

DUNDEE LOW EMISSION ZONE

OUTCOMES FROM STATUTORY CONSULTATION ON THE PROPOSED LEZ SCHEME FOR DUNDEE

SYSTRA

Dundee City Council
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CHANGING FOR THE FUTURE

SUMMARY TABLE

Client	Dundee City Council
Project	Dundee Low Emission Zone
Title of Document	Outcomes from Statutory Consultation on the proposed LEZ scheme for Dundee
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1. INTRODUCTION

1.1 Statutory Consultation

1.1.1 [Section 11](#) of the Transport (Scotland) Act 2019 states that before a local authority submits its final Low Emission Zone (LEZ) proposals to Scottish Ministers for approval, it must consult with:

- the Scottish Environment Protection Agency,
- NatureScot
- Historic Environment Scotland,
- such persons as the authority considers represent the interests of—
 - i. the road haulage industry,
 - ii. the bus and coach industry,
 - iii. the taxi and private hire car industry,
 - iv. local businesses, and
 - v. drivers, likely to be affected by the proposal,
- such persons as are specified by the Scottish Ministers in regulations
 - i. neighbouring local authorities
 - ii. the Regional Transport Partnership (Tactran)
 - iii. the local Health Board
- such other persons as the authority considers appropriate

1.1.2 In line with The Act 2019, Dundee City Council (DCC) launched an eight-week consultation from 14th June 2021 to 9th August 2021 on its proposed LEZ scheme for the city, as agreed at the [Community Safety and Public Protection Committee](#) on 7th June 2021.

1.1.3 The statutory consultation period consisted of the following elements:

- Letter correspondence to statutory consultees advising of LEZ proposals
- Stakeholder workshops

- Online survey seeking views on the proposed LEZ option
- Information flyer delivered to residents and businesses in proposed LEZ area

1.1.4 This report summarises the outcomes from the eight-week statutory consultation on Dundee City Councils proposals for its LEZ and will form part of the submission of the LEZ Scheme to Scottish Ministers.

1.1.5 Prior to summarising the statutory consultation, the report will review the previous consultation events undertaken in support of the LEZ in Dundee.

2. PREVIOUS CONSULTATION SUPPORTING DUNDEE'S LEZ

2.1 Public and Stakeholder Consultation

2.1.1 Upon completion of the Interim NLEF Stage 2 Assessment Report (*Dundee Low Emission Zone, National Low Emission Framework Interim Stage 2 Report, SYSTRA 2019*) DCC's Community Safety and Public Protection Committee gave approval on 30th September 2019 to undertake a consultation exercise on five possible LEZ Options. The consultation took the form of an online public survey and face to face workshops with key (and statutory) stakeholders. The outcomes from the consultation period were reported to the [Community Safety and Public Protection Committee](#) in February 2020 and summarised here.

2.1.2 The online public survey ran for six weeks from 4th October to 19th November 2019 and was administered by DCC. The survey was viewed 1902 times and was completed a total of 1336 times. Most completions (96%) were by individuals and the greatest number of respondents (42%) live and work in Dundee. The survey included questions seeking to discover respondents' views on LEZs in general and specifically the potential options for Dundee that emerged from the Interim NLEF Stage 2 Report with:

- 65% of respondents supported the general principle of LEZs and
- 60% supported the principle of a LEZ for Dundee
- 64% considered that it should apply to all vehicle types
- 35% (the greatest percentage of respondents) favoured the LEZ option that has now been identified as the preferred LEZ Option for Dundee.

2.1.3 A range of workshops with key stakeholders were held concurrently with the live public survey dates during October and November 2019. Key stakeholders were also invited to submit a formal written response on their views on the LEZ proposals. The stakeholders represented at the workshops were as follows:

- Bus industry representatives:
 - Stagecoach East Scotland, Xplore Dundee, Moffat & Williamson and the Confederation of Passenger Transport (CPT)
- Freight industry representatives:
 - Logistics UK (Freight Transport Association), Road Haulage Association, United Parcel Service (UPS), local freight operators
- The Tayside and Central Regional Transport Partnership (Tactran)
- Business community:
 - DDOne, Federation of Small Businesses (FSB) and Dundee & Angus Chamber of Commerce, local businesses
- Community Councils:
 - Stobswell Forum, City Centre & Harbour, West End

- Environmental/interest groups
 - British Lung Foundation, Friends of the Earth Tayside (FoET), Friends of Riverside Nature Park, Scottish Wildlife Trust and Extension Rebellion, Dundee Civic Trust, Dundee Resource & Re-Use Centre
- Taxi representatives
- Car park operators (no response)

2.1.4 Further analysis of the results can be found in the second [Interim NLEF Stage 2 Report](#). The consultation results show the level of support for the introduction of a LEZ in Dundee and specifically the final proposed LEZ area, including restrictions on all vehicles types as specified in the LEZ Regulations.

2.2 Focused Covid-19 Consultation

2.2.1 In response to the Covid-19 pandemic, the national LEZ Leadership Group announced in May 2020 a temporary pause in plans to implement LEZs across Scotland. Plans were formally resumed in August 2020 and a new indicative timescale for the introduction of LEZs was published, that aims to see their introduction between February and May 2022.

2.2.2 In light of the difficulties faced by many throughout 2020 and 2021, DCC were keen to understand the level of support for the introduction of a LEZ in the city post pandemic and gauge the impact the pandemic may have had on businesses and bus operators in preparing for its introduction.

2.2.3 Major bus and coach operators in the city have been consulted regularly and kept up to date with ongoing proposals for the city's LEZ. Given the importance of bus compliance to the success of any LEZ, the operators were approached in March 2021 and all operators completed a questionnaire on the impact of Covid-19 on investment plans and likely future fleet compliance.

2.2.4 A questionnaire was also circulated to approximately 300 city centre businesses and members of the Dundee LEZ Delivery Group attended the Dundee Business Recovery meeting in February 2021 to present the current LEZ proposals and to seek views from the broad range of city businesses in attendance.

2.2.5 A key outcome from the focused consultation was to inform the length of the grace period. It was recognised that the Covid-19 pandemic has had an unprecedented impact on society, including on the wider environment and the economy. Cognisance of the difficulties faced by many throughout 2020 and 2021, particularly in the context of a Dundee city centre LEZ and its implications for city businesses and bus operators, suggested that a grace period greater than the required minimum was needed and a two year grace period was proposed.

2.3 Key outcomes from previous consultation

2.3.1 The preferred LEZ scheme for Dundee has been shaped by ongoing consultation with key stakeholders and members of the public in Dundee and surrounding area. Key outcomes from the consultation undertaken prior to the Statutory Consultation are:

- A majority of those surveyed in support of a LEZ in Dundee and in support of the final LEZ area proposed
- The grace period is required to be greater than the one year minimum, with a two year grace period proposed.

2.3.2 These findings and the wider appraisal outcomes allow DCC to approach the Statutory Consultation seeking views on the preferred scheme only.

3. SUMMARY OF STATUTORY CONSULTEE RESPONSES

3.1 Introduction

3.1.1 To seek views from the statutory stakeholders, the consultation consisted of the following elements:

- Letter correspondence to statutory consultees advising of LEZ proposals
- Stakeholder workshops on LEZ proposals with question and answer sessions

3.2 Written Submissions from Stakeholders

3.2.1 Table 3.1 lists the stakeholders contacted directly by DCC and shows those that have provided a written submission in response.

Table 3.1 : List of Stakeholder contacted by DCC and record of response

Stakeholder Type	Organisation	Response Received
Bus and coach industry	Moffatt & Williamson	
Bus and coach industry	Stagecoach East Scotland	Yes
Bus and coach industry	Xplore Dundee	Yes
Bus and coach industry	Stagecoach Citylink Coaches	Yes
National Body	Historic Environment Scotland	Yes
National Body	SEPA	
National Body	NatureScot	Yes
Neighbouring Local Authority	Angus Council	
Neighbouring Local Authority	Fife Council	Yes
Neighbouring Local Authority	Perth & Kinross Council	
Local Health Board	NHS Tayside	Yes
Regional Transport Partnership	SESTran	Yes
Regional Transport Partnership	TACTRAN	Yes
Freight Representative	Road Haulage Association	Yes
Freight Representative	Logistics UK	Yes
Local Business	Royal Mail	Yes
Local Business	UPS	Yes
Business Representative	Dundee & Angus Chamber of Commerce	N/A
Business Representative	Eco Stars	N/A
Taxi Operators	DCC Taxi Liaison Group	N/A

3.2.2 Note that Eco Stars, a free national environmental fleet management recognition scheme which operates a local scheme in Dundee, was utilised to send letters to its members from the local business and freight community. Dundee and Angus Chamber of Commerce facilitated a stakeholder workshop (as noted in 3.3 below) and sent correspondence to their members on DCC's behalf. The DCC taxi liaison group sent letters to its members to allow all taxi representatives the opportunity to respond.

3.2.3 In addition to the responses noted above, DCC received written submissions from the following individuals and organisations:

- Asthma UK & British Lung Foundation Scotland
- Dundee and Angus Green Party
- Enterprise Holdings
- Friends of the Earth Tayside
- Maggie Chapman, MSP for Scottish Green Party

- Paths for All
- RAC Motoring
- The National Union of Rail, Maritime and Transport Workers (RMT) Dundee Taxi Branch
- Tayside & Fife Greener Practice
- Unite Union Taxi Branch

3.2.4 Full written submissions are provided in Appendix A for those that consented for their response to be published. Each response was assessed and the key themes and comments collated, as summarised below:

- Bus operators are broadly supportive or in favour of the LEZ, particularly one which restricts all vehicles and does not single out bus services.
- The two year grace period is supported by bus operators, with a view that any grace period less than this would not allow compliance of their fleets. This is caveated with:
 - The full impacts of the Covid-19 pandemic are not fully understood and investment plans may further be affected.
 - The occasional requirement to use non-compliant vehicles and likely fines as a results (e.g. when a bus requires urgent maintenance, replacement vehicles needed to cover breakdowns).
- The two year grace period will allow for a natural replacement of the freight fleet by which time the Euro VI emission standard will become standard for most operators
- All neighbouring authorities and regional transport partners that responded are supportive of the proposed LEZ scheme. Some comments expressed by the stakeholder were:
 - second hand non-compliant vehicles may increase in areas outside the LEZ, impacting on air quality
 - businesses serving Dundee may be adversely affected
 - Park and Ride proposals will complement the LEZ and serve wider communities
 - Dundee bus station is used by operators serving neighbouring authority areas (and beyond) and concerns that its inclusion in the LEZ will have a detrimental impact on service provision to local communities
- Several stakeholders encourage DCC to not implement the LEZ in isolation but alongside measures to promote and increase active travel and a shift to sustainable modes, such as improved cycle and walking infrastructure. While Dundee is relatively well served with electric vehicle infrastructure, this should be further promoted and provisions increased. Park and Ride options should be provided from all areas serving Dundee.
- Green groups and health bodies are generally supportive of the proposed zone that aims to improve air quality and reduce traffic associated emissions, however a number of concerns were expressed.
 - Lochee Road is excluded from the LEZ and therefore the LEZ does not address an area with high levels of air pollution close to the residential population.

