all respondents to provide a comment explaining their response in part one. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and all themes are reflected in the analysis.

A summary of themes for individuals is shown in Appendix D in Table D-11.

Yes

83 (35% of 234) respondents answered yes to part one of question 3a indicating that they agreed with the penalty charges proposed. Of these 83 respondents, 49 respondents (59% of 83) providing no further comment as explanation and were classified under the no comment theme. For those respondents who agreed with the penalty charges and gave a reasoning the following themes were identified:

- 20 (24%) commented that the proposed charge values were fair.
- 9 (11%) respondents made other comments that were not directly related to the question, such as “*Raise the legal driving age to 25*” and “*charges reduce value of non-compliant vehicles so harder to upgrade*”.

All other themes were mentioned by 2 or less respondents from a total of 9 (11%) remaining as shown in Appendix D in Table D-11.

No

133 (57% of 234) respondents answered no to part one of question 3a indicating that they did not agree with the information proposed in Table 5 of the consultation document. 10 (8%) respondents made no further comment in explanation of their answer. For those respondents that gave a reasoning the following key themes were identified:

- the most common reasoning indicated by 38 (29%) respondents was that the penalty charge values were too high.
- 17 (13%) respondents identified that they did not agree with the proposed LEZ in general.
- 15 (11%) respondents felt that the proposed charges were a further tax on motorists.
- 13 (10%) respondents felt that motorcycles should be exempt or face lower penalty charges.
- 9 (7%) respondents commented that the charge value proposed was too low.
- 9 (7%) respondents commented that the consultation was too complex.
- 8 (6%) respondents expressed concerns about potential impacts on city centre business and shops.
- 29 (12%) respondents did not agree with Table 5 and made other comments that were not directly related to the question.

Other themes identified by respondents are detailed in Appendix D in Table D-11.

Not Answered

Out of the 18 respondents who did not answer yes or no to part one of question 3a, most expressed no further comment. One respondent expressed that the consultation was too complex (this was also expressed by 9 (7%) respondents who answered no to part one).

3.5.2. Reasoning – Organisations

The organisations who responded to Question 3a have first been evaluated by organisation type. Of the 24 (34% of 71) respondents from organisations who agreed with the vehicle types, base level penalty charge and subsequent tiers proposed in Table 5 of the consultation document, the majority were from public bodies (13, 18%) community groups (6, 8%) and third sector/NGOs (3, 4%).

29 (41% of 71) of the organisations did not agree with the penalty charges proposed in Table 5 of the consultation document. ‘No’ received the majority of responses from business and industry (8, 11%), and community groups (7, 10%).

18 (25% of 71) of the organisations did not answer question 3a. The majority of these represented business and industry (8, 11%) with a further (4, 6%) representing community groups.

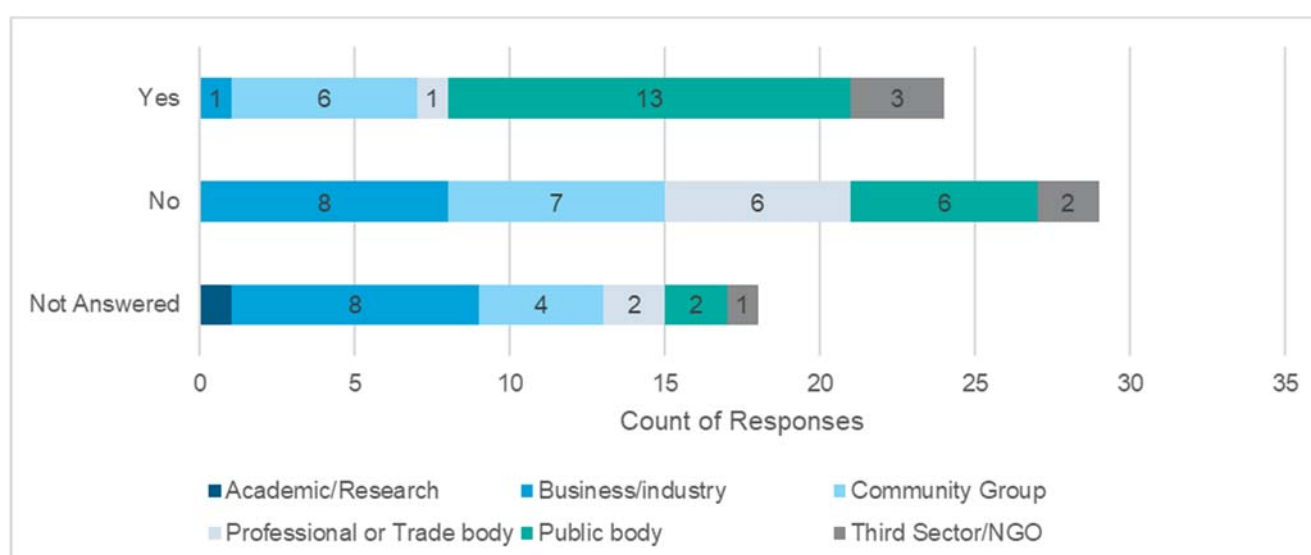
A summary of the organisation type is shown in Table 3-10 and represented in Figure 3-10.

Table 3-10 - Q3a Split by Organisation Type

Response	Academic /Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Yes	-	1 (1%)	6 (8%)	1 (1%)	13 (18%)	3 (4%)	24 (34%)
No	-	8 (11%)	7 (10%)	6 (8%)	6 (8%)	2 (3%)	29 (41%)
Not Answered	1 (1%)	8 (11%)	4 (6%)	2 (3%)	2 (3%)	1 (1%)	18 (25%)
Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-10 - Q3a Summary of Split by Organisation Type



A summary of themes for organisations is shown in Appendix D in Table D-12.

Yes

24 (34% of 71) respondents answered yes to part one of question 3a indicating that they agreed with the proposals detailed in Table 5 of the consultation document. No comment was made by 4 (17%) of respondents who agreed with the proposals. For these respondents the key themes identified were:

- The most common response for organisations was that they felt the penalty charge value was fair, cited by 18 (75%) respondents
- 6 (25%) respondents agreed with Table 5 of the consultation document but qualified this agreement with a variety of concerns (identified as other comments in Appendix D in Table D-12). The concerns relevant to the question included, the proposal was a “*penalty regime not a charging regime*”, link charges to Retail Price Index (RPI) or Consumer Price Index (CPI) to remain at a fair level and to increase the base level to £90 for cars, minibus, light commercial vehicles and specialist vehicles to cover Penalty Charge Notice, (PCN) costs.

No

29 (41% of 71) respondents answered no to part one of question 3a indicating that they did not agree with the information proposed in Table 5 of the consultation document. Only one respondent did not provide a comment. For the respondents who did provide a comment the key themes identified were:

- The most common reasoning reported by 10 (34%) respondents was that the penalty charge values were too high for heavy goods and public service vehicles.
- 6 (21%) respondents identified that they thought that the charge values were fair but half were part of the group that felt that HGV and PSV charges were too high.
- 10 (34%) respondents stated a variety of other concerns (identified as other comments in Appendix D in Table D-12). The concerns relevant to the question included the following; slow phasing in of proposal is necessary, exemptions should be available for community and voluntary groups, historic vehicles and specialist vehicles, and that Taxis are controlled by licensing so penalty charges should not be required.

The remaining themes were identified by 4 or less respondents and are summarised in Appendix D in Table D-12.

Not Answered

Out of the 18 (25% of 71) respondents who did not answer yes or no, most expressed no further comment. Where a view was expressed these themes are summarised in Appendix D in Table D-12.

3.6. Question 3b: Which surcharge ‘curve’ in Figure 1 represents the best approach to designing a surcharge?

Question 3b had two parts. The first part was a closed question where respondents were asked to identify which of the four penalty escalation curves presented in the consultation document was preferred by respondents, (described as Graphs 1 to 4 in the consultation document). The second part allowed a comment to be made to explain why the Graph had been selected.

- Out of the 234 Individual respondents Graph 1 was the most common with 86 (28%) selecting it as their preferred option. 42 (14%) individuals selected Graph 2 with 23 (8%)

selecting Graph 3 and 21 (7%) opting for Graph 4. 62 (20%) individuals did not answer part one, the reasons, where given, are explored in the next section.

- For organisations 23 (8%) of the respondents selected the Graph 2 surcharge curve, 11 (4%) selected Graph 1, 6 (2%) selected Graph 3 and 3 (1%) selected Graph 4. 28 (9%) respondents representing organisations did not answer part one.
- Overall Graph 1 was the most commonly selected surcharge curve chosen by 97 (32%) of all respondents.

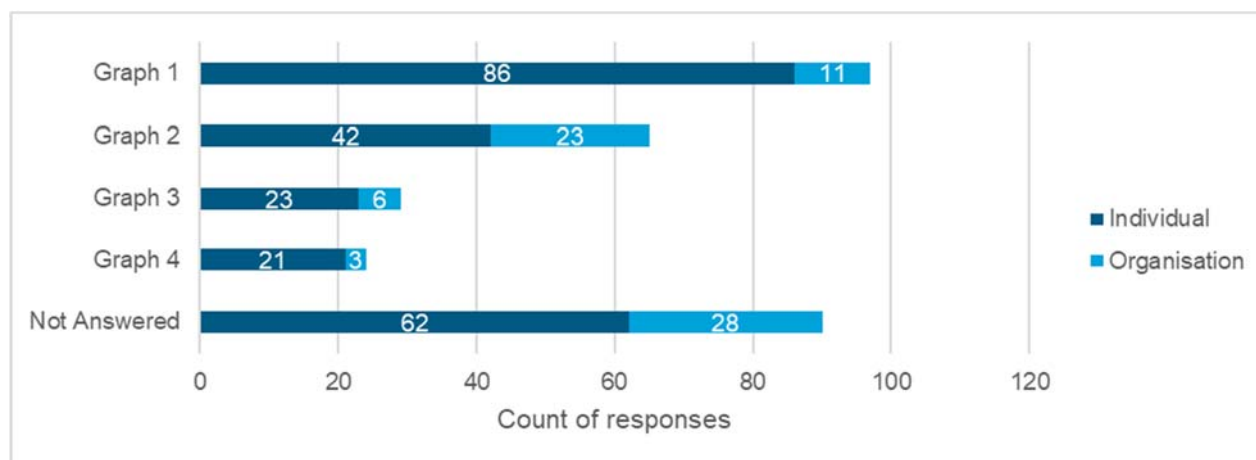
The results are shown in Table 3-11 and Figure 3-11

Table 3-11 - Q3b Split by Respondent

Response	Individual	Organisation	Total
Graph 1	86 (28%)	11 (4%)	97 (32%)
Graph 2	42 (14%)	23 (8%)	65 (21%)
Graph 3	23 (8%)	6 (2%)	29 (10%)
Graph 4	21 (7%)	3 (1%)	24 (8%)
Not Answered	62 (20%)	28 (9%)	90 (30%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-11 - Q3b Summary of Split by Respondent



3.6.1. Reasoning – Individuals

The explanations given for individuals selection of the charge escalation curves (Graphs 1 to 4), were examined. A summary of themes for individuals is shown in Appendix D in Table D-13.

Graph 1

Graph 1 was the most commonly selected graph for individuals, with 86 of all individual respondents selecting this graph as their preferred charge escalation curve. 20 (23%) these respondents gave no further explanation in the comments section. Where a view was expressed the key themes identified were:

- 19 (22%) identified that this curve would discourage repeat offenders.

- 11 (13%) respondents identified that Graph 1 would give offenders a chance to change their behaviour in response to the first charges.
- 10 (12%) respondents felt that Graph 1 was the fairest option (note that 8 of these respondents had disagreed with Table 5 in the consultation document in Question 3a)
- 7 (8%) respondents felt it was the least-worst option (i.e. they didn't agree with charges but if they had to select a graph this was the preference). All 7 of these respondents had disagreed with Table 5 in the consultation document in Question 3a. Respondents comments included *"if experience shows that the wealthy simply regard it as a tax worth paying then you may need to reconsider"* and *"It should also be made clear if the surcharge is intended to act as a punishment to discourage offending or as a tax on offenders."*

12 (14%) respondents identified that they objected to the penalty charges in their comments. This was more common for Graph 1 than it was with those who did not select a Graph. Reviewing responses to other parts of Question 3 all of these respondents had disagreed with the proposed Table 5 in the consultation document in Question 3a and from their comments disagreed with all penalty charges and therefore may not have intended to select a preferred Graph. If these 9 responses from Graph 1 are moved to Not Answered, Graph 1 would still be the most popular option for individuals with 77 selections (33% of all individuals).

Graph 2

42 individuals selected Graph 2. 10 (24%) of these respondents gave no further explanation in the comments section. Where a view was expressed the key theme identified was:

- 28 respondents (67%) stated that this was the simplest rule.

Graph 3

23 individuals selected Graph 3. Where a view was expressed the key themes identified were:

- 9 (39%) respondents identified that Graph 3 would discourage repeat offenders.
- 5 (22%) respondents identified that it was the fairest option.

Graph 4

21 individuals selected Graph 4. Where a view was expressed the key theme identified was:

- 18 (86%) respondents identified that Graph 4 would discourage repeat offenders.
- 6 (29%) other comments were made of relevance to the question. These included: *"linear approach would be best, with each offence increasing the penalty by one tier"* another commented that *"Charges should encourage use of public transport as much as possible."*

Not Answered

62 individual respondents did not select any of the Graphs. If the 12 respondents discussed under Graph 1 who may have accidentally selected Graph 1 are added to the not answered category there would be 74 respondents who gave no answer, 21 (28%) of whom objected to all penalty charges.

- 39 (63%) of these respondents gave no explanation and are recorded as no comment.
- 9 (15%) respondents objected to all penalty charges,

- 8 (13%) respondents identified that they did not agree with any of the four graphs presented and
- 6 (10%) stated they were not sure.

3.6.2. Reasoning – Organisations

The organisations who responded to Question 3b are evaluated by organisation type. The most common response from organisations was to select none of the four graphs as the question was not answered by 28 (39%) of the 71 organisations. These respondents constituted the largest proportion in business and industry, community groups, professional or trade bodies and third sector / NGO's groups

The most common Graph selected was Graph 2, with 23 selections (32%) favoured by business and industry and the majority of public bodies.

Graph 1 was the second most common with 11 selections (15%) favoured mostly amongst community groups. Graph 3 was the 3rd most common and Graph 4 was the least common amongst organisations.

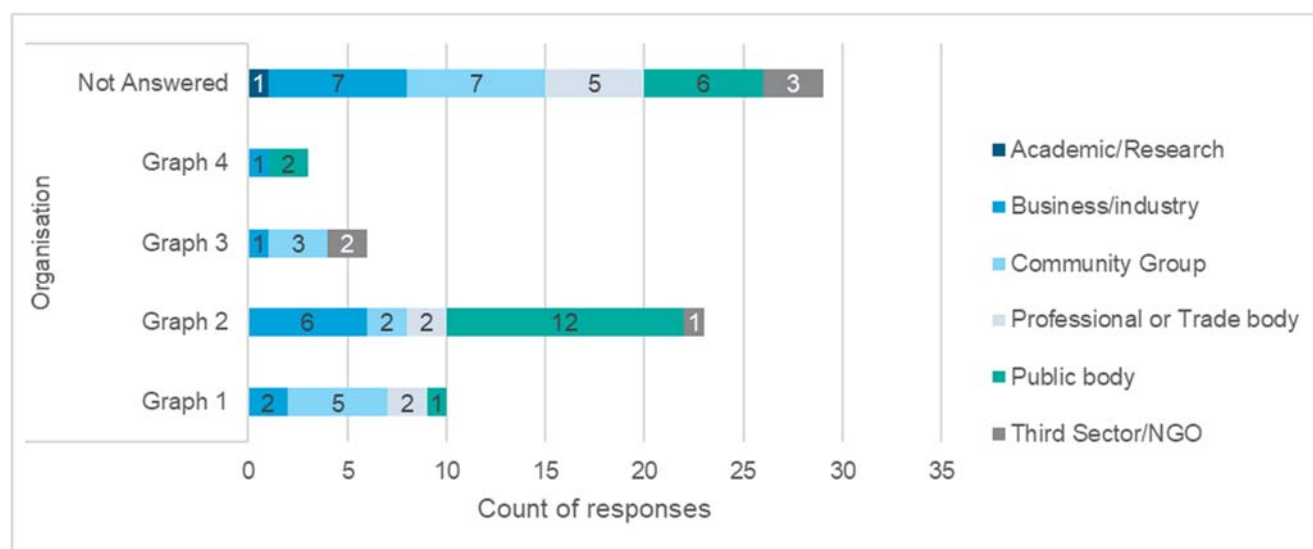
A summary of primary responses for organisations is shown in Table 3-12 and Figure 3-12.

Table 3-12 - Q3b Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Graph 1	-	2 (3%)	5 (7%)	2 (3%)	2 (3%)	-	11 (15%)
Graph 2	-	6 (8%)	2 (3%)	2 (3%)	12 (17%)	1 (1%)	23 (32%)
Graph 3	-	1 (1%)	3 (4%)	-	-	2 (3%)	6 (8%)
Graph 4	-	1 (1%)	-	-	2 (3%)	-	3 (4%)
Not Answered	1 (1%)	7 (10%)	7 (10%)	5 (7%)	5 (7%)	3 (4%)	28 (39%)
Grand total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-12 - Q3b Summary of Split by Organisation Type



A summary of themes for organisations is shown in Appendix D in Table D-14.

Graph 1

11 organisations selected Graph 1. A variety of reasons were identified and no key theme was identifiable.

Graph 2

23 organisations selected Graph 2. The key theme identified by 18 (78%) of respondents was that this was the simplest approach.

Graph 3

6 organisations selected Graph 3, with the main reason being given by 4 (67%) respondents was to discourage repeat offenders.

Graph 4

Only 3 respondents selected Graph 4, the main reason given was to discourage repeat offenders.

Not Answered

The most common response across organisations was not to select any of the four graphs. 21 (75%) respondents offered no comment in explanation. 4 (14%) indicated that having read the consultation they were not sure about which option was best. One respondent commented *"escalation curve requires more nuance, with different charges for private and commercial vehicles, or size of vehicle. Keeping it as a flat rate would be unfair, and a more balanced approach would help build public support for the LEZ scheme."*

3.7. Question 3c: How should the surcharge approach be applied in order to discourage non-compliant vehicles from driving within a LEZ?

Question 3c was an open question seeking respondent views on how the surcharge approach should be applied in order to discourage non-compliant vehicles from driving within a LEZ.

- 107 (35%) of the individual respondents were categorised in themes discussed in 3.7.1 below with a further 43 (14%) adding comments that could not be grouped into common themes.
- 32 (10%) of organisation respondents were categorised into common themes discussed in 3.7.2 with a further 13 (4%) responses that could not be grouped into common themes.

Many respondents did not answer or entered “No comment” as their answer. 84 (28%) of individual respondents did not answer and 26 (9%) of organisation respondents did not answer.

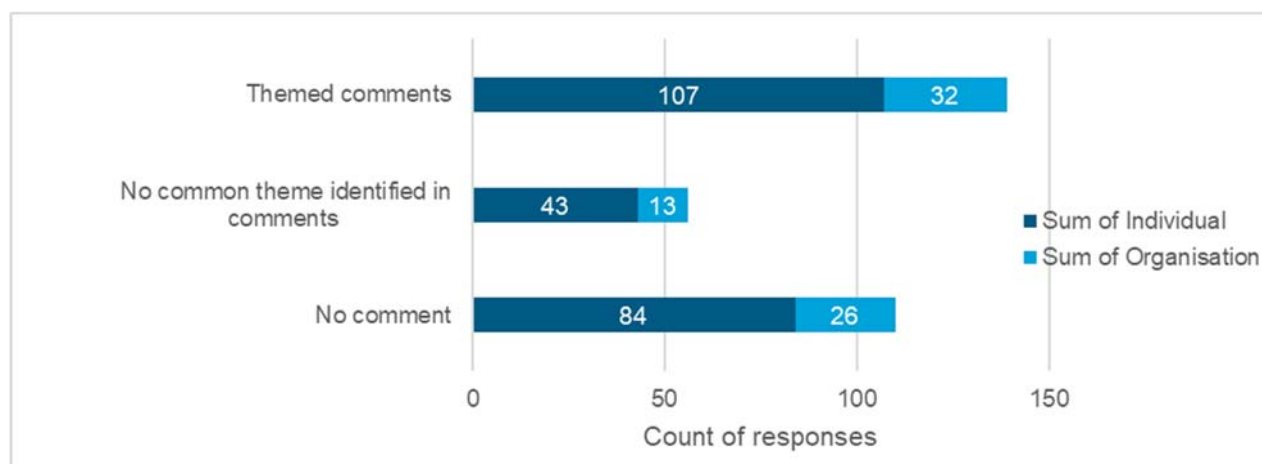
The results are shown in Table 3-13 and Figure 3-13.

Table 3-13 - Q3c Split by Respondent

Response	Individual	Organisation	Total
Comments with common themes	107 (35%)	32 (10%)	139 (46%)
Other comments	43 (14%)	13 (4%)	56 (18%)
No comment / Not Answered	84 (28%)	26 (9%)	110 (36%)
Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-13 - Q3c Summary of Split by Respondent



3.7.1. Reasoning – Individuals

From the 234 individual respondents, the comments provided to explain how the surcharge approach should be applied to discourage non-compliant vehicles from driving within a LEZ were widespread with 23 individual common themes being identified, as shown in Appendix D in Table D-15, including no comment and no common theme identified, (included in other comments).

The most common theme identified by individuals in answer to Question 3c was no comment, selected by 84 (36%) of individual respondents.

For the common themes identified in Appendix D in Table D-15 the key themes were:

- 19 (8%) did not agree with the LEZ.
- 17 (7%) suggested for the first few offences a warning letter should be sent.
- 16 (7%) of respondents suggested that number plate recognition should be used.
- 14 (6%) were not sure.
- 12 respondents (5%) felt that the approach should be to strictly enforce the rules.

The remaining themes were identified by 5% or less of respondents as detailed in Appendix D in Table D-15.

43 respondents (18%) expressed views which could not be grouped into common themes. Comments made that are relevant to the analysis of question 3c and not already expressed in the analysis above include:

- *"Police penalty? Treat like other motoring offences."*;
- *"Will you be making it a penalty point offence?"*;
- *"Name & Shame"*;
- *"Use penalty charge revenue for grants ... made available to help people buy a zero emission electric car. Hydrogen cars should not be eligible for grants as they are not a feasible solution to the problem of improving air quality."*

3.7.2. Reasoning – Organisations

From the 71 organisations who responded, the comments provided to explain how the surcharge approach should be applied to discourage non-compliant vehicles from driving within a LEZ were widespread with the same 23 common themes identified in Appendix D in Table D-16 being examined.

From the 71 respondents representing organisations, the comments were widespread. 16 of the 23 common themes identified in Table D-16 were reflected within the views expressed by organisations, including the 'no comment' and 'other comments' themes. The most common theme identified by organisations in answer to Question 3c was no comment, selected by 26 (37%) of 71 respondents.

For the rest of the common themes identified in Table D-16 the key themes were;

- 11 (15%) agreed with the penalty charges and vehicle types outlined in Table 4 of the consultation document.
- 9 (13%) identified the tiered penalty approach was preferred.
- 5 (7%) suggested for the first few offences a warning letter should be sent.
- 4 (6%) identified that a nationally consistent approach should be agreed across all LEZ areas.
- 4 (6%) indicated that they would prefer a charging scheme similar to the London Congestion Zone or Dartford Tunnel systems.

The remaining themes were identified by 5% or less of respondents and are shown in Table D-16.

13 respondents (18%) had views that could not be grouped by common themes. Comments made that are relevant to the analysis of question 3c and not already expressed in the analysis above include:

"Compliance levels should be studied and reviewed. This will soon demonstrate whether the penalty level is appropriate."

One respondent suggested that it would require the rapid issue of warning letters, a second suggested a period of grace should be adopted during initial implementation and a cap on fines. A third respondent suggested that charges should be based on mileage inside LEZ and reason for use.

3.8. Question 3d: How many days should lapse before a registered keeper of a vehicle returns to the base tier of the penalty charge?

Question 3d has been analysed in two steps as an open response was allowable in the consultation. The first step identified if respondents gave a number of days that should lapse before a registered keeper of a vehicle returns to the base tier of the penalty charge. The second step of the analysis identified any reasoning given in the response. For step one typically respondents gave a number of days/months/years, but in some cases it was suggested that a variable number of days should be allowable.

In step one the entries typically varied from zero days up to 3 years, but 2 respondents made suggestions of over 3 years. For ease of analysis the entries in days have been rounded to the nearest month for periods of one month or more. A summary of the responses is shown in Table 3-14 and Figure 3-14.

Overall 1 month was the most common response chosen by 51 (17%) of all respondents, however 150 (49%) did not provide a duration in their Question 3d answer.

Out of the 234 individual respondents, 115 (38%) respondents did not answer the question. Where the question was answered:

- The most common response was one month, suggested by 30 respondents (10%).
- 23 (8%) respondents suggested 12 months.
- 16 respondents (5%) selected a period of 1 to 14 days.
- 14 respondents (5%) expressed that there should be no return to the base tier.
- 9 respondents (4%) selected a period of 6 months.
- Other options were less common, and each made up less than 3% or less of the total 305 responses.

