



Glasgow City Council

**Environment, Sustainability and Carbon Reduction
City Policy Committee**

**Report by George Gillespie, Executive Director of
Neighbourhoods, Regeneration and Sustainability**

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Item 3

23rd November 2021

**LOW EMISSION ZONE (LEZ)
PUBLIC CONSULTATION AND PUBLISHING OF FINALISED SCHEME
DESIGN**

Purpose of Report:

To report on the findings of the statutory LEZ public consultation and to seek approval to formally publish the LEZ scheme design.

Recommendations:

It is recommended that Committee notes the contents of this report, including;

- 1) The progress being made in establishing phase 2 of the Glasgow Low Emission Zone;
- 2) The results of the statutory consultation on the LEZ preferred scheme design, based on the independent report findings and the actions arising;
- 3) The evidence reports relating to the development of the LEZ and the predicted air quality benefit;
- 4) The content of the finalised LEZ scheme design;
- 5) The intention to formally publish the finalised LEZ scheme design and report on feedback / objections; and,
- 6) The timeline for further progress leading to the introduction of phase 2 of the LEZ in May 2022.

Ward No(s):

Citywide: ✓

Local member(s) advised: Yes No ✓

consulted: Yes No ✓

1. Background on Glasgow's Low Emission Zone

- 1.1 At its meeting on [28th September 2017](#), the City Administration Committee (CAC) agreed to a set of proposals for introducing the Low Emission Zone (LEZ) and identified key elements of Glasgow's journey towards this goal. Since that date, the Environment, Sustainability, Carbon Reduction and City Policy Committee has considered updates on the progress of the LEZ on [20th March 2018](#) and [11th June 2019](#) which detailed the introduction of phase 1 of the LEZ and progress in the development of phase 2.
- 1.2 A further LEZ update was considered on [6th October 2020](#) noting the revised timescale for introduction of phase 2 due to the impacts of the pandemic on the legislative timescale. The meeting of [8th June 2021](#) considered the detail of the preferred scheme design and sought approval to take this design to statutory public consultation.
- 1.3 The LEZ is an intervention directed at protecting and improving public health. This is in a context where the harmful effects of poor air quality have become a significant global concern, particularly for urban policy. It is also part of a broader approach to enhancing the amenity and attractiveness of the city centre through cleaner air.
- 1.4 The LEZ is intended to accelerate the pace of improvement in Glasgow's air quality and, in particular, to ensure that air quality levels in the city centre cease to breach EU limits and Scottish objectives for nitrogen dioxide (NO₂).
- 1.5 The principal cause of emissions and resulting air pollution in the city is road traffic, and detailed analysis of air pollution in the city centre has been undertaken to determine source apportionment. This analysis identified that, on the streets with the highest level of pollution, buses (60-75%) and other diesel engine vehicles are the main source of pollution. The initial proposal for Glasgow's LEZ was therefore to improve emissions from the bus fleet, with other vehicle types being included in the LEZ in phase 2.
- 1.6 Phase 2 of the LEZ is dependent on the LEZ legislation contained within the Transport (Scotland) Act which received Royal Assent on 15th November 2019. Part 2 of the Act conferred new powers on local authorities in relation to the creation, and civil enforcement, of LEZs. The Act allows Scottish Ministers to set out much of the necessary substantive and procedural detail of the regime by way of Regulations which came into force on 31st May 2021.

2. LEZ Phase 2 Scheme Design and Public Consultation

- 2.1 The initial public consultation on LEZ scheme options was conducted between 17th February and 29th March 2020, the results of which were reported to Committee on 6th October 2020. Comment was invited on specific issues including; proposed boundary options, emission standards, vehicle types, grace periods and any unintended consequences.