- The zone is not large enough and does not cover the majority of state schools and residential areas.
 - Major car parks are excluded and this does not promote the needed shift to sustainable and active travel modes.
 - The two-year grace period is too long and it should be as short as possible. The delay in LEZ implementation should mean a grace period is not required/should be minimal
- NHS Tayside are supportive of the LEZ in Dundee and understand why Lochee Road is not included in the LEZ. They are however concerned for people living in areas of deprivation and the risk in the health inequalities that an LEZ may bring.
 - Wheelchair accessible taxis are predominately diesel cars and with a longer life and costs associated with replacement, users of wheelchair taxis may be unfairly impacted. A longer grace period for taxis would be preferred.
 - Several stakeholders noted they are pleased with levels of engagement to date with many noting previous concerns have been taken into consideration

3.3 Stakeholder Workshops

3.3.1 SYSTRA and DCC organised seven virtual stakeholder workshops held in June, July and August 2021 during DCC's 8-week statutory consultation period on its LEZ proposals. A summary of the workshop groups and number of attendees is provided in Table 3.2.

Table 3.2 : Dundee LEZ Stakeholder Workshops 2021

Workshop Group	Date	Number of Attendees
Neighbouring authorities & regional transport partners	24/06/2021	20
Bus Operators	01/07/2021	6
Freight Operators	06/07/2021	4
Taxi Trade Representatives	07/07/2021	2
Stobswell Forum	08/07/2021	3
City centre & harbour community council	21/07/2021	4
Green Groups Forum	02/08/2021	4
Business Community	05/08/2021	15
Total No. of Stakeholders Consulted:		58

3.3.2 Each workshop was scheduled for 1 hour 30 minutes. At all stakeholder workshops, a presentation on the proposals for the LEZ in Dundee, including details on planned operation and enforcement timeline for its introduction, was given by the Dundee LEZ Delivery Group (LEZDG). This was followed by a question and answer session.

3.3.3 It should be noted that the sessions were held with representatives of each group or community with the reach of each session extending beyond the number of attendees listed in Table 3.2.

3.3.4 The feedback gathered at each session is summarised below. In general, the feedback was considered positive and in support of the LEZ with no stakeholder group expressing objections to the proposals.

Neighbouring Authorities and Regional Transport Partners

3.3.5 A joint session was attended by representatives from Dundee City Council, Perth and Kinross Council, Angus Council, Fife Council, Stirling Council, Tactran and SEStran. After the initial presentation, there were a number of queries and comments, as summarised below.

- The general response from a number of attendees was supportive of the proposals for the LEZ with no objections raised
- Is it likely that bus operators will move their non-compliant vehicles to neighbouring authorities?
- With all four cities having the same standard this could benefit across all of Scotland i.e. if driver changes to be compliant in Dundee, the benefits of this cleaner vehicle will be felt wherever it travels
- Awareness that money is being made available to all local authorities through bus alliance/bus priority/BSIP that will benefit all

Bus Operators

3.3.6 The session was attended by representatives from Xplore Dundee (McGills), Stagecoach East Scotland, Scottish Citylink Coaches and Moffat and Williamson. The invite was extended to the wider coach industry (through CPT) but no other operators attended. The key comments from the session were:

- The exclusion of the three car parks on the periphery does not seem logical and will result in no reduction in car trips to the city.
- All operators expect compliance of fleet by 2024 and welcome two year grace period, though it was noted this will require significant investment and if BEAR Retrofit not successful then compliance forecast may change.
- Concern about the future of LEZs. Will these be replaced by Ultra LEZs or Zero Emission Zones for example, meaning the current investment in diesel Euro VI and retrofit buses will not offer value for money.
- With Lochee Road outside the LEZ, are there plans for improvements to the corridor?
- Bus operators should be included in early in all discussions around any bus priority measures in planned for the city

Freight Operators

3.3.7 The session was attended by two representatives from the Road Haulage Association (RHA) and one from Logistics UK (previously FTA). Both RHA and Logistics UK publicised the session to their members on a weekly basis but no local freight operators accepted the invite to the session. The key comments from the session were:

- Dundee have taken a sensible, pragmatic approach to introducing the LEZ
- Both RHA and Logistics UK voiced their support for the proposal and committed to circulating information to members as required
- The timeline for HGVs is considered fair, and allows for a natural fleet change to Euro VI by 2024, meaning very few non-compliant HGVs will be on the network.
- The retrofit funding for HGVs is not viable and does not work on articulated vehicles

Taxi Representatives

3.3.8 A session for taxi operators and drivers was organised by DCC, through the Taxi Liaison Group. 9 invites were accepted, including from 4 taxi firms, though the meeting was held

with two attendees only, from the Unite Union and the Rail, Maritime and Transport Workers Union.

- 3.3.9 Neither attendee had objections to the scheme and offered to further publicise the proposed LEZ as required. It was noted that there should be clarity around the exemptions for disabled users of taxi services and wheelchair accessible taxis.

Community Councils

- 3.3.10 In line with the stakeholder consultation held in 2019 on the emerging LEZ options, SYSTRA approached the following Community Councils:

- Stobswell Forum
- City Centre and Harbour
- West End
- Colside

- 3.3.11 Briefing sessions were arranged with Stobswell Forum and City Centre and Harbour Community Council and key comments from the community council sessions were:

- Is this unfair on residents of the zone and should the grace period be extended for residents?
- Both community councils expressed desire to help publicise the LEZ, particularly funding that is available for households and businesses.
- Belief that stopping buses from idling at stops in the city would improve air quality and this should be enforced before any introduction of the LEZ

Dundee Green Groups Forum

- 3.3.12 A session was organised through the Dundee Green Groups Forum and was attended by Friends of the Earth Tayside, Dundee Climate Action Group and Extinction Rebellion. The following comments and questions were recorded:

- The online consultation appears more simple than other cities – why is this?
- 2022 is a “red herring”, the actual date that should be publicised is 2024 [noted by LEZDG that awareness of the LEZ has led to bus operators investing in their fleets in preparation so improvements are seen now]
- How does the proposed LEZ meet the LEZ objectives on sustainable travel and why have the council not set the LEZ out as part of the wider vision for changes to the city?
- Are the grace periods the same for other cities?
- How has the traffic and air quality modelling accounted for predicted changes in fleets by 2024 e.g. more second hand diesel cars on the road as a cheap alternative?
- When are the ANPR cameras being put in place and will they monitor from that date? Would there be an advantage to record as early as possible to capture a true real-time picture of compliance in the city?

Business Community

- 3.3.13 The briefing session was organised by DCC and Dundee and Angus Chamber of Commerce. The session was attended by business representative from across sectors. Following the presentation, the following comments were noted:

- Publicity is key. While the proposals are relatively simple and easy to understand there has to be continued publicity (in a simple manner) between now, declaration in 2022 and enforcement in 2024
- Business Gateway noted there has been relatively little questions received from small businesses about the LEZ. Does the show a lack of engagement with small businesses and what has been done to engage with these?

3.4 Response to Stakeholder Submissions and Comments

3.4.1 As noted in the previous sections, no stakeholders expressed objection or opposition to the proposed LEZ scheme however, there were a number of questions and concerns raised. This section provides a response to these concerns, utilising the evidence base and analysis undertaken to identify the preferred LEZ scheme.

3.4.2 **Comment:** Dundee bus station is used by operators service neighbouring authority area (and beyond) and concerns that its inclusion in the LEZ will have a detrimental impact on service provision to local communities.

Response: Consultation with operators raised no concerns about impacts to services utilising the bus station. All current services are expected to utilise compliant vehicles by 2024 and the benefits from the cleaner buses will be felt in all communities they serve. Creating a dedicated route that allows non-compliant buses in / out of the bus station would likely impact on the air quality on Dock Street, where recorded levels of pollutants are high, as this section of road would be used to access the bus station. It was noted by one operator that pick-ups and drop-offs at the bus station may be impacted. This concern is mitigated with the location of the bus station in relation to the LEZ and the available parking in relative proximity (e.g. Olympia car park and Gallagher Retail Park (free for 2 hours))

3.4.3 **Comment:** Lochee Road is excluded from the LEZ and therefore the LEZ does not address an area with high levels air pollution.

Response: Lochee Road is a key transport corridor in Dundee and has had some of the highest recorded NO₂ levels in Dundee in recent years. The corridor was considered for inclusion in the LEZ from the outset and six Lochee Road Scenarios were tested for suitability in the Paramics traffic model. The results from this concluded that while there were benefits to Lochee Road there were significant disbenefits to surrounding areas and city-wide traffic conditions. Including the Lochee Road corridor effectively pushes the most polluting vehicles on to local roads that are more residential in nature and shifts the known problem on Lochee Road to other locations. The traffic modelling showed significant increase in traffic flows and journey times on adjacent routes such as City Road, Loon's Road and Perth Road/Hawkhill. Full details can be found in Chapter 9 of the second [Interim NLEF Stage 2 Report](#) and through [SEPA's online visualisation tool](#). In addition to these negative effects, air quality modelling undertaken by SEPA showed that the preferred LEZ scheme (i.e. excluding Lochee Road) still brings an average 20% reduction in NO_x on the corridor and predicts levels of NO₂ will be reduced by 1-2 µg/m³, primarily due to compliant cleaner buses serving the corridor (and all bus routes in the city). For these reasons, Lochee Road is not included in the proposed LEZ and DCC are exploring other options to further improve air quality and sustainable travel on the corridor.

3.4.4 **Comment:** The zone is not wide enough and doesn't cover the majority of state schools and residential areas.

Response: The [Interim NLEF Stage 2 Report](#) and accompanying model testing report details the appraisal and testing of possible LEZ scenarios encompassing areas larger than inner ring road area. Aside for the resulting detrimental impact to the network traffic

conditions (including increased congestion, queueing and therefore emissions) the inclusion of residential areas where there are currently no air quality issues would be harmful and unfair to those living in these areas and increase the cost to comply with the LEZ.

3.4.5 **Comment:** Major car parks are excluded and this does not promote the needed shift to sustainable and active travel modes.

Response: From a legislative viewpoint it is not possible to include the three car parks on the periphery of the proposed LEZ area (Bell Street, West Marketgait NCP and Wellgate Centre) if the inner ring road is excluded from LEZ area, although options encompassing these car parks were considered in detail. See Chapter 10 of the [Interim NLEF Stage 2 Report](#) for a full explanation on the car park considerations.

3.4.6 **Comment:** The two-year grace period is too long and it should be as short as possible.

Response: The minimum grace period after the introduction of a LEZ is one year. Consultation with bus operators and local businesses informed that recovery from the unprecedented Covid-19 pandemic will take many years and many would not be able to comply with LEZ emission standards by 2023. Giving one year additional grace (when up to three years could have been given), allows for bus operators, businesses and residents of Dundee and surrounding areas to plan for the LEZ introduction and mitigates against any unintended consequences of enforcement at an earlier date. It has also been shown that bus operators have already commenced improving their fleet in order to be compliant by 2024 and therefore the benefits of the LEZ will be felt before enforcement begins.

3.4.7 **Comment:** Concern for people living in areas of deprivation and the risk in the health inequalities that an LEZ may bring.

Response: The LEZ proposals have been subject to an Integrated Impact Assessment and this concluded that when the LEZ is delivered with exemptions and funding support, the unintended impacts can be minimised and mitigated against. DCC will continue to promote and support opportunities as they become available.