For organisations 35 (11%) of respondents did not answer the question. Where the question was answered by organisations:

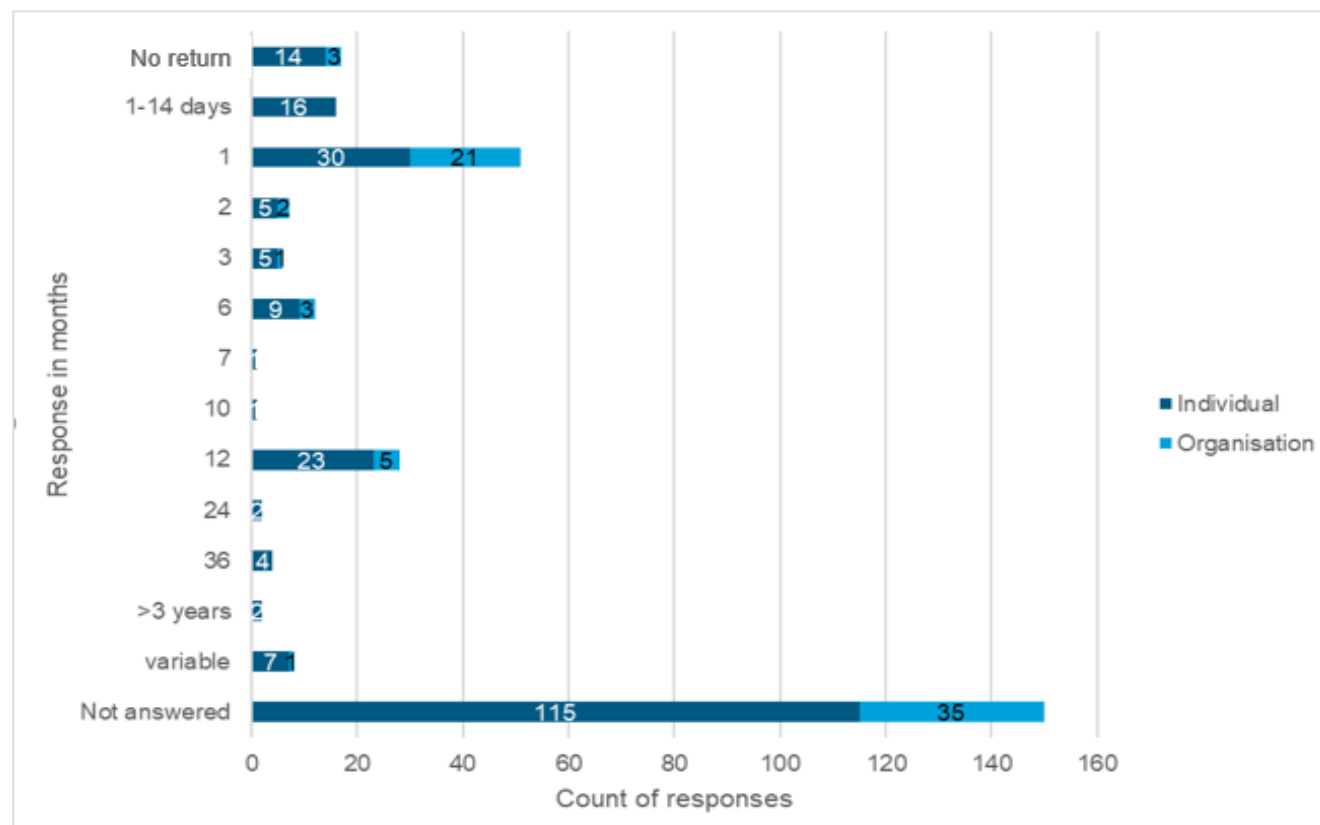
- The most common response was one month with 21 (7%) respondents suggesting this duration.
- 5 organisations (2%) selected 12 months.
- Other options were less common, and each made up less than 1% of the total 305 responses.

Table 3-14 - Q3d Split by Respondent

Response (in months)	Individual	Organisation	Total
No return to base tier	14 (5%)	3 (1%)	17 (6%)
1 to 14 days	16 (5%)	-	16 (5%)
1	30 (10%)	21 (7%)	51 (17%)
2	5 (2%)	2 (1%)	7 (2%)
3	5 (2%)	1 (0%)	6 (2%)
6	9 (3%)	3 (1%)	12 (4%)
7	1 (0%)	-	1 (0%)
10	1 (0%)	-	1 (0%)
12	23 (8%)	5 (2%)	28 (9%)
24	2 (1%)	-	2 (1%)
36	4 (1%)	-	4 (1%)
>3 years	2 (1%)	-	2 (1%)
Variable	7 (2%)	1 (0%)	8 (3%)
Not answered	115 (38%)	35 (11%)	150 (49%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-14 – Q3d Summary of Split by Respondent



3.8.1. Reasoning – Individuals

From the 234 individual respondents, 11 common themes were identified as given in Appendix D in Table D-17, including no comment and other comments, reflecting that no relevant common theme was identified. A summary of key themes for individuals is shown in Appendix D in Table D-17.

125 (53%) of individual respondents did not give any comment on the duration to lapse before returning to the base tier with 65 (28%) of these respondents not expressing a number of days to lapse before returning to the base tier. Where comments were provided:

- 22 (9%) respondents, who selected periods between 1 day and 12 months explained their selections were to ensure that the charges were a proper deterrent.
- 20 (9%) respondents did not state a number of days as they did not agree with penalty charges.
- 18 (8%) respondents stated that they were not sure.
- 12 (5%) respondents, 11 of whom selected zero days, expressed that there should be no return to base tier.
- 9 (4%) respondents who selected a range from 1 to 12 months, expressed that the period they selected would allow for occasional mistakes.

Other themes were selected by 3% or less of individual respondents.

23 respondents (10%) provided views that could not be grouped into common themes. Comments made that are relevant to the analysis of question 3d and not already expressed in the analysis above include:

- *"Penalty should not apply to the keeper, but to the driver"*
- *"Suggest dropping in the range one tier a month to one tier a year."*
- *"more time required to make alternative arrangements from first notice"*
- *"serial offenders should not immediately return to base, but gradually return to base the longer they do not re-offend"*
- *"A high and severe penalty structure will encourage dishonest evasion. A fair and coercive approach will encourage support and long term success."*
- *"Recommend review during implementation"*

3.8.2. Reasoning – Organisations

A summary of the number of days (given in months) to return to the base tier for organisation types is shown in Table 3-15 and Figure 3-15.

Where a number of days for returning to the base tier was provided by organisations one month was the most common answer for public bodies, business and industry, community groups and professional and trade bodies. Those who answered from third sector / NGO organisations selected 12 months.

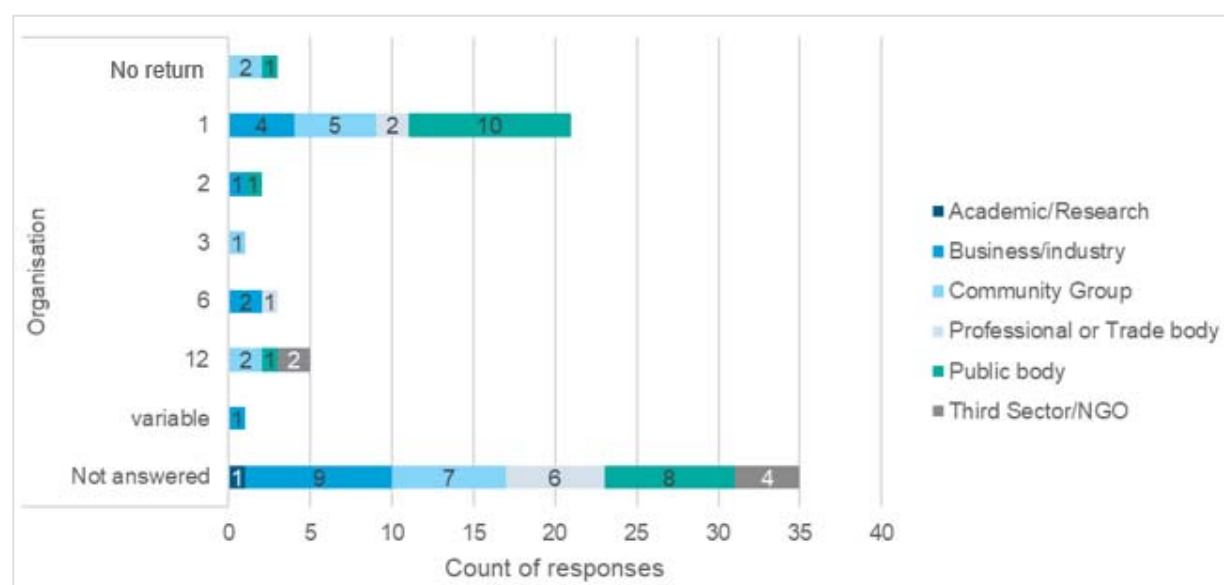
A summary of key themes for organisations is shown in Appendix D in Table D-18.

Table 3-15 - Q3d Split by Organisation Type

Response (in months)	Academic/Research	Business/Industry	Community Group	Professional or Trade body	Public body	Third Sector/NGO	Total
No return to base tier	-	-	2 (3%)	-	1 (1%)	-	3 (4%)
1-14 days	-	-	-	-	-	-	-
1	-	4 (6%)	5 (7%)	2 (3%)	10 (14%)	-	21 (30%)
2	-	1 (1%)	-	-	1 (1%)	-	2 (3%)
3	-	-	1 (1%)	-	-	-	1 (1%)
6	-	2 (3%)	-	1 (1%)	-	-	3 (4%)
12	-	-	2 (3%)	-	1 (1%)	2 (3%)	5 (7%)
Variable	-	1 (1%)	-	-	-	-	1 (1%)
Not answered	1 (1%)	9 (13%)	7 (10%)	6 (8%)	8 (11%)	4 (6%)	35 (49%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-15 - Q3d Summary of Split by Organisation Type



From the 71 respondents representing organisations, the comments were identified within 8 common themes identified in Appendix D in Table D-18, including no comment and other comments, reflecting that no relevant common theme was identified.

No view (no comment) was provided by 38 (54%) of the organisations responding with 22 (31%) of these respondents not giving a number of days for returning to the base tier.

Where a view was expressed:

- 7 (10%) respondents, who selected periods between 1 day and 12 months explained their selection was on the basis that it would be a proper deterrent.

- 4 (6%) respondents, who did not give a number of days stated they did not agree with penalty charges as their answer to Question 3d.
- 3 (4%) respondents, one of which said there should be no return to the base bier and others gave no answer, explained that they preferred a flat rate penalty charge.
- 3 (4%) respondents, all of which did not give a number of days, expressed that they were not sure.

Other themes were selected by 3% or less of organisation respondents.

18 respondents (25%) views could not be grouped by common themes. Comments made that are relevant to the analysis of question 3d and not already expressed in the analysis above include:

- *"Prefer for every day a contravention does not occur should result in moving down one tier, and a resetting to Tier 1 at the end of the calendar month."*
- *"Unless the contravention takes place within the grace period of a LEZ or prior to an arranged retrofit of the vehicle taking place."*

3.9. Question 4: Do you agree with the general principles of the LEZ enforcement regime? If not, why not?

Question 4 had two parts, the first part was a closed question requiring a yes or no response to indicate whether the respondent agreed with the general principles of the LEZ enforcement regime. The second part of Question 4 was an open question allowing respondents to provide a comment to explain their answer.

The results for part 1 are shown in Table 3-16 and Figure 3-16. Of the 305 respondents:

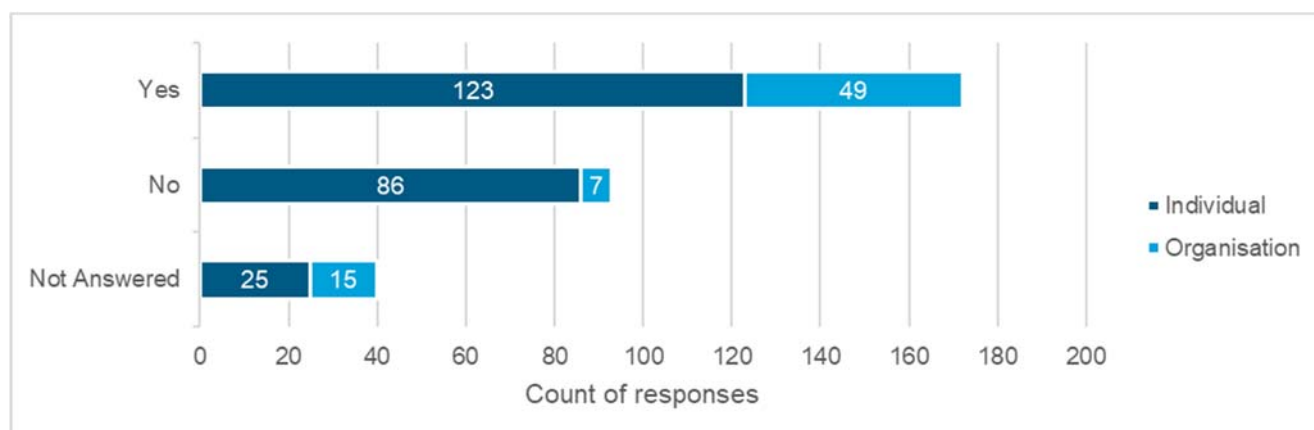
- 172 (56%) agreed with the general principles of the LEZ enforcement regime.
- 93 (30%) showed no agreement.
- 40 (13%) did not provide a response to the question.

Table 3-16 - Q4 Split by Respondent

Response	Individual	Organisation	Total
Yes	123 (40%)	49 (16%)	172 (56%)
No	86 (28%)	7 (2%)	93 (30%)
Not Answered	25 (8%)	15 (5%)	40 (13%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-16 - Q4 Summary of Split by Respondent



The second part of Question 4 allowed all respondents to provide a comment explaining their response in part one. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and therefore all of the themes are reflected in the analysis.

3.9.1. Reasoning – Individuals

A summary of themes for individuals is shown in Appendix D in Table D-19.

Yes

123 (53% of 234) individual respondents answered yes to part one of Question 4, indicating that they agreed with the general principles of the LEZ enforcement regime. Of these 123 individual respondents, 115 respondents (93% of 123) provided no further comment as explanation and therefore were classified under the no comment theme. No key themes were evident in the remaining responses.

No

86 (37% of 234) individual respondents answered no to part one of Question 4, indicating that they did not agree with the general principles of the LEZ enforcement regime. 13 (15% of 86) respondents made no further comment in explaining their answer. For those respondents that gave a reasoning the following key themes were identified:

- 21 (24%) responses were a clear that they did not agree with the LEZ scheme.
- 12 (14%) respondents disagreed with Local Authorities using private companies for enforcement.
- 10 (12%) respondents further stated that enforcement charges were effectively an additional tax on motorists.
- 8 (9%) respondents felt that the LEZ was a revenue making scheme.
- 7 (8%) respondents were concerned about the cost impacts associated with purchasing new vehicles.
- 7 (8%) were concerned about the impact on socio-economically disadvantaged groups.
- 5 (6%) respondents commented that the enforcement regime was too complicated.

Other themes identified by respondents are detailed in Table D-19.

Not Answered

25 (11% of 234) individual respondents who did not answer yes or no, 22 (88% out of 25) expressed no further comment and 3 (12%) of respondents indicated they did not understand the question.

3.9.2. Reasoning – Organisations

A breakdown of the themes identified by organisations who responded to Question 4 evaluated by organisation type are shown in the Table 3-17 and represented in Figure 3-17.

Out of the 71 organisations who responded:

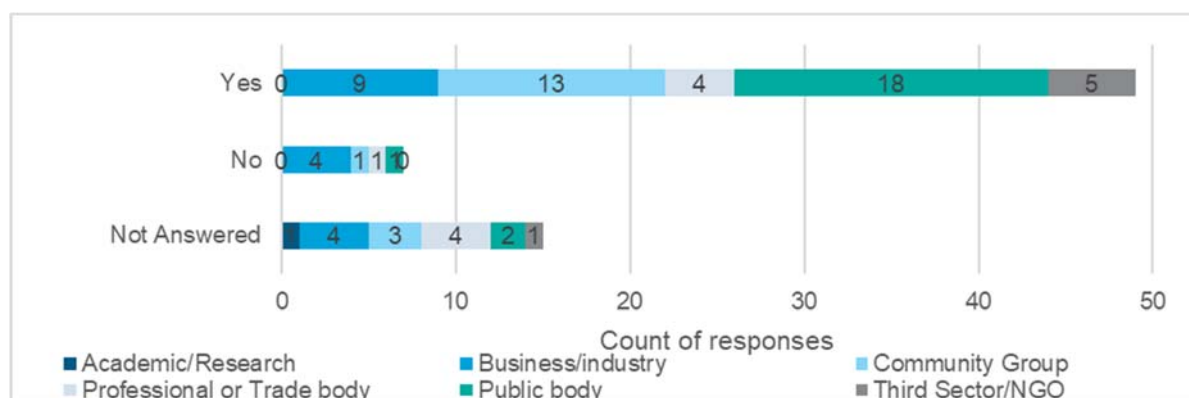
- 49 (69%), agreed to the principles of the LEZ regime outlined in the consultation, with respondents mainly represented by public bodies (18, 25%), community groups (13, 18%), business and industry (9, 13%) and third sector /NGO organisations (5, 7%).
- 7 (10%) of the organisations showed a disagreement.
- 15 (21%) recorded no answer to Question 4.

Table 3-17 - Q4 Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/NGO	Total
Yes	-	9 (13%)	13 (18%)	4 (6%)	18 (25%)	5 (7%)	49 (69%)
No	-	4 (6%)	1 (1%)	1 (1%)	1 (1%)	-	7 (10%)
Not Answered	1 (1%)	4 (6%)	3 (4%)	4 (6%)	2 (3%)	1 (1%)	15 (21%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-17 - Q4 Summary of Split by Organisation Type



A summary of themes for organisations is shown in Appendix D in Table D-20.

Yes

49 (69% of 71) respondents from organisations answered yes to part one of Question 4, indicating that they agreed with the general principles of the LEZ regime. 21 (43% of 49) of respondents made no further comment after agreeing to the LEZ regime and therefore were

classified under the no comment theme. For the respondents who did provide a comment the key themes identified were:

- 8 (16%) respondents identified that support would be needed for Local Authorities to implement and enforce the penalty charges.
- 4 (8%) stressed the need for allowing discretion when applying the penalty charges.

No

Seven (10% of 71) respondents from organisations answered no to part one of question 4, indicated that they did not agree with principles of the LEZ regime. Two (29% of 7) of the respondents who disagreed required more detail on the LEZ implementation.

For the rest of the respondents who provided a comment, the themes identified from their comments are summarised in Table D-20.

Not Answered

15 (21% of 71) of respondents from organisations who did not answer yes or no, 10 (67% of 15) expressed no further comment. The themes identified from the views that were expressed, are summarised in Table D-20.

3.10. Question 5: What are your views on the proposed list of 'other persons' that local authorities must consult with on their LEZ plans?

Section 11 of the Transport (Scotland) Act (2019) outlines the organisations local authorities must consult when making, amending or revoking a scheme. Question 5 was an open question asking respondents to describe which groups they felt must be included in the consultation process in addition to those already included in Section 11 of the Transport (Scotland) Act (2019). A list of 'other persons' whom the local authorities must consult was suggested as well as a list of 'other persons' which would not be included was presented for respondents to comment upon.

The results are shown in Table 3-18 and Figure 3-18.

Of the 305 respondents:

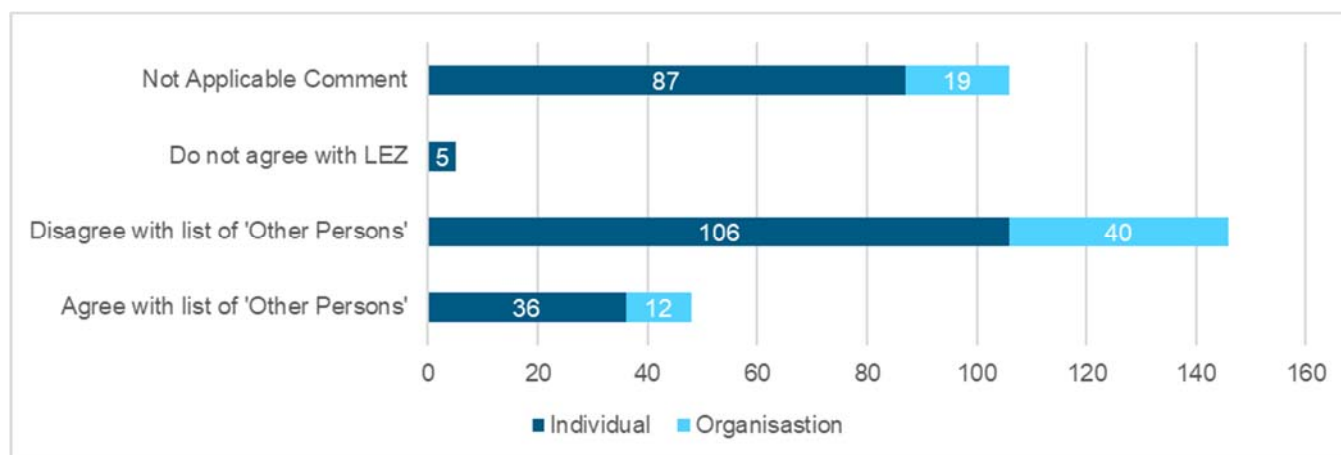
- A total of 48 (16%) of respondents agreed with the list of 'other persons' to be included in the list of persons local authorities must consult on their LEZ plan.
- 146 (48%) of respondents did not agree with the list and either wanted to include groups on the list of 'other persons' which were not intended to be included or wanted to exclude groups which were on the list to be included. Some respondents also made suggestions to include groups which were not on either list.
- 106 (35%) of respondents either did not respond or did not provide an applicable comment for the question.
- 5 (2%) or respondents did not agree with the proposed LEZs in general.

Table 3-18 - Q5 Split by Respondent

Response	Individual	Organisation	Total
Agree with list of 'Other Persons' to include	36 (12%)	12 (4%)	48 (16%)
Disagree with list of 'Other Persons' to include	106 (35%)	40 (13%)	146 (48%)
Do not agree with LEZ	5 (2%)	-	5 (2%)
Not Applicable Comment	87 (29%)	19 (6%)	106 (35%)
Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-18 - Q5 Summary of Split by Respondent



3.10.1. Reasoning – Individuals

36 (15% of 234) individual respondents agreed with the proposed list of 'other persons' and 106 (45% of 234) did not agree. 87 (37% of 234) respondents did not provide any applicable comment for the question.

Of the 234 individual respondents the following themes were identified:

- 87 (37%) did not provide a response/comment for the question.
- 36 (15%) agreed with the proposed list of other persons without changes.
- 27 (12%) wanted the inclusion of groups not listed in the list of 'other persons' whom the Scottish Government were not intending to include on the list of groups local authorities must consult (these groups/persons are provided in Appendix E). The most commonly identified 'other persons' was motoring related groups such as classic car clubs.

For those individual respondents who wanted to include groups on the 'other persons' lists, the most common responses were as follows:

- 50 (21%) wanted the inclusion of historical vehicle organisations;
- 18 (8%) wanted the inclusion of the Federation of Small Businesses.
- 16 (7%) wanted the inclusion of delivery companies (including the Royal Mail).
- 15 (6%) wanted the inclusion of coach companies.

Other groups are shown in the themes in Appendix D in Table D-21.

Out of the 234 individual respondents 7 (3%) wanted the exclusion of groups from the list of 'other persons' local authorities must consult. These were:

- 5 (2%) wanted the exclusion of active travel groups,
- 3 (1%) wanted the exclusion of the Active Nation Commissioner for Scotland or motorcycle groups.

Other proposed exclusions were mentioned by 2 (1%) or less respondents and included the Commissioner for Children and Community Council's in the LEZ.

3.10.2. Reasoning – Organisations

12 (17% of 71) of organisation respondents agreed with the proposed list of 'other persons' to include while 40 (56% of 71) did not agree. 19 (27% of 71) of organisation respondents did not provide an applicable comment for this question.

The responses split by organisation type are shown below in Table 3-19 and Figure 3-19.

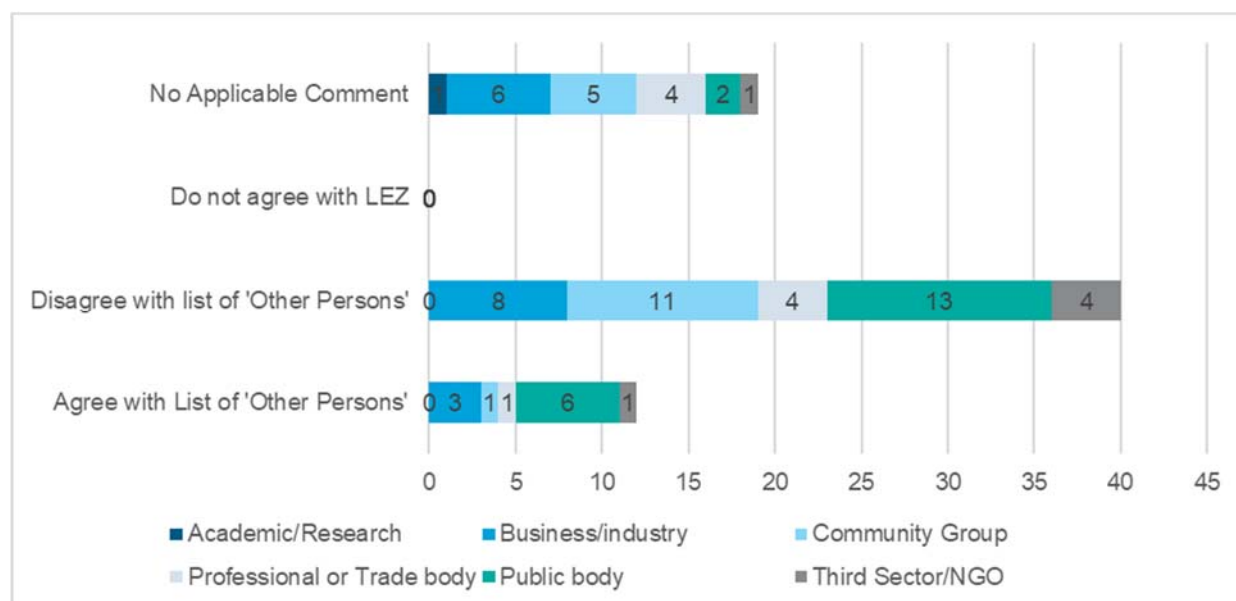
As seen in Table 3-19, most organisation respondents did not fully agree with the list of 'other persons' to be included. The main organisation category which disagreed were public bodies (13, 18%). However, most respondents who did agree with the list were also public bodies (6, 8%).

Table 3-19 - Q5 Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Agree with list	-	3 (4%)	1 (1%)	1 (1%)	6 (8%)	1 (1%)	12 (17%)
Disagree with list	-	8 (11%)	11 (15%)	4 (6%)	13 (18%)	4 (6%)	40 (56%)
Do not agree with LEZ	-	-	-	-	-	-	-
No Applicable Comment	1 (1%)	6 (8%)	5 (7%)	4 (6%)	2 (3%)	1 (1%)	19 (27%)
Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-19 - Q5 Summary of Split by Organisation Type



A summary of themes for organisations is shown in Appendix D in Table D-22.