- 2.2 The feedback from this initial consultation directly influenced the details of the preferred LEZ scheme design (“the scheme”), particularly in relation to the LEZ boundary and grace periods.
- 2.3 The preferred LEZ scheme design was subject to statutory public consultation between 24th June 2021 and 2nd September 2021. The consultation invited comment on all aspects of the scheme, including those elements which are mandatory under the Transport (Scotland) Act 2019. The preferred scheme design included the following detail;
- i. A statement setting out the reasons why the proposed LEZ scheme should be made.
 - ii. A copy of the map, and list of roads which the proposed scheme covers.
 - iii. The date which the proposed scheme comes into effect.
 - iv. The types of vehicles the proposed scheme applies to (the ‘scope’ of the LEZ).
 - v. The objectives of the proposed scheme, with a particular emphasis on the objectives which meet the mandatory objectives outlined in Section 14(4) of the Act.
 - vi. The grace periods for residents, non-residents, and different types of vehicles.
 - vii. The circumstances in which the local authority must, may or must not grant or renew a time limited exemption.
 - viii. The operating hours of the LEZ.
- 2.4 Full details of the preferred scheme design which went to public consultation can be found [here](#).
- 2.5 All evidence reports produced in the development of the scheme were published as part of the consultation background information. This includes;
- [Glasgow Air Quality Evidence Report](#) – Initial report on the LEZ proposals by SEPA
 - [Glasgow’s LEZ – prepared by SEPA](#) – an interim report on phase 1 of the LEZ and lockdown
 - [Glasgow LEZ Emissions Report](#) – final report from SEPA detailing the emissions reductions throughout the LEZ
 - [Glasgow City Centre LEZ Testing](#) – Transport modelling report on the LEZ boundary options by SYSTRA
 - [LEZ Post Covid Uncertainty Summary Note](#) – Note on post covid uncertainty prepared by Jacobs / SYSTRA for Transport Scotland
 - [Glasgow City Centre Testing Covid Measures](#) – Report on LEZ transport modelling including preferred boundary options and uncertainty prepared by SYSTRA
 - [Glasgow LEZ IIA Final Report](#) – Integrated Impact Assessment of the preferred LEZ scheme prepared by Jacobs

- 2.6 In addition to a summary of the scheme, a “Q&A” section was prepared to provide more detail to frequently asked questions. Each questionnaire section was also preceded by a summary of the relevant information for further background information.
- 2.7 It is worthy of note that at the time of consultation, the final SEPA report detailing predicted NO₂ concentrations was not available due to an unforeseeable cyber-attack. This report has subsequently been published and is available [here](#).
- 2.8 This consultation invited comment from a range of statutory and non-statutory consultees, including the general public and city centre users. Statutory consultees, as set out in the Low Emission Zones (Scotland) Regulations 2021, and draft LEZ Guidance, include:
- i. The Scottish Environment Protection Agency;
 - ii. Scottish Natural Heritage;
 - iii. Historic Environment Scotland;
 - iv. such persons as the authority considers represent the interests of—
 - the road haulage industry,
 - the bus and coach industry,
 - the taxi and private hire car industry
 - local businesses, and drivers, likely to be affected by the proposal,
 - such other persons as the authority considers appropriate
 - Local authorities neighbouring the authority that is delivering the scheme
 - Regional Transport Partnerships
 - NHS (including Health Boards)
- 2.9 The consultation was heavily promoted through both direct and indirect methods. All statutory consultees were directly contacted and invited to comment, as were around 400 representatives of stakeholder organisations such as industry, charities, trade organisations, community councils and community organisations. This also included others who had previously communicated with Glasgow City Council regarding LEZ engagement.
- 2.10 Given the special circumstances which are proposed in terms of residents, all residential addresses within and adjacent to the LEZ were written to, informing them of the scheme and inviting comments. This was sent to ~9000 individual addresses.
- 2.11 The consultation was also promoted through various media releases, radio advertising and social media posts, including promoted posts to widen the reach. Neighbouring Local Authorities promoted these posts through their own social media to extend the messaging into the main commuter areas around Glasgow.