3.5 Online Consultation

3.5.1 DCC set out its proposals for the LEZ on its website (www.dundee.gov.uk/lez) where those wishing to provide feedback could do so through an online consultation form. Feedback was sought only on the proposals as defined in the *Statement of Scheme Proposal* and did not seek wider views (e.g. on whether a LEZ was supported or whether the scheme should change) as this was captured in the consultation exercise in 2019.

3.5.2 There were 124 completed responses to the online consultation. As the survey did not gather statistical information, the responses were categorised into one of the following categories, based on the content of their answer:

○ Support for the LEZ	26%
○ Neutral	30%
○ Against the LEZ	36%
○ Lacks Coverage/ Do more	8%

3.5.3 The majority of responses (36%) were against the introduction of the proposed LEZ. Given the nature of the online question, it is perhaps expected that those individuals with concerns on the LEZ take the time to complete the survey whereas those who agree with the proposals may be less inclined to do so. However, 26% of responses were in support

of the LEZ with a further 8% broadly in support of the LEZ in principle but believe it should cover a larger area.

3.5.4 30% of responses were classed as neutral and did not express an opinion for or against the LEZ. Of these, the majority used the survey to ask specific questions on the proposal. Where possible, DCC will endeavour to answer these directly where contact details are available.

3.5.5 Those responding against the LEZ gave varying reasons for their objections. Each response was assessed and the key concerns emerging from the responses are detailed below, alongside a response to each:

- **Concern** that the LEZ will push traffic onto neighbouring residential streets
Response: The [Interim NLEF Stage 2 Report](#) and accompanying model testing report show that the road network in Dundee operates relatively similarly to existing conditions with proposed LEZ in place and that there is no increase in traffic on local routes. This is primarily because the LEZ does not include the key strategic inner ring road corridor and does not therefore displace traffic from these routes.
- **Concern** that parking will be displaced into residential areas neighbouring the city centre
Response: Linked to the above response, the analysis has shown that the car parks excluded from the LEZ area will provide sufficient capacity for non-compliant vehicles that can no longer park in the city centre.
- **Concern** the grace period doesn't provide enough time to update vehicles
- **Response:** The grace period gives vehicle owners almost 3 years from the consultation dates before enforcement begins. There is no evidence to suggest a grace period greater than two years is required and this would be unlikely to be accepted by Scottish Ministers.
- **Concern** about financial support for individuals/businesses to enable them to switch to compliant vehicle
Response: Means tested funding ([LEZ Support Fund](#)) is available for households and businesses to help those who most need it comply with the LEZ measures and it should be remembered that a compliant vehicle does not need to be a new vehicle (either conventional fuel or hybrid/electric).
- **Concern** for impact on city centre businesses.
Response: The LEZ proposals have been subject to an Integrated Impact Assessment which considered the impact to city centre businesses.

4. KEY OUTCOMES FROM CONSULTATION

4.1.1 In line with The Act 2019, Dundee City Council (DCC) held an eight-week consultation from 14th June 2021 to 9th August 2021 on its proposed LEZ scheme for the city, as agreed at the [Community Safety and Public Protection Committee](#) on 7th June 2021.

4.1.2 The statutory consultation period consisted of the following elements:

- Letter correspondence to statutory consultees advising of LEZ proposals
- Stakeholder workshops
- Online survey seeking views on the proposed LEZ option
- Information flyer delivered to residents and businesses in proposed LEZ area

4.1.3 DCC received written submission from 24 stakeholders, businesses or interest groups. In general all responses supported the introduction of the proposed LEZ in Dundee however

some responses (notably those from health and green groups) believe the LEZ should be larger in size and scope.

4.1.4 DCC also set out its proposals for the LEZ on its website (www.dundeecity.gov.uk/lez) where those wishing to provide feedback could do so through an online consultation form. There were 124 completed responses to the online consultation. While 36% of responses were against the introduction of the proposed LEZ, 26% were for the proposals and a further 8% support the LEZ but feel it should extend further (in size and scope).

4.1.5 The statutory consultation has further informed the development of the LEZ in Dundee and has not highlighted the need for DCC to reconsider any aspect of the LEZ as defined in the *Statement of Scheme Proposal*.

APPENDIX A: RESPONSES FROM STAKEHOLDERS

Written submissions are detailed below as provided by each stakeholder. No changes have been made to the text (other than some formatting changes) from that received by SYSTRA. Each response is included with permission from the stakeholder or is publicly available.

NHS Tayside

DUNDEE CITY COUNCIL – PROPOSAL TO MAKE A LOW EMISSION ZONE SCHEME

NHS Tayside’s Directorate of Public Health welcomes the opportunity to provide feedback on the proposed Low Emission Zone (LEZ) scheme in Dundee City Centre. The document ‘Dundee City Council – Proposal to make a Low Emission Zone Scheme’ was read to inform our response. We found the proposal comprehensive yet succinct, transparent, and clearly presented.

Background

Air pollution remains the single largest environmental health risk contributing to premature death and disease in the United Kingdom.^{i,ii} Poor air quality, due to gaseous and particulate pollution, is associated with both short- and long-term adverse effects on human health. The size of polluting particles, concentration of pollutants and the duration of exposure are key determinants of potential adverse health effects. Particles larger than 10 µm are mainly deposited in the nose or throat, whereas particles smaller than 10 µm pose the greatest risk for health because they can be drawn deeper into the lung. The strongest evidence for adverse effects on health is associated with fine particles (PM2.5). However, epidemiological studies have also shown that gaseous air pollution is associated with adverse effects on health, including reduced life expectancy.ⁱⁱⁱ

As well as exposure related factors, the effects of air pollution on health also depend on an individual’s vulnerability. Long term exposure to air pollution can affect everyone’s health.

However, some people are more vulnerable to the effects of air pollution because of their age (children and older people are at increased risk), existing medical conditions and/or health determining behaviours.

Air pollution is ubiquitous but in urban areas especially where there is a large volume of traffic, exposure to air pollution can be high. The levels of air pollution experienced on high pollution days in Scotland are usually not sufficient to cause acute problems in healthy individuals but can exacerbate symptoms in people who have pre-existing health conditions e.g. exacerbations of respiratory and cardiovascular conditions.

In addition to the acute health impacts of peak air pollution, there is an extensive body of evidence which associates lower level long-term exposure to air pollution with increases in premature mortality and morbidity. Ambient air pollution has been associated with respiratory disease and cardiovascular disease (e.g. ischaemic heart disease and stroke).ⁱ

Outdoor air pollution, especially particulate matter, has also been classified by the International Agency for Research on Cancer (IARC) as carcinogenic to humans (a Group 1 carcinogen) through its causation of lung cancer.^{iv,v} In addition, there is emerging evidence which links air pollution with dementia, low birth weight and Type 2 diabetes.ⁱ

While Scotland enjoys relatively good air quality in comparison to its own past and compared to other developed countries, air pollution remains a public health concern. This is due to a number of factors:

- Even in the UK where particulate matter concentrations in many cities do comply with guidelines, life expectancy can still be improved through improvements in air quality.^{vi}
- Small particulate pollution impacts health even at very low concentrations. Indeed, no threshold has been identified below which no damage to health is observed. For this reason the World Health Organization’s air pollution guideline sets out ‘limits’ which aim to achieve the lowest concentration of particulate matter possible.^{vii} NO₂ has been associated with adverse health effects below the current legal limits.^{viii}
- It is our most vulnerable populations who are most affected by air pollution. Areas of high deprivation are associated with poorer air quality. The health impacts of poor air quality compound pre-existing health inequalities.
- Air pollution and climate change are inextricably linked. The climate emergency is a significant risk to population health. Measures to combat air pollution which lead to a reduction in the combustion of fossil fuels will bring about additional health benefits by mitigating climate change.
- Measures to reduce air pollution can bring about health co-benefits (i.e. benefits in addition to the direct benefits from reducing air pollution). For example, there are considerable physical and mental health benefits from people walking and cycling rather than driving.

Therefore, NHS Tayside’s Directorate of Public Health is extremely supportive of measures that aim to improve air quality and reduce traffic associated emissions.

The proposed LEZ is ambitious yet realistic, and we are supportive of the proposed zone. However we would like to provide some additional comments to enhance the opportunities that the introduction of a LEZ brings.

Lochee Road

Ideally we would have liked to have seen Lochee Road, an area which suffers from higher levels of air pollution, included as part of the LEZ scheme. However, we recognise that the unintended consequences of doing this could be significant, potentially shifting the problem rather than creating a real improvement.

Although Lochee Road cannot be included in the LEZ as stands currently, it remains a priority area for action to reduce air pollution and mitigate the negative impacts of poorer air quality on health. Other measures which should be considered for introduction include traffic management to reduce congestion, prioritisation of safe and segregated pedestrian and cycle paths, and other measures to reduce the negative impact of air pollution on health such as the introduction of urban vegetation.

Maximising the benefits

The introduction of a LEZ in Dundee city centre has the potential to accelerate change to create safe places that nurture health and wellbeing, and create vibrant spaces for people to live, travel, work, socialise and play, building on previous success stories such as pedestrianising Union Street through the ‘Spaces for People’ programme.

Low emission zones are not just about replacing higher polluting public and private motor vehicles with lower polluting ones. Doing only this would be a missed opportunity and would mean Objectives 2 and 3 of the LEZ scheme will not be fully achieved.

The overwhelming support for a LEZ in the centre of Dundee provides an opportunity for a modal shift in transport use from a predominant dependence on sedentary private automobile use to more active and sustainable travel means e.g. walking, wheeling and cycling, and lower emitting public transport. Not only will this reduce air pollution and reduce traffic congestion, it promotes social inclusivity,

confers substantial benefits for health and wellbeing beyond the immediate effects of reducing air pollution, and helps reduce transport related greenhouse gas emissions which is a significant barrier for the city to achieve its climate goal of net zero by 2045.

During the two year grace period we strongly encourage Dundee City Council to accelerate the roll out of measures such as safe segregated space for walking and cycling, to maximise co-benefits.

Inequalities

As people living in areas of deprivation are more affected by poorer air quality, the LEZ would be expected to reduce health inequalities rather than increase them. However this cannot be assumed, and the potential for unintended impacts on inequalities needs to be considered during the planning of the LEZ, with opportunities to reduce inequalities maximised, and any risk of increasing health inequalities comprehensively considered and mitigated.

For example, there is a need to ensure that people who are least likely to have contributed to transport emissions do not shoulder the cost of measures to reduce air pollution. For example, the costs of retrofitting buses/replacing higher emitting buses should not be passed onto passengers. Furthermore, there is a need to demonstrate how the LEZ support fund will be promoted and made accessible for those that require it most.

The Directorate of Public Health would be happy to review Dundee City Council’s Health Inequalities Impact Assessment (HIIA) associated with the Low Emission Zone scheme.

Monitoring and Evaluation

We look forward to reviewing the monitoring and evaluation plan associated with the proposed scheme. As we tentatively emerge from the emergency footing of the pandemic, the Public Health Directorate would be delighted to be more involved again in this very important area of work as much as our current capacity allows.

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ⁱⁱ World Health Organization. Ambient air pollution – a major threat to health and climate. Available at: <https://www.who.int/airpollution/ambient/en/> [Cited 12 February 2020].