Of the 71 organisation respondents the following themes were identified:

- 17 (24%) wanted the inclusion of groups not listed in the list of 'other persons' whom the Scottish Government were not intending to include on the list of groups local authorities must consult (these groups/persons are provided in Appendix E and are various with no dominant group. They include groups such as rural residents, parent/toddler groups, and the Confederation for Passenger Transport / Community Transport Association).
- 12 (17%) agreed with the list of 'other persons' to be included.
- 19 (27%) did not provide a response/comment for this question.

For those respondents who did not agree with the list of 'other persons', the most common responses were as follows:

- 11 (15%) wanted to include trade bodies representing the transport sector.
- 7 (10%) wanted to include community transport operators.
- 6 (8%) supported the inclusion of historical vehicle organisations and delivery companies (including Royal Mail).

Out of the 71 organisation respondents 2 (1%) wanted the exclusion of a groups from the list of 'other persons' local authorities must consult. These included active travel groups and motorcycle groups.

3.11. Question 6: If a LEZ scheme review was undertaken, what elements would you expect the review to investigate and how would the review ensure transparency and accountability?

Question 6 is an open question which asked respondents to provide comments on the elements they would expect a review to investigate and also how they would ensure transparency and accountability. Table 3-20 and Figure 3-20

Figure 3-20 summarises the views on what elements of the LEZ scheme a review should investigate.

The most frequent responses of the 305 respondents were:

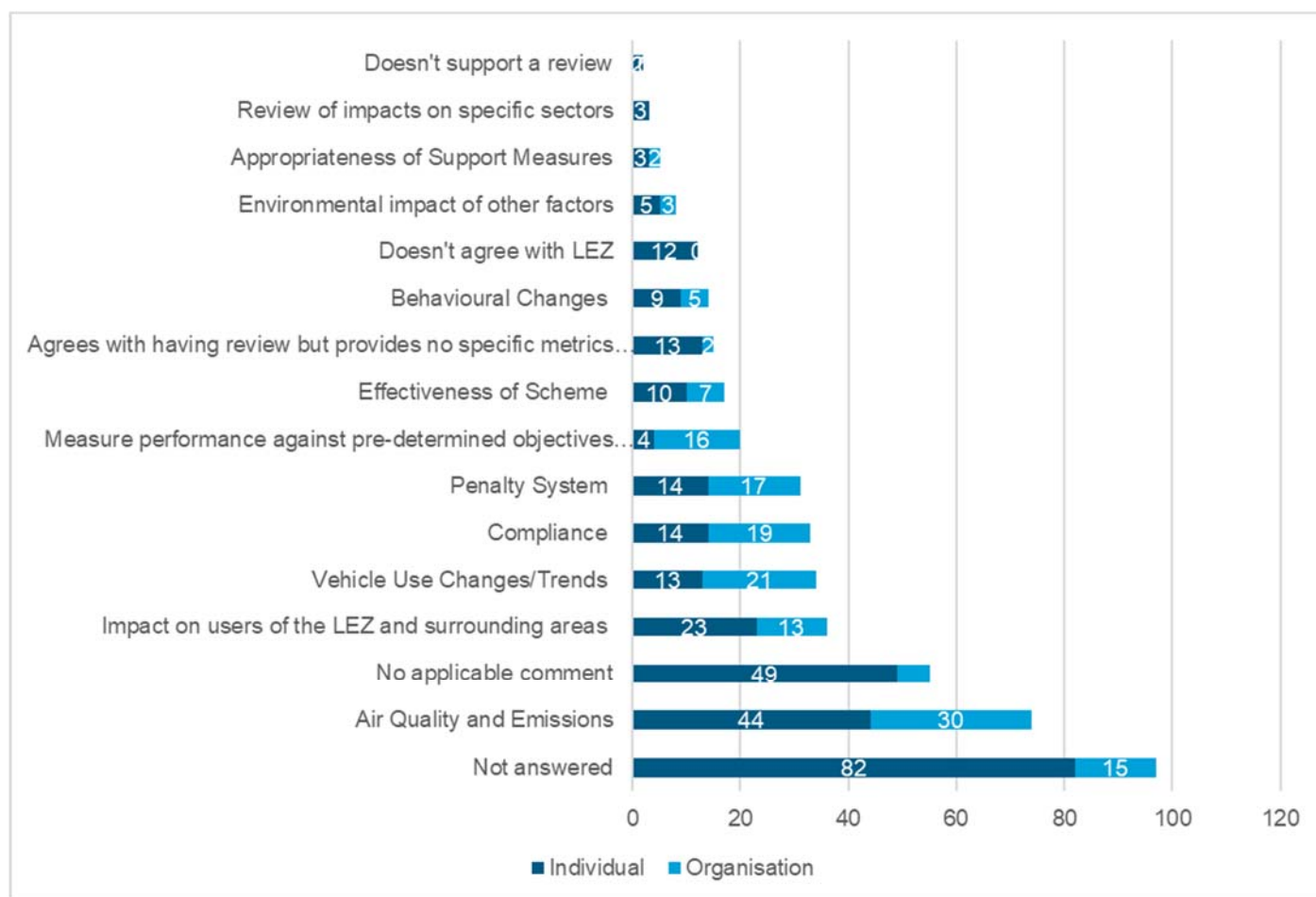
- A total of 97 (32%) did not provide a response to this question and 55 (18%) did not provide an applicable comment.
- 74 (24%) suggested a review should include investigation of air quality and emissions (such as determining any changes in air quality from before and after the implementation of the LEZ).
- 38 (12%) wanted the review to include the impacts on users of the LEZ as well as the surrounding areas, including cost/benefit analysis, impacts on local businesses, health impacts etc.
- 36 (12%) suggested a review of vehicle use changes/trends, such as areas of congestion, parking, public transport use, traffic displacement and fleet composition (compliant versus non-compliant vehicles).
- 33 (11%) wanted the review to assess compliance with the LEZ, including number of breaches, repeat offenders and the number of appeals.

Table 3-20 - Q6 Split by Respondent

Response	Individual	Organisation	Total
Not answered	82 (35%)	15 (21%)	97 (32%)
No applicable comment	49 (21%)	6 (8%)	55 (18%)
Air Quality and Emissions - determine changes/patterns in air quality and vehicle emissions before and after LEZ, have continuous monitoring, look at carbon reductions and if emission targets are being achieved	44 (19%)	30 (42%)	74 (24%)
Impact on users of the LEZ and surrounding areas - (employees, businesses, commuters) (including costs, health impacts (including pedestrian injuries), impacts on various income groups	23 (10%)	13 (18%)	38 (12%)
Vehicle Use Changes/Trends - congestion, parking, public transport use, traffic displacement, reduced vehicle use, fleet composition (number of compliant vehicles etc.)	13 (6%)	21 (30%)	36 (12%)
Compliance - number of breaches and repeat offenders, any hot spots for non-compliance, number and success of appeals	14 (6%)	19 (27%)	33 (11%)
Penalty System - enforcement, review of charges (including what revenue was spent on and who profits), payment rates, performance of penalty system including enforcement technology and any bias on enforcement, review of rates	14 (6%)	17 (24%)	31 (10%)
Measure performance against pre-determined objectives and/or Local Authority Objectives	4 (2%)	16 (23%)	20 (7%)
Effectiveness of Scheme - check if update to boundaries is required, should scheme be discontinued, any negative impacts? review model and assumptions	10 (4%)	7 (10%)	17 (6%)
Agrees with having review but provides no specific metrics for review	13 (6%)	2 (3%)	15 (5%)
Behavioural Changes - trends in movements (visits to city centre, changes in modes of transport, time spent in LEZ, demographics of user groups)	9 (4%)	5 (7%)	14 (5%)
Doesn't agree with LEZ	12 (5%)	-	12 (4%)
Environmental impact of other factors - scrapping older vehicles, electric car batteries, emissions from sources other than vehicles, alternate methods of pollution control, impact on CO ₂ emissions/climate change	5 (2%)	3 (4%)	9 (3%)
Appropriateness of Support Measures - adequate signage and communication plan, strategies, investment in suitable transport alternatives	3 (1%)	2 (3%)	6 (2%)
Review of impacts on specific sectors - (vintage vehicles, petrochemical industry)	3 (1%)	-	3 (1%)
Doesn't support a review	2 (1%)	-	2 (1%)
Total number of respondents used to calculate percentages	234	71	305

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-20 - Q6 Summary of Responses Split by Respondent



3.11.1. Reasoning – Individuals

As shown in Table 3-20, of the 234 individual respondents:

- 82 (35%) did not provide a response to the question and 49 (21%) did not provide an applicable comment.
- 44 (19%) suggested a review of air quality and emissions (such as determining any changes in air quality from before and after the implementation of the LEZ).
- 23 (10%) wanted the review to include the impacts on users of the LEZ as well as the surrounding areas, including things such as cost/benefit analysis, impacts on local businesses, health impacts etc.
- 14 (6%) wanted the review to assess compliance with the LEZ, including number of breaches, repeat offenders and the number of appeals.

The second part of question 6 asked the respondents to provide suggestions on how to ensure transparency and accountability during the review process. A summary of themes for individual respondents is shown in Appendix D in Table D-23.

Of the 234 individual respondents:

- 96 (47%) did not provide an applicable comment and 82 (35%) did not answer this question.

- 13 (6%) suggested transparency could be achieved by publishing all data and reasoning behind decisions, as well as having reviewers declare any biased interests.
- 10 (4%) suggested that there should be multiple reviews (e.g. annual).

3.11.2. Reasoning – Organisations

As shown in Table 3-20, Of the 71 organisation respondents:

- 30 (42%) suggested a review of air quality and emissions (such as determining any changes in air quality from before and after the implementation of the LEZ).
- 21 (30%) suggested a review of vehicle use changes/trends, such as areas of congestion, parking, public transport use, traffic displacement and fleet composition (compliant versus non-compliant vehicles).
- 19 (27%) wanted the review to assess compliance with the LEZ, including number of breaches, repeat offenders and the number of appeals.
- 17 (24%) suggested to review the penalty system (enforcement, review of charges, payment rates, any bias in enforcement).
- 16 (23%) respondents suggested measuring performance against pre-determined objectives and/or local authority objectives.

The second part of question 6 asked the respondents to provide suggestions on how to ensure transparency and accountability during the review process. A summary of themes for organisations is presented in Appendix D in Table D-24. Of the 71 organisation respondents the key themes included:

- 30 (42%) provided no applicable comment and 15 (21%) did not answer the question.
- 7 (10%) suggested transparency could be achieved by publishing all data and reasoning behind decisions, as well as having reviewers declare any biased interests.
- 7 (10%) suggested having a public consultation process with each review.
- 7 (10%) suggested that an independent body was involved in the review process.

3.12. Question 7: What secondary objectives should be created for LEZ schemes? Please be as specific as possible in your reasoning

Question 7 was an open question asking respondents to identify secondary objectives that the LEZ proposals should be delivering. Initial coding was undertaken to determine respondents' views on secondary objectives. 202 respondents provided a comment and a summary of their responses are shown in Table 3-21 and Figure 3-21 and discussed below.

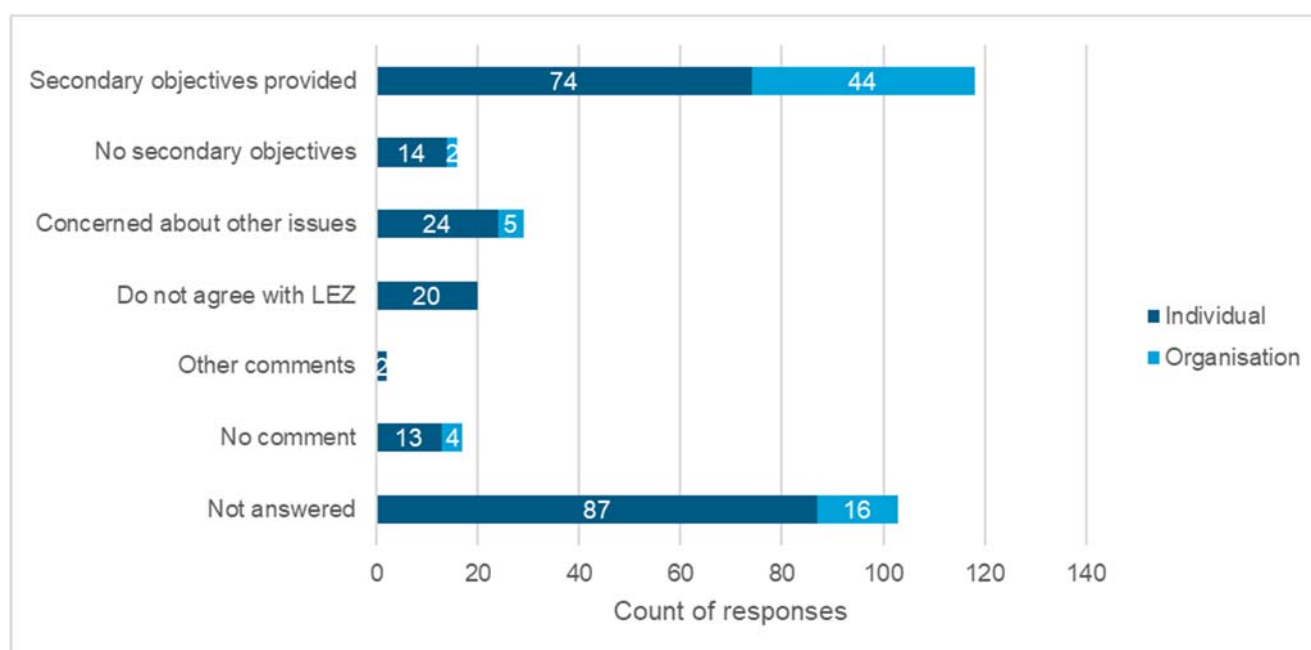
- 118 (39%) identified secondary objectives that the LEZ proposals should be delivering, this was the most common response for individuals and organisations.
- 29 (10%) identified concerns about other issues relating to the LEZ proposals in their response.
- 20 (7%) expressed that they did not agree with the LEZ proposals.
- 17 (6%) gave no comment in relation to secondary objectives for the LEZ proposals.
- 16 (5%) felt that no secondary objectives should be applied with most respondents expressing that the proposals should focus on the primary objectives.

Table 3-21 - Q7 Split by Respondent

Response	Individual	Organisation	Total
Secondary objectives provided	74 (24%)	44 (14%)	118 (39%)
No secondary objectives	14 (5%)	2 (1%)	16 (5%)
Concerned about other issues	24 (8%)	5 (2%)	29 (10%)
Do not agree with LEZ	20 (7%)	-	20 (7%)
Other comments	2 (1%)	-	2 (1%)
No comment	13 (4%)	4 (1%)	17 (6%)
Not answered	87 (29%)	16 (5%)	103 (34%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-21 - Q7 Summary of Split by Respondent



3.12.1. Reasoning – Individuals

147 out of the 234 respondents answered Question 7. 13 respondents stated they had no comment and 2 identified other comments not relevant to the question about secondary objectives for LEZ schemes. The remaining 132 respondents' comments and explanations are explored below. Respondents identified more than one theme in their comment and all themes are reflected in the analysis, so the total number of themes is greater than the number of respondents.

A summary of themes for individuals is shown in Appendix D in Table D-25

The following key themes were identified by respondents:

- 39 (17%) agreed that modal shift should be included as a secondary objective of the LEZ proposals.

- 38 (16%) suggested public transport provision should be included as a secondary objective.
- 34 (15%) identified provisions under planning and placemaking should be included as an appropriate secondary objective.
- 28 (12%) felt that addressing congestion should be included as a secondary objective.
- 27 (12%) believe that public health and wellbeing should be included as secondary objectives of the LEZ proposals.
- 24 (10%) expressed other concerns in relation the LEZ but did not identify any secondary objectives.

Modal Shift

Where individuals identified modal shift as a secondary objective, further details provided by respondents included:

- Active travel should be prioritised.
- Reducing dependency on private cars was needed.
- Park and ride schemes were needed and it was suggested that LEZ revenues could be used to provide free provision.
- Powered two wheeled vehicles should be promoted to achieve modal shift.

Planning and Placemaking

Individuals who identified Planning and Placemaking as a secondary objective, highlighted the following areas:

- There was a need to preserve culture and heritage including heritage vehicle use.
- Planning for more space for pedestrians especially around roads used by buses was needed.
- Planning needed to consider tourists and visitors.
- Zero emission vehicle infrastructure was needed.
- Delivery logistics planning was needed.

Public Health and Wellbeing

Individuals who identified public health and wellbeing highlighted the following areas:

- Road safety should be a focus of public health and wellbeing.
- Noise reduction, education on emission reduction and minimising exposure, air quality monitoring and vehicle emission spot checks could improve public health and wellbeing.

Public Transport Provision

Individuals who identified public transport provision should be addressed as a secondary objective of the LEZ proposals identified the following areas to address:

- Cost, frequency, reliability, satisfaction, integration between transport modes and infrastructure should all be addressed to improve public transport provision.
- Public transport fleet should be upgraded to low and zero emission vehicles.
- Public transport in rural areas needed addressing.
- To increase public transport reliance, it needs to be in public control.

- Improvements by provision of bicycle spaces on buses and trains was needed and powered two wheelers could be allowed in bus lanes and bus prioritisation areas.

Other

Other views expressed by individuals included:

- The LEZ scheme was thought to be just a revenue generating scheme.
- There could be potentially negative economic impacts.
- Substantial infrastructure investment was required.
- Revenue from the LEZ should be reinvested in infrastructure and research and development for low emission vehicles and promote availability of electric vehicles.
- The LEZ proposals were forcing the public to change behaviours without gaining public support.
- Alternatives to the LEZ proposals were suggested by respondents including targeted workplace travel planning and banning petrol and diesel vehicles.

3.12.2. Reasoning – Organisations

A breakdown of the responses by organisations relating to secondary objectives for LEZ schemes are shown in Table 3-22 and Figure 3-22.

Out of the 71 organisations:

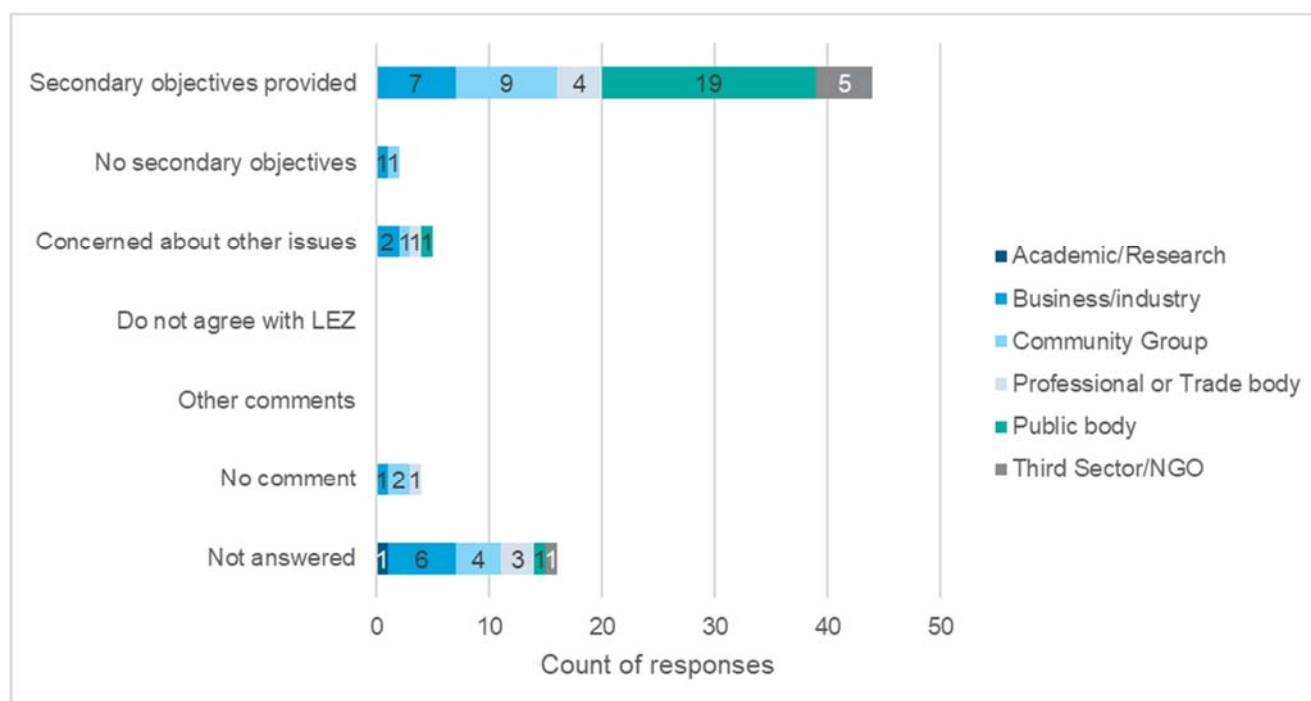
- 44 (62%) provided secondary objectives they thought should be included in the LEZ proposals, these respondents included the majority of each organisation type.
- 16 (23%) did not answer Question 7.
- 5 (7%) expressed concerns about other issues relating to the LEZ but did not identify any secondary objectives.

Table 3-22 - Q7 Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/NGO	Total
Secondary objectives provided	-	7 (10%)	9 (13%)	4 (6%)	19 (27%)	5 (7%)	44 (62%)
No secondary objectives	-	1 (1%)	1 (1%)	-	-	-	2 (3%)
Concerned about other issues	-	2 (3%)	1 (1%)	1 (1%)	1 (1%)	-	5 (7%)
Do not agree with LEZ	-	-	-	-	-	-	(0%)
Other comments	-	-	-	-	-	-	(0%)
No comment	-	1 (1%)	2 (3%)	1 (1%)	-	-	4 (6%)
Not answered	1 (1%)	6 (8%)	4 (6%)	3 (4%)	1 (1%)	1 (1%)	16 (23%)
Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-22 - Q7 Summary of Split by Organisation Type



Out of the 71 responses from organisations, 55 answered Question 7. Four respondents stated they had no comment. Comments and explanations for the remaining 51 respondents are explored below. Respondents identified more than one theme in their comment and all

themes are reflected in the analysis, so the total number of themes is greater than the number of respondents.

A summary of key themes and the reasoning for organisations is shown in Appendix D in Table D-26.

The following key themes were identified by respondents:

- 34 (48%) agreed that modal shift should be included as a secondary objective of the LEZ proposals.
- 27 (38%) suggested public transport provision should be included as a secondary objective.
- 23 (32%) identified provisions under planning and placemaking should be included as an appropriate secondary objective.
- 22 (31%) felt that addressing congestion should be included as a secondary objective.
- 20 (28%) believe that public health and wellbeing should be included as secondary objectives of the LEZ proposals.
- 6 (8%) indicated that Climate Change should be a key consideration for the LEZ proposals.
- 5 (7%) expressed other concerns in relation the LEZ but did not identify any secondary objectives.

Congestion

Organisations expressed that congestion reduction should be a secondary objective and that congestion could be improved by:

- Reducing single occupancy vehicles.
- Improving journey times reliability for public transport to aid modal shift.

Modal Shift

Where organisations identified modal shift as a secondary objective, further details provided by respondents included:

- Active travel should be prioritised.
- Reducing dependency on private cars was advised.
- Noting that delivering modal shift would improve prosperity, strengthen communities, improve mobility and increase social inclusion and accessibility.

Planning and Placemaking

Organisations who identified planning and placemaking as a secondary objective provided the following further detail:

- It was felt that cycle infrastructure needed planning.
- Vehicle fleet and movement information collected by the LEZ enforcement could be used to inform transport strategies
- Parking control provision should be used to support public transport.

Public Health and Wellbeing

Organisations who identified public health and wellbeing as a secondary objective provided the following further detail:

- secondary objectives focusing on public health and wellbeing would deliver accessibility and inclusivity and improve citizen wellbeing.
- protecting community transport journeys would deliver public health and wellbeing objectives.
- climate change needs to be measured to ensure its addressed but should be secondary to air quality objectives

Other

Other concerns expressed by organisation included:

- The need to reinvest revenue from LEZ schemes in infrastructure for low emission vehicles.
- Access to alternative fuel vehicle emissions.
- There was a potential for negative economic impacts.
- Real vehicle emissions versus test emissions for compliant and non-compliant vehicles was required.

3.13. Question 8: Do you agree with the steps outlined in Figure 2 for enabling a LEZ scheme to come into effect? If not, why not?

Question 8 had two parts, the first was a closed question requiring a yes or no response to indicate whether the respondent agreed with the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect. The second part of Question 8 was an open question allowing respondents to provide a comment to explain their answer.

The results for part 1 are shown in Table 3-23 and illustrated in Figure 3-23.

Of the 305 respondents:

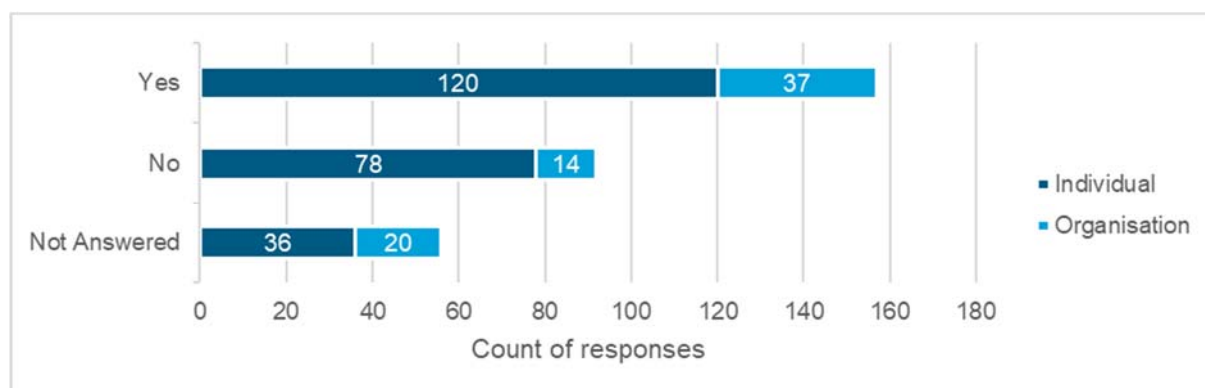
- 157 (51%) agreed with the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect.
- 92 (30%) showed no agreement.
- 56 (18%) did not answer the question.