3. Consultation Respondents

- 3.1 There were 4,742 responses to the consultation survey; of which 1,801 entries were filtered out as only partially completed and not fully submitted. This therefore left 2,941 valid responses, all of which are included in the analysis.
- 3.2 Several written responses were also submitted, mainly from statutory consultees, larger organisations, interest groups, charities and other neighbouring local authorities.
- 3.3 Respondents represented a breadth of stakeholders, summarized below:
- i. **Type of respondent:** the vast majority (97%) of respondents replied to the survey as individuals rather than on behalf of an organisation.
 - ii. **Area of residence:** there was a good spread of respondents in terms of where they lived, from 11% living around but not within the City of Glasgow area, to 23% living in the City of Glasgow in areas not within or adjacent to the proposed LEZ. Two in five (21%) lived close to the proposed LEZ and 12% lived within or immediately adjacent to it.
 - iii. **Gender:** the sample was skewed towards males, with over half of respondents (54%) male and one third (33%) female. The remainder of respondents did not wish to provide their gender or did not answer this question.
 - iv. **Age:** Over one quarter (28%) of respondents were in the 16-34 age group. Nearly a further quarter (23%) were aged 35-44, and one in five (20%) were aged 45-54. Respondents aged 16-34 were most likely to be city centre residents (37%) or live and work in the city centre (54%).
 - v. **Ethnicity:** Most respondents were white (84%), in particular white Scottish (63%). Three per cent identified as BAME (either Asian, Black or Chinese) and a further 3% identified as mixed or other.
 - vi. **Disability:** One in ten (11%) reported having a disability, evenly split between mobility-related (5%) and other (6%) disabilities.
- 3.4 Most respondents either worked in the city centre (40%) or visited (40%). Over one in ten (14%) were residents, with 4% both living and working in the city centre. Most respondents were frequent visitors to the city centre, with 76% visiting at least once a week. Two fifths were very frequent visitors, visiting at least 5 days a week, while 23% were infrequent visitors, visiting once a month or less often.
- 3.5 Car, train and walking were the most popular forms of transport overall to and within the city centre. Car was the most prevalent form of transport overall; four in five (81%) travelled by car in the city centre, with 11% using their car every day. Nearly two thirds (63%) used the train to access the city centre, whilst around one third of respondents (34%) used a bus or coach. A

number of respondents mentioned active travel options, such as walking (58%) and cycling (24%). Almost half (48%) travelled by taxi, although this tended to be infrequently. Very few respondents drove an LGV, HGV, used a motorbike/moped or wheeled at all.

4 Consultation responses

4.1 The consultation was structured in such a way as to invite comment on the main constituent elements of the scheme; both those defined nationally by the Transport (Scotland) Act 2019 and the subsequent Regulations, and those proposed specifically for the Glasgow LEZ.

4.2 The full, independent, consultants report on the consultation findings is available [here](#).

4.3 The main findings for each of these elements are summarised below and more detail provided in Appendix 1:

- i. **Views of LEZs in principle:** Overall, views were evenly split on support for LEZs in principle, but with more in favour than opposed (48% vs. 41%). Support and opposition both tended towards similarly strong positions, with 29% strongly supportive and 27% strongly opposed. One in ten (10%) were neutral. Overall support and opposition was broadly similar across age groups.
- ii. **Views on proposed LEZ boundary:** Views on the boundary were split. Over one quarter (28%) agreed with the boundary as depicted on the map, while one in five (21%) said the area covered by the LEZ was too large, and one in ten (11%) said it was too small. Around one third (34%) overall said they do not support a LEZ in Glasgow at all.
- iii. **Views on emission standards:** Significantly more disagreed than agreed with the emission standards overall (49% disagree vs. 37% agree). Strength of disagreement was considerable with 30% strongly disagreeing compared with one in five (19%) selecting 'disagree'. Only 16% agreed strongly, about half as many as strongly disagreed. Over one in ten (14%) were neutral.
- iv. **Views on exemptions:** As with other aspects of the LEZ, views tended to be evenly split in terms of agreement and disagreement. Business owners were especially sceptical, although the small base size for business owners should be borne in mind.
- v. **Views on grace periods:** Overall, more respondents disagreed than agreed with the proposals (45% vs. 38%). Strength of disagreement was again especially marked (29% strongly disagree vs. 16% disagree) and agreement much milder (13% strongly agree vs. 26% agree), meaning respondents were more than twice as likely to strongly disagree than strongly agree. Sixteen per cent were neutral. Business owners were especially strongly opposed (68% disagreed, 38% strongly). City centre

residents tended to be more positive towards the proposed grace periods than those working in the city centre (43% vs. 36% agree). Visitors were similarly well disposed compared to city centre workers (41% agree).