ⁱⁱⁱ Committee on the medical effects of air pollutants. Statement on the evidence for the effects of nitrogen dioxide on health, 2015. Available at:

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^{iv} International Agency for Research on Cancer. Air Pollution and Cancer. IARC Scientific Publication No. 161. Available at: <https://publications.iarc.fr/Book-And-Report-Series/Iarc-Scientific-Publications/Air-Pollution-AndCancer-2013>. [Cited 9 January 2019].

^v International Agency for Research on Cancer. Q&As on outdoor air pollution and cancer, 2018. Available at: https://www.iarc.fr/wp-content/uploads/2018/07/pr221_QA.pdf [Cited 9 January 2019].

^{vi} Danjak D, Walton H, Smith JD. Birmingham City Health and Economic Impact Assessment study. Kings College London, 2019. <https://www.uk100.org/wp-content/uploads/2019/05/KCL-UK100-Birmingham-CityHealth-and-Economic-Impact-2019.pdf>

^{vii} World Health Organization. Air Quality Guidelines – Global Update 2005. Available at: https://www.who.int/phe/health_topics/outdoorair/outdoorair_aq/en/. [Cited 9 January 2019].

^{viii} DEFRA and Public Health England. Air Quality: A Briefing for Directors of Public Health. March 2017 https://www.local.gov.uk/sites/default/files/documents/6.3091_DEFRA_AirQualityGuide_9web_0.pdf [Cited 14.01.20]

Historic Environment Scotland

Dear Head of Sustainable Transport and Roads

Dundee Low Emission Zone Boundary

Thank you for your consultation of 15 June 2021 seeking any representations on the proposed Low Emission Zone scheme for Dundee. We note the proposed boundary for the Dundee Low Emission Zone and its supporting statement and can confirm that we have no comments to offer.

Greener Practice Tayside & Fife

Open Letter to Tayside & Fife Councillors in support of Climate Mitigation for Public Health

Dear Councillors,

We are a group of healthcare workers writing in support of council interventions to improve public health and mitigate the climate crisis. The hope is that the evidence presented here can help to inform decision making that will be in the interests of us all.

The Climate Crisis

It is now widely recognised that the worsening climate crisis is a public health emergency which will dwarf COVID-19 in terms of impact on our population's health and our economy.¹ Leading medical journals such as the BMJ and The Lancet are reminding us almost every week of our responsibility as health professionals to raise these issues.¹² The public look to nurses, doctors and scientists as those they trust to communicate the facts and so, we have a duty to speak up.³⁴

COVID and Emissions

While COVID-19 monopolised global attention over the past year, the need for climate action becomes increasingly urgent. Despite the global shutdown, emissions fell by only 6% in 2020,⁵ and the UN has warned that progress "falls far short" of what is necessary to avoid temperatures rising. Rising global temperatures result in a raft of adverse health outcomes, such as increased risk of further pandemics and infectious disease, increased migration, poorer nutritional value of food and worsening extreme weather, such as heavy rain and flooding.¹

Inequality

We know that these ‘adverse health outcomes’ most greatly impact the poorest and most vulnerable parts of society, and further widen health inequalities in Scotland and around the world.⁶ We need to radically reduce carbon emissions to net zero to avoid unmanageable climate change and unacceptable harm to public health.¹ We recognise the work underway to reduce fuel poverty and properly insulate homes which is a key part of reducing health inequalities.

Deprivation

Those living in areas of deprivation have less access to green spaces and are particularly vulnerable to the health impacts of car dependence, air pollution and climate change.⁷ For instance, people living in the most deprived areas of Scotland are less likely to have a driving licence, own a car, or to drive frequently, but are up to 5 times more likely to be killed by traffic collisions than those living in the most affluent areas.⁸

Air Pollution

Dundee has two of the most polluted streets in Scotland,⁹ and with the harm from air pollution in the UK being equivalent to over 40000 deaths a year, this would equate to 473 deaths every year in Tayside and Fife, based purely on population extrapolation.¹⁰ Air pollution causes headache, lung disease, heart disease, stroke, diabetes and cancer.¹¹ Pregnant women and unborn babies are especially vulnerable and there is some evidence of association with learning and behavioural difficulties, obesity, and increased risk of chest infections.¹¹ Mike Berners-Lee calculates that for every mile driven in a built-up area that 3.5 minutes of life are lost due to the effects of air pollution.¹²

Transport

Accordingly, we need urgent change in our transport system. These are decisions which rest in your hands as public officials, rather than ours as healthcare workers. Transport remains the single biggest contributor to greenhouse gas emissions in Scotland and has remained stubbornly high despite improvements in other sectors.¹³ It is therefore a crucial priority for action on climate to meet net zero 2045 law, but also to improve health and reduce health inequality.

Low Emissions Zone

We support the low-emission zone in Dundee, and view it as a necessary measure to reduce the harm caused by air pollution to the public. Indeed, we support clean air for all in Tayside and Fife, not just a small part of Dundee. Reduced air pollution and greenhouse gas emissions will improve the health of our people.

Healthy Places

Creating healthy places for people through cleaner air, safe active-travel and access to green and blue space are vital to mitigate the climate crisis and offer huge opportunity to improve the health and inclusivity of our communities. A focus on healthy places will improve the happiness and wellbeing of our communities, and economic activity while reducing the strain on overstretched health services.

Green & Blue Space

We know that exposure to space that is green (vegetation) or blue (water courses) reduces stress hormones like cortisol, which are linked to raised blood pressure, poor mental health, and many chronic diseases.¹⁴ Time in nature can improve sleep and boost the immune system, which reduces susceptibility for infectious diseases, and may even have a preventative effect on cancer.¹⁵¹⁶ Time in a natural environment can be helpful for calming behaviour including helping symptoms of ADHD, and has been shown to improve memory.¹⁷ There is evidence too, that greener schools have higher test scores, even adjusting for family income.¹⁸ Nature experience is also associated with improved social cohesion, resilience, and a sense of purpose.¹⁹

Opportunity for Health

Further to the health benefits from green space, the co-benefits to health and wellbeing from getting people out of cars and walking, wheeling, running, or cycling are enormous. These include responding to our obesity and diabetes crises; improving mental health through increased exercise and exposure to nature; and reducing air pollution which in turn reduces rates of asthma, lung

cancer, strokes, heart attacks, and likely dementia too.²⁰

The Spaces for People Programme

As one of the few truly positive changes to emerge during these difficult times, 'Spaces for People' made walking, wheeling, running, and cycling safer during the COVID-19 pandemic. We are aware that these have been designed as temporary measures and would urge you to improve, extend, and connect them, to create a comprehensive and safe active travel network in all areas.

Design for Health

Tayside and Fife are designed for cars, but this needs to change. Even electric cars have particulate matter emissions from brake dust and tyre wear that have harmful air pollution effects.²¹ We need to transform our regions to make active travel an easy, safe, and appealing option for everyday journeys. This must be an inclusive process which prioritises accessibility for those with disabilities.

Safe Active Travel Networks

If active travel is to be an appealing option, we need connected networks that provide safety for the whole journey, rather than just a short stretch. This is especially true for families with children, disabled people, and women - who are least likely to use active travel at present, but who report they would if it were safer.²² Safety at junctions is a particular concern, with the new infrastructure often ending at junctions leaving people on bikes adrift amidst fast-moving traffic. Soft segregation measures with narrow paths reduce accessibility for those with disabilities. We welcome new segregated lanes but are disappointed to see some new lanes which are advisory rather than physically segregated, as lanes with painted lines only (advisory) have been associated with a 30% increased odds of injury.²³ We support projects - such as the new active travel project in Arbroath - which strive to achieve an integrated active travel system.

Biodiversity

Biodiversity is essential for human life, yet we are amidst a mass extinction and the UK is the least effective G7 member at protecting nature.²⁴²⁵²⁶²⁷ Adaptation is required to cope with increasing temperatures, increased rainfall, and the risk of flooding as climate change worsens. This adaptation can be done in combination with access to greenspace and improved biodiversity to improve the health and wellbeing of the public and reduce risks to health and finances.

Progress is Slow

We acknowledge the steps that councils have started to make towards improvement, yet progress still feels painfully slow in comparison to what is required. With the eyes of the world on Scotland at COP26, we hope that we can showcase significant change that we are truly proud of. We as healthcare workers have the knowledge and evidence about what is needed to improve health, but we need you, the decision makers to facilitate this. The reward is healthy, happier people, reduced illness with the added benefits of reduced costs associated with illness on the health system,²⁸ and other costs such as absence from work.

Responsibility

As Councillors, you hold the keys to these particular public health issues. It is our responsibility as health professionals to highlight the importance of these. Please prioritise clean air, access to green and blue space, and infrastructure for safe walking, cycling, running, and wheeling, and help us protect the health of our people. There is strong evidence of public support for climate mitigation, and there is a multitude of resources available to you to guide on how to do this, referenced at the end of this letter.

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- ⁴ <https://www.ipsos.com/ipsos-mori/en-uk/ipsos-mori-veracity-index-2020-trust-in-professions>
- ⁵ <https://www.nature.com/articles/d41586-021-00090-3>
- ⁶ https://www.health.org.uk/sites/default/files/202003/Health%20Equity%20in%20England_The%20Marmot%20Review%2010%20Years%20On_executive%20summary_web.pdf
- ⁷ <https://www.gov.scot/publications/scotlands-people-annual-report-results-2013-scottish-household-surveyrevised-october-2015/pages/11/>
- ⁸ <https://www.scotpho.org.uk/health-wellbeing-and-disease/injuries/data/road-traffic-injuries>
- ⁹ <https://foe.scot/press-release/revealed-scotlands-most-polluted-streets-2019/>
- ¹⁰ <https://www.rcplondon.ac.uk/news/prescribing-clean-air>
- ¹¹ https://ranzcof.edu.au/RANZCOG_SITE/media/RANZCOGMEDIA/Women's%20Health/Patient%20nformation/Air-pollution-and-pregnancy.pdf?ext=.pdf
- ¹² Berners-Lee, Mike. How Bad Are Bananas? : the Carbon Footprint of Everything. London :Profile, 2020.
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- ¹⁴ <https://www.rcpsych.ac.uk/news-and-features/blogs/detail/sustainability-blog/2020/07/09/look-after-nature-so-nature-can-look-after-us>
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- ²¹ https://ukair.defra.gov.uk/assets/documents/reports/cat09/1907101151_20190709_Non_Exhaust_Emissions_typeset_Final.pdf
- ²² <https://www.sustrans.org.uk/media/2930/2930.pdf>
- ²³ <https://findingspress.org/article/18226-cycling-injury-risk-in-london-impacts-of-road-characteristics-andinfrastructure>
- ²⁴ <https://www.rspb.org.uk/globalassets/downloads/about-us/48398rspb-biodiversity-intactness-indexsummary-report-v4.pdf>
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- ³⁰ https://ec.europa.eu/clima/citizens/support_en
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³³ <https://cat.org.uk/info-resources/zero-carbon-britain/zcb-online-resource-hub/?page=1>

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Fife Council

Consultation on Dundee's Proposed Low Emission Zone

Fife Council Response:

Fife Council is supportive of improving air quality and on the proposed Dundee LEZ schemes as laid out as part of this consultation. It aligns well with Fife's strategic intentions to improve air quality, reduce emissions, encourage sustainable travel and improve town centres.