Table 3-23 - Q8 Split by Respondent

Response	Individual	Organisation	Total
Yes	120 (39%)	37 (12%)	157 (51%)
No	78 (26%)	14 (5%)	92 (30%)
Not Answered	36 (12%)	20 (7%)	56 (18%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-23 - Q8 Summary of Split by Respondent



3.13.1. Reasoning – Individuals

The second part of Question 8 allowed all respondents to provide a comment explaining their response in part one. The responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and therefore all the themes are reflected in the analysis.

A summary of themes for individuals is shown in Appendix D in Table D-27.

Yes

120 (51% of 234) individual respondents answered yes to part one of Question 8, indicating that they agreed with the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect. Of these 120 individual respondents, the majority (113 respondents (94% of 120)) provided no further comment as explanation and therefore were classified under the no comment theme.

No

78 (33% of 234) individual respondents answered no to part one of Question 8, indicating that they did not agree with the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect. Of the 78 individual respondents, 14 (18%) made no further comment in explaining their answer. The following key themes were identified where respondents gave a reasoning:

- 24 (31%) responses were a clear they did not agree with the LEZ scheme.
- 13 (17%) respondents stated that more public consultation / public input is required on the different steps of the LEZ scheme, particularly in the final design steps.

Not answered

36 (15% of 71) individual respondents who did not answer yes or no, with 35 (97% out of 25) of these expressing no further comment.

3.13.2. Reasoning – Organisations

A breakdown of the key themes identified by organisations who responded to Question 8 evaluated by organisation type are shown in the Table 3-24 and illustrated in Figure 3-24.

Out of the 71 organisations who responded:

- 37 (52%), agreed to the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect, with respondents mainly represented by

public bodies (14, 20%), community groups (10, 14%), business and industry (6, 8%) and third sector /NGO organisations (5, 7%).

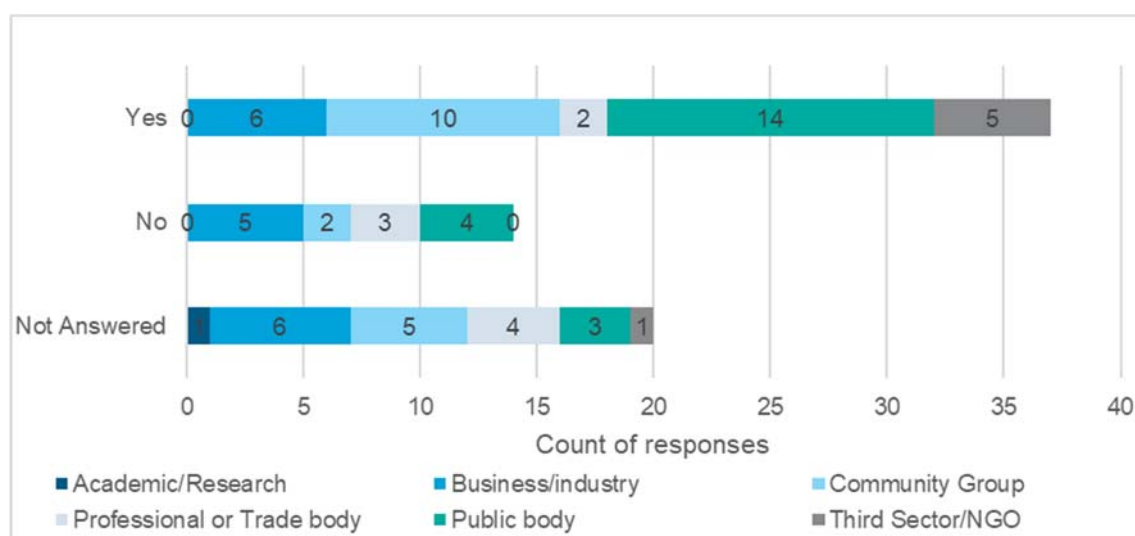
- 20 (28%) gave no answer to Question 8, with respondents mainly represented by business and industry (6, 8%) and community groups (15, 7%) organisations.
- 14 (20%) of the organisations showed a disagreement, with respondents mainly represented by business and industry (5, 7%).

Table 3-24 - Q8 Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Yes	-	6 (8%)	10 (14%)	2 (3%)	14 (20%)	5 (7%)	37 (52%)
No	-	5 (7%)	2 (3%)	3 (4%)	4 (6%)	-	14 (20%)
Not Answered	1 (1%)	6 (8%)	5 (7%)	4 (6%)	3 (4%)	1 (1%)	20 (28%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-24 - Q8 Summary of Split by Organisation Type



A summary of themes for organisations is shown in Appendix D in Table D-28.

Yes

37 (52% out of 71) respondents from organisations answered yes to part one of Question 8, indicating that they agreed with the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect.

21 (57% of 37) of respondents made no further comment. 4 (11%) of respondents each indicated that more consultation with stakeholders and the public was required. For the rest of the respondents who provided a comment, the themes identified from their comments are summarised in Appendix D in Table D-28.

No

14 (20% of 71) respondents from organisations answered no to part one of Question 8, indicated that they did not agree with the steps outlined in Figure 2 of the consultation document for enabling a LEZ scheme to come into effect.

5 (36%) respondents referenced step 2 of Figure 2 of the consultation document (public consultation). The issues raised about step 2 of Figure 2 of the consultation document included questioning who is involved at this step and how much weight do their opinions carry, having the public consultation approved through a local authority committee process, having an additional step for scheme redesign based on the public consultation feedback, and the need for mandatory consultation as well as public consultation. 5 (36%) respondents also indicated that more public consultation was required.

3 (31%) respondents requested timelines for the steps in the process. With regard to timelines organisations were concerned that completing all the steps in the Figure 2 of the consultation document for enabling a LEZ scheme to come into effect would not be possible in the timescale set out in the 2017 Programme for Government for LEZ implementation.

For the rest of the respondents who provided a comment, the themes identified from their comments are summarised in Appendix D in Table D-28.

Not answered

20 (28% out of 71) of respondents from organisations who did not answer yes or no, with the majority (17 (85% of 20)) expressing no further comment.

3.14. Question 9: How can local authorities maximise the technological opportunities available from the deployment of approved devices?

Question 9 was an open question allowing respondents to comment on how local authorities can maximise the technological opportunities available from the deployment of approved devices used for the LEZ enforcement. Initial coding was undertaken to determine respondents' views on whether technological opportunities should be maximised at all. A summary is shown in Table 3-25 and illustrated in Figure 3-25.

Of the 305 respondents;

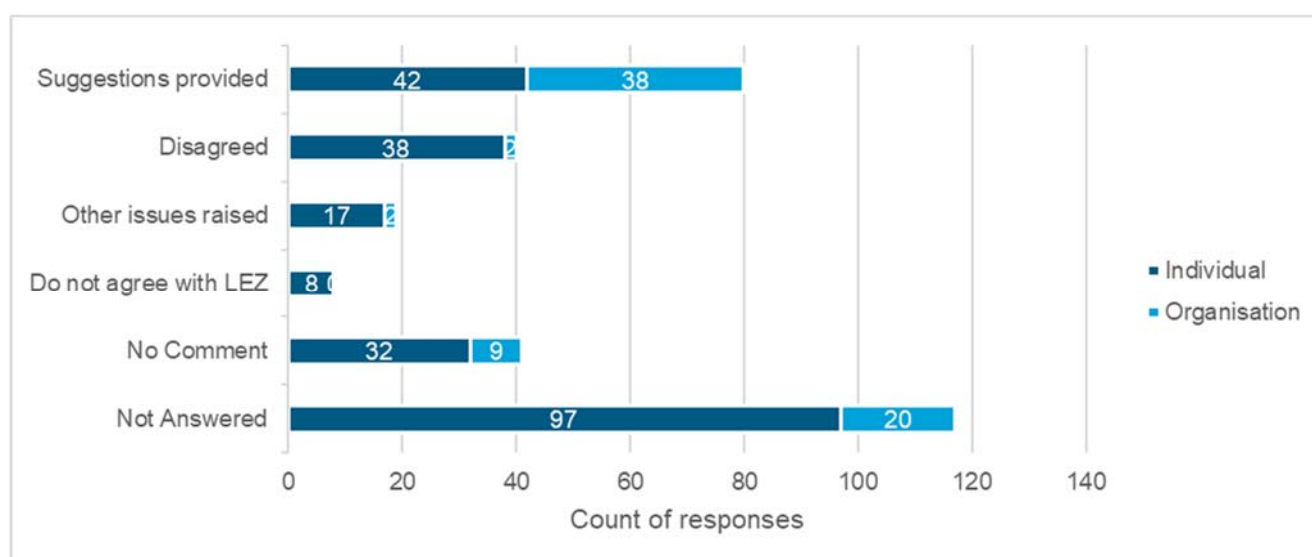
- 80 (26%) provided suggestions on how local authorities can maximise the technological opportunities available from the deployment of approved devices.
- 40 (13%) respondents stated that they did not think that technological opportunities should be maximised and that approved devices should only be used for the LEZ enforcement.
- 19 (6%) raised other issues not directly related to technological opportunities.
- 8 (3%) respondents stated they did not agree with the LEZ.
- 41 (13%) indicated they had no comment.
- 117 (38%) did not provide a respond to the question.

Table 3-25 - Q9 Split by Respondent

Response	Individual	Organisation	Total
Suggestions provided	42 (14%)	38 (12%)	80 (26%)
Disagree	38 (12%)	2 (1%)	40 (13%)
Other issues raised	17 (6%)	2 (1%)	19 (6%)
Do not agree with LEZ	8 (3%)	-	8 (3%)
No Comment	32 (10%)	9 (3%)	41 (13%)
Not Answered	97 (32%)	20 (7%)	117 (38%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-25 - Q9 Summary of Split by Respondent



3.14.1. Reasoning – Individuals

137 out of the 234 responses completed by individuals answered Question 9. Their responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and all themes are reflected in the analysis. A summary of sub-themes for individuals is shown in Appendix D in Table D-29.

42 (18% of 234) respondents provided suggestions on how local authorities can maximise the technological opportunities available from the deployment of approved devices used for the LEZ enforcement. The following key themes were identified where respondents provided a suggestion:

- 9 (4%) responses suggested consideration being given to having ANPR database connections for drivers to check compliance of their vehicles.
- 7 (3%) responses suggested that the LEZ enforcement technology could be used to improve traffic management (for example using to enforce traffic restrictions, monitoring speeds and re-evaluating speed limits and use of smart lights for traffic control).

- 6 (3%) responses suggested there could be police/ DVLA ANPR database connections for other enforcement uses, such as checking road tax and insurance has been paid for vehicles.

38 (16% of 234) respondents indicated that they did not think that technological opportunities should be maximised and that approved devices should only be used for the LEZ enforcement. The following key themes were identified where respondents gave a reasoning:

- 19 (8%) responses disagreed based on privacy issues (due to concerns about data protection and management, privacy of personal data privacy and references were made to 'big brother').
- 7 (3%) responses indicated concerns about it increasing LEZ implementation cost.

3.14.2. Reasoning – Organisations

A breakdown of the themes identified by organisations who responded to Question 9 evaluated by organisation type are shown in Table 3-26 and illustrated in Figure 3-26.

Out of the 71 organisations who responded:

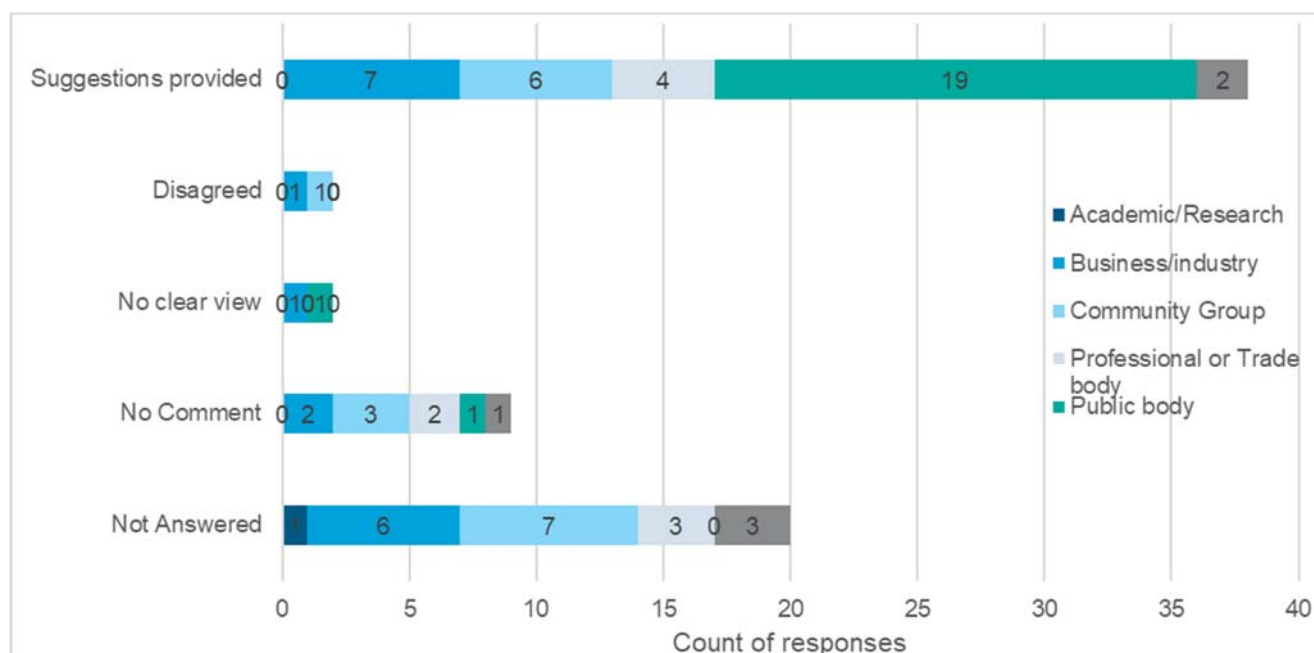
- 38 (54%), provided suggestions on how local authorities can maximise the technological opportunities available from the deployment of approved devices, with respondents mainly representing public bodies (19, 27%), business and industry (7, 10%) and community groups (6, 8%).
- 9 (13%) stated they had no comment.
- 20 (28%) gave no answer to Question 9.

Table 3-26 - Q9 Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Suggestions provided	-	7 (10%)	6 (8%)	4 (6%)	19 (27%)	2 (3%)	38 (54%)
Disagreed	-	1 (1%)	1 (1%)	-	-	-	2 (3%)
Other issues raised	-	1 (1%)	-	-	1 (1%)	-	2 (3%)
No Comment	-	2 (3%)	3 (4%)	2 (3%)	1 (1%)	1 (1%)	9 (13%)
Not Answered	1 (1%)	6 (8%)	7 (10%)	3 (4%)	-	3 (4%)	20 (28%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-26 - Q9 Summary of Split by Organisation Type



A summary of sub-themes for individuals is shown in Appendix D in Table D-30.

38 (54% of 71) respondents provided suggestions on how local authorities can maximise the technological opportunities available from the deployment of approved devices. The following key themes were identified where respondents gave a reasoning:

- 12 (17%) responses suggested that there should be collaboration with other organisations such as the academic sector, the intelligent transport systems community and emissions remote sensing community.
- 8 (11%) responses suggested that the LEZ enforcement technology could be used to improve traffic management (for example using to enforce traffic restrictions, monitoring speeds and re-evaluating speed limits and use of smart lights for traffic control).
- 6 (8%) responses suggested there could be an ANPR database connection for drivers to use to check compliance of vehicles.
- 6 (8%) responses suggested there could be police / DVLA ANPR database connections for other enforcement uses, such as checking road tax and insurance has been paid for vehicles.

Disagreed

2 (3% of 71) respondents indicated that they did not think that technological opportunities should be maximised and that approved devices should only be used for the LEZ enforcement. The following key themes were identified where respondents gave a reasoning:

- 2 (3%) respondents were concerned about privacy issues (due to concerns about data protection and management, privacy of personal data privacy and references were made to 'big brother').
- 1 (1%) respondents indicated concerns about it increasing LEZ implementation cost.

3.15. Question 10: What positive or negative impacts do you think the LEZ proposals outlined within this consultation may have on:

3.15.1. (a) particular groups of people, with particular reference to 'protected characteristics'

Question 10a was an open question allowing respondents to indicate what positive or negative impacts the LEZ proposals outlined in the consultation document will have on particular groups of people, with particular reference to 'protected characteristics' of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief and sex and sexual orientation. Initial coding was undertaken to determine if respondents thought impacts were positive or negative. The results for Question 10a are shown in Table 3-27 and illustrated in Figure 3-27.

Of the 305 respondents;

- 123 (40%) did not answer the question.
- 75 (25%) anticipated negative impacts.
- 25 (8%) predicted positive impacts.
- 24 (8%) respondents speculated both positive and negative impacts.
- 20 (7%) indicated no impact
- 21 (7%) were not clear in their answer on determining the impact.
- 17 (6%) did not comment.

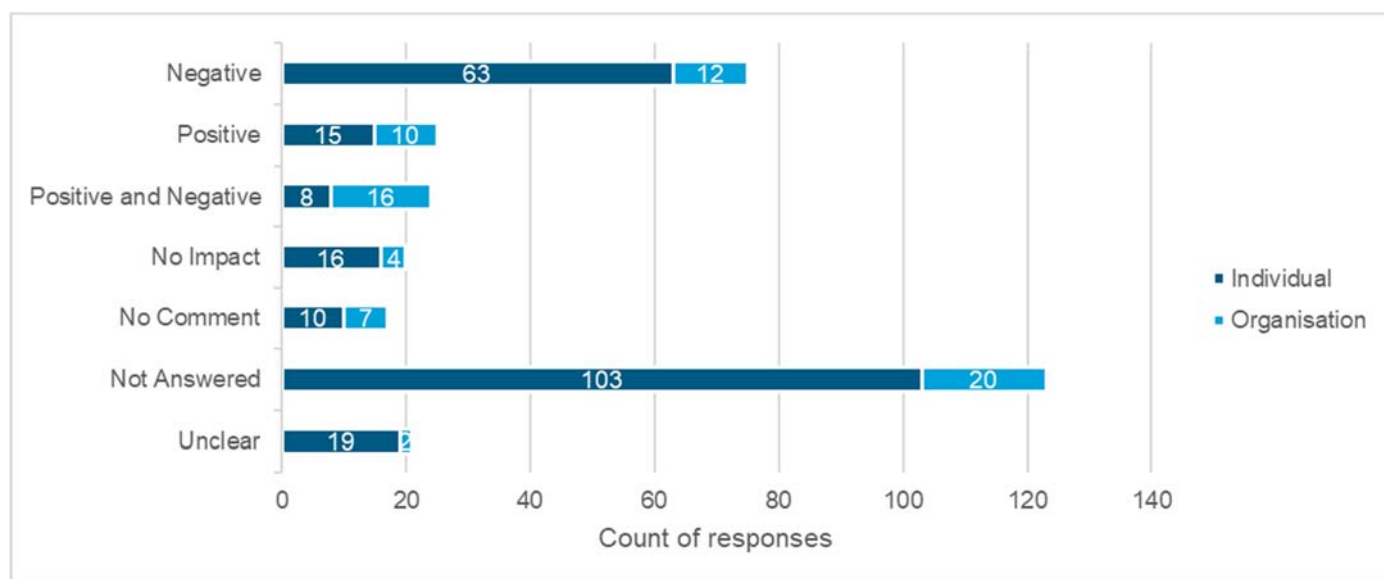
Where respondents referred to particular protected groups this was typically a reference to disability (30 respondents, 10%) or age (24 respondents, 8%).

Table 3-27 - Q10a Split by Respondent for Positive or Negative Impacts

Response	Individual	Organisation	Total
Negative	63 (21%)	12 (4%)	75 (25%)
Positive	15 (5%)	10 (3%)	25 (8%)
Positive and Negative	8 (3%)	16 (5%)	24 (8%)
No Impact	16 (5%)	4 (1%)	20 (7%)
No Comment	10 (3%)	7 (2%)	17 (6%)
Not Answered	103 (34%)	20 (7%)	123 (40%)
Unclear	19 (6%)	2 (1%)	21 (7%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-27 - Q10a Summary of Split by Respondent



3.15.1.1. Reasoning – Individuals

131 out of the 234 responses completed by individuals answered Question 10a. Their responses were grouped to indicate the common themes identified by each respondent. Respondents identified more than one theme in their comment and all themes have been included in the analysis. A summary of themes for individuals is shown in Appendix D in Table D-31.

Positive

15 (6% of 234) respondents identified positive impacts. The following key themes were identified for the respondents that gave a reasoning:

- 11 (5%) respondents felt there would be positive impacts due to the reduced congestion and improvement in air quality in city centres.
- 8 (3%) respondents felt that there would be a positive improvement in health due to the LEZ proposals.

Negative

63 (27% of 234) respondents identified negative impacts on protected groups as a consequence of the LEZ proposals. The following key themes were identified for the respondents that gave a reasoning:

- 40 (17%) respondents attributed the likely negative impacts to the costs associated with the purchase of new compliant vehicles.
- 19 (8%) respondents did not agree with the LEZ scheme.

Positive and Negative

8 (3% of 234) respondents identified both positive and negative impacts in their response. These 8 (3%) respondents identified that there would be a positive improvement in health but 6 (3%) stated that there were also negative impacts associated with the purchase of new compliant vehicles.

3.15.1.2. Reasoning – Organisations

A breakdown of the themes identified by organisations who responded to Question 10a evaluated by organisation type are shown in the Table 3-28 and represented in Figure 3-28.

Out of the 71 organisations who responded:

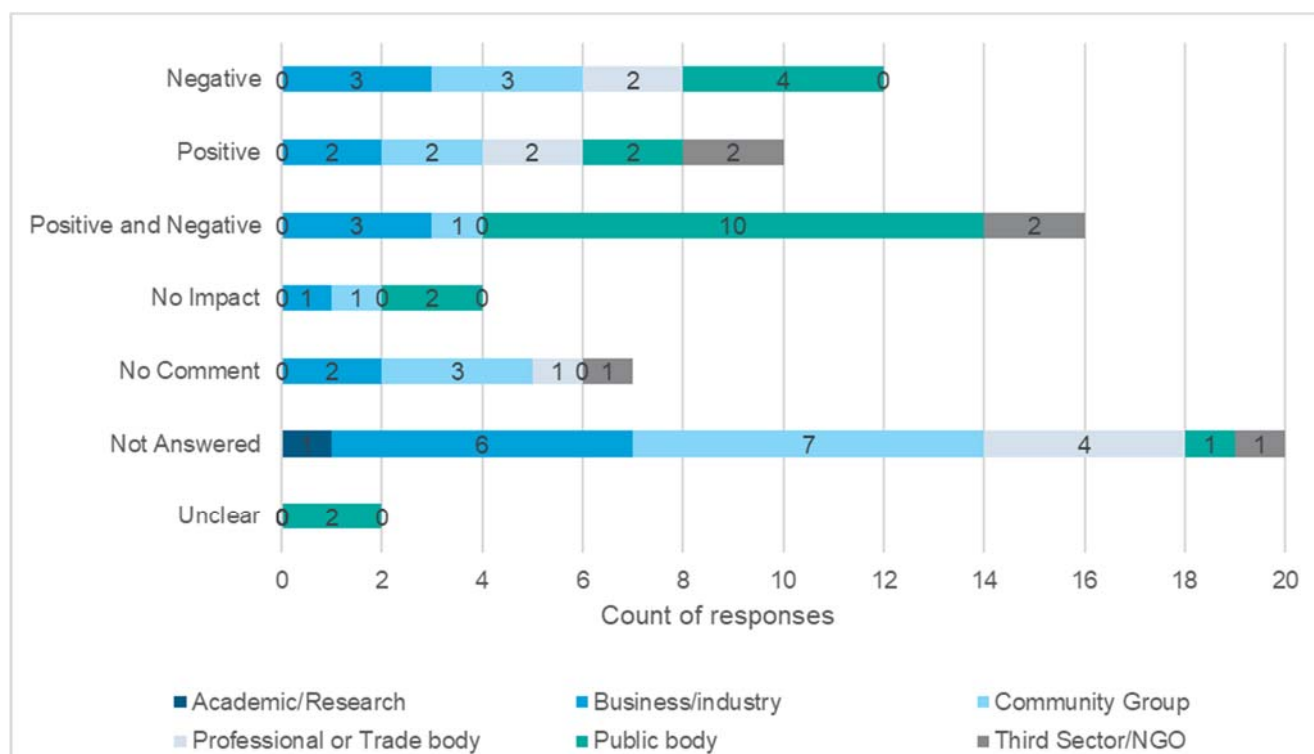
- 20 (28%) did not answer the question.
- 16 (23%) expressed both positive and negative views of impacts on protected groups due to the LEZ proposals, with respondents mainly represented by public bodies (10, 14%),
- 12 (17%) predicted negative impacts.
- 10 (14%) anticipated positive impacts.
- 7 (10%) stated they had no comment.

Table 3-28 - Q10a Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Negative	-	3 (4%)	3 (4%)	2 (3%)	4 (6%)	-	12 (17%)
Positive	-	2 (3%)	2 (3%)	2 (3%)	2 (3%)	2 (3%)	10 (14%)
Positive and Negative	-	3 (4%)	1 (1%)	-	10 (14%)	2 (3%)	16 (23%)
No Impact	-	1 (1%)	1 (1%)	-	2 (3%)	-	4 (6%)
No Comment	-	2 (3%)	3 (4%)	1 (1%)	-	1 (1%)	7 (10%)
Not Answered	1 (1%)	6 (8%)	7 (10%)	4 (6%)	1 (1%)	1 (1%)	20 (28%)
Unclear	-	-	-	-	2 (3%)	-	2 (3%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-28 - Q10a Summary of Split by Organisation Type



Out of the 71 responses completed by organisations, 51 answered Question 10a. Their comments and explanations are explored below. Each respondent may have given more than one reason in their comment so 51 respondents recorded 117 sub-themes.

A summary of key themes for organisations is shown in Appendix D in Table D-32.

Positive

10 (14% of 71) respondents identified positive impacts with the key theme identified by respondents 8 (11%) being that there would be the reduced congestion and an improvement in air quality in city centres.