- vi. **Views on penalty charges:** Respondents tended to be strongly opposed to the proposed penalty charges. They were almost twice as likely to disagree with them than agree (57% vs. 31%) and nearly three times as likely to strongly disagree than disagree (42% vs. 15%). As with exemptions and grace periods, business owners and 'other' users were less likely than overall to agree (21% and 22% respectively vs. 31% overall). Those who work in the city centre (61%) were more likely than those living and working in the city centre (49%) and visitors (53%) to disagree.
- vii. **Overall views on Glasgow's LEZ proposals:** Towards the end of the survey, having been shown information about the different aspects of the LEZ, respondents were asked about their overall support or opposition for the proposal. Half (51%) opposed Glasgow's LEZ overall, with opposition tending to be strong: 38% strongly opposed, nearly three times as many as opposed (13%). 42% supported Glasgow's LEZ proposals, with 22% strongly supporting. People with disabilities were less likely to support the LEZ overall than those without disabilities (34% vs. 45% support), and more likely to oppose it (57% vs. 48%). This pattern of lower support amongst people with disabilities runs throughout the consultation findings.

5 Consultation Key Themes

- 5.1 Support for the proposed LEZ is mixed and has declined since the initial consultation in 2020. Many of the comments revealed that respondents have a more onerous perception of the impacts than is expected given the detail of the scheme. Careful consideration of how to ensure that public perception matches the actual predicted impacts is a key priority. Further communication outlining the funding assistance available for those who are impacted is also key to addressing feedback.
- 5.2 Consultation revealed several key themes:
 - i. **Disagreement with some proposals.** Views on the proposals were mixed, with more tending to disagree than agree with the proposals. Penalty charges in particular elicited some strong disagreement.
 - ii. **The potential impact of the LEZ proposals on people.** This was reiterated in open-ended responses throughout the survey, with the impact on people on low incomes of particular concern. There were also worries about the impact on people who travel into the city centre to work, most of whom reported using their car at least once a week to travel to or within the city centre.

- iii. **Opposition from city workers and business owners.** This tended to be strongest amongst those who work in the centre and amongst business owners. It should be noted however that the subsample of business owners was small, with only 34 respondents, so findings should be treated with caution.
- iv. **Concerns for persons with disabilities.** Those with disabilities tended to be more concerned than those without, possibly reflecting some unease around how the LEZ might disproportionately impact them. This could be to do with issues regarding infrastructure, especially ensuring adequate public transport, which emerged as a general concern in the consultation. It may also be that people with disabilities are more likely to be reliant on their vehicles, so anything that may make that more difficult is likely to cause unease.
- v. **Large numbers of respondents supported the scheme.** It may be that targeting the concerns of particular groups such as city centre workers (who tend to use the city centre most frequently and use their cars to access it), people on low incomes and those with disabilities with more information and reassurance could help with the smooth implementation of the LEZ.

6. Consultation Actions

- 6.1 It is considered that continued communication and engagement with stakeholders and the general public will be key to addressing many of the themes and concerns raised by respondents.
- 6.2 Actions to be taken based on the specific consultation themes include:
 - i. More respondents were in favour of an LEZ in principle than opposed it, however compared with the 2020 consultation, support for LEZs in general and Glasgow's LEZ has declined. This is likely due to the continuing impacts of COVID-19 (mainly financial) which has disproportionately affected some groups more than others. A greater focus is required on publicising the health, local amenity and environmental benefits of Glasgow's LEZ to attempt to overcome this negativity. Continued impetus on highlighting Scottish Government funding availability will also be important, with communications targeted to affected groups where possible.
 - ii. The LEZ boundary proposals should be largely unchanged. However, feedback over specific junctions and signage will be used to help inform any minor revisions necessary. Any major changes, in response to requests to retain access to peripheral car parks, would involve leaving areas with significant air quality problems outwith the LEZ. This would significantly undermine the aims of the LEZ to achieve compliance with the air quality objectives.