However, clarification is sought around the potential effect on Fife's air quality and economic impact with the following issues and how Dundee City Council are proposing to mitigate these issues;

The potential increase in secondhand noncompliant vehicles may rise in Fife, for example LEZ grant vehicle scrappage scheme could be promoted to surrounding local communities

Small businesses, such as taxi operators, delivery and trades people based in Fife and serving Dundee could be adversely affected by the LEZ

The ECO Stars partnership scheme provides recognition, guidance and advice on best practice to operators of goods vehicles, buses and coaches. It's being rolled out in Fife to help fleet operators improve efficiency, reduce fuel consumption and reduce emissions - all helping to improve local air quality and make cost savings at the same time. Suggest that ECO stars is adopted nationally to help improve Air Quality Management Areas (AQMAs) and LEZs such as Dundee.

Dundee Bus Station is however within the Dundee LEZ and bus services which operate between Fife and Dundee use this bus station and also serve the main stops within the City Centre within the proposed LEZ. At this stage, a proportion of Fife's bus operators fleet are not compliant. These operators are aware of the deadline for enforcement and the need for compliant vehicles to travel within the LEZ. There will also be a need for Fife Council to ensure that operators are aware that contracted bus services between Fife and Dundee are compliant from that date, which may have financial implications to supported service budgets.

The introduction of the Tay Bridgehead Park & Ride site, with its focus on encouraging modal shift to public transport and reducing traffic within the City, would support the improvement of air quality. This should be considered for funding as part of the Dundee LEZ as it will help reduce the number of vehicles entering the city from outside.

With regards to ongoing consultation, it is important to keep neighbouring communities, particularly those in North East Fife informed of progress in relation to the implementation and any subsequent changes that may be planned. This could include updates to the North East Fife Area Committee of Fife Council as discussed at the neighbouring authority update session on the 24th June 2021.

As the enforcement will not start until the end of May 2024, it would be beneficial to "warn" any non-compliant vehicles entering the LEZ before that date that enforcement is coming so that this does not come as a shock in May 2024.

My only feedback would be the need to co-ordinate the introduction of the LEZ with a Park & Choose facility at the Fife side of the road bridge. As well as providing a means of reducing vehicle traffic to Dundee this would also enable a better public transport hub this side of the water. During a recent campaign to stop the 99 bus we were advised by bus companies, Stagecoach, and the Road Bridge engineers, that only a Park & Choose would provide the necessary infrastructure for 99 express bus to stop here. Currently buses pass through every y minutes without stopping and residents in Newport & Tayport must travel into Dundee and out again by bus to reach Leuchars and St Andrews.

Fife Council (Individual Elected Member Response)

My only feedback would be the need to co-ordinate the introduction of the LEZ with a Park & Choose facility at the Fife side of the road bridge. As well as providing a means of reducing vehicle traffic to Dundee this would also enable a better public transport hub this side of the water. During a recent campaign to stop the 99 bus we were advised by bus companies, Stagecoach, and the Road Bridge engineers, that only a Park & Choose would provide the necessary infrastructure for 99 express bus to stop here. Currently buses pass through every y minutes without stopping and residents in Newport & Tayport must travel into Dundee and out again by bus to reach Leuchars and St Andrews.

Dundee and Angus Green Party

Dundee LEZ proposals: submission from Dundee and Angus Green Party

Introduction

As the local branch of the Scottish Green Party, we welcome the introduction of a Low Emission Zone for Dundee. Air pollution is a serious problem in Dundee, especially for children and other vulnerable groups, and is therefore an urgent matter of both public health and human rights. The LEZ is an important part of addressing this crisis, but is by no means the only action which must be taken.

Scope

We are disappointed to see that the Lochee Road, one of the most polluted streets in Scotland, is not to be included within the Low Emission Zone. While we would not wish the rollout of the LEZ to be delayed by reconsideration of the geographical scope at this stage, we urge the Council to take swift and effective alternative action to address the particular issues in the Lochee Road Corridor.

More broadly, we note that the majority of Dundee’s state schools and residential areas are excluded from the Zone. We would invite the Council to develop a vision of a much more comprehensive low emissions zone, encompassing the areas where most of its residents live, work, play and go to school, along the lines of that which has been in successful operation for many years in Freiburg, Germany. If there are any legislative barriers to the fulfilment of such a vision, we would be delighted to work with the Council to lobby for these to be removed.

Timing

We note that the proposals incorporate a two year ‘grace period’ from the introduction of the LEZ to its enforcement, with no collection of data during this period and no incentive for reduction of high emitting traffic until at least May 2024. We believe that, especially in view of the delay to the LEZ rollout caused by the pandemic, the minimum grace period of one year, as will be the case in Glasgow, would be more appropriate. We understand that consultation with businesses has led to the proposal of a two-year period, but have not heard of any similar consultation with health professionals or patients’ groups. Since businesses, especially bus companies, will have been aware since at least

2019 that a LEZ was forthcoming, and have been able to make the necessary changes in Glasgow, we do not see why they should not be obliged to do so here. Every month of delay will add to the toll of suffering and death caused by air pollution, and it is therefore incumbent upon the Council to act decisively.

We would also urge the Council, so far as the legislation permits, to use the grace period in order to monitor traffic, using the cameras that will be installed. This would allow the establishment of baseline data which would help to assess the effectiveness of the zone and plan for future initiatives. If it were possible to use this data to advise owners that their vehicles will be non-compliant, that might also be of assistance.

Mitigation

We note that there are funds available to assist with the costs of transition away from high-polluting, non-compliant vehicles. We would urge that these be used in a socially just manner, focusing on the needs of those with fewest resources and options, and ensuring that those who are entitled to appropriate exemptions, including disabled people, are fully informed of their rights and the pathways to achieving them.

Transport strategy

The introduction of the LEZ alone will not bring about the necessary transformation of Dundee into a place of high air quality, bringing health, wellbeing and safety for all its residents. The intersecting crises of pollution, climate and biodiversity require bold and broad changes, while the experience of the coronavirus pandemic reminds us both that we can act collectively, and that we must, in order to survive, prioritize care and compassion over ‘business as usual’.

Dundee requires an active and ambitious transport strategy which goes far beyond simple substitution of one type of motor vehicle for another. That strategy must include comprehensive action to promote active transport, not only for a minority of confident walkers and cyclists, but for all. That includes ensuring that the journeys that families and individuals have to make, to school, work, shopping and leisure, can be carried out easily and safely without use of a private car. It means traffic management and infrastructure changes, including safe and separated paths and bike lanes, possibly even a cable car or lift, as in Trondheim or Luxembourg, and might also include electric bike hire, as in Madrid. The strategy must also include ensuring that bus travel is safe, comfortable, efficient and affordable, and in particular addressing the reluctance that many may feel about returning to public transport following the pandemic. Park and ride schemes should be researched and care taken to ensure that other policies, particularly planning, act to facilitate active and public transport and to minimise dependence on cars and the movement of freight, especially in and near residential areas.

Conclusion

We welcome the introduction of the LEZ, and hope that this will be fully operational as soon as possible, in order to provide the maximum benefit for the health of the people of Dundee. We hope that this will signal the beginning of a period of fundamental transformation in our city, building on the lessons of the pandemic and fully aware of the climate and biodiversity emergencies. Our generation has both the opportunity and the responsibility to make Dundee a place where people can truly live well, both now and in the future. We would welcome further opportunities to talk with the Council and others about how this vision can be fulfilled.

RMT Taxi Rep.

Subject: Unfair on wheelchair taxis

As there is no petrol wheelchair taxis we at the RMT feel it is a bit unfair. This means that a petrol taxi can be any age up to 20 years, But A diesel taxi can only be up to 7 years old. This is rather unfair. But is par for the course in Dundee.

Unite Union Taxi Branch

Subject: Unite union taxi branch Dundee Hi the proposals unite union taxi branch would like to see regarding the low emission zones is a further exemption period for all taxi and private hire operators until may 2027 .We are extremely worried that the 30th of may 2024 will have a devastating affect on the trade to try and replace vehicles to meet the deadline currently set by Dundee city council . Also the covid 19 pandemic has had a massive affect on the trade with lost revenue due to the lack of passengers no night time economy people working from home and reduced foot fall and the hospitality in the city suffering due to restrictions put in place to combat the pandemic. The Dundee taxi branch at unite are currently having discussions with the Scottish government regarding these issues affecting the trade not only in Dundee but in all other city’s in Scotland and hopefully we can work together for the Benefit of the trade and councils in Scotland we are not against low emission zones in Dundee but we do need proper financial help towards vehicles and more time to allow the trade to make some kind of recovery before operators can purchase newer vehicles to meet the low emission criteria in our city .

Friends of the Earth Tayside

Consultation on Dundee's LEZ proposals - submission from Friends of the Earth Tayside

Thank you for the opportunity to hear about and discuss the proposals for the Low Emission Zone in Dundee, at the consultation event on 2nd August. This response is submitted on behalf of Friends of the Earth Tayside.

We welcome the fact that progress is being made to introduce a Low Emission Zone in the centre of Dundee, given the long history of high levels of air pollution in the city centre. It is regrettable that the LEZ will not be put into effect until May 2024, but the reasons for the further delay were explained to us. We suggest the grace period and the LEZ cameras should be used to capture the latest traffic data, enabling the impact of the LEZ to be monitored as soon as the restrictions come into force.

When the delay to the implementation of the LEZs due to the coronavirus pandemic was announced on 7 May 2020, the Cabinet Secretary for Transport Michael Matheson sought to emphasise the positive opportunity this created "to consider the kind of transport systems we want to see return to our cities after COVID-19." He went on:

"Given the recent uptake in active travel and air quality levels we are going to take the opportunity to review how Low Emission Zones can be designed and how our cities might witness a green recovery transformation in tandem with Covid-19 recovery plans. We must be bold in our actions to reset the system to meet our climate change ambitions, reduce inequalities, improve our health and wellbeing and deliver sustainable economic growth." *

Unfortunately, there seems to be no sign of this kind of vision and reflection in the way these proposals for Dundee's Low Emission Zone have been presented. The LEZ seems to be regarded as a burdensome obligation imposed on the City Council by Scottish Government, rather than a valuable opportunity to improve the quality of the air that the citizens of Dundee breathe, and a significant step in moving towards a more sustainable transport system over the coming years, with other benefits for people's health and wellbeing. This is despite the inclusion (in two places) in the consultation document of

references to the ambitious objectives for the LEZ agreed by the Community Safety and Public Protection Committee meeting on February 24 2020, even before the pandemic struck:

- Protect public health through improving air quality in Dundee and achieving air quality compliance for nitrogen dioxide (NO₂), Particulate Matter (PM)₁₀ and PM_{2.5}
- Develop an environment that helps promote more active and sustainable travel choices in Dundee and contributes to meeting emission reduction targets set out in Part 1 of the Climate Change (Scotland) Act 2009, and
- Contribute to the ongoing transformational change in Dundee and help promote the city as an inclusive and desirable place to live, invest, visit and learn

The proposals for the LEZ address the first of these objectives, but say nothing about the second and third of them. There is no other reference to active travel, or even a mention of walking and cycling. We would have liked to see the Council including some sort of vision for a more sustainable transport system in Dundee, in line with the second objective, and an indication of the other measures which are planned to bring this about, taking account of the experiences from the pandemic and the need to meet emission reduction targets. As it is, maybe the vision for the future is of a city with just as many vehicles choking up our streets, but at least they will have to meet the latest regulations on air quality and emissions.