Negative

12 (17% of 71) respondents felt there would be negative impacts on particular groups as a consequence of the LEZ proposals. The main key theme identified for the respondents 8 (11%) was the costs associated with the purchase of new compliant vehicles.

Positive and Negative

16 (23% 71) respondents identified both negative and positive impacts. The key themes identified were:

- positive impacts - improved health (11,16%) and reduced congestion and an improvement in air quality in city centres (9,13%)
- negative impacts - cost impacts associated with the purchase of new vehicles (12,17%) and there being a need for exemptions so not to negatively impact residents, disabled and economically disadvantaged people (5,7%).

3.15.2. (b) the very young and old

Question 10b was an open question, allowing respondents to indicate what positive or negative impacts the LEZ proposals outlined in the consultation document, will be experienced by the very young and old. Initial coding was undertaken to determine if respondents thought impacts were positive or negative. The results for Question 10b are shown in Table 3-29 and illustrated in Figure 3-29.

Of the 305 respondents;

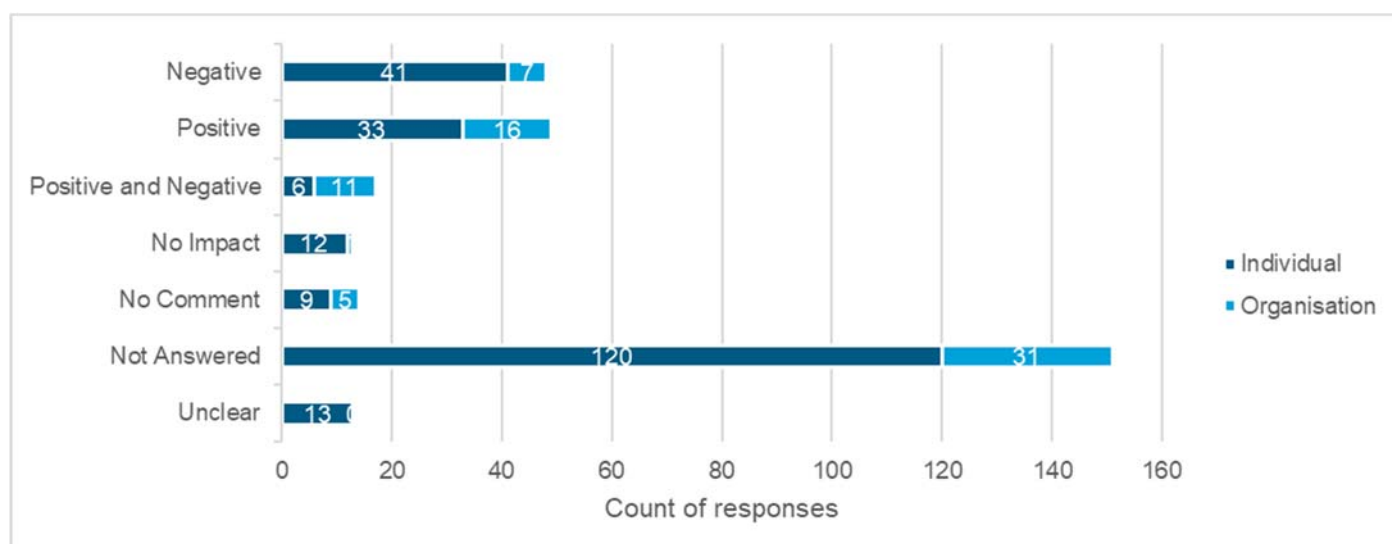
- 151 (50%) did not answer the question,
- 49 (16%) predicted positive impacts.
- 48 (16%) anticipated negative impacts.
- 17 (6%) respondents speculated both positive and negative impacts.
- 13 (4%) indicated no impact.
- 14 (5%) indicated they had no comment.
- 13 (4%) were not clear in their answer on determining the impact.

Table 3-29 - Q10b Split by Respondent

Response	Individual	Organisation	Total
Negative	41 (13%)	7 (2%)	48 (16%)
Positive	33 (11%)	16 (5%)	49 (16%)
Positive and Negative	6 (2%)	11 (4%)	17 (6%)
No Impact	12 (4%)	1 (0%)	13 (4%)
No Comment	9 (3%)	5 (2%)	14 (5%)
Not Answered	120 (39%)	31 (10%)	151 (50%)
Unclear	13 (4%)	-	13 (4%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-29 - Q10b Summary of Split by Respondent



3.15.2.1. Reasoning – Individuals

114 out of the 234 responses by individuals answered Question 10b. Their responses were grouped to indicate the key themes identified by each respondent. Respondents identified more than one theme in their comment and all themes were included in the analysis. A summary of themes for individuals is shown in Appendix D in Table D-33.

Positive

33 (14% of 234) respondents identified positive impacts on young and old. The following key themes were identified for the respondents that gave a reasoning:

- 24 (10%) respondents felt there would be positive impacts due to the reduced congestion and improvement in air quality in city centres.
- 16 (7%) respondents felt that there would be a positive improvement in health due to the LEZ proposals.

Negative

41 (18% of 234) respondents identified negative impacts on young and old, because of the LEZ proposals. The following key themes were identified for the respondents that gave a reasoning:

- 23 (10%) respondents attributed the likely negative impacts to the costs associated with the purchase of new compliant vehicles.
- 13 (6%) respondents were concerned over the lack of public transport options.
- 9 (4%) respondents did not agree with the LEZ scheme.

Positive and Negative

6 (3% of 234) respondents identified both negative and positive impacts in their response. The key themes identified were that there would be a positive improvement in health (4, 2%) but stated that there were also negative impacts associated with the purchase of new compliant vehicles (6,3%).

3.15.2.2. Reasoning – Organisations

A breakdown of the themes identified by organisations who responded to Question 10b evaluated by organisation type are shown in the Table 3-30 and Figure 3-30.

Out of the 71 organisations who responded:

- 31 (44%) did not answer the question.
- 16 (23%) expressed positive impacts on the young and old due to the LEZ proposals, with respondents mainly represented by public bodies (8, 11%).
- 11 (15%) predicted both positive and negative impacts, with respondents mainly represented by public bodies (7, 10%).
- 7 (10%) anticipated negative impacts.
- 5 (7%) stated they had no comment.

Table 3-30 - Q10b Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Negative	-	2 (3%)	4 (6%)	1 (1%)	-	-	7 (10%)
Positive	-	3 (4%)	2 (3%)	1 (1%)	8 (11%)	2 (3%)	16 (23%)
Positive and Negative	-	2 (3%)	1 (1%)	-	7 (10%)	1 (1%)	11 (15%)
No Impact	-	-	1 (1%)	-	-	-	1 (1%)
No Comment	-	2 (3%)	1 (1%)	1 (1%)	-	1 (1%)	5 (7%)
Not Answered	1 (1%)	8 (11%)	8 (11%)	6 (8%)	6 (8%)	2 (3%)	31 (44%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-30 - Q10b Summary of Split by Organisation Type



Out of the 71 responses completed by organisations, 40 answered Question 10b. Their comments and explanations are explored below. Each respondent may have given more than one reason in their comment so 40 respondents recorded 103 sub-themes.

A summary of themes for organisations is shown in Appendix D in Table D-34.

Positive

16 (23% of 71) respondents identified positive impacts on the young and old. The key themes identified for the respondents that gave a reasoning were the following;

- 14 (20%) responses qualified the likely positive impacts to the reduced congestion and improvements in air quality in city centres.
- 8 (11%) responses qualified the likely positive impacts to an improvement in health.

Negative

7 (10% of 71) respondents identified negative impacts on the young and old, because of the LEZ proposals. The key theme identified was that the likely negative impacts to the costs associated with the purchase of new compliant vehicles (5, 7%).

Positive and Negative

11 (15% of 71) respondents identified both negative and positive impacts. The key themes identified were the following where;

- positive impacts - improved health (6,8%) and reduced congestion and an improvement in air quality in city centres (6,8%)
- negative impacts - cost impacts associated with the purchase of new vehicles (8,11%)

3.15.3. (c) people facing socioeconomic disadvantages

Question 10c was an open question, allowing respondents to indicate what positive or negative impacts the LEZ proposals outlined in the consultation document, will be experienced by the people facing socioeconomic disadvantages. Initial coding was undertaken to determine if respondents thought impacts were positive or negative. The results for Question 10c are shown in Table 3-31 and illustrated in Figure 3-31.

Of the 305 respondents:

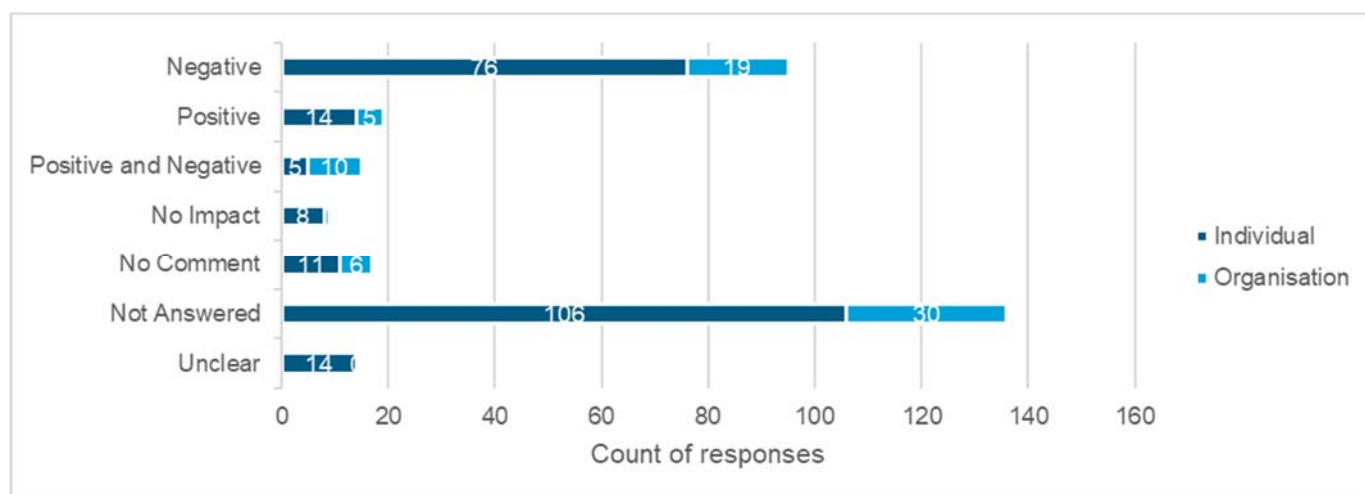
- 136 (45%) did not answer the question.
- 95 (31%) anticipated negative impacts.
- 19 (6%) predicted positive impacts.
- 17 (6%) did not comment.
- 15 (5%) respondents speculated both positive and negative impacts.
- 14 (5%) were not clear in their answer on determining the impact.
- 9 (3%) indicated no impact on the people facing socioeconomic disadvantages.

Table 3-31 - Q10c Split by Respondent

Response	Individual	Organisation	Total
Negative	76 (25%)	19 (6%)	95 (31%)
Positive	14 (5%)	5 (2%)	19 (6%)
Positive and Negative	5 (2%)	10 (3%)	15 (5%)
No Impact	8 (3%)	1 (0%)	9 (3%)
No Comment	11 (4%)	6 (2%)	17 (6%)
Not Answered	106 (35%)	30 (10%)	136 (45%)
Unclear	14 (5%)	-	14 (5%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-31 - Q10c Summary of Split by Respondent



3.15.3.1. Reasoning – Individuals

128 out of the 234 responses completed by individuals answered Question 10c. Their responses were grouped to indicate the themes identified by each respondent. Respondents identified more than one theme in their comment and all themes have been included in the analysis. A summary of key sub-themes for individuals is shown in Appendix D in Table D-35.

Positive

14 (6% of 234) respondents identified positive impacts. The following key themes were identified:

- 6 (3%) respondents felt there would be positive impacts due to the reduced congestion and improvement in air quality in city centres.
- 5 (2%) respondents felt the LEZ will enable improved transport network which will benefit people facing socioeconomic disadvantages.

Negative

76 (32% of 234) respondents felt there would be negative impacts on people facing socioeconomic disadvantages, because of the LEZ proposals. The following key themes were identified:

- 56 (24%) respondents attributed the likely negative impacts to the costs associated with the purchase of new compliant vehicles.
- 11 (5%) respondents did not agree with the LEZ scheme.

Positive and Negative

5 (2% of 234) respondents identified both negative and positive impacts. The key themes identified were:

- Positive impacts - improved health (3,1%).
- Negative impacts – the cost's impacts associated with the purchase of new vehicles (5,2%)

3.15.3.2. Reasoning – Organisations

A breakdown of the themes identified by organisations who responded to Question 10c evaluated by organisation type are shown in the Table 3-32 and represented in Figure 3-32.

Out of the 71 organisations who responded;

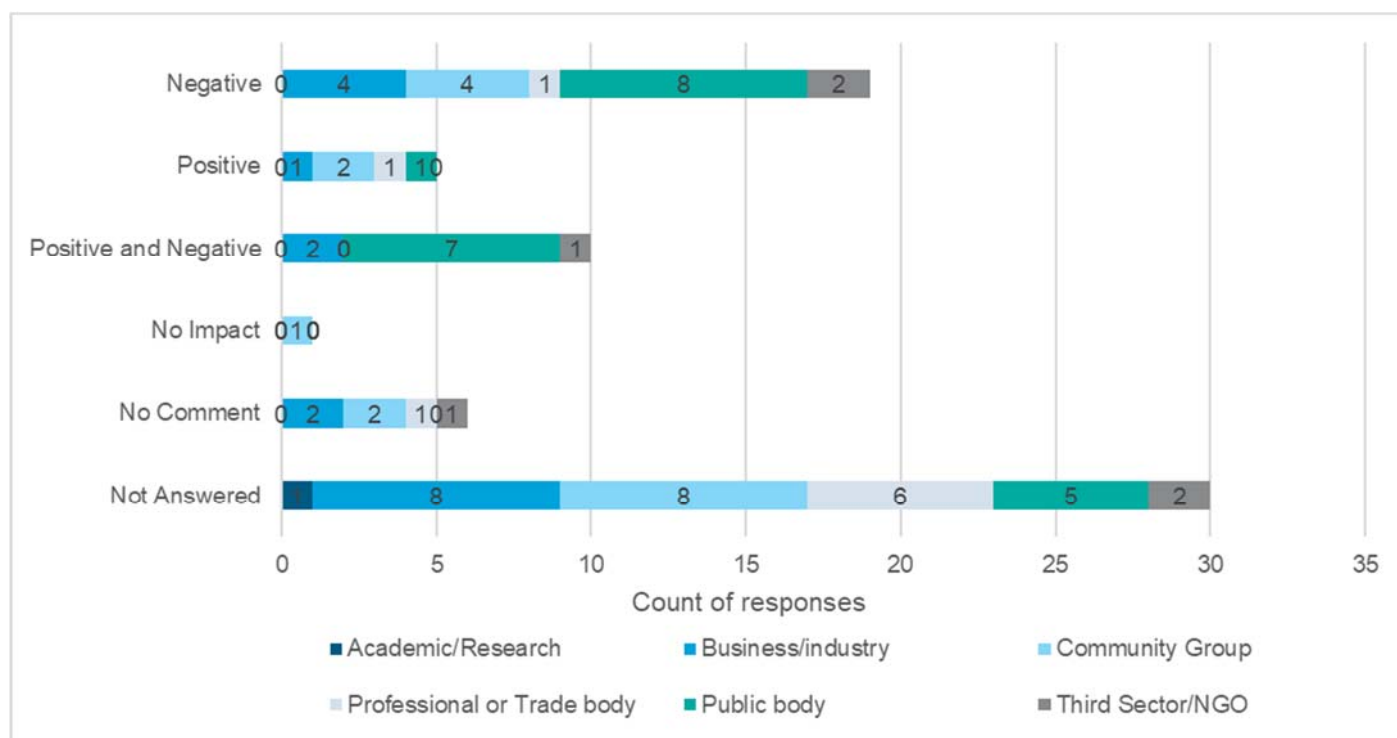
- 30 (42%) recorded no answer to Question 10c.
- 19 (27%) expressed negative impacts due to the LEZ proposals on the people facing socioeconomic disadvantages, with respondents mainly represented by public bodies (8, 11%).
- 10 (14%) anticipated positive impacts and negative impacts, with respondents mainly represented by public bodies (7, 10%).
- 6 (8%) stated they had no comment.
- 5 (7%) predicted positive impacts.

Table 3-32 - Q10c Split by Organisation Type

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Negative	-	4 (6%)	4 (6%)	1 (1%)	8 (11%)	2 (3%)	19 (27%)
Positive	-	1 (1%)	2 (3%)	1 (1%)	1 (1%)	-	5 (7%)
Positive and Negative	-	2 (3%)	-	-	7 (10%)	1 (1%)	10 (14%)
No Impact	-	-	1 (1%)	-	-	-	1 (1%)
No Comm ent	-	2 (3%)	2 (3%)	1 (1%)	-	1 (1%)	6 (8%)
Not Answer ed	1 (1%)	8 (11%)	8 (11%)	6 (8%)	5 (7%)	2 (3%)	30 (42%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-32 - Q10c Summary of Split by Organisation Type



Out of the 71 responses completed by organisations, 41 answered Question 10c. Their comments and explanations are explored below. Each respondent may have given more than one reason in their comment so 41 respondents recorded 103 sub-themes.

A summary of key themes for organisations is shown in Appendix D in Table D-36.

Positive

Five (7% of 71) respondents identified positive impacts on the people facing socioeconomic disadvantages, citing improved health, reduced congestion and improvements in air quality and an improved transport network.

Negative

19 (27% of 71) respondents felt there would be negative impacts on the people facing socioeconomic disadvantages, because of the LEZ proposals. The key theme identified was the costs associated with the purchase of new compliant vehicles (17, 24%).

Positive and Negative

10 (14% 71) respondents identified both negative and positive impacts. The key themes identified were the following:

- positive impacts - improved health (5,7%).
- negative impacts - the cost's associated with the purchase of new vehicles (7,10%).

3.16. Question 11: Do you think the LEZ proposals outlined in this consultation are likely to increase, reduce or maintain the costs and burdens placed on business sectors? Please be as specific as possible in your reasoning.

Question 11 was an open question allowing respondents to indicate whether there will be a likely increase, reduction or no impact (maintain) on the costs and burdens placed on the business sectors due to the LEZ proposals outlined in the consultation.

Initial coding was undertaken to determine whether the respondents' views would be an increase, reduction or no impact. The results of this initial coding are shown in Table 3-33 and illustrated in Figure 3-33.

Of the 305 respondents;

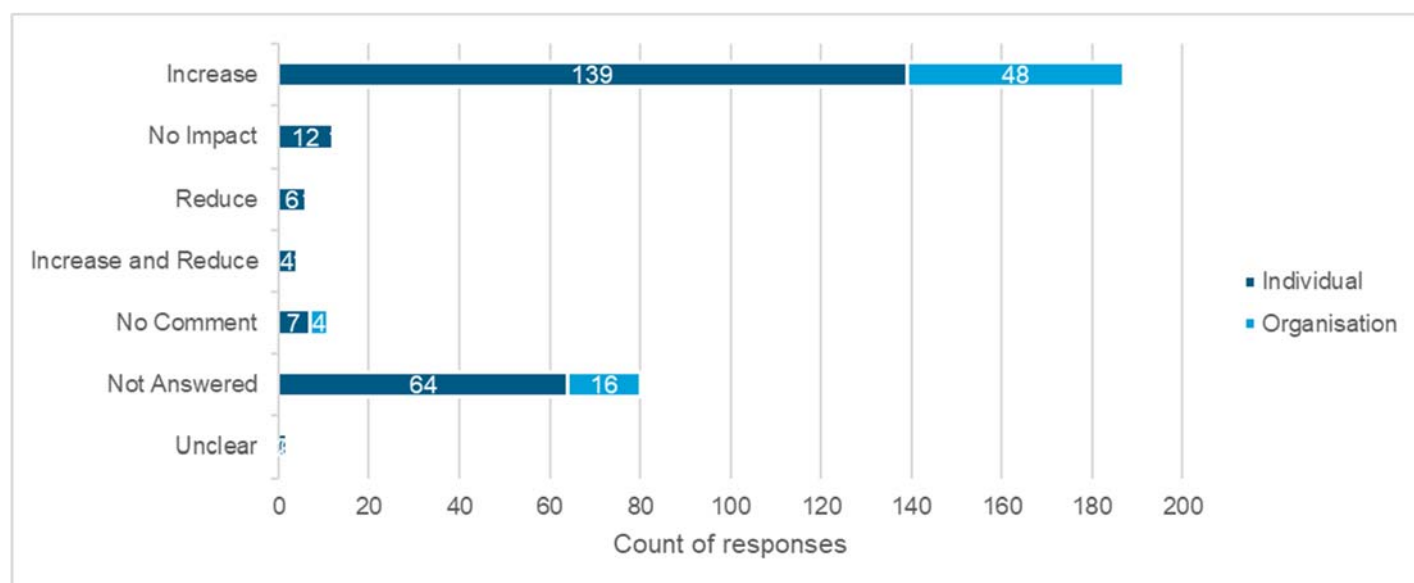
- 187 (61%) anticipated an increase in the costs and burdens placed on the business sectors.
- 13 (4%) indicated no impact.
- 7 (2%) predicted a reduction.
- 5 (2%) speculated both an increase and reduction.
- 11 (4%) did not comment.
- 80 (26%) did not answer Question 11.
- 2 (1%) were not clear on determining the impact of LEZ.

Table 3-33 - Q11 Split by Respondent

Response	Individual	Organisation	Total
Increase	139 (46%)	48 (16%)	187 (61%)
No Impact	12 (4%)	1 (0%)	13 (4%)
Reduce	6 (2%)	1 (0%)	7 (2%)
Increase and Reduce	4 (1%)	1 (0%)	5 (2%)
No Comment	7 (2%)	4 (1%)	11 (4%)
Not Answered	64 (21%)	16 (5%)	80 (26%)
Unclear	2 (1%)	-	2 (1%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-33 - Q11 Summary of Split by Respondent



3.16.1. Reasoning – Individuals

170 out of the 234 responses completed by individuals answered the Question 11. Their responses were grouped to indicate the themes identified by each respondent. Several respondents identified more than one theme in their comment and all themes are reflected in the analysis. A summary of sub-themes for individuals is shown in Appendix D in Table D-37.

Increase

139 (59% of 234) respondents indicated there would be a likely increase in the costs and the burdens on the business sectors. The following key themes were identified where respondents gave a reasoning:

- 73 (31%) respondents attributed the likely increase to the capital cost of businesses purchasing electric vehicles and increased transportation cost for commuters.
- 36 (15%) respondents predicted an increase but were no specific about the cause.
- 20 (9%) respondents anticipated a reduced footfall in city centres.
- 17 (7%) respondents indicated reduction in trade as business will close or move out of the LEZ and lose customers.
- 7 (3%) respondents were concerned over the impact on Small business/SME.
- 7 (3%) respondents wanted exemptions and grants to be provided for upgrading vehicles.
- 7 (3%) respondents did not agree with the LEZ.
- 5 (2%) respondents suggested that to adapt to the LEZ it will require time.

Reduce

6 (3% of 234) respondents indicated that costs and burdens on business would reduce, mainly citing that city centres would be better places to live.

Increase and Reduce

4 (2% of 234) respondents answers indicated that there would be both an increase and reduction on costs and the burdens on the business sectors.

No Impact

12 (5% of 234) respondents indicated no impact with the majority either providing no further comment 6 (3%) or 4 (2%) suggesting that to adapt to the LEZ it will require time.

Seven (1% of 234) individual respondents stated they had no comment for Question 11, and a further 64 (27% of 234) individuals did not answer Question 11.

3.16.2. Reasoning – Organisations

A breakdown of the key themes identified by organisations who responded to Question 11 evaluated by organisation type are shown in the Table 3-34 and represented in Figure 3-34.

Out of the 71 organisations who responded:

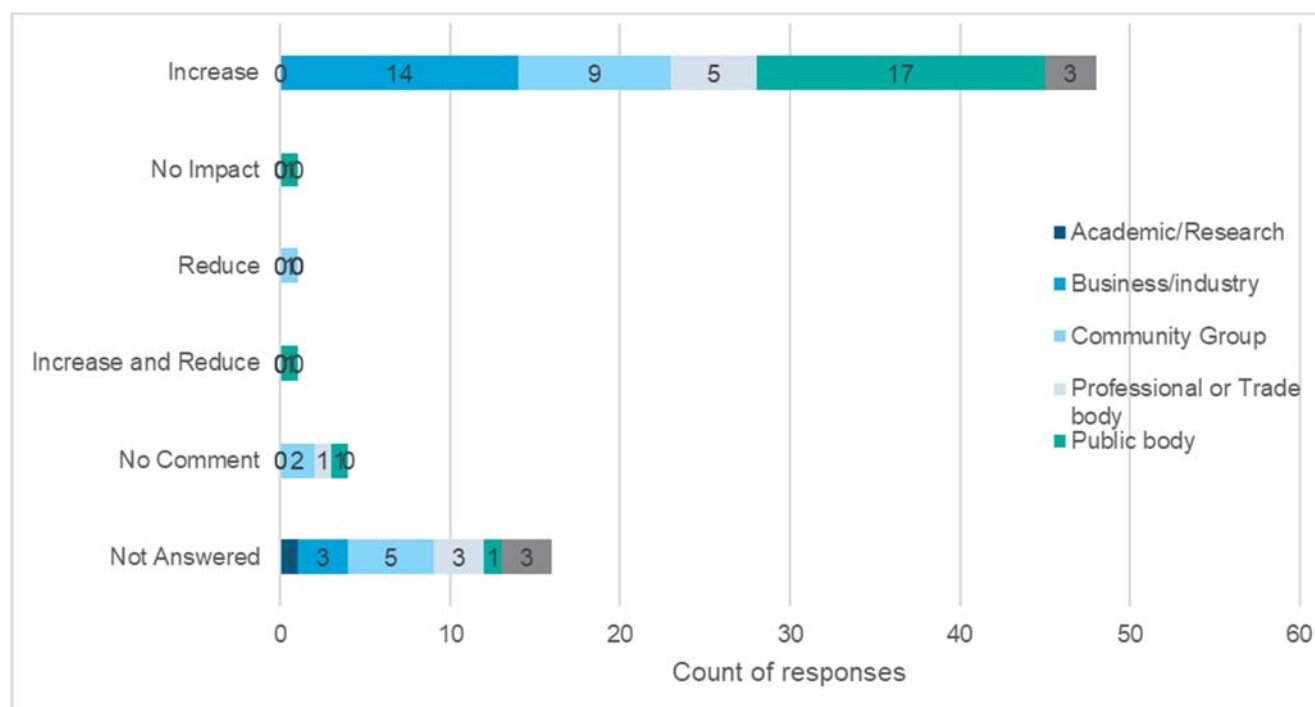
- 48 (68%), expressed that the costs and burdens placed on the business sectors would increase, with respondents mainly represented by public bodies (17, 24%), business/industry (14, 20%), community groups (9, 13%) and professional or trade bodies (5, 7%) organisations.
- 16 (23%) recorded no answer to Question 11.