- iii. Emission standards are set in legislation and apply to all Scottish LEZs. These are the scientifically required standards that will allow the aims of the LEZ to be achieved. The emission standards are not an arbitrary decision but are in fact based on sound science. Around 10% of the fleet is predicted to be non-compliant when the LEZ enforcement begins, yet improving emissions from these vehicles will reduce traffic based oxides of nitrogen emissions by more than 50%. This prediction is based on overall traffic composition projections from the Systra transport modelling report, derived from Scottish national fleet composition figures. During the two rounds of traffic data gathering undertaken to inform the models, it was found that there was good agreement between the observed fleet in Glasgow and the national figures, with the exception of buses which were found to be generally older in Glasgow at the time of both counts. Communicating that the LEZ will directly affect a relatively small number of drivers, yet have a large positive effect on emissions is vital to LEZ support. Overcoming the incorrect perception that compliance with LEZ emission standards requires the purchase of a new or electric car will be a key priority focus of future communications campaigns.
- iv. Exemptions are also set in legislation and apply to all Scottish LEZs. Greater communication of these exemptions, particularly in relation to disabled vehicles and blue badge holders is essential. This is especially important given the higher levels of opposition from those who identified as disabled in the consultation. The proposal; not to grant any general local time limited exemptions is based on maintaining the efficiency of the LEZ and achieving its stated aims. This still retains the possibility of granting exemptions in exceptional circumstances for specific, defined purposes.
- v. Grace periods have been determined based on the need to provide improved air quality within the earliest timeframes; whilst also cognisant of the fact that Covid-19 has had an adverse impact on the economy. The revised timescale has already pushed implementation of the LEZ back by five months from the original proposal and the provision of an extra year grace period for residents of the zone reflects their reduced choices as to entry.
- vi. Penalty charges in particular elicited strong disagreement. These are set in legislation and apply to all Scottish LEZs. The increasing level of penalty for subsequent entries to an LEZ leads to a potentially high maximum penalty charge. This is designed to act as a disincentive to entry. The perception of the LEZ as a money making scheme is far from accurate and the LEZ is expected to operate at a cost not recovered through penalties. Greater communication of this fact and the aim of the LEZ; which is to completely exclude those most polluting vehicles will be key priorities for the communication strategy going forward.

6.3 A small percentage of businesses engaged with the consultation despite wide publicity. This could be due to existing awareness as there has been extensive

previous engagement with businesses to date. This however cannot be counted upon. As the LEZ development continues, a greater focus on the methods, platforms and engagement strategies used to capture the attention of businesses, particularly SMEs, will be taken forward.

- 6.4 Communications targeting drivers (radio ads, fuel pump ads, etc) remains a key consideration. Whilst some aspects of the communication strategy will focus on modal shift encouragement, there has to be an acknowledgement that some people will still need to drive into the LEZ zone and therefore we have a continued duty to warn and inform.

7. Consultation Conclusions

- 7.1 It should be noted that this was a consultation, not a representative survey. Therefore the findings reflect the views of respondents, but cannot be extrapolated to those of any particular group e.g. city centre residents, Glasgow residents, people who work in the city centre or business owners.
- 7.2 The consultation revealed generally negative opinions from respondents regarding the LEZ and its component parts. It is important that these are addressed and explained through increased communications and actions as detailed in Section 6 of this report.
- 7.3 Many of the comments focused on perceived financial impacts arising from the introduction of the LEZ. It is important that the various forms of financial assistance available continue to be publicised appropriately to encourage take up by eligible groups.
- 7.4 Some of the comments revealed that information regarding the scope of the LEZ (the proportion of vehicles affected) and the measures required to comply with the LEZ conditions had not been conveyed appropriately. Many respondents were under the impression that either an electric or brand new vehicle would be required to continue to enter the zone. It is therefore likely that a substantial number of respondents are worrying about compliance unnecessarily. Focused communications will be required to ensure that the requirements of the LEZ are accurately understood and prevent people from potentially incurring unnecessary concern or expense.
- 7.5 While many component parts of the LEZ are determined at a national level, concerns expressed by respondents to these elements are legitimate and must be addressed. This is particularly important with regard to the responses from people identifying as disabled. Publicity and communications emphasizing that “blue badge” holders will be exempt from the LEZ, whether in their own, or travelling in another’s vehicle will be an essential element in allaying these concerns. Vehicles registered with a “disabled” or “disabled passengers vehicle” tax class will be also be exempt as will vehicles with a reduced tax class because the vehicle is being used by a person in receipt of personal independence payments. Vehicles used by organisations and subject to an organizational blue badge will also be exempt.