Some strategic context is needed. We were told at the meeting on 2nd August that this is given in other documents, which refer to the planned introduction of the LEZ, so it's not clear why there is no reference to these in the LEZ proposals. We cannot see, therefore, how the LEZ will contribute to the second and third objectives set by the CSPP Committee.

Other measures that could reinforce the benefits of the LEZ, in line with the second and third objectives, might include:

- further developing the network of safe walking and cycling routes for commuting and leisure
- encouraging walking and cycling-friendly policies and facilities in workplaces, schools and other premises
- adjustments to traffic management (e.g. phasing of traffic lights at crossings) to favour cyclists and pedestrians
- energetic measures to encourage people to return to using buses after the downturn during the pandemic
- park and ride schemes at the main entry points to the city, where thorough analysis of traffic patterns shows that these facilities are likely to be of sufficient benefit to justify the associated environmental impacts
- a change in approach to local planning, to develop 20-minute neighbourhoods and reduce dependence on private cars (as proposed to Parliament by Michael Matheson on June 9th)**
- creation of more car-free urban spaces and housing developments, and ensuring provision of secure cycle storage for all the occupants in new houses
- promoting Dundee as a liveable city, with clean air and attractive communal spaces for people to relax and enjoy themselves (as signified by the new urban beach).

A more imaginative, joined-up, assertive approach to the implementation of the LEZ is needed, to maximise its benefits to the city, and we would welcome the opportunity to discuss these possibilities with the City Council.

Notes:

* The speech announcing the pause in implementing the LEZs is at: <https://www.transport.gov.scot/news/scotland-s-low-emission-zones-paused/>

** See this report in the Courier on the Cabinet Secretary's speech on the kind of changes required to meet climate change targets:
https://www.thecourier.co.uk/fp/news/politics/scottishpolitics/2295049/the-2020s-to-be-defining-decade-for-tackling-climate-change-in-scotland/?utm_source=Sailthru&utm_medium=email&utm_campaign=Politics%20newsletter%2014/6/21&utm_term=TC%20REG

UPS

UPS Response to Dundee Consultation on Introduction of Low Emission Zone (LEZ)

August 2021

Background

UPS is one of the world's largest logistics companies, playing a vital role in the collection, warehouse and delivery of goods. Our UK operation includes more than 50 operating facilities, approximately 8,900 employees and a fleet of more than 2,900 vehicles. UPS provides critical national and international time sensitive delivery services for businesses of all sizes.

UPS operates a delivery depot at Unit 7, Noble Road, Wester Gourdie Industrial Estate, Dundee, DD2 4UH. This depot provides delivery and collection of small packages and documents to businesses and consumers in the Dundee area.

Dundee Low Emission Zone

As per our previous response to the first consultation, UPS supports objectives to improve air quality in the city. UPS is committed to improving air quality and is also working on solutions for reducing congestion which are detailed below. However, we would urge local authorities to understand the challenges commercial fleets currently face regarding vehicle availability, grid capacity and final mile delivery (amongst others) and that any restrictions are balanced with the recognition of the importance road freight plays in the city by providing critical delivery and collection services for businesses and consumers in the Dundee area.

Commitment to Reducing Environmental Impact

We take our environmental footprint extremely seriously. We continually work to minimise the miles we travel and strive to increase the energy efficiency of our transportation network, regularly monitoring our carbon footprint and investing in low and zero carbon technologies such as electric vehicles and liquefied natural gas HGVs. In addition to our 2021 pledge to be carbon neutral across scope 1, 2 and 3 emissions in our global operations by 2050, we have established interim 2035 environmental sustainability targets:

- 50% reduction in CO2 per package delivered by 2035 (2020 base year).
- 100% of company facilities powered by renewable electricity by 2035.
- 30% of the fuel used in its global air fleet be sustainable aviation fuel by 2035.

Transitioning to Electric Vehicles

UPS currently operates a fleet of approximately 69 electric vehicles (making us one of the largest single users of electric vehicles in central London), with plans for further investment. We first introduced electric vehicles in London in 2008. Since then one of the key challenges has been cost effective electric vehicle availability. This is not currently provided by the market as most EV's are up to three times the cost of an equivalent diesel vehicle. As a result in the last 10 years we have developed a diesel to electric conversion with EFA-S (a company in Germany), learnt how to deploy e-assist cycle solutions in dense areas, worked with Tevva on a diesel to range-extended electric conversion solution and most

recently with Arrival on the development of a brand new design of EV. But still the problem persists. We think that in the next three to five years this problem will be overcome through the efforts of ourselves and others to innovate in this space but we would urge local authorities to recognise the pace at which low emission zones are introduced in the city to ensure commercial fleets are able to comply given the cost and availability of low emission vehicles.

Range Extended Electric Vehicles

We have also been introducing range extended, electric vehicles into our fleet in 2019. These vehicles contain a small diesel engine which allows the vehicle to operate electrically over longer distances by re-charging via the diesel engine when needed. These vehicles have geo fencing technology that ensures the vehicle is operating in electric mode if it enters a LEZ without the need for driver intervention. We would also ask that these vehicles are considered compliant within the LEZ.

Last Mile/E- Cargo Bikes

At UPS we are utilising different concepts for cycle logistics which are aimed at reducing traffic congestion and emissions associated with urban package delivery. We are currently using cargo bikes in Dublin and in several cities across Europe.

The challenge with cycle logistics generally is that we are limited by the capacity of the cargo bikes to carry sufficient volume of packages to make the delivery system viable. As a result, we look to place a large container (or “eco-hub”) in a “staging area” within a city centre location that would allow the handler (or handlers) to continually refill the cargo bikes throughout the day and carry out final mile deliveries. In Dublin, the container is placed above ground on a pedestrianised city street. In London, given much denser and crowded streets, we have investigated other locations to place the containers such as under-utilised underground car parks.

In UPS’ experience, we have found that space being available for city centre container staging, e-tricycle parking and charging availability to support sustainable final mile deliveries, have all proven to be challenging but crucial in ensuring we can, on a practical level, carry out our operations in a sustainable and commercially viable manner.



London

Dublin

Electrifying the Fleet – Grid Capacity

At UPS, our goal has been to move towards electric vehicles in urban locations. The challenge we have faced with expanding our electric fleet is in not having enough grid capacity for charging these vehicles simultaneously at peak times in the evening. It is not feasible to charge the vehicles during the day as they are on the streets carrying out multiple deliveries with only minimum time spent at each location. As a result, we worked closely with UK Power Networks (UKPN) and a three tier system of landlords to update the site’s grid capacity at our Kentish Town depot, at considerable expense, and are now able to charge all the EVs at once, including during peak time. While this investment has been hugely successful, a recent report from FREVUE (a European project funded by the EU’s Seventh Framework Programme for research, technological development and demonstration) highlighted the fact that UPS was required to make an investment in a UKPN asset without control over its operation. Additionally, UPS is a global operator but for smaller operations this type of investment may be out of reach, which prohibits the uptake of electric vehicles.

SMART Grid Technology

In addition to the conventional grid upgrade that we undertook, UPS worked with a consortium to deploy a radical new technology solution with the potential to dramatically reduce the cost of recharging a fleet of electric vehicles. Recharging a fleet of electric vehicles can be rendered cost-prohibitive by the need for expensive external power grid reinforcement work. To overcome this, the consortium, which comprises UPS, UK Power Networks and Cross River Partnership, has commissioned a combined smart-grid and energy storage system at the UPS operation in central London. The initiative was supported financially by the UK's Office for Low Emission Vehicles. It has had the immediate effect of raising the number of 6-7.5 tonne vehicles that can be recharged simultaneously overnight from the electricity power supply available at the site from 65 to the whole 170 fleet without any further external grid reinforcement work.

Believed to be a world first to be operating live at this scale and combining both smart-grid and energy storage technologies, the intention of the consortium is to produce a strategy for how the solution could be used in other UPS facilities and beyond to electrify fleets cost-effectively. UPS believes the day is rapidly drawing closer when the cost of an urban distribution electric vehicle, including the necessary power supply investments, will be lower than that of its diesel counterpart. This breakthrough will be instrumental in enabling electric vehicles to be deployed in scale in the world's cities, itself an essential component of tackling the air quality challenges that those cities face.

Grace Period

We welcome proposals to provide a grace period before enforcement in 2024. Businesses need certainty in order to plan and the vehicles we are ordering today, will be in our fleets in 10-15 years' time. The more time and certainty we have to plan, the more low emission options we can bring into our fleet.

We would also urge for financial support for companies in transitioning to low emission options, especially for electric vehicles and the corresponding infrastructure required. It is our contention that a lack of grid capacity is preventing private companies from investing in electric vehicles, inhibiting the ability of cities across the UK to achieve its goal of cleaner and more sustainable vehicles.

Summary

In general, UPS supports the proposals related to Dundee's aims to improve air quality in the city. We would also urge the local authority to consider some of the challenges commercial fleet operators such as ourselves are faced with and look at other innovative ways of ensuring the feasibility of sustainable delivery and logistics including:

- Provide funding and support to companies wanting to electrify their fleet and invest in grid capacity and/or develop and deploy Smart grid technology which will allow the charging of vehicles overnight in a cost effective way.
- Ensure range extended, electric vehicles are considered compliant and not liable to a charge.
- Look at making space available for city centre container staging, e-tricycle parking and charging availability to support sustainable final mile deliveries.

Tactran

Dear Sir,

Dundee Low Emission Zone – Consultation response

Thank you for the presentation provided to Tactran Members and Officers on 24th June 2021 outlining the proposals and timescales for the proposed Dundee Low Emission Zone. The presentation was very informative.

From the presentation and the information provided in the invitation letter and also on the Dundee City Council website it is our understanding that Dundee City Council intend introducing a Low Emission Zone (LEZ) that will cover the area within the Inner Ring Road, excluding Bell Street, West Marketgait NCP and Wellgate car parks. The proposed LEZ scheme is to apply to all vehicle types, apart from motorcycles and mopeds (which have been scoped out of the proposed LEZ scheme) and those subject to a national exemption. The proposed LEZ scheme is intended to be introduced on 30th May 2022 with a 2-year grace period (during which enforcement of the LEZ will not take place), meaning enforcement would commence on 30th May 2024. The zone will only be accessible to vehicles that meet the emissions criteria: Euro VI for buses, coaches & HGVs (registered from 2013); Euro 6 for diesel cars and LGVs (Registered from 2015) and Euro 4 for petrol cars and LGVs (registered from 2006). It is also noted that the objectives for Dundee’s Low Emission Zone are:

- Protect public health through improving air quality in Dundee and achieving air quality compliance for nitrogen dioxide (NO2), Particulate Matter (PM)10 and PM2.5;
- Develop an environment that helps promote more active and sustainable travel choices in Dundee and contributes to meeting emission reduction targets set out in Part 1 of the Climate Change (Scotland) Act 2009; and
- Contribute to the ongoing transformational change in Dundee and help promote the city as an inclusive and desirable place to live, invest, visit and learn. The proposed Dundee Low Emission Zone objectives are in line with the objectives of the Tactran Regional Transport Strategy 2015 – 2036 Refresh. In particular, Dundee LEZ will assist in achieving Tactran’s specific objectives for Economy; Health & Well-being and the Environment, as follows:

- 4a) Helping to meet or better all statutory air quality requirements;
- 3a) contributing to achievement of the Scottish national targets and obligations on greenhouse gas emissions;
- 3c) Promoting a shift towards more sustainable modes;
- 1a) Ensuring that transport infrastructure and services in the region help deliver economic growth, particularly in key business and employment sectors and in supporting town centres.