Table 3-34 - Q11 Split by Organisation Type

Response	Academic / Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Increase	-	14 (20%)	9 (13%)	5 (7%)	17 (24%)	3 (4%)	48 (68%)
No Impact	-	-	-	-	1 (1%)	-	1 (1%)
Reduce	-	-	1 (1%)	-	-	-	1 (1%)
Increase and reduce	-	-	-	-	1 (1%)	-	1 (1%)
No Comment	-	-	2 (3%)	1 (1%)	1 (1%)	-	4 (6%)
Not Answered	1 (1%)	3 (4%)	5 (7%)	3 (4%)	1 (1%)	3 (4%)	16 (23%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-34 - Q11 Summary of Split by Organisation Type



A summary of themes for organisations is shown in Appendix D in Table D-38.

Increase

48 (68% of 71) respondents from organisation indicated that would be a likely increase in the costs and the burdens on the business sectors due to the LEZ proposals outlined in the consultation. The following key themes were identified for the respondents that gave a reasoning:

- 42 (59%) respondents attributed the likely increase to the capital cost of businesses purchasing electric vehicles and increased transportation cost for commuters.
- 12 (17%) respondents were concerned over the cost impacts on small businesses/SME.
- 8 (11%) respondents wanted exemptions and grants to be made available.

Reduce

Only one (1%) respondent indicated that there would be a reduction on the costs and burdens on the businesses, with 2 themes identified.

Increase and reduce

Only one (1%) respondent indicated that there would be both an increase and a reduction on the cost impacts on the business sector. This respondent identified 3 themes in their response.

No Impact

Only one respondent (1%) indicated there would be no impacts on costs and burdens on the business sector and indicated that their view was that no exemptions should be made.

Four (6%) respondents provided no comment on Question 11, and a further 16 (23%) did not answer Question 11.

3.17. Question 12: What impacts do you think the LEZ proposals outlined within this consultation may have on the personal data and privacy of individuals?

Question 12 was an open question asking respondents to comment on potential impacts on personal data and privacy as a result of implementing the LEZ proposals. 200 respondents provided a comment. Initial coding was undertaken to determine whether the respondents' views indicated there would be privacy issues. A summary is presented in Table 3-35 and Figure 3-35 and discussed below.

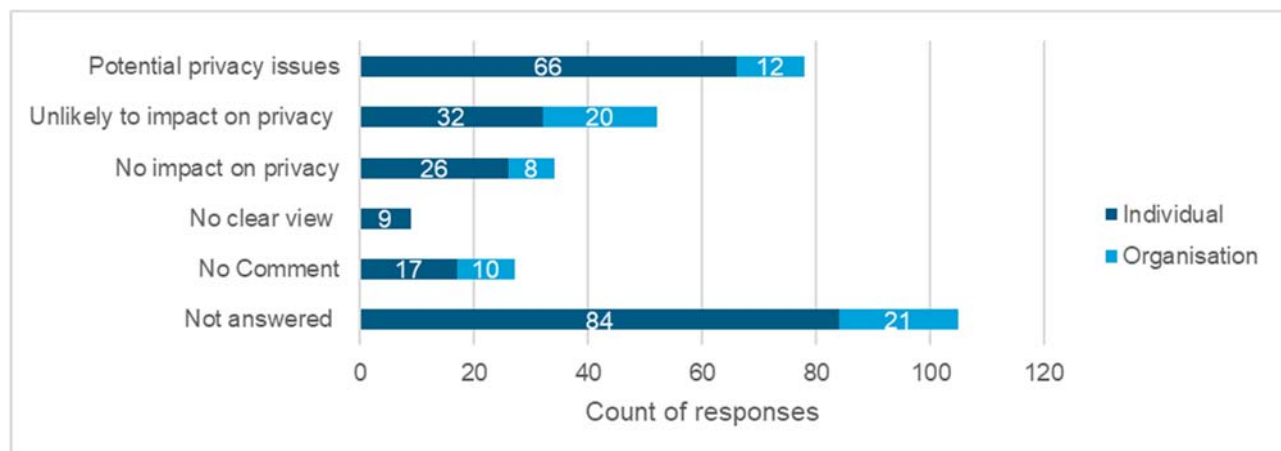
- 78 (26%) identified potential privacy issues, this was the most common response for individual respondents.
- 52 (17%) identified that impacts on privacy would be unlikely, this was the most common response for organisations.
- 34 (11%) identified that no impact on privacy was expected.
- 27 (9%) respondents stated they had no comment in answer to Question 12.

Table 3-35 - Q12 Split by Respondent

Response	Individual	Organisation	Total
Potential privacy issues	66 (22%)	12 (4%)	78 (26%)
Unlikely to impact on privacy	32 (10%)	20 (7%)	52 (17%)
No impact on privacy	26 (9%)	8 (3%)	34 (11%)
No clear view	9 (3%)	-	9 (3%)
No comment	17 (6%)	10 (3%)	27 (9%)
Not answered	84 (28%)	21 (7%)	105 (34%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-35 - Q12 Summary of Split by Respondent



3.17.1. Reasoning – Individuals

150 out of the 234 individuals answered Question 12. Their comments and explanations are explored below. Each respondent may have given more than one reason in their comment so 150 respondents recorded 164 sub-themes.

A summary of themes and sub-themes for individuals is shown in Appendix D in Table D-39.

The following key themes were identified for individual respondents:

- A total of 38 (16%) of respondents cited data protection and management issues as a potential impact on the personal data and privacy of individuals as a result of implementing the LEZ proposals. 36 (15%) of these respondents identified potential privacy issue was a concern and 2 (1%) identified mentioned data protection and management but did not feel it had an impact on privacy.
- 20 (9%) identified there would be less privacy of personal data as an impact of the LEZ proposals, all of whom had recognised potential privacy issues.
- 20 (9%) trusted that the General Data Protection Regulations, (GDPR), would be followed, 13 (6%) of whom had identified that an impact on privacy was unlikely as a result of the LEZ proposals and 3 (1%) identified no impact on privacy.
- 20 (9%) of individual respondents identified no impact on privacy and provided no further comment on Question 12.
- 19 (8%) recorded other comments that could not be grouped in the common sub-themes, 8 (3%) of whom had identified that an impact on privacy was unlikely, 4 (2%) that there were potential privacy issues and 7 (3%) had no clear view on privacy issues.
- 11 (5%) expressed concern about the ability to monitor vehicles (and peoples) movements as a result of implementing the LEZ proposals, all of whom had recognised potential privacy issues.

17 (7%) individual respondents stated they had no comment on Question 12, and a further 84 (36%) individuals did not answer Question 12.

3.17.2. Reasoning – Organisations

A breakdown of the themes identified by organisations relating to data privacy issues as a result of implementing the LEZ proposals are shown in Table 3-36 and

Figure 3-36 below.

Out of the 71 organisations who responded:

- 20 (28%), expressed that impacts on privacy were unlikely, these respondents included the majority of business and industry and community groups.
- 12 (17%) expressed that potential privacy issues were likely, the majority of these respondents representing public bodies.
- 8 (11%) expressed that there would be no impact on privacy.
- 10 (14%) of organisations stated they had no comment.
- 21 (30%) recorded no answer to Question 12.

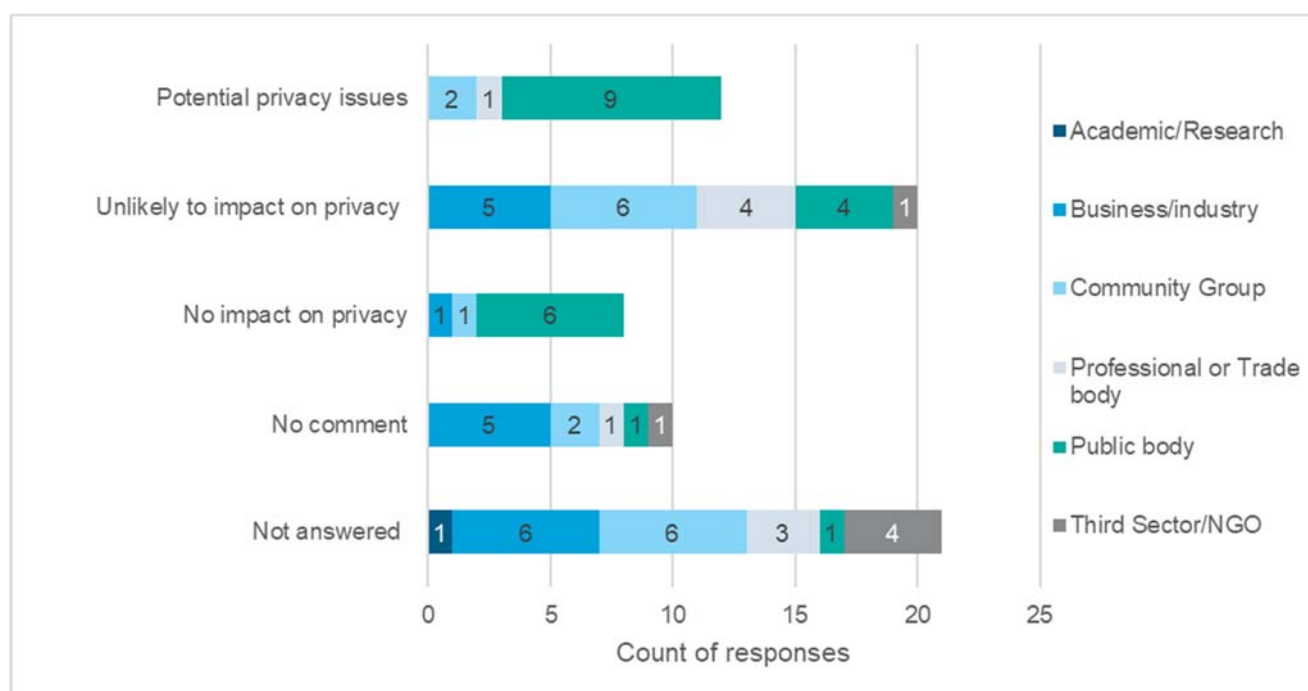
Table 3-36 - Q12 Split by Organisation Type

Response	Academic / Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Potential privacy issues	-	-	2 (3%)	1 (1%)	9 (13%)	-	12 (17%)
Unlikely to impact on privacy	-	5 (7%)	6 (8%)	4 (6%)	4 (6%)	1 (1%)	20 (28%)
No impact on privacy	-	1 (1%)	1 (1%)	-	6 (8%)	-	8 (11%)
No comment	-	5 (7%)	2 (3%)	1 (1%)	1 (1%)	1 (1%)	10 (14%)
Not answered	1 (1%)	6 (8%)	6 (8%)	3 (4%)	1 (1%)	4 (6%)	21 (30%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages are based on 71 responses completed by organisations.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-36 - Q12 Summary of Split by Organisation Type



40 out of the 71 organisations answered Question 12. Their comments and explanations are explored below. Each respondent may have given more than one reason in their comment so 40 respondents recorded 44 sub-themes. A summary of themes and sub-themes for organisations is shown in Appendix D in Table D-40.

The following key themes were identified for organisations:

- 16 (23%) trusted that the General Data Protection Regulations, (GDPR), would be followed during the implementation of the LEZ proposals. 9 (13%) of these respondents

identified that an impact on privacy was unlikely and 5 (7%) that there would be no impact on privacy as a result of the LEZ proposals.

- 9 (13%) were concerned about data protection and management issues as an impact of the LEZ proposals, all of whom had recognised potential privacy issues.
- 8 (11%) felt that the privacy issues with the LEZ proposals would be the same as other decriminalised enforcement mechanisms (ANPR and CCTV surveillance), 7 (10%) of whom had identified that an impact on privacy was unlikely as a result of the LEZ proposals.

10 (14%) organisations stated they had no comment on Question 12 and a further 21 (30%) organisations did not answer Question 12.

3.18. Question 13: Do you think the LEZ proposals outlined within this consultation are likely to have an impact on the environment? If so, which ones and how?

Question 13 was an open question asking respondents to comment on potential impacts on the environment as a result of implementing the LEZ proposals. 225 respondents provided a comment. Initial coding was undertaken to determine whether the respondents' views indicated there would be positive, negative or no impacts on the environment. A summary is presented in Table 3-37 and Figure 3-37 and discussed below:

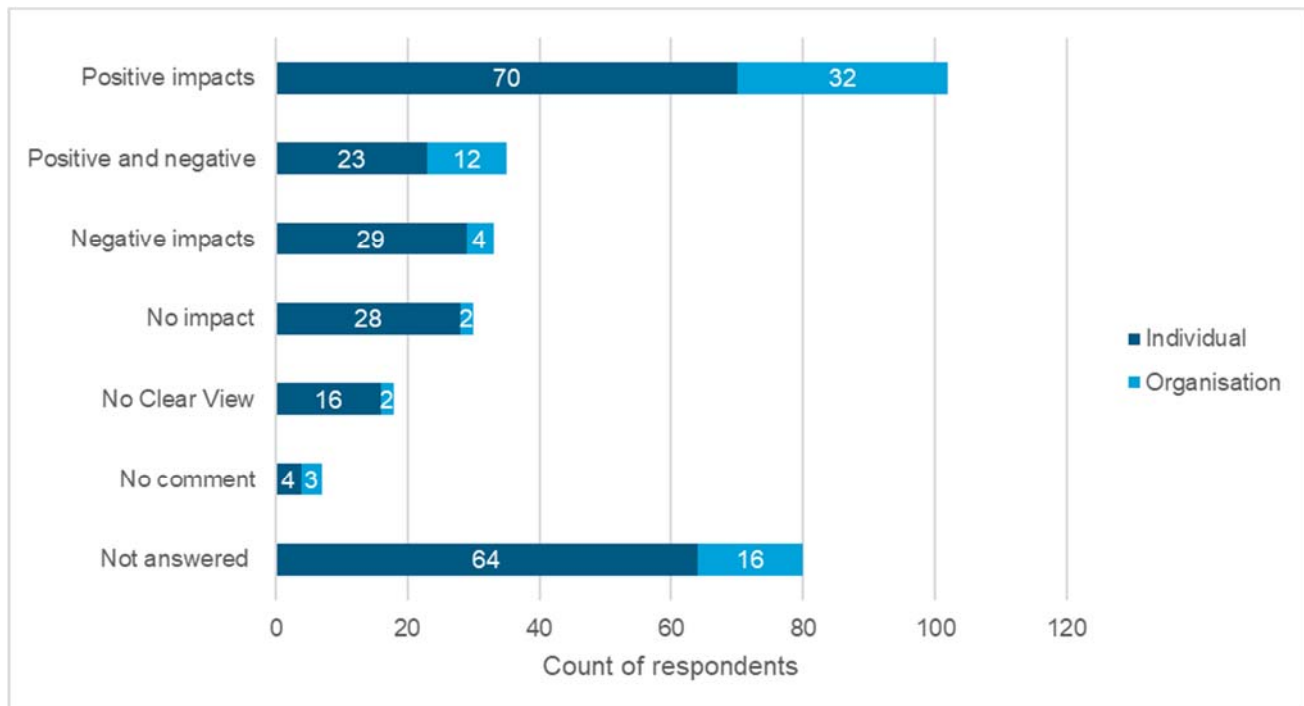
- 102 (33%) identified positive environmental impacts, this was the most common response for individuals and organisations.
- 35 (11%) expressed both positive and negative environmental impacts as a result of implementing the LEZ proposals in their responses.
- 33 (11%) felt that the environmental impacts would be negative.
- 30 (10%) believed the LEZ proposals would have no impact on the environment.
- 18 (6%) gave no clear view regarding the environmental impact of the LEZ proposals.

Table 3-37 - Q13 Split by Respondent

Response	Individual	Organisation	Total
Positive impact	70 (23%)	32 (10%)	102 (33%)
Positive and negative impacts	23 (8%)	12 (4%)	35 (11%)
Negative impact	29 (10%)	4 (1%)	33 (11%)
No impact	28 (9%)	2 (1%)	30 (10%)
No clear view	16 (5%)	2 (1%)	18 (6%)
No comment	4 (1%)	3 (1%)	7 (2%)
Not answered	64 (21%)	16 (5%)	80 (26%)
Grand Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-37 - Q13 Summary of Split by Respondent



3.18.1. Reasoning – Individuals

170 out of the 234 individuals answered Question 13. Four respondents recorded no comment and 16 gave no clear view on the environmental impacts as a result of implementing the LEZ proposals. The remaining 150 comments and explanations are explored below. Each respondent may have given more than one reason in their comment so 150 respondents recorded 217 sub-themes.

A summary of themes for individuals is shown in Appendix D in Table D-41

The following key themes were identified for individual respondents:

- 69 (29%) cited improvement in air quality as an environmental impact, 46 (20%) of these respondents identified this was a positive impact and 21 (9%) had cited this as a positive impact but also identified other negative impacts resulting from the LEZ proposals.
- 19 (8%) identified worldwide environmental cost (from energy production, battery lifecycle and manufacturing of electric vehicles) as an environmental impact of the LEZ proposals, 11 (5%) of these respondents identified this as a negative impact and 7 (3%) had cited this as a negative impact but identified other positive environmental impacts.
- 18 (8%) noted that air quality issues were likely to be worsened elsewhere as a result of displaced traffic due to the LEZ implementation. 9 (4%) had identified this as a negative impact and 8 (3%) had cited this as a negative impact but identified other positive environmental impacts.
- 10 (4%) expressed there would be public health improvements are likely as a result of the LEZ proposals, 9 (4%) of whom had identified this as a positive environmental impact resulting from the LEZ proposals.
- 35 (15%) expressed other comments regarding impacts and these could not be grouped into common themes. 16 (7%) of these respondents felt that the environmental impacts would be positive, 13 (6%) thought there would be no impact and 5 (2%) identified negative environmental impacts.

3.18.2. Reasoning – Organisations

A breakdown of the responses by organisations relating to potential environmental impacts as a result of implementing the LEZ proposals are shown in Table 3-38 and Figure 3-38 below.

Out of the 71 organisations who responded to the consultation:

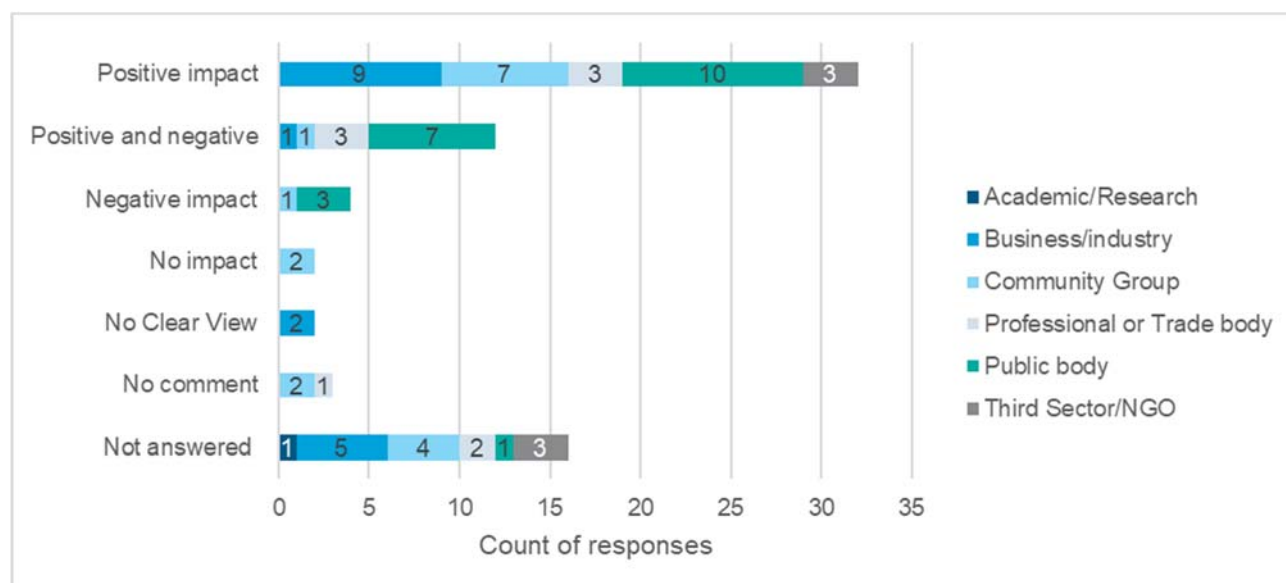
- 32 (45%) expressed that positive impacts on the environment were likely as a result of the LEZ proposals, these respondents included the majority of business and industry, community groups and public bodies.
- 16 (23%) did not answer Question 13.
- 12 (17%) identified both positive and negative impacts on the environment, with the majority being public bodies and professional or trade bodies.

Table 3-38 - Q13 Split by Organisation Type

Response	Academic / Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/ NGO	Total
Positive impacts	-	9 (13%)	7 (10%)	3 (4%)	10 (14%)	3 (4%)	32 (45%)
Positive and negative	-	1 (1%)	1 (1%)	3 (4%)	7 (10%)	-	12 (17%)
Negative impacts	-	-	1 (1%)	-	3 (4%)	-	4 (6%)
No impact	-	-	2 (3%)	-	-	-	2 (3%)
No clear view	-	2 (3%)	-	-	-	-	2 (3%)
No comment	-	-	2 (3%)	1 (1%)	-	-	3 (4%)
Not answered	1 (1%)	5 (7%)	4 (6%)	2 (3%)	1 (1%)	3 (4%)	16 (23%)
Grand Total	1 (1%)	17 (24%)	17 (24%)	9 (13%)	21 (30%)	6 (8%)	71 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Figure 3-38 - Q13 Summary of Split by Organisation Type



55 out of the 71 organisations answered Question 13. Three respondents recorded no comment and two gave no clear view on the environmental impacts as a result of implementing the LEZ proposals. Comments and explanations from the remaining 50 respondents are explored below. Each respondent may have given more than one reason in their comment so 50 respondents recorded 107 sub-themes. A summary of themes and sub-themes for organisations is shown in Appendix D in Table D-42.

The following key themes were identified for organisations:

- 37 (52%) cited improvements in air quality as an environmental impact. 25 (35%) of these respondents identified this was a positive impact and 12 (17%) had cited this as a positive impact but also identified other negative impacts resulting from the LEZ proposals.
- 16 (23%) identified that air quality was likely to be worsened outside the LEZ due to displaced traffic. 10 (14%) of these respondents had cited this as a negative impact but identified other positive environmental impacts and 4 (6%) had stated their views was that there would be overall positive impacts and 2 (3%) had identified their view was that there would only be negative impacts.
- 12 (17%) noted that carbon emissions would be reduced as a result of implementing the LEZ proposals. 7 (10%) had identified this as a positive impact, 2 (3%) had stated there would be negative impacts on air quality, but there would be potential for some limited reduction in carbon emissions and 2 (3%) had identified a reduction in carbon emissions as a positive impact, but also identified other negative impacts (displacement of air quality issues).
- 9 (13%) expressed there would be public health improvements are likely as a result of the LEZ proposals all of which cited positive environmental impacts.
- 8 (11%) felt that there would be an improvement in the natural and urban environment as a result of the LEZ proposal, 7 (10%) of these respondents felt that the overall environmental impacts would be positive.

3.19. Question 14: Do you have any other comments that you would like to add on the Scottish Government's LEZ proposals outlined within this consultation?

This question was an open question and gave respondents the opportunity to provide any additional comments on the LEZ proposals. As detailed in Table 3-39, a total of 153 (50%) respondents answered this question, with 109 (36%) responses from individuals.

Table 3-39 - Q14 Split by Respondent

Response	Individual	Organisation	Total
Answered	109 (36%)	44 (14%)	153 (50%)
Not answered	125 (41%)	27 (9%)	152 (50%)
Total	234 (77%)	71 (23%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

A wide variety of views were expressed (187 different views - more than there were respondents). Many respondents sought to reiterate views expressed in earlier questions in response to this question. The most common of these reiterated views are briefly described below (percentages have been calculated based on 305 respondents). These views had already been considered in specific consultation questions, so are not detailed here – this section focuses on new issues first raised in question 14.

- 36 (12%) respondents repeated that they do not agree with the LEZ proposal.
- 22 (7%) respondents identified impacts on business, tourism, rural dwellers, disabled and socio-economically disadvantaged people.
- 20 (7%) respondents identified issues with public transport including investment, infrastructure and control, need for park and ride schemes, bus improvements, promotion of two wheeled vehicles.
- 19 (6%) respondents were concerned about the implementation of the LEZ proposals including scheme design, speed and phases of implementation, emission standards not being stringent enough, complexity of the scheme, the post implementation review stage, potential for reversal and comparison to other cities.
- 15 (5%) respondents expressed their support for the LEZ proposals.
- 11 (4%) respondents were concerned about climate change issues including issues with lifecycle and operational carbon emissions from electric vehicles.
- 8 (3%) respondents expressed that clear communication and a full impact assessment would be helpful.
- 8 (3%) respondents were concerned about emissions including zero emission cars, emissions from construction and railway sources, and testing for older vehicles to check emissions rather than relying on manufacturers data.
- 8 (3%) respondents were concerned about exemptions included in the LEZ proposals including historic vehicles, motorbikes and taxis.
- 8 (3%) respondents were concerned about the LEZ operation including the need for strict enforcement, grant availability for vehicle improvements, the focus on commercial vehicles, asking for consideration of road use pricing or non-charging options and less stringent emissions standards.
- 6 (2%) respondents were concerned about electric vehicle infrastructure.

Other views which had been repeated by respondents raised by 5 or less correspondents have not been highlighted here.