- 7.6 Other nationally determined elements of the LEZ also elicited negative comments, particularly around the penalty charges that will apply for non-compliant entry. The Scottish approach to LEZs, that they are designed to completely exclude the most polluting vehicles to maximise the air quality benefits rather than charge for entry, must be emphasized.
- 7.7 Consideration will be given to those aspects of the boundary which elicited comment to ensure an efficient and practical operation of the LEZ boundary. While some major changes to the boundary were requested in comments, these would cause both practical problems to deliver and result in areas of the city centre continuing to exceed the air quality objectives for an unacceptably longer period of time.
- 7.8 On consideration of the consultation feedback, no changes are proposed to those other elements of the scheme which are at the discretion of the Council i.e. local exemptions and grace periods. While some comments requested exemptions for particular groups, these would reduce the effectiveness of the LEZ in achieving the health based air quality objectives. The introduction of the LEZ has already been postponed by five months and an extra year grace period for compliance granted to residents of the zone. Any further delay will extend the period of time where residents and users of the city centre are exposed to harmful levels of air pollution.
- 7.9 Overall, the impacts from the scheme are considered to be reasonable and proportionate having regard to the overall benefits. Effective mitigation, in the form of financial assistance and lead in time before LEZ enforcement, has already been put in place and will be publicised further. The action to reduce emissions from a relatively small proportion of the vehicle fleet (~10% by introduction date), will have a significant impact by reducing NOx emissions by over 50% in the city centre and contributing towards a healthier environment for all by helping achieve compliance with the air quality objectives.

8. Next Steps

- 8.1 The considerable numbers of people who responded to the consultation should be thanked for taking the time to engage with a subject with complex elements. Whilst the consultation stage of the scheme has formally closed, all identifiable respondents will be informed of the publishing of the final scheme design and engagement will continue with key stakeholders throughout the design and delivery phases. Communications will continue to address key themes identified during the consultation and noted above.
- 8.2 Adaptations to the LEZ boundary, in response to consultation comments, will be made and incorporated into the LEZ "Final Scheme". This scheme will be formally published, as required by Regulations for a statutory period of at least 28 days during which formal objections can be registered.
- 8.3 A report on any formal objections will be prepared and the scheme adjusted if necessary. This will be detailed in a report to Committee early in 2022 where permission will be sought to refer the final scheme to the City Administration

Committee for formal approval. At this stage the City Administration Committee will be required to consider whether a formal examination, as detailed in Regulations, is required.

- 8.4 After consideration by the City Administration Committee, the final scheme will be submitted to Scottish Ministers for approval. Scottish Ministers will be required to consider whether the scheme is approved, modified, or if a formal examination is required.
- 8.5 An examination of any aspect of the final scheme would result in a delay to the adoption of the LEZ, such that enforcement would not be possible on the proposed date of 1st June 2023.

9. Policy and Resource Implications

Resource Implications:

Financial: Grant funding for the LEZ and associated projects is provided by the Scottish Government and administered by Transport Scotland.

Legal: Progress on the LEZ is dependent on the Transport (Scotland) Act 2019 and the associated Regulations which came into force on 31st May 2021.

Personnel: LEZ actions will be undertaken using existing staff resources, partner organisations and consultant support.

Procurement : Procurement has been undertaken in respect of LEZ projects such as communications and engagement, consultant support and consultation activities. Procurement of capital purchase for enforcement equipment, infrastructure and back office is underway.

Council Strategic Plan:

The recommendations of this report support the following Strategic Plan themes:

- A Vibrant City
- A Healthier City
- A Sustainable and Low Carbon City

The following Strategic Plan actions are supported:

- Glaswegians are active and healthier
- Glasgow is healthier
- The city is clean and public spaces are well maintained

The following Strategic Plan Priority is supported:

61. Develop options for the city to introduce Scotland's first low emission zone and work with partners on a cleaner fleet of buses and cars – including electric.

Equality and Socio-Economic Impacts:

Does the proposal support the Council's Equality Outcomes 2021-25? Please specify. Generally supportive of the stated outcomes.

What are the potential equality impacts as a result of this report? The LEZ is aimed at protecting the health of some of Glasgow's most vulnerable residents. An EQIA screening of the first phase of the LEZ has been undertaken - <https://www.glasgow.gov.uk/CHttpHandler.ashx?id=45428&p=0>

A further EQIA for phase 2 of the LEZ has been undertaken as part of the [Integrated Impact Assessment](#).

Poor air quality differentially impacts on residents with prior health conditions and improvements in air quality should therefore provide benefits.