Tactran recognises that although the proposed Dundee Low Emission Zone covers the area within the Inner Ring Road, its influence will be far wider as Dundee city centre is a regional cultural and economic centre serving a far wider area than the city itself. It is also recognised that a number of the bus services accessing the city centre originate from outside the city in Angus, Perth & Kinross and Fife, and as such any improvements to the buses on these routes will assist in reducing harmful emissions in the neighbouring authority areas as well. In terms of goods vehicles, it is noted that the LEZ in Glasgow and the proposed LEZs in Aberdeen, Edinburgh and Dundee all intend having the same standard for vehicle emissions criteria for accessibility to the LEZ. This will also have a positive impact on other city and town centres, as haulage firms modernise their fleets to meet these standards. I therefore can confirm that Tactran is fully supportive of the proposed Dundee Low Emission Zone.

Asthma UK and British Lung Foundation

Asthma UK and British Lung Foundation Scotland

Asthma UK and British Lung Foundation (AUK-BLF) Scotland welcomes the opportunity to engage with Dundee City Council on the issue of Low Emission Zones in the city centre. We responded to the previous consultation in 2019 on the Low Emission Zone proposals and are grateful for the opportunity to do so again.

Air pollution levels in our cities are too high. We envisage a world in which everyone can breathe clean air with healthy lungs. Tackling transport emissions is central to our goal as poor air quality can be linked to a number of lung conditions, including asthma, chronic obstructive pulmonary disorder and lung cancer. Alongside other negative health impacts, exposure to polluted air is also linked to premature death. It is clear from this that we must do more to tackle unhealthy air.

When people are exposed to high pollution levels, for example on a busy road or during a high pollution episode, they breathe in these toxic materials into their lungs. Many people initially experience immediate symptoms such as irritated airways, feeling out of breath, and coughing. Such toxins can exacerbate symptoms, including triggering an asthma attack or a COPD flare-up. People with asthma may notice that they need to use their reliever inhaler more than normal when pollution levels are high.

Whilst we welcome the implementation of the Low Emission Zone, we believe that the proposal does not go far enough, with concerns around the notable exclusions of Lochee Road, West Market Gait and Dock Street and the three car parks. The council may recall we supported option C in the previous consultation, and we call on the Council to redraw the LEZ boundaries to reverse these omissions. The ambition of Dundee City Council to reduce air pollution is admirable. We support any measures to tackle unhealthy levels of air pollution in the city of Dundee and applaud actions the council has taken thus far to encourage a modal shift to cleaner forms of transport. However, the ambition to create a city of clean air must be matched by actions. The Council must go further and include areas like Lochee Road and West Market Gait in the Low Emission Zone.

If this is not done, the Council should invest further in Park and Ride facilities outside of the city centre to encourage more use of active and public transport. The alternatives to polluting vehicles will offset the air pollution that will remain by not including the three roads previously mentioned.

With regards to the timescales, AUK-BLF Scotland reiterates its previous position that these should be the shortest possible. We support the introduction of the LEZ in 2022, however the two-year grace period to allow for the Council to inform and prepare the public on the enforcement of fines, should be reduced to one year. It should be noted that although the LEZ will be installed in 2022, the council should be clear on how it will make the LEZ work if fines are not applicable for two years.

Finally, we would like Dundee City Council to set out what it plans to do after the introduction of the LEZ, and in particular the end of the grace period, to further reduce air pollution in Dundee. We would like to see the LEZ extended to residential areas around the city centre and the traffic corridors leading to the city centre. We hope that the council can set out a long-term plan following the introduction of the LEZ.

RAC Motoring Services

The RAC has some concerns about the impact of Dundee's LEZ will have on the breakdown and recovery sector.

As a responsible business we have taken steps to ensure that as many as possible of the RAC's fleet

entering the LEZs will be Euro VI compliant. However, we are concerned that a number of recovery vehicles operated by accredited third-party recovery organisations, often small businesses will be adversely impacted by the restrictions to be imposed on older vehicles. Recovery vehicles are generally much larger and are called upon sometimes when an RAC patrol van is not available or is unable to tow a broken-down or accident-damaged vehicle. We would like to ask you to consider that an exemption be granted from LEZ restrictions and subsequent penalty charge notices for recovery vehicles. This would be a local exemption as recovery (specialist) vehicles are not within Scotland's national regulations.

Recovery vehicles play a crucial role in keeping Dundee's busy routes clear. We work closely with our contractor partners who help us to ensure our members' vehicles are repaired or removed as quickly as possible. Many of these contractor partners also work with our major competitors. However, our contractor partners remain deeply concerned by a number of aspects about the proposals. Firstly, the default position of an LEZ is restrictive, meaning non-compliant vehicles are not permitted to enter the boundaries of the proposed LEZ. This may have a profound impact on rescuing stranded vehicles and result in motorists not being rescued at roadside. Secondly, if operators of non-compliant vehicles decide to continue providing a service and choose to enter these zones where not permitted, there is substantial concern about the financial impact of a £960 penalty charge notice. Such a charge and the prohibitive nature of the LEZ could make operations unviable and result in drivers in Dundee not receiving the urgent rescue they require in the event of a breakdown.

Recovery vehicles are specialist in nature and very expensive, many costing well in excess of £100,000 and operators will utilise them for many years (often 10 years or more) in order to pay back their high cost. Consequently, there is a disproportionate number of non-compliant older recovery vehicles in use across Scotland. The latest data we have from our contractor partners working in and around Dundee as of September 2020 shows that only 57% of recovery vehicles are Euro VI compliant. While many of our contractor partners plan to increase the numbers of compliant vehicles, the costs required to replace large recovery vehicles will make this unachievable by 2022. We are asking you to consider carefully the implications this may have on road safety and air quality in Dundee:

- If there are fewer recovery vehicles operating, this may leave broken-down vehicles stranded on roads in Dundee in dangerous situations, increasing the likelihood of road traffic collisions. If operators choose not to operate given the prohibitive nature of the Zone and the resulting PCNs, we may be no longer able to guarantee drivers roadside rescue and recovery in a timely manner. This will cause high levels of distress among drivers and we are concerned by the road safety implications.
- Stranded vehicles impact upon traffic flow, causing congestion. Congested roads and stop-start traffic, with idling vehicles will increase emissions. We support the Scottish Government and Dundee's intention to reduce emissions in its urban areas but we are concerned that restricting older recovery vehicles will be counter-productive and have the opposite effect on overall emissions to that intended.

The RAC understands the impact that roadside emissions have on public health and we share the Dundee's desire to improve air quality in its largest cities. As a motoring group, we supported the principle of introducing a Low Emission Zone based upon targeting the most polluting vehicles. However, we also believe that the safe operation of the road network and effective traffic management are also priorities and would trust you agree. In England, we have worked with major councils in Birmingham, Manchester, Leeds and Bath and these councils have acknowledged the importance of recovery vehicles in keeping their roads safe and moving and we were pleased that they have categorised recovery vehicles as 'specialist vehicles' and agreed to exemptions from daily charges in these Clean Air Zones.

About Logistics UK

Logistics UK (the new name for FTA) is one of Britain's largest business groups and the only one providing a voice for the entirety of the UK's logistics sector. Our role, on behalf of over 18,000 members, is to enhance the safety, efficiency and sustainability of freight movement throughout the supply chain, across all transport modes. Logistics UK members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.

Logistics UK seeks to ensure our industry can continue to supply businesses and consumers with the goods they require every day, while reducing any social impacts, including carbon dioxide emissions and air pollution. Transport decarbonisation is a key focus for the industry, and it is fully committed to achieving Net Zero by 2050. Through best practice, innovation and investment into new technologies, action is being taken across the sector.

Background

Logistics UK (at time was called FTA) submitted a response to Dundee City Council's previous consultation on the proposed LEZ, in November 2019.

We fully support the reasoning behind Dundee City Council's plans to reduce air pollution and protect public health.

Response to consultation

We are delighted to see that our previous concerns have been taken into consideration. These include the following points:

- With the new start date of 30th May 2022, for Dundee's LEZ Euro VI vehicles will naturally through replacement cycles, have become "standard" fleet for many operators in and around Dundee.
- The size of the zone now seems proportionate and will help achieve the desired effect.
- The new start date will allow the van fleet to move to required standards. This is particularly helped by the 2-year grace period for both residents and non-residents of the LEZ area.
- The grace period meaning that enforcement will commence on 30th May 2024, will allow the local businesses within and around Dundee time to prepare for the changes.
- We are also encouraged by the fact that Dundee City Council has recognised the important role that freight and logistics businesses play and indeed how they support the local economy.
- Finally, we are encouraged by the fact that Dundee City Council will be utilising the LEZ Retrofit Fund which provides grants funded by Transport Scotland.

Stagecoach East Scotland

Stagecoach are very much in favour of the implementation of a LEZ that treats all vehicles in the same way. The decision to avoid singling out buses for either early adoption or ignoring the impact that other vehicle types have on the air quality of the city centre are to be welcomed.

Buses offer an important means of supporting the reduction in emissions throughout the city by offering alternative means to travel other than the private car. The investment in cleaner vehicles made by all operators of local bus services and inter-city express coach operations in recent years means that for the most part the industry is set up for the introduction of the LEZ and the enforcement from 2024.

Areas that remain a concern either in the proposal as it stands or should it be changed before implementation include;

Delay in enforcement – whilst this will certainly be unwelcome in some quarters the impact of Covid on our investment programme has already seen the cancellation of new vehicles due for delivery in 2020 and a much reduced ability to invest in new vehicles for 2021. There would be no means of delivering a compliant fleet by the time of introduction of the LEZ in May 2022. Any push for compliance from that date would result in bus services being curtailed from some surrounding areas which will obviously have a negative impact on those communities relying on these services but also on the congestion and air quality within the city as additional car traffic replaces these services.

The current progress with the pandemic would suggest that a wider return to fleet investment should be possible in 2022. By the time of enforcement in May 2024 there is an expectation that all of our services would be operated by compliant fleets. The only concern is around provision of replacement vehicles covering for breakdown's or late running. These vehicles may be based in surrounding areas and not scheduled to operate into the LEZ but in order to maintain a service they may be used as a last resort in order to ensure that a journey operates and to avoid inconvenience to those relying on it. It would be perverse that a bus operator be faced with the option of a fine for operating a journey in such circumstances or leave passengers stranded. This d be especially the case if the fines were to multiply exponentially unlike the London charging scheme.