3.19.1. Reasoning – Individuals

16 individual respondents identified additional issues not previously identified in the analysis of consultation questions and their views are listed below:

- Use of the LEZ proposals as an opportunity to boost economy not just improve air quality.
- Address Illegal parking on private property.
- Consideration of other measures with suggestions including:
 - Air filtration devices.
 - Traffic wardens enforcing no idling policies.
 - Reducing energy use of government buildings.
- A statement that the green agenda ignores population growth and consumption.
- Concern regarding temporary LEZ exemptions for events including those involving Historic Vehicles.
- The need for consistent timescales for LEZ implementation across UK, not just in Scotland.
- Comments indicating that evidence does not support the case for climate change.
- Examine successful systems used around the world not just the UK.
- Deal with port emissions sources.
- Apply emission standards (less stringent) to vehicles all over Scotland, so that air quality is improved in all of Scotland and not just towns and cities.
- Publicise the LEZ proposals more extensively then have a referendum to decide if LEZs are implemented.
- Consider each application for business exemptions on its own merits.

Specific comments made by individuals are given below where respondent's gave permission.

- *'This should be managed and driven as an opportunity to boost the economy and drive exports as well as improved air quality and overall quality of life. I suspect that so far only the improved air quality has been addressed.'*
- *'Should we have some form of "filtration devices" cited at busy junctions to capture some of the air pollution emitted in these areas? Particulate debris from tyres, brake dust and other car components is also a hazard. Does some thought need to be given to different vehicles and routines for "road sweeping" in these areas, in an attempt to gather up particulate materials.'*
- *'We should work together with timescales across the UK... Cars provide direct routes and allow for out of hours travel. Stop excessive parking, revoke the bill that allows councils to charge for workplace parking, stop bus gates. And instead of Low Emission Zones, why not just ensure that all vehicles in Scotland must achieve a specific standard. Euro 5 by 2030 and Euro 6 by 2040?'*
- *'Publicise how much improvement in global pollution this will deliver. By introducing a prime time six month tv advertising campaign giving us the numbers then have a*

referendum to see if the public agree with them carrying the costs and the benefits of this policy?’

3.19.2. Reasoning – Organisations

Responses from 14 organisations highlighted new areas of consideration not identified in the analysis of consultation questions. A summary of is presented below:

- A number of organisations stated that they were already fully engaged in carbon dioxide and air quality reduction initiatives in their operations.
- Apply LEZ proposals in all Air Quality Management Areas.
- The need to promote shared transport options.
- Concern over older buses being moved to use outside LEZs.
- A need to resolve bus retrofit funding (BEAR).
- The view that smaller zero emission vehicles (such as smart cars) should not be allowed to use bus lanes.
- There being a need to include periodic real time emissions capture.
- Suggestion of the use of a web-based portal to view emissions data from remote sensing.
- The need for more renewable energy generation within cities such as solar and mini-turbines.
- The need to reference to English guidance when developing LEZ proposals.
- The need to promote greater public awareness on emissions and exposure reduction.
- Specific concern raised about air quality around schools and the air pollution generated by school drop off/pick up.
- Clarifications requested on how foreign vehicles and retrofitted vehicles would be dealt with.

Specific comments made by organisations are presented below with the respondent’s permission.

- *‘Consider widening low pollution zones countrywide close to schools, although this may not be directly feasible. However the issue of too many vehicles transporting pupils to school is serious and widespread, causing ill-health, congestion and leading to a lack of exercise needs to be addressed nationwide.’*
- *‘If a council fails to sort an AQMA in 5 years it should automatically become a LEZ. Don’t fail the people of smaller cities and villages where air pollution is being recorded annually ad nauseam, and significantly damaging their health.’*
- *‘We would highlight the need to resolve the current Bus Emissions Abatement Retrofitment (BEAR) funding problem so Scottish operators can progress fleet upgrades to Euro VI without financial penalty, bringing Scotland in line with other parts of the UK.’*

Appendices

Appendix A. List of Consultation Questions

Number	Consultation Question
1a	Do you agree with the proposed present-day emission standard for Scottish LEZs? If not, why not?
1b	What are your views on Scotland making a transformative shift to zero or ultra-low emission city centres by 2030? Please be as specific as possible in your reasoning.
2a	Which of the proposed national LEZ exemptions do you agree with? Please be as specific as possible in your reasoning.
2b	Are there any other LEZ exemptions you would propose? If so, what should these exemptions be and why?
3a	Do you agree with the proposed base level and subsequent tiers of penalty charges for each vehicle type as outlined in Table 5? Please explain your answer.
3b	Which surcharge 'curve' in Figure 1 represents the best approach to designing a surcharge?
3c	How should the surcharge approach be applied in order to discourage non-compliant vehicles from driving within a LEZ?
3d	How many days should lapse before a registered keeper of a vehicle returns to the base tier of the penalty charge?
4	Do you agree with the general principles of the LEZ enforcement regime? If not, why not?
5	What are your views on the proposed list of 'other persons' that local authorities must consult with on their LEZ plans?
6	If a LEZ scheme review was undertaken, what elements would you expect the review to investigate and how would the review ensure transparency and accountability?
7	What secondary objectives should be created for LEZ schemes? Please be as specific as possible in your reasoning
8	Do you agree with the steps outlined in Figure 2 for enabling a LEZ scheme to come into effect? If not, why not?
9	How can local authorities maximise the technological opportunities available from the deployment of approved devices?
10	What positive or negative impacts do you think the LEZ proposals outlined within this consultation may have on:

Number	Consultation Question
	(a) particular groups of people, with particular reference to 'protected characteristics' listed above (b) the very young and old (c) people facing socioeconomic disadvantages
11	Do you think the LEZ proposals outlined within this consultation are likely to increase, reduce or maintain the costs and burdens placed on business sectors? Please be as specific as possible in your reasoning.
12	What impacts do you think the LEZ proposals outlined within this consultation may have on the personal data and privacy of individuals?
13	Do you think the LEZ proposals outlined within this consultation are like to have an impact on the environment? If so, which ones and how? Please be as specific as possible in your reasoning.
14	Do you have any other comments that you would like to add on the Scottish Government's LEZ proposals outlined within this consultation?

Appendix B. List of Organisations Responding

Response ID	Permitted Organisation Names	Type	Publishing permissions
ANON-PEPT-XKC4-K	AIR Alliance	Academic/Research	Publish response with name
ANON-PEPT-XKEE-6	"Construction Industry Business"	Business/industry	Do not publish response
ANON-PEPT-XK4M-W	"Design Business"	Business/industry	Do not publish response
ANON-PEPT-XKG2-N	"Distribution Industry Business"	Business/industry	Do not publish response
BHLF-PEPT-XKQZ-7	"Distribution Industry Business"	Business/industry	Do not publish response
ANON-PEPT-XKZG-W	"Transport Industry Business"	Business/industry	Publish response only (without name)
ANON-PEPT-XKMS-V	"Transport Industry Business"	Business/industry	Publish response only (without name)
ANON-PEPT-XKM2-U	"Transport Industry Business"	Business/industry	Do not publish response
ANON-PEPT-XKCS-J	"Transport Industry Business"	Business/industry	Publish response only (without name)
BHLF-PEPT-XK6Z-C	"Transport Industry Business"	Business/industry	Do not publish response
ANON-PEPT-XK6U-7	"Transport Industry Business"	Business/industry	Publish response only (without name)
ANON-PEPT-XK48-8	At The Market Ltd	Business/industry	Publish response with name
ANON-PEPT-XK51-2	Bernie Reddington Garden Services Ltd	Business/industry	Publish response with name

Response ID	Permitted Organisation Names	Type	Publishing permissions
ANON-PEPT-XKKS-T	BISAF Ltd	Business/industry	Publish response with name
ANON-PEPT-XK6Q-3	FirstGroup plc UK Bus Division	Business/industry	Publish response with name
BHLF-PEPT-XK6K-W	Scottish Water	Business/industry	Publish response with name
BHLF-PEPT-XK6X-A	UPS Ltd	Business/industry	Publish response with name
ANON-PEPT-XKMX-1	Xplore Dundee	Business/industry	Publish response with name
ANON-PEPT-XKF6-R	"Community Transport Group"	Community Group	Publish response only (without name)
ANON-PEPT-XKFR-M	"Historic Motoring Club"	Community Group	Do not publish response
ANON-PEPT-XKKD-B	"Historic Motoring Club"	Community Group	Publish response only (without name)
ANON-PEPT-XKEV-Q	"Historic Motoring Club"	Community Group	Publish response only (without name)
ANON-PEPT-XKWD-Q	"Historic Motoring Club"	Community Group	Publish response only (without name)
ANON-PEPT-XK6G-S	"Motorcycle Club"	Community Group	Publish response only (without name)
ANON-PEPT-XK67-9	"Transport Industry Advisors"	Community Group	Publish response only (without name)
ANON-PEPT-XK6S-5	Border Community Transport Services	Community Group	Publish response with name
ANON-PEPT-XK54-5	CLEAR Buckhaven & Methil	Community Group	Publish response with name

Response ID	Permitted Organisation Names	Type	Publishing permissions
ANON-PEPT-XK5W-8	DB Vintage Vehicles	Community Group	Publish response with name
ANON-PEPT-XKQ7-4	Dundee Resource & Re-Use Centre	Community Group	Publish response with name
ANON-PEPT-XKNQ-U	Friends of the Earth Scotland	Community Group	Publish response with name
ANON-PEPT-XKW1-4	Glasgow Vintage Vehicle Trust	Community Group	Publish response with name
ANON-PEPT-XK5M-X	Highland MG Owners Club	Community Group	Publish response with name
ANON-PEPT-XKCV-N	Paths for All	Community Group	Publish response with name
ANON-PEPT-XKM4-W	Scottish Kit Car Club	Community Group	Publish response with name
ANON-PEPT-XKCF-5	The Vintage Motor Cycle Club	Community Group	Publish response with name
ANON-PEPT-XKWG-T	"Transport Industry Advisors"	Professional or Trade body	Do not publish response
BHLF-PEPT-XK66-8	"Transport Industry Advisors"	Professional or Trade body	Do not publish response
ANON-PEPT-XK6H-T	"Transport Industry Advisors"	Professional or Trade body	Publish response only (without name)
ANON-PEPT-XKK1-R	Chartered Institute of Logistics and Transport	Professional or Trade body	Publish response with name
ANON-PEPT-XKCC-2	Environmental Industries Commission (EIC)	Professional or Trade body	Publish response with name
ANON-PEPT-XKNF-G	Freight Transport Association	Professional or Trade body	Publish response with name

Response ID	Permitted Organisation Names	Type	Publishing permissions
BHLF-PEPT-XKQU-2	Law Society of Scotland	Professional or Trade body	Publish response with name
ANON-PEPT-XKW9-C	Mineral Products Association Scotland	Professional or Trade body	Publish response with name
ANON-PEPT-XK6V-8	Scottish Taxi Federation	Professional or Trade body	Publish response with name
ANON-PEPT-XKM7-Z	"Local Authority"	Public body	Do not publish response
ANON-PEPT-XKMH-H	"Local Authority"	Public body	Publish response only (without name)
ANON-PEPT-XK6R-4	"Local Authority"	Public body	Publish response only (without name)
BHLF-PEPT-XKQ8-5	"Local Authority"	Public body	Do not publish response
BHLF-PEPT-XKQ5-2	"Local Authority"	Public body	Do not publish response
BHLF-PEPT-XKQA-E	"Local Authority"	Public body	Do not publish response
BHLF-PEPT-XKNM-Q	"Mobility and Access Advisors"	Public body	Do not publish response
ANON-PEPT-XK62-4	"NHS Hospital"	Public body	Publish response only (without name)
ANON-PEPT-XK4V-6	"Transport Industry Advisors"	Public body	Publish response only (without name)
ANON-PEPT-XKMK-M	"Transport Industry Advisors"	Public body	Publish response only (without name)
ANON-PEPT-XK4R-2	"Transport Industry Advisors"	Public body	Publish response only (without name)

Response ID	Permitted Organisation Names	Type	Publishing permissions
ANON-PEPT-XKMF-F	"Transport Industry Advisors"	Public body	Publish response only (without name)
ANON-PEPT-XKQW-4	"Transport Industry Advisors"	Public body	Publish response only (without name)
BHLF-PEPT-XKQQ-X	"Transport Industry Advisors"	Public body	Do not publish response
ANON-PEPT-XK6M-Y	Aberdeenshire Council	Public body	Publish response with name
ANON-PEPT-XKMT-W	Cults, Bieldside and Milltimber Community Council	Public body	Publish response with name
BHLF-PEPT-XK68-A	Dowanhill Hyndland Kelvinside Community Council	Public body	Publish response with name
ANON-PEPT-XK6P-2	Fife Council	Public body	Publish response with name
ANON-PEPT-XKKU-V	Rosemount and Mile End Community Council	Public body	Publish response with name
ANON-PEPT-XKNB-C	Scone and District Community Council	Public body	Publish response with name
ANON-PEPT-XK4G-Q	Scottish Fire and Rescue Service	Public body	Publish response with name
BHLF-PEPT-XK6Y-B	"Mobility and Access Advisors"	Third Sector/NGO	Do not publish response
ANON-PEPT-XK52-3	"Transport Industry Advisors"	Third Sector/NGO	Do not publish response
ANON-PEPT-XKCG-6	Asthma UK and British Lung Foundation Scotland	Third Sector/NGO	Publish response with name
ANON-PEPT-XK6D-P	Community Transport Association	Third Sector/NGO	Publish response with name

Response ID	Permitted Organisation Names	Type	Publishing permissions
ANON-PEPT-XKCD-3	Disabled Motoring UK	Third Sector/NGO	Publish response with name
ANON-PEPT-XKM6-Y	Sustrans Scotland	Third Sector/NGO	Publish response with name

Appendix C. Catalogue of References

Question	Response ID	References/ Document Name	Author	Number of respondents	Source	Remarks
1	ANON-PEPT-XKNQ-U, ANON-PEPT-XKCG-6	Community Safety and Public Protection Committee's report dated 20/09/2019	Dundee City Council	2	https://www.dundee.gov.uk/reports/agendas/cspp300919ag.pdf	
	ANON-PEPT-XKN5-Y, ANON-PEPT-XK6M-Y	Transport (Scotland) Act 2019		2	http://www.legislation.gov.uk/asp/2019/17/contents/enacted	
	ANON-PEPT-XKC4-K	CWA 17379 standardised European methodology		1		
	ANON-PEPT-XKQ7-4	Article: RDE2-compliant cars help diesel hit back, dated 01/05/2019	FleetNews website	1	https://www.fleetnews.co.uk/news/fleet-industry-news/2019/05/01/rde2-compliant-cars-help-diesel-to-hit-back	E-magazine article dated 01/05/2019
	BHLF-PEPT-XKQA-E	West Lothian real time vehicle emissions pilot project (Spring 2017).		1		
	ANON-PEPT-XKKU-V	Professional Engineer (issue 7, 2019)		1		
	ANON-PEPT-XKNJ-M	California study on electric vehicles		1		
	ANON-PEPT-XKNF-G	FTA electric vehicle report		1		
	ANON-PEPT-XKWV-9	Institute of Mechanical Engineers Report 2020		1		
	ANON-PEPT-XK67-9	REF 1 - Benefits of Investing in Cycling (2014), British Cycling	British Cycling	1	https://www.britishcycling.org.uk/zuvvi/media/bc_files/campaigning/BENEFITS_OF_INVESTING_IN_CYCLING_DIGI_FINAL.pdf, page 2	
	BHLF-PEPT-XK6Y-B	Article on www.creds.ac.uk/ev05-comouk	Centre for Research into Energy Demand Solutions	1	https://www.creds.ac.uk/ev05-comouk	Website

Question	Response ID	References/ Document Name	Author	Number of respondents	Source	Remarks
2	ANON-PEPT-XKMC-C	Article: Classic car sector worth £5.5bn to British economy in 2016, dated 20/10/2016	Honestjohn website	1	https://classics.honestjohn.co.uk/news/general-news/2016-10/classic-car-sector-worth-gbp55bn-to-british-economy-in-2016	Blog, dated 20 October 2016
5	ANON-PEPT-XK67-9	Phase 1: Key findings report A blueprint for Scotland (January 2020), Infrastructure Commission for Scotland	Infrastructure Commission for Scotland	1	https://infrastructurecommission.scot/storage/245/FullReport_200120.pdf	
	ANON-PEPT-XK67-9	Article: New housing design in England overwhelmingly 'mediocre' or 'poor', dated 21/01/2020	University College London website	1	https://www.ucl.ac.uk/news/2020/jan/new-housing-design-england-overwhelmingly-mediocre-or-poor	Article by UCL media dated 21/01/2020
7	ANON-PEPT-XKMH-H	Climate Change (Scotland) Act 2009		1		
	BHLF-PEPT-XKQQ-X	Climate Change (Scotland) Act 2010		1		
	BHLF-PEPT-XKQQ-X	Climate Change Plan 2018		1		
	ANON-PEPT-XKZG-W	The UK Department for Transport estimates that 23% of all car journeys are two miles or less, however we note that the RAC's research suggests that 76% of Scots say that they would find it very difficult to adjust their lifestyle to being without a vehicle with a lack of convenient alternatives as a reason for not switching from private vehicle use.	019 RAC Report on Motoring	1		
	ANON-PEPT-XKWV-9	Accelerating Road Transport Decarbonisation (January 2020), Institute of Mechanical Engineers	Institute of Mechanical Engineers	1		Report

Question	Response ID	References/ Document Name	Author	Number of respondents	Source	Remarks
	ANON-PEPT-XKCV-N	Scottish Government's Active Scotland Outcomes Framework		1		
	ANON-PEPT-XKCV-N	National Walking Strategy		1		
	ANON-PEPT-XKCV-N	The Cycling Action Plan for Scotland		1		
	BHLF-PEPT-XK6Y-B	2019 Scotland Bike Share User Survey		1		
	ANON-PEPT-XK69-B	National Walking Strategy and Cycling Plan				The Long-term Vision for Active Travel in Scotland
9	ANON-PEPT-XKW7-A, ANON-PEPT-XKFA-3, ANON-PEPT-XKNJ-M	Book: George Orwell, "1984"	George Orwell	3		Book
	ANON-PEPT-XKWV-9	Accelerating Road Transport Decarbonisation (January 2020), Institute of Mechanical Engineers	Institute of Mechanical Engineers	1		Report
	BHLF-PEPT-XKQ5-2	Transport (Scotland) Act 2019		1		
	ANON-PEPT-XKK1-R	2020 United Nations Climate Change Conference (COP26)		1		
10	ANON-PEPT-XKCS-J	Academic research indicates that a 1% reduction in car journeys could see 11% growth in bus journeys.		1		
	ANON-PEPT-XKZG-W	019 RAC Report on Motoring		1		
	ANON-PEPT-XKCF-5	Whist it is hoped that LEZs with improve health, the impact shown in the research referred to in the initial Consultation Document indicated that		1		

Question	Response ID	References/ Document Name	Author	Number of respondents	Source	Remarks
		action in other European cities had only led to improvements in life expectancy in terms of weeks, and where other factors may have also had effect.				
	BHLF-PEPT-XK6Y-B	British Lung Foundation Children		1		
	ANON-PEPT-XKM2-U	Article on Council Website: Real Time Vehicle Emissions pilot project, March 2017	West Lothian Council	1	https://www.westlothian.gov.uk/article/45802/Real-Time-Vehicle-Emissions-pilot-project-March-2017	Article on Council Website
	BHLF-PEPT-XK6Y-B	Fairer Scotland Duty Assessment National Transport Strategy (NTS2),		1		
11	ANON-PEPT-XK6U-7	Taxi and Private Hire Cars Age Limitation and Emission Standards policy	City of Edinburgh Council	1	https://www.edinburgh.gov.uk/downloads/file/26799/taxi-and-phc-vehicle-age-and-emissions-policy-20-may-19	
12 & 13		FTA's Cleaning the Air Briefing Note		1		
		Accelerating Road Transport Decarbonisation (January 2020), Institute of Mechanical Engineers		1		
		The Climate Change (Scotland) Act 2009		1		
14	ANON-PEPT-XKNF-G	FTA Electric Vehicle Report		1		
	ANON-PEPT-XKNF-G	FTA Cleaning the Air Briefing Note		1		

Appendix D. Tables of Summary of Themes for Consultation Questions

D.1. Q1a Do you agree with the proposed present-day emission standards for Scottish LEZs? If not, why not?

D.1.1. Individuals

Table D-1 - Q1a Summary of Themes - Individuals

Theme	Yes	No	Not Answered
Suggest more extreme measures required to tackle air quality problem	4 (4%)	19 (16%)	-
Questioning effectiveness of LEZs/ Don't believe they are the solution or questions the need for them	1 (1%)	30 (25%)	-
Exemptions for classic/vintage/historical vehicles	3 (3%)	33 (27%)	-
Concerns about scrapping/penalising older vehicles/having to purchase new vehicles	-	31 (26%)	-
Specific society group is unfairly penalised/targeted	-	19 (16%)	-
Targets wrong vehicles^	-	11 (9%)	-
Cost to individuals and Local Authorities to implement scheme	1 (1%)	18 (15%)	-
Lack of public transport (or suitable alternative such as better park and ride facilities)	-	15 (12%)	-
Political comment	1 (1%)	11 (9%)	-
Concern about environmental cost to purchase new cars	1 (1%)	7 (6%)	-
Diesel vs petrol concerns (i.e. questions if diesel is actually worse?)	-	7 (6%)	-
Supports exemption of motorcycles	1 (1%)	3 (2%)	-
Concern at lack of infrastructure to support LEZ and electric vehicles	1 (1%)	3 (2%)	-
Concern regarding timescale for implementation of LEZ	-	3 (2%)	-
Negative impact on businesses/high street	-	5 (4%)	-
Concern about environmental impact of electric vehicles	1 (1%)	2 (2%)	-
Standards too punitive	-	2 (2%)	-
Air quality versus CO2 concerns	-	2 (2%)	-
Felt unable to provide reasoning	-	1 (1%)	-
Too difficult, not practical/possible to implement	-	2 (2%)	-
Exemptions for lorries/large vans	-	1 (1%)	-
Don't understand consultation material	-	1 (1%)	-
No comment provided	96 (90%)	4 (3%)	6 (100%)
Total number of respondents used for percentage calculation*	107	121	6

^Concern Euro standards do not reflect reality. Should consider vehicle specific emissions and/or concern of real-world emissions versus lab emissions.

*Note that some respondents identified more than one subject in their explanation of whether they supported the LEZ or not so the total count of subjects is more than the number of respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.1.2. Organisations

Table D-2 - Q1a Summary of Themes - Organisations

Theme	Yes	No	Not Answered
Suggest more extreme measures required to tackle air quality problem	14 (33%)	6 (33%)	1 (9%)
Questioning effectiveness of LEZs/ Don't believe they are the solution or questions the need for them	3 (7%)	4 (22%)	1 (9%)
Exemptions for classic/vintage/historical vehicles	-	2 (11%)	1 (9%)
Concerns about scrapping/penalising older vehicles/having to purchase new vehicles	-	4 (22%)	1 (9%)
Specific society group is unfairly penalised/targeted	2 (5%)	2 (11%)	-
Targets wrong vehicles [^]	5 (12%)	6 (33%)	-
Cost to individuals and Local Authorities to implement scheme	-	1 (6%)	-
Lack of public transport (or suitable alternative such as better park and ride facilities)	2 (5%)	-	1 (9%)
Concern about environmental cost to purchase new cars	-	1 (6%)	-
Diesel vs petrol concerns (i.e. questions if diesel is actually worse?)	1 (2%)	-	-
Supports exemption of motorcycles	1 (2%)	2 (11%)	-
Concern at lack of infrastructure to support LEZ and electric vehicles	-	2 (11%)	-
Concern regarding timescale for implementation of LEZ	2 (5%)	1 (6%)	-
Standards too punitive	1 (2%)	-	-
Air quality versus CO2 concerns	1 (2%)	-	-
Wants standards to be the same across all LEZs in Scotland	2 (5%)	-	1 (9%)
Felt unable to provide reasoning	1 (2%)	-	1 (9%)
No comment provided	16 (38%)	-	6 (55%)
Total number of respondents used for percentage calculation*	42	18	11

[^]Concern Euro standards do not reflect reality. Should consider vehicle specific emissions and/or concern of real-world emissions versus lab emissions.

*Note that some respondents identified more than one subject in their explanation of whether they supported the LEZ or not so the total count of subjects is more than the number of respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.2. Q1b What are your views on Scotland making a transformative shift to zero or ultra-low emission city centres by 2030? Please be as specific as possible in your reasoning.