Please highlight if the policy/proposal will help address socio-economic disadvantage. Socio-economic impacts have been considered as part of the Integrated Impact Assessment of phase 2 of the LEZ.

Climate Impacts:

Does the proposal support any Development of the LEZ directly addresses actions 22 and 53 of the Climate Plan. It also contributes towards actions 26,33,54,55 and 56.

*Climate Plan actions?
Please specify:*

What are the potential climate impacts as a result of this proposal? One of the statutory objectives of any Scottish LEZ is to contribute to climate change targets. This is expected to provide a slight beneficial impact based on preferential entry conditions being applied to low and zero emissions vehicles. Impacts will be further quantified through modelling conducted by SEPA.

Will the proposal contribute to Glasgow's net zero carbon target? The LEZ will contribute to the reduction of carbon emissions within the city centre and beyond through the promotion of low and zero emission vehicles. Impacts will be further quantified through modelling conducted by SEPA.

Privacy and Data Protection Impacts: This report has no immediate impacts upon privacy or data protection. However, data collection as part of any enforcement of the LEZ will be fully considered for compliance with relevant legislation and procedures.

10. Recommendations

It is recommended that Committee notes the contents of this report, including;

- 1) The progress being made in establishing phase 2 of the Glasgow Low Emission Zone;
- 2) The results of the statutory consultation on the LEZ preferred scheme design, based on the independent report findings and the actions arising;
- 3) The evidence reports relating to the development of the LEZ and the predicted air quality benefit;
- 4) The content of the finalised LEZ scheme design;
- 5) The intention to formally publish the finalised LEZ scheme design and report on feedback / objections; and,
- 6) The timeline for further progress leading to the introduction of phase 2 of the LEZ in May 2022.

Appendix 1 – Detailed findings of the consultation responses

- 1. Views of LEZs in principle:** Overall, views were evenly split on support for LEZs in principle, but with more in favour than opposed (48% vs. 41%). Support and opposition both tended towards similarly strong positions, with 29% strongly supportive and 27% strongly opposed. One in ten (10%) were neutral. Overall support and opposition was broadly similar across age groups.
- 2. Views on proposed LEZ boundary:** Views on the boundary were split. Over one quarter (28%) agreed with the boundary as depicted on the map, while one in five (21%) said the area covered by the LEZ was too large, and one in ten (11%) said it was too small. Around one third (34%) overall said they do not support a LEZ in Glasgow at all.
 - i. Respondents were asked to give reasons for their response. Overall, 18% of comments were generally supportive, with 12% saying the proposed LEZ should be bigger. Negative impacts on people and on business and the economy were mentioned by over a third each (36% and 34% respectively). Tying in with generally lower levels of agreement throughout the survey amongst those who work in the city centre, the most commonly mentioned negative impact on people was on those who work in the LEZ area (12%). Public transport issues were also mentioned by over one quarter (28%), with one in five (19%) citing inadequate public transport.
 - ii. Many written comments regarding the boundary focused on other elements of the LEZ, however some of the written responses highlighted particular concerns around some of the boundary junctions or regarding car park access near the boundary. Some concern was expressed regarding potential displacement of the most polluting vehicles into LEZ adjacent areas.
- 3. Views on emission standards -** Significantly more disagreed than agreed with the emission standards overall (49% disagree vs. 37% agree). Strength of disagreement was considerable with 30% strongly disagreeing compared with one in five (19%) selecting 'disagree'. Only 16% agreed strongly, about half as many as strongly disagreed. Over one in ten (14%) were neutral.
 - i. The largest proportion of comments about emissions standards expressed a negative view. Two in five (41%) voiced their opposition for a variety of reasons, with the single largest proportion (12%) mentioning the cost of upgrading or buying a new vehicle. One in five (21%) responses were from those who disagreed with the standards, but made suggestions on how they could be changed, in particular allowing older vehicles (9%) into the LEZ. Just over a third (35%) of comments were supportive and felt the standards could go further, with 16% saying the emissions standards were not strict enough and one in ten (9%) wanting action on pollution from buses as well.

4. Views on exemptions - As with other aspects of the LEZ, views tended to be evenly split in terms of agreement and disagreement. Business owners were especially sceptical, although the small base size for business owners should be borne in mind.