Inclusion of Seagate Bus Station – while major car parks are excluded from the LEZ the bus station which similarly sits at the outskirts of the city centre and proposed LEZ is included. While most local bus services will be routed through the city centre itself to reach the bus station and would therefore need to be fully compliant the bus station also acts as the stopping point for long distance coach services which will otherwise have no alternative stopping point for the city. Glasgow’s LEZ has already shown that it is possible to identify a compliant route into and out of the bus station to ensure any impact is limited whilst ensuring that connectivity can be maintained. This is not simply an impact on the city itself but as the interchange point between the local bus network and inter-city coach networks it provides the link between rural Angus, North East Fife and east Perthshire and services to the major Scottish cities.

Notably the sections of road used to access the bus station (Trades Lane) are amber, rather than red, on the emissions map, which suggests that the access roads could remain accessible without negatively impacting the improvements to be seen. Any vehicles using the rest of Seagate that pass within the LEZ would comply and therefore naturally improve the overall situation.

Access to the bus station is open to any operators, not only Stagecoach, and as such we cannot comment upon the impact this decision will have on those operators or any future operators wishing to provide services.

Lochee Road – as a bus operator using Lochee Road we have no firm view on whether the omission of this area from the LEZ is a good or a bad thing as any bus route serving Lochee Road will also serve the city centre and be compliant. What we would raise however is that if Lochee Road is not to be part of the scheme and works are undertaken to narrow the roadway and give over part of the space to a cycle way that this undoubtedly will make the operation of buses less efficient and likely to increase overall pollution.

Penalties – Development of LEZ proposals in other Scottish cities have contained greater detail on the penalties regime. Notably Edinburgh (the other major city centre we serve) notes that penalties are not a revenue generator for the City Council. We would support Dundee in making a similar

commitment and also believe there should be a commitment as to where the revenue generated would be reinvested.

Proposals by the Tayside Bus Alliance, covering the Tay Cities Region, to invest Scottish Government money in speeding up bus journeys and reducing the impact of congestion to encourage modal shift away from car to more sustainable modes makes a logical connection with the introduction of the LEZ. A commitment to use the penalty revenue to support modal shift through would spin off the benefits of the city centre LEZ to the city as a whole and the wider region.

Paths for All

Low Emission Zones
Response from Paths for All

We welcome the opportunity to make a submission to this consultation. Our comments are limited to those aspects that have direct relevance to the work and objectives of Paths for All. We are not able to give detailed comments.

We support LEZs in Scotland to improve air quality and contribute to healthy and thriving cities and towns. This supports the Government intention to make our towns and cities friendlier and safer places for walking, wheeling, and cycling.

Air pollution quite clearly continues to contribute to the early deaths of many people in Scotland. Some of the most vulnerable people (living in poverty and people with disabilities) are affected more by pollution – it makes our society less equal.

LEZs have been shown to be the most effective method of improving air quality quickly. They should be introduced alongside measures to support modal shift away from the car to walking, cycling, and public transport.

LEZs should benefit the environment hugely - delivering cleaner air, that will benefit our health. Cleaner air will also benefit the natural environment. LEZs also have the potential to deliver carbon reductions.

There is a risk that if LEZs are too small they will simply encourage polluting vehicles to operate outside the LEZ pushing up the levels of pollution in different areas that have not experienced it before.

LEZs should be introduced alongside measures enabling modal shift away from the private car to walking, wheeling, cycling, and public transport.

Bus travel is declining in Scotland and reversing this will be key to reducing car use. Most trips by bus also involve walking so this is important in terms of active travel and health and wellbeing. There should be a concerted effort to enable more use of buses.

Generally, we must make it easier for people to walk in their communities and make it harder to use a car in our urban areas.

Urban Design Frameworks should favour the pedestrian rather than the car. Urban realm improvements should be aimed at reducing car use, not encouraging it.

Benefits

- Reduced costs due to air pollution through days lost at work and NHS.
- Reduced physical inactivity and associated costs.
- Better places for people to live and work and associated economic benefits

We must allocate road space to modes of transport that are more space efficient and less polluting – i.e., walking, wheeling, cycling, and public transport. Poor air quality along with poorly maintained public footways/pavements can be a barrier to people adopting active travel.

We support an emphasis on greater use of public transport, green infrastructure, walking, wheeling, and cycling in tackling air pollution. As well as being a part of the solution, walking, wheeling, and cycling become more pleasant and therefore more likely to be adopted as air quality improves – creating a “virtuous circle”.

Improving air quality can play a part in creating better quality walking, wheeling, and cycling environments throughout Scotland – and so will support delivery of the Scottish Government’s Active Scotland Outcomes Framework, National Walking Strategy, The Cycling Action Plan for Scotland, and the Long-term Vision for Active Travel in Scotland.

Our interest in air quality and low emissions is as they relate to walking and promoting walking. Our main objective is to increase the number of people walking for the health benefits, but also there is an environmental benefit as well from people moving to walking from driving etc. The impact of air quality on health is often underestimated. Improved air quality is a good example of preventative spend – with the health benefits accruing over time.

Paths for All

Paths for All is a Scottish charity founded in 1996. We champion everyday walking as the way to a happier, healthier Scotland. We want to get Scotland walking: everyone, everyday, everywhere.

Our aim is to significantly increase the number of people who choose to walk in Scotland - whether that's for leisure or walking to work, school, the shops or to a nearby public transport hub. We want to create a happier, healthier Scotland where increased physical activity improves quality of life and wellbeing for all. We work to develop more opportunities and better environments not just for walking, but also for cycling and other activities, to help make Scotland a more active, more prosperous, greener country.

Our work supports the delivery of the Scottish Government’s Active Scotland Outcomes Framework, National Walking Strategy, The Cycling Action Plan for Scotland and the Long-term Vision for Active Travel in Scotland, community and workplace health walking, path network development and active travel policy development. We are a partnership organisation with 30 national partners. Our funders include the Scottish Government, Transport Scotland, NatureScot, and The Life Changes Trust.

Smarter Choices, Smarter Places

The Smarter Choices, Smarter Places (SCSP) Programme is Paths for All’s grant scheme to support behaviour change initiatives to increase active and sustainable travel. The programme is funded through Transport Scotland and aims to make walking and cycling the modes of choice for short local trips and encourage sustainable travel choices for longer journeys.

The RHA thanks the Dundee authorities for the opportunity to comment on its Low Emission Zone proposals. Our response follows a separate stakeholder engagement meeting between Dundee officials and the RHA on 6 July 2021.

The RHA comments that, to reduce nitrogen oxide (NOx) pollution, public authorities across the United Kingdom are choosing to implement a policy model that seeks to deter vehicles deemed “polluting” from entering designated areas through punitive charges. Currently, within Scotland, this manifests itself as “Low Emission Zones” (LEZ) and as “Clean Air Zones” (CAZ) in England.

Whilst the RHA supports the overall goal to improve air quality and has appreciated the difference in approach and consultation between Scotland and England, the stance taken in England has caused hauliers across the United Kingdom a significant strategic problem with ramifications for Scotland. Specifically, by linking compliance to the Euro VI diesel standards, public authorities undermine the asset values of non-Euro VI diesel vehicles. This is because market demand for such vehicles falls, with a consequential fall in their residual values.

Exacerbating this are two further problems. First, the aggressive timescales to implement CAZ within England overlooked there has been an insufficient supply of compliant vehicles to meet demand and thereby creating a shortage. This has caused price inflation in the desired vehicles (in this instance, Euro VI) thus causing the market to become distorted and disrupting business investment decisions and consequential vehicle replacement cycles. We regret that as much as £1.2bn has been prematurely wiped from the value of the Euro V fleet of HGVs (94,000 lorries).

Secondly, the RHA strongly believes that NOx emissions evidence does not justify the aggressive stance taken against HGVs in England. Using data sourced from the National Atmospheric Emissions Inventory, we estimate that, following the £1.9bn investment made by hauliers in the latest HGVs, NOx emissions have fallen by over 60% since 2013. With no further policy intervention, this will fall by over 85% from 2013 levels by 2025.

This context matters. In a low margin industry such as haulage (2% in 2020 – Source: Statistica), the premature devaluation of an asset can push the operator into an accounting loss, which increases the difficulty particularly for SME operators to raise the necessary finance commercially to replace their vehicles. Our concern therefore is a perverse outcome will occur, where market forces will cause operators to run older more polluting vehicles for longer than desired.

The RHA is grateful to have had the opportunity to discuss with officials across Scotland the strategic problems arising from the chosen policy model to reduce NOx emissions. Ideally, we would prefer alternative solutions to be implemented, where natural vehicle replacement cycles and market forces do the “heavy lifting” required to upgrade vehicles to the latest cleanest standards without automatic recourse to public funds. Such an approach might then be augmented by non-charging interventions to target pollution hotspots via improved traffic flow measures and appropriate financial support to retire the oldest pre-Euro V vehicles from the road.

Given the decision to implement a LEZ in Dundee, mitigating the impact of the asset devaluation on non-Euro VI vehicles is therefore crucial. We therefore give qualified support to the limited geographic area that the LEZ will cover - this will ensure that actual pollution hotspots are identified and targeted. We also give qualified support that, following the two-year grace period, enforcement will begin no earlier than 30th May 2024. Given the market distortion we set out above, we judge this will allow sufficient time for the second-hand market in Euro VI vehicles to develop thereby enabling SMEs the opportunity to upgrade their vehicles.

Citylink are in favour of the implementation of a LEZ that treats all vehicles that use the City in the same way. The decision to avoid singling out buses and coaches and ignoring the impact that other vehicle types have on the air quality of Dundee are to be welcomed.

Coaches offer alternative means of travelling, other to a private car and as such are important tools for reducing the emissions within the City. Operating companies have invested in cleaner vehicle for inter-city and express operations which means that the majority of our fleet is prepared for the introductions of the LEZ enforcement from 2024.

Areas that we would like to be considered are below:

- Excluding Seagate Bus Station from the proposed LEZ zone – As the bus station is situated on the outskirts of the centre, like several of the major car parks that are currently excluded from the LEZ, we propose the bus station is also excluded. Most scheduled vehicle will need to operate through the city centre to service the bus station, however this is not the case for all operators. For example, as a coach operator, the bus station serves as a pick up/drop off point. As with Glasgow LEZ it has been proven that there is a way to identify a route to the bus station which would ensure connections can still be made but with minimum impact on the LEZ. Due to the function of the bus station being an interchange for many services connection major Scottish cities, the impact if the station wasn't excluded is much wider than the city itself.

- Delay in enforcement – whilst this will certainly be unwelcome in some areas, the impact of COVID on operators' ability to not only invest, but receive pre-ordered vehicles has been vastly reduced. Due to this, it could be possible that a percentage of our fleet becomes non-compliant if introduced in May 2022. If compliance is insisted upon from May 2022 it may result in our local operation being curtailed from some surrounding areas. This will therefore have a negative impact on local communities that rely on the service, as well as subsequently increasing car use within the area.

Given our operators have received a vastly reduced income due to a reduction in operated mileage, if the continued COVID trend continues and our prediction for a small growth in 2022 is accurate, then it is possible that Operators could begin to invest in fleet in 2022. It is therefore appropriate to assume that by May 2024, when enforcement commences, all of our fleet would be compliant. The area that is of a concern though, is regarding vehicles used to replace a scheduled service i.e. through a breakdown or accident. The vehicles used for emergency cover are often sourced last minute, and therefore not scheduled to necessarily operate within the LEZ. It would therefore make little sense for an operator to act on behalf of a passenger to prevent them being stranded, to incur a fine for operating such a journey.