D.2.1. Individuals

Table D-3 - Q1b Summary of Themes – Individuals

Theme	Agree	Disagree	Neither Agree nor Disagree
Require better public transport (or suitable alternative including park and ride, trains)	25 (11%)	6 (3%)	6 (3%)
Concern at lack of infrastructure to support ULEZ/electric vehicles or electric vehicle technology (i.e. range, time to charge)	20 (9%)	14 (6%)	8 (3%)
Concern for Scrapping / Penalising Older Cars / Cost to replace vehicles & upgrade fleets / Cost of EV	12 (5%)	8 (3%)	4 (2%)
Specific society group is unfairly penalised/targeted. Provision should be made for specific societal groups.	11 (5%)	11 (5%)	5 (2%)
Cost to individuals and/or Local Authorities to implement	10 (4%)	12 (5%)	5 (2%)
Unsure of time goal /concern regarding timescale for implementation / suggest phased approach	6 (3%)	7 (3%)	7 (3%)
Suggest more extreme measures required such as moving to zero emissions sooner etc./ Target additional emission sources / Include additional cities, towns	20 (9%)	-	-
Exemption for classic/vintage/historical cars	18 (8%)	-	6 (3%)
Concern of environmental impact of electric vehicles	10 (4%)	8 (3%)	6 (3%)
Questioning of effectiveness of ULEZs or Science behind it / impact of air quality on health	2 (1%)	15 (6%)	5 (2%)
Concern about political motives behind scheme	3 (1%)	17 (7%)	4 (2%)
Suggest requires funding / subsidies / incentives	8 (3%)	1 (0%)	-
Improve cycling infrastructure / active travel / pedestrianisation / walking infrastructure	9 (4%)	-	-
Concern for business in ULEZ - Negative impact on business /high street/city centres/tourism	4 (2%)	9 (4%)	1 (0%)
Air quality versus CO2 concerns	1 (0%)	3 (1%)	1 (0%)
Want introduction of low emission public transport (electric bus fleets / trams etc)	4 (2%)	-	-
Concern about environmental cost to purchase new cars	3 (1%)	-	2 (1%)
Too difficult, not practical/possible to implement	-	5 (2%)	1 (0%)
Targets wrong vehicles. Concern Euro standards do not reflect reality of emissions. Should consider vehicle specific emissions and/or concern of real-world emissions versus lab emissions.	3 (1%)	1 (0%)	-
Focus on highest polluters first / target specific vehicles	2 (1%)	1 (0%)	-
Prefer it to operate only at peak times (i.e. not 24/7)	2 (1%)	-	1 (0%)
Timescale should be in line with UK government	1 (0%)	-	1 (0%)
Concern over size of zone / definition of city centres	-	1 (0%)	1 (0%)
Deliveries at night / zero emission last mile freight deliveries	1 (0%)	-	-
Diesel versus Petrol Concerns (ie.is diesel actually worse?)	1 (0%)	1 (0%)	-
Exemption for motorcycles	1 (0%)	-	-
Fines invested in clean transport	1 (0%)	-	-
Infrastructure investment in alternative routes (i.e. bypass)	1 (0%)	-	-
Focus on reducing congestion	-	-	1 (0%)
Total number of respondents used for percentage calculation*	234		

*Note that some respondents identified more than one subject in their explanation of whether they supported the LEZ or not so the total count of subjects is more than the number of respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.2.2. Organisations

Table D-4 - Q1b Summary of Themes - Organisations

Theme	Agree	Disagree	Neither Agree nor Disagree
Require better public transport (or suitable alternative including park and ride, trains)	20 (28%)	1 (1%)	1 (1%)
Concern at lack of infrastructure to support ULEZ/electric vehicles or electric vehicle technology (i.e. range, time to charge)	13 (18%)	2 (3%)	1 (1%)
Concern for Scrapping / Penalising Older Cars / Cost to replace vehicles & upgrade fleets / Cost of EV	14 (20%)	-	1 (1%)
Specific society group is unfairly penalised/targeted. Provision should be made for specific societal groups.	7 (10%)	-	-
Cost to individuals and/or Local Authorities to implement	7 (10%)	1 (1%)	-
Unsure of time goal /concern regarding timescale for implementation / suggest phased approach	12 (17%)	2 (3%)	-
Suggest more extreme measures required such as moving to zero emissions sooner etc./ Target additional emission sources / Include additional cities, towns	13 (18%)	1 (1%)	1 (1%)
Exemption for classic/vintage/historical cars	3 (4%)	-	1 (1%)
Concern of environmental impact of electric vehicles	-	1 (1%)	-
Questioning of effectiveness of ULEZs or Science behind it / impact of air quality on health	1 (1%)	1 (1%)	-
Concern about political motives behind scheme	-	1 (1%)	-
Suggest requires funding / subsidies / incentives	9 (13%)	-	-
Improve cycling infrastructure / active travel / pedestrianisation / walking infrastructure	5 (7%)	-	1 (1%)
Concern for business in ULEZ - Negative impact on business /high street/city centres/tourism	2 (3%)	1 (1%)	-
Air quality versus CO2 concerns	2 (3%)	-	-
Want introduction of low emission public transport (electric bus fleets / trams etc)	2 (3%)	-	1 (1%)
Concern over size of zone / definition of city centres	-	-	1 (1%)
Deliveries at night / zero emission last mile freight deliveries	1 (1%)	-	-
Total number of respondents used for percentage calculation*	71		

*Note that some respondents identified more than one subject in their explanation of whether they supported the LEZ or not so the total count of subjects is more than the number of respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.3. Q2a Which of the proposed national LEZ exemptions do you agree with? Please be as specific as possible in your reasoning.

D.3.1. Individuals

Table D-5 - Q2a Summary of Themes - Individuals

Theme	Number of respondents
No comment/no clear view	78 (33%)
Have little impact on overall emissions /not often used	77 (33%)
Social importance /part of cultural heritage	56 (24%)
Provides an essential service	27 (12%)
Difficult to convert /upgrade vehicles	24 (10%)
Grace period to upgrade fleet / phased approach / exemptions for a short time only	17 (7%)
Specific group shouldn't be penalised (i.e. disabled or low income)	12 (5%)
Cost to upgrade / replace vehicles	22 (9%)
Specialist vehicles have longer life span than others /replaced after serviceable lifespan (including those adapted for disabled use)	13 (6%)
Low emission vehicles not practical / not available to perform specialist function	15 (6%)
Economically important / cost to business / job losses / restricts job opportunities	15 (6%)
Should be able to attend events within LEZ / apply for exemption for specific events / Pay one-off fee for event access	10 (4%)
No exemptions /exemptions open to abuse	9 (4%)
Not answered question	3 (1%)
Access allowed in an emergency	6 (3%)
Subsidies / funding should be available to upgrade	8 (3%)
Public transport is too limited / cannot meet needs of disabled	5 (2%)
Exemptions or licenses should be available for people that live in the LEZ only / business within LEZ only	7 (3%)
Historic vehicles should be more stringent (i.e. classed as over >30yrs old only) / Exemptions only apply for car club members / Must not be used on a daily basis / Only apply to commercial vehicles	5 (2%)
Exemptions should be extended to additional vehicle types	2 (1%)
Historic vehicles should be less stringent (i.e. classed as over <30 yrs old) / classic cars should also be exempt (in addition to historic cars)	6 (3%)
Does not agree with LEZ	4 (2%)
Wider disabled accessibility concerns (pavements, drop kerbs etc.)	3 (1%)
Concern regarding environmental cost to upgrade vehicles	2 (1%)
Exemptions should not apply to commercial vehicles	2 (1%)
Total number of respondents used for percentage calculation	234

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.3.2. Organisations

Table D-6 - Q2a Summary of Themes – Organisations

Theme	Number of respondents
No comment/no clear view	13 (18%)
Have little impact on overall emissions /not often used	10 (14%)
Social importance /part of cultural heritage	7 (10%)
Provides an essential service	11 (15%)
Difficult to convert /upgrade vehicles	10 (14%)
Grace period to upgrade fleet / phased approach / exemptions for a short time only	9 (13%)
Specific group shouldn't be penalised (i.e. disabled or low income)	12 (17%)
Cost to upgrade / replace vehicles	1 (1%)
Specialist vehicles have longer life span than others /replaced after serviceable lifespan (including those adapted for disabled use)	6 (8%)
Low emission vehicles not practical / not available to perform specialist function	2 (3%)
Economically important / cost to business / job losses / restricts job opportunities	2 (3%)
Should be able to attend events within LEZ / apply for exemption for specific events / Pay one-off fee for event access	7 (10%)
No exemptions /exemptions open to abuse	5 (7%)
Not answered question	9 (13%)
Access allowed in an emergency	6 (8%)
Subsidies / funding should be available to upgrade	4 (6%)
Public transport is too limited / cannot meet needs of disabled	6 (8%)
Exemptions or licenses should be available for people that live in the LEZ only / business within LEZ only	1 (1%)
Historic vehicles should be more stringent (i.e. classed as over >30yrs old only) / Exemptions only apply for car club members / Must not be used on a daily basis / Only apply to commercial vehicles	2 (3%)
Exemptions should be extended to additional vehicle types	5 (7%)
Historic vehicles should be less stringent (i.e. classed as over <30 yrs old) / classic cars should also be exempt (in addition to historic cars)	1 (1%)
Total Number of respondents used for percentage calculation	71

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.4. Q2b Are there any other LEZ exemptions you could propose? If so, what should these exemptions be and why?

Table D-7 - Q2b Split by Respondent – Full Table

Response	Individual	Organisation	Total
No response provided	93 (40%)	20 (28%)	117 (38%)
No additional exemptions	43 (18%)	16 (23%)	59 (19%)
Motorcycles / two wheeled vehicles / scooters / mopeds	19 (8%)	-	20 (7%)
Residents of LEZ	6 (3%)	2 (3%)	8 (3%)
Classic cars	7 (3%)	1 (1%)	8 (3%)
Breakdown recovery vehicles	2 (1%)	3 (4%)	8 (3%)
Historic vehicle >20yrs old	4 (2%)	2 (3%)	7 (2%)
Emergency vehicles (charitable/volunteer organisations)	2 (1%)	5 (7%)	7 (2%)
All Vehicles	6 (3%)	-	6 (2%)
Community transport (schools, charities, community groups, car clubs)	1 (0%)	5 (7%)	6 (2%)
Commercial vehicles / delivery vehicles	4 (2%)	-	5 (2%)
Specialised HDV	3 (1%)	2 (3%)	5 (2%)
Utility repair vehicles	1 (0%)	4 (6%)	5 (2%)
Public transport / buses / diesel buses	1 (0%)	3 (4%)	5 (2%)
Refuse Vehicle	3 (1%)	-	4 (1%)
Construction vehicles / concrete trucks / road maintenance	2 (1%)	2 (3%)	4 (1%)
Personal vehicles of emergency service workers	2 (1%)	1 (1%)	3 (1%)
Farm vehicles	2 (1%)	1 (1%)	3 (1%)
HDV / delivery vehicles- with time of day restrictions	2 (1%)	1 (1%)	3 (1%)
Personal vehicles of shift workers	2 (1%)	-	3 (1%)
Classic cars - commercial only (i.e. funeral & wedding cars)	1 (0%)	2 (3%)	3 (1%)
Black cabs / accessible taxis	1 (0%)	2 (3%)	3 (1%)
Personal vehicles of public transport workers	2 (1%)	-	2 (1%)
Existing vehicles of residents	2 (1%)	-	2 (1%)
Rural communities (without adequate public transport)	2 (1%)	-	2 (1%)
Gas powered vehicles / LPG	2 (1%)	-	2 (1%)
Small cars / small cars with 2 stroke engine	2 (1%)	-	2 (1%)
Socio economic disadvantaged	2 (1%)	-	2 (1%)
Kit Cars	1 (0%)	1 (1%)	2 (1%)
All vehicles with MOT	1 (0%)	-	1 (0%)
Any vehicle made before Euro emissions legislation	1 (0%)	-	1 (0%)
Personal vehicles of carers (of residents within LEZ)	1 (0%)	-	1 (0%)
Severe weather events	-	-	1 (0%)
Outside broadcast vehicles	1 (0%)	-	1 (0%)
Vehicles registered outside of LEZ	1 (0%)	-	1 (0%)
Steam trains	-	1 (1%)	1 (0%)

Response	Individual	Organisation	Total
All vehicles >15yrs old	1 (0%)	-	1 (0%)
Diplomatic vehicles	1 (0%)	-	1 (0%)
Removal vehicles	-	-	1 (0%)
School buses / transportation	1 (0%)	-	1 (0%)
Historic motorcycles	1 (0%)	-	1 (0%)
Ground maintenance vehicles	-	-	1 (0%)
Businesses within LEZ	-	1 (1%)	1 (0%)
Commercial vehicles (small local business)	-	1 (1%)	1 (0%)
All vehicles meeting Euro 6 standards (on road tested)	-	1 (1%)	1 (0%)
All petrol vehicles	1 (0%)	-	1 (0%)
All vehicles (with paid for permit)	1 (0%)	-	1 (0%)
New technological solutions	1 (0%)	-	1 (0%)
Motor sport vehicles	1 (0%)	-	1 (0%)
Total Number of respondents used for percentage calculation	234 (100%)	71 (100%)	305 (100%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.4.1. Individuals

Table D-8 - Q2b Summary of Themes - Individuals

Theme	Number of respondents who identified theme
No response to question	95 (41%)
No comment/no clear view provided	76 (32%)
Have little impact on overall emissions / low environmental impact	19 (8%)
Cost to upgrade / replace vehicles	11 (5%)
Temporary exemption should be available (i.e. for event)	12 (5%)
Grace period to upgrade fleet / phased approach / exemptions for a short time only	7 (3%)
Reduce congestion	11 (5%)
Economically important / cost to business / job losses / restricts job opportunities	5 (2%)
Specialist vehicles have longer life span than others / specialist vehicles replaced after serviceable lifespan (including those adapted for disabled use)	2 (1%)
Of social importance / important part of cultural heritage	5 (2%)
Public Transport is limited when required	2 (1%)
Emergencies / Exemption available following appeal (for emergencies)	3 (1%)
Subsidies / funding should be available to upgrade	4 (2%)
Affordable	5 (2%)
Difficult to convert/upgrade vehicles/will not be able to meet standards	2 (1%)
Doesn't agree with LEZ	3 (1%)
Concern regarding environmental cost to upgrade vehicles	2 (1%)
Well maintained	1 (0%)
Essential travel for key workers	1 (0%)
Revenue for city	1 (0%)
Total number of respondents used for percentage calculation	234

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.4.2. Organisations

Table D-9 - Q2b Split by Organisation Type – Full Table

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/NGO	Total
No response provided	4 (6%)	8 (11%)	2 (3%)	2 (3%)	3 (4%)	20 (28%)	1 (1%)
No Additional Exemptions	-	5 (7%)	1 (1%)	1 (1%)	8 (11%)	1 (1%)	16 (23%)
Motorcycle / Two wheeled vehicles / Scooters / Mopeds	-	1 (1%)	-	-	-	-	1 (1%)
Residents of LEZ	-	-	-	-	2 (3%)	-	2 (3%)
Classic cars	-	-	1 (1%)	-	-	-	1 (1%)
Breakdown recovery	-	2 (3%)	2 (3%)	-	2 (3%)	-	6 (8%)
Historic vehicle >20yrs old	-	-	2 (3%)	-	1 (1%)	-	3 (4%)
Emergency Vehicles (Charitable/Volunteer Organisations)	-	-	1 (1%)	-	4 (6%)	-	5 (7%)
Community transport (schools, charities, community groups, car clubs)	-	-	1 (1%)	-	2 (3%)	2 (3%)	5 (7%)
Specialised HDV	-	-	-	-	2 (3%)	-	2 (3%)
Utility repair vehicles	-	-	1 (1%)	-	3 (4%)	-	4 (6%)
Public transport / Buses / Diesel Buses	-	1 (1%)	-	1 (1%)	1 (1%)	-	3 (4%)
Construction vehicles / Concrete trucks / Road maintenance	-	1 (1%)	-	1 (1%)	-	-	2 (3%)
Personal vehicles of emergency service workers	-	-	-	-	1 (1%)	-	1 (1%)
Farm vehicles	-	1 (1%)	-	-	-	-	1 (1%)
HDV / Delivery vehicles- with time of day restrictions	-	-	-	-	1 (1%)	-	1 (1%)
Personal vehicles of shift workers	-	-	1 (1%)	-	-	-	1 (1%)
Classic cars - commercial only (i.e. funeral & wedding cars)	-	-	1 (1%)	-	1 (1%)	-	2 (3%)
Black Cabs / Accessible Taxis	-	1 (1%)	-	1 (1%)	-	-	2 (3%)

Response	Academic/ Research	Business/ Industry	Community Group	Professional or Trade body	Public body	Third Sector/NGO	Total
Kit Cars	-	-	1 (1%)	-	-	-	1 (1%)
Steam trains	-	-	-	1 (1%)	-	-	1 (1%)
Ground Maintenance Vehicles	-	1 (1%)	-	-	-	-	1 (1%)
Businesses within LEZ	-	-	-	1 (1%)	-	-	1 (1%)
Commercial Vehicles (Small local business)	-	1 (1%)	-	-	-	-	1 (1%)
All vehicles meeting Euro 6 standards (on road tested)	-	1 (1%)	-	-	-	-	1 (1%)
Total	1 (1%)	19 (27%)	20 (28%)	8 (11%)	30 (42%)	6 (8%)	84 (118%)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

Table D-10 - Q2b Summary of Themes – Organisations

Theme	Number of respondents who identified theme
No response to question	22 (31%)
No comment/no clear view	16 (23%)
Have little impact on overall emissions / low environmental impact	6 (8%)
Cost to upgrade / replace vehicles	13 (18%)
Temporary exemption should be available (i.e. for event)	5 (7%)
Grace period to upgrade fleet / phased approach / exemptions for a short time only	9 (13%)
Reduce congestion	3 (4%)
Economically important / cost to business / job losses / restricts job opportunities	3 (4%)
Specialist vehicles have longer life span than others / specialist vehicles replaced after serviceable lifespan (including those adapted for disabled use)	5 (7%)
Of social importance / important part of cultural heritage	1 (1%)
Public Transport is limited when required	4 (6%)
Emergencies / exemption available following appeal (for emergencies)	3 (4%)
Essential service	6 (8%)
Subsidies / funding should be available to upgrade	1 (1%)
Difficult to convert/upgrade vehicles/will not be able to meet standards	2 (3%)
Doesn't agree with LEZ	1 (1%)
Lease Agreements	1 (1%)
Road safety issues / vehicle recovery delays	1 (1%)
No local exemptions / All exemptions should be national	1 (1%)
Total number of respondents used for percentage calculation	71

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.5. Q3a Do you agree with the proposed base level and subsequent tiers of penalty charges for each vehicle type as outlined in Table 5? Please explain your answer.

D.5.1. Individuals

Table D-11 - Q3a Summary of Themes - Individuals

Theme	Yes	No	Not Answered	Total*
Charge increases too steeply	-	4 (3%)	-	4 (2%)
Charge too high for HGV and PSV	-	2 (2%)	-	2 (1%)
Charge too low for HGV, PSV and LGV	-	3 (2%)	-	3 (1%)
Charge value fair	20 (24%)	4 (3%)	-	24 (10%)
Charge value too high	2 (2%)	38 (29%)	-	40 (17%)
Charge value too low	-	9 (7%)	-	9 (4%)
Consultation too complex	-	9 (7%)	1 (6%)	10 (4%)
Cost of purchasing compliant vehicle too high	1 (1%)	7 (5%)	-	8 (3%)
Do not agree with LEZ	-	17 (13%)	-	17 (7%)
Further tax on motorists	-	15 (11%)	-	15 (6%)
Motorcycles should be exempt or lower charge	1 (1%)	13 (10%)	-	14 (6%)
Potential impacts on city centre business/shops	1 (1%)	8 (6%)	-	9 (4%)
Prefer London congestion charge approach	-	3 (2%)	-	3 (1%)
Proposed system too complex	-	3 (2%)	-	3 (1%)
Reduce first time fine	1 (1%)	3 (2%)	-	4 (2%)
Too much emphasis on charges	1 (1%)	4 (3%)	-	5 (2%)
With clear communication	2 (2%)	3 (2%)	-	5 (2%)
Other comments [^]	9 (11%)	29 (22%)	-	38 (16%)
No comment	49 (59%)	10 (8%)	17 (94%)	76 (32%)
Number of respondents used for percentage calculation	83 (100%)	133 (100%)	18 (100%)	234 (100%)

*Note that some respondents identified more than one theme in their explanation so the total count of themes is more than the 234 individual respondents.

[^]While Other seems to have a high number of responses, these cannot be subdivided as they represent a large number of unique comments (not necessarily tied to the specific question)

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.5.2. Organisations

Table D-12 - Q3a Summary of Themes - Organisations

Theme	Yes	No	Not Answered	Total*
Charge increases too steeply	-	1 (3%)	-	1 (1%)
Charge too high for HGV and PSV	-	10 (34%)	-	10 (14%)
Charge value fair	18 (75%)	6 (21%)	1 (6%)	25 (35%)
Charge value too low	1 (4%)	3 (10%)	-	4 (6%)
Consultation too complex	1 (4%)	2 (7%)	1 (6%)	4 (6%)
Cost of purchasing compliant vehicle too high	-	3 (10%)	-	3 (4%)
Different charging mechanism	-	3 (10%)	1 (6%)	4 (6%)
Motorcycles should be exempt or lower charge	-	2 (7%)	-	2 (3%)
Prefer flat rate	-	4 (14%)	-	4 (6%)
Prefer London congestion charge approach	-	1 (3%)	-	1 (1%)
Proposed system too complex	1 (4%)	3 (10%)	-	4 (6%)
Reduce first time fine	-	2 (7%)	1 (6%)	3 (4%)
With clear communication	1 (4%)	1 (3%)	1 (6%)	3 (4%)
Other comments	6 (25%)	10 (34%)	2 (11%)	18 (25%)
No comment	4 (17%)	1 (3%)	14 (78%)	19 (27%)
Number of respondents used for percentage calculation	24 (100%)	29 (100%)	18 (100%)	71 (100%)

*Note that some respondents identified more than one subject in their explanation of whether they supported the LEZ or not so the total count of themes is more than the 71 organisation respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.6. Q3b Which surcharge ‘curve’ in Figure 1 represents the best approach to designing a surcharge?

D.6.1. Individuals

Table D-13 - Q3b Summary of Themes - Individuals

Theme	Graph 1	Graph 2	Graph 3	Graph 4	Not Answered	Total*
Discourage repeat offenders	19 (22%)	-	9 (39%)	18 (86%)	-	46 (20%)
Fairest option	10 (12%)	3 (7%)	5 (22%)	-	-	18 (8%)
Individuals get chance to respond to first charge	11 (13%)	1 (2%)	1 (4%)	-	-	13 (6%)
Least worst option	7 (8%)	-	-	-	-	7 (3%)
No rule preferred	-	-	-	-	8 (13%)	8 (3%)
Not sure	2 (2%)	-	-	1 (5%)	6 (10%)	9 (4%)
Object to all penalty charges	12 (14%)	-	-	-	9 (15%)	21 (9%)
Prefer flat rate	2 (2%)	-	1 (4%)	-	-	3 (1%)
Simplest rule	-	28 (67%)	-	-	-	28 (12%)
Other comment	8 (9%)	3 (7%)	4 (17%)	6 (29%)	-	21 (9%)
No comment	20 (23%)	10 (24%)	5 (22%)	1 (5%)	39 (63%)	75 (32%)
Total number of respondents used for percentage calculation	86 (100%)	42 (100%)	23 (100%)	21 (100%)	62 (100%)	234 (100%)

*Note that some respondents identified more than one theme in their explanation of whether they supported the LEZ or not so the total count of themes is more than the 234 individual respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.6.2. Organisations

Table D-14 - Q3b Summary of Themes - Organisations

Theme	Graph 1	Graph 2	Graph 3	Graph 4	Not Answered	Grand Total
Discourage repeat offenders	2 (18%)	1 (4%)	4 (67%)	2 (67%)	-	9 (13%)
Fairest option	1 (9%)	4 (17%)	1 (17%)	-	-	6 (8%)
Individuals get chance to respond to first charge	1 (9%)	-	-	-	-	1 (1%)
Least worst option	1 (9%)	-	-	-	-	1 (1%)
No rule preferred	1 (9%)	-	-	-	-	1 (1%)
Not sure	1 (9%)	-	-	-	4 (14%)	5 (7%)
Object to all penalty charges	-	1 (4%)	-	-	1 (4%)	2 (3%)
Prefer different for private and commercial	1 (9%)	2 (9%)	-	-	1 (4%)	4 (6%)
Prefer flat rate	1 (9%)	1 (4%)	-	-	-	2 (3%)
Simplest rule	-	18 (78%)	-	-	-	18 (25%)
Other comments	2 (18%)	7 (30%)	1 (17%)	3 (100%)	2 (7%)	15 (21%)
No comment	2 (18%)	-	1 (17%)	-	21 (75%)	24 (34%)
Number of respondents used for percentage calculation	11 (100%)	23 (100%)	6 (100%)	3 (100%)	28 (100%)	71 (100%)

*Note that some respondents identified more than one theme in their explanation of whether they supported the LEZ or not so the total count of themes is more than the 71 organisation respondents.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.7. Q3c How should the surcharge approach be applied in order to discourage non-compliant vehicles from driving within a LEZ?

D.7.1. Individuals

Table D-15 - Q3c Summary of Themes - Individuals

Theme	Count of Respondents*
As per Table 4 of consultation document	9 (4%)
Clear communication	3 (1%)
Clear signage and alternative routes	6 (3%)
Concern for socio-economically disadvantaged and disabled	3 (1%)
Do not agree with charges	6 (3%)
Do not agree with LEZ	19 (8%)
First few offences - warning letter	17 (7%)
Focus on Heavy Goods and Public Service Vehicles	1 (0%)
Gradually apply charges	8 (3%)
Incentives rather than penalties	2 (1%)
Not sure	14 (6%)
Number plate recognition	16 (7%)
Prefer different charge scheme (e.g. Dartford/London)	6 (3%)
Prefer flat rate	2 (1%)
Provide adequate secure parking close to centres for pedestrian access	1 (0%)
Provide genuine alternatives to car travel	3 (1%)
Requires consultation	2 (1%)
Strictly enforced	12 (5%)
Tiered penalties	8 (3%)
Use points on licence, driving bans or seize vehicle for non-compliance	6 (3%)
Other comments	43 (18%)
No comment	84 (36%)

*Note that some respondents identified more than one theme in their explanation of whether they supported the LEZ or not so the total number of themes is more than the 234 individual respondents.

Percentages in the table are expressed as the number of respondents identifying a theme and are based on a total of 234 responses.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.

D.7.2. Organisations

Table D-16 - Q3c Summary of Themes - Organisations

Theme	Count of Respondents*
As per Table 4 of consultation document	11 (15%)
Clear communication	1 (1%)
Concern for socio-economically disadvantaged and disabled	3 (4%)
Do not agree with charges	1 (1%)
First few offences - warning letter	5 (7%)
Nationally consistent	4 (6%)
Not sure	1 (1%)
Number plate recognition	3 (4%)
Prefer different charge scheme (e.g. Dartford/London)	4 (6%)
Prefer flat rate	2 (3%)
Provide genuine alternatives to car travel	1 (1%)
Requires consultation	1 (1%)
Strictly enforced	2 (3%)
Tiered penalties	9 (13%)
Other comments	13 (18%)
No comment	26 (37%)

*Note that some respondents identified more than one theme in their explanation of whether they supported the LEZ or not so the total number of themes is more than the 71 organisation respondents.

Percentages in the table are expressed as the number of respondents identifying a theme and are based on a total of 71 responses.

Percentages have been rounded to whole numbers, so in some cases the sum of percentages as presented in the tables will not add to 100%.

Themes in bold have been identified as key themes in the main report text.