- i. Views on national exemptions - Slightly more agreed than disagreed overall with the national exemptions (44% vs. 40%). Visitors were significantly more likely than all other types of user to agree (51%), and business owners less likely than all other user groups to agree (26%). Indeed, one third (32%) of business owners strongly disagreed. Approaching half (45%) of comments were generally opposed to exemptions. The largest proportions wanted parity of exemptions for everyone (same or no exemptions, 12%) or for the public sector (15%). Eight percent generally felt it was unfair/unequal. Over one quarter (27%) suggested that certain types of vehicles should not be exempt, in particular showman's vehicles (14%). One in ten (10%) mentioned impacts on people, such as negative impacts for people living or working in the LEZ.
- ii. Views on localised exemptions - Proportions agreeing and disagreeing were very evenly split (38% and 39%). Over one in five (22%), however, were neutral indicating potential uncertainty or lack of knowledge regarding the exemptions. Once again, disagreement tended to be strong, with one quarter (26%) strongly disagreeing, whilst only 13% strongly agreed. Business owners were especially unlikely to agree, less than any other user type (15% agree vs. 33% to 43% of other users), and more likely to disagree overall (50% vs. 39% overall) and particularly disagree strongly (38% vs. 26% overall).
- iii. Around one quarter (24%) made supportive comments in favour of specific proposed exemptions. Most of those stating opposing sentiments to the exemptions as proposed expressed general opposition to the LEZ rather than to the specific exemptions. One in ten (10%) wanted the same rules for all and/or no exemptions at all, while 18% suggested other types of exemptions that could be applied.

5. Views on grace periods - Overall, more respondents disagreed than agreed with the proposals (45% vs. 38%). Strength of disagreement was again especially marked (29% strongly disagree vs. 16% disagree) and agreement much milder (13% strongly agree vs. 26% agree), meaning respondents were more than twice as likely to strongly disagree than strongly agree. Sixteen per cent were neutral. Business owners were especially strongly opposed (68% disagreed, 38% strongly). City centre residents tended to be more positive towards the proposed grace periods than those working in the city centre (43% vs. 36% agree). Visitors were similarly well disposed compared to city centre workers (41% agree).

- i. Around one quarter (24%) supported the grace periods but would want them to be shorter or to have none, while 18% expressed more general support. Again, however, comments were predominantly opposed. Over one third (36%) wanted longer grace periods and/or opposed the LEZ

altogether, and again a large minority (24%) took the opportunity to emphasise again the potential negative impacts on people, in particular those on low incomes (12%) and those who live in the LEZ (10%).

6. Views on penalty charges - Respondents tended to be strongly opposed to the proposed penalty charges. They were almost twice more likely to disagree with them than agree (57% vs. 31%) and nearly three times as likely to strongly disagree than disagree (42% vs. 15%). As with exemptions and grace periods, business owners and 'other' users were less likely than overall to agree (21% and 22% respectively vs. 31% overall). Those who work in the city centre (61%) were more likely than those living and working in the city centre (49%) and visitors (53%) to disagree

- i. Most comments (58%) expressed opposition to penalty charges, with the largest single concern expressed (22%) being the belief it was a 'money-making scheme'. Concern was expressed again regarding the impact on low-income people (15%).

7. Overall views on Glasgow's LEZ proposals - Towards the end of the survey, having been shown information about the different aspects of the LEZ, respondents were asked about their overall support or opposition for the proposal. Half (51%) opposed Glasgow's LEZ overall, with opposition tending to be strong: 38% strongly opposed, nearly three times as many as opposed (13%). 42% supported Glasgow's LEZ proposals, with 22% strongly supporting. People with disabilities were less likely to support the LEZ overall than those without disabilities (34% vs. 45% support), and more likely to oppose it (57% vs. 48%). This pattern of lower support amongst people with disabilities runs throughout the consultation findings.

- i. One quarter (25%) of those providing reasons for their reply voiced general support for the LEZ. Most comments (18%) noted general support, with 8% suggesting the LEZ would address pollution and health. There was a wide range of comments voicing opposition and/or concern. Infrastructure was mentioned by one in five (21%), in particular inadequate public transport (17%). There was also concern regarding impacts on people living/working in the LEZ (14%) and those on low incomes (13%). One in five (21%) were concerned about potential negative impacts on business and the economy.