City of Edinburgh Council

Low Emissions Zone (LEZ) Consultation 2021

Summary of findings

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September 2021

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Executive summary

- The City of Edinburgh Council ran a consultation from 28th June to 20th September 2021 regarding the proposed Edinburgh Low Emission Zone (LEZ).
- Self-completion survey: responses = 4,976 online from individuals, 75 online,
 22 email from organisations. Findings summarised by Scott Porter Research.

Respondent demographics and modes of travel

- Demographics of main online survey show a tendency towards an older, and a more male audience with 60% over 45 years old, and 60% male.
- The car was the most used mode of transport overall and second most frequently used after walking.

Support for the LEZ overall

- Mixed views overall, but whilst 48% were strongly/somewhat in favour and 48% strongly/somewhat opposed, largest response was 'strongly oppose' at 34%.
- Strong opposition especially notable for businesses within the LEZ (56%) and who access it (57%).
- Reasons for opposition led by implications for those affected: financial for individuals, especially low income households and workers; detrimental impact for businesses and perceived reduction in people using city centre; insufficient public transport and electric vehicle infrastructure.

Support for the boundary

- More opposed than in favour: 52% strongly/somewhat opposed versus 40% strongly/somewhat in favour.
- Most opposition related to concerns for increased congestion, longer journeys and more pollution at the boundary/in other areas; as well as impact on North/ South, East/West routes (alternative routes, increase congestion/pollution).

Support for the approach to a single grace period of 2 years

■ 54% strongly/somewhat in favour and 35% strongly/somewhat opposed. However only 24% felt 2 years was right, 43% too short, 23% too long.

Awareness of support grants

 Awareness low: 28% aware of support grants for small businesses and lowincome households; 23% aware of other sustainable travel grants/loans.

Support for the exemptions approach

• 58% strongly/somewhat in favour, 23% strongly/somewhat opposed, but should be noted only 44% of businesses in favour.

Adapting to the LEZ - action taken

- 24% said vehicle would comply, so no action needed.
- Multiple actions noted, none more than 20%. Most frequently mentioned: 19% change route; 18% use more public transport; 15% walk more; 13% upgrade vehicle; 13% cycle more.

Views of Organisations

 Organisations views generally reflect mixed nature of findings, with more specific comment about the effects on businesses, mostly detrimental; and also imperative need to affect change to reduce pollution/help the environment.

1. Background to this report

1.1 The consultation and Scott Porter's role

The City of Edinburgh Council (the Council) has completed a consultation exercise to understand views on its proposal for the city's Low Emission Zone (LEZ). There was a need to analyse the consultation findings and Scott Porter Research & Marketing Ltd were asked to conduct this work as a fully independent market research agency.

1.2 Data included within analysis

The data analysed was taken from an online survey which generated 4,976 responses and also from responses from representatives of organisations, 75 online and 20 by email. The survey was designed by the Council with assistance from Scott Porter. The Council then scripted and hosted the online survey, which was live from 28th June until 20th September 2021.

1.3 Analysis process and data protection

The data processing and analysis for the online survey was as follows:

- the analysis requirements were discussed at a briefing meeting between the Council and Scott Porter, and the anonymised raw data was compiled into 4 datasets across the period of the consultation and sent by secure means to Scott Porter
- data processing included quality and sense checks to review where possible if there were duplicate responses and assess how many surveys were complete
- the data was cleaned and checked and final sample size determined, data tables run and an initial set reviewed prior to full analysis, with further data mining and cross tabulation completed as determined by the results
- the online data from the 75 organisation representatives was analysed separately and the qualitative responses from 22 emails were also reviewed for their content, summarised and both were then added to the analysis in a separate section of the report.

The analysis for all included a review of respondents' levels of support for, views of and knowledge of: the LEZ proposal overall; the boundary as described; the grace period; support grants; exemptions; and actions that might be taken as a result of the LEZ.

In terms of data protection, Scott Porter abides by the Market Research Society Code of Conduct and Data Protection/GDPR rules. All data was screened and passed on to Scott Porter by the Council in a format that complies with GDPR and Council policies. The online survey included personal data, but this was anonymised by the Council prior to analysis, with name, organisation and email being removed. This ensured the dataset for analysis had no identifiable personal data (i.e. responses such as age, gender, physical/mental health could not be traced back to an individual).

2. Authors' thoughts

2.1 Thoughts on the findings

Reviewing the data it can be seen that, not surprisingly, responses reflect the respondent's own situation and their views on environmental issues. Aligned to this is the fact that self-completion formats, such as an online survey, used for public consultation tend to be completed by those with an interest, or those who want to get their views across. This is likely to mean that those who have reviewed the LEZ and are happy with it will not have felt the need to comment and therefore not completed the survey. This can, of course, colour the tone of comments and must be taken into account when interpreting findings.

In terms of the respondents for the consultation there was a wide mix of audiences: the general public, to businesses and other organisations who took time to make submissions. They included those living in Edinburgh and also the surrounding areas; and a good mix of demographics, although the online sample has a more male and an older age group (40 years plus) bias. Across the sample there were also multiple modes of private and public transport used.

All of the above suggests that the data from the consultation can be taken as a robust view of different sample groups in and around Edinburgh (with the associated caveats about self-completion methods already mentioned).

Support for the LEZ and its details is very mixed, but this appears to have less to do with the principle of being able to breathe better air, and more to do with the practical implications for people within and also travelling to the zone, as well as the specific practical details of the proposal.

It would be remiss not to note that the covid-19 pandemic has, of course, had an impact on views, especially with regards to the financial situation of both individuals and businesses and the potential ability now, or in the near future to upgrade vehicles and also the need to preserve cash flow and jobs. Interestingly there is also mention of some reluctance to use public transport due to the perceived risk. All of this could perhaps explain a concentration of views on the financial implications for individuals and businesses and suggest people may be 'protective' of their situation and reluctant to have more change 'forced' on them whilst only now coming out of the massive upheaval of the past 18 months. Perhaps also for some the pandemic has left them feeling even more reliant on their vehicles, to feel safer or to be sure they can earn their living.

All in all, the main thoughts that need to be considered and reviewed in moving forward with the LEZ proposal relate to the following:

Support for the LEZ overall

- Overall there are two main areas of concern the financial implications and the implications for the edge of the zone (see Boundary).
- The financial implications are a major worry for many who do not support the LEZ, and it is primarily seen as discriminatory to low income households, but also to those who cannot afford to upgrade at this point in time. This is likewise the case for businesses, but also for city centre businesses is the danger people do not visit the city and trade is lost as a result.
- Of note are the comments regarding the infrastructure for electric vehicle charging and the cost of the vehicles themselves (more than in 2019), with

- questions raised about how charging points will be provided within a city of many flat dwellers and what purchase incentives there may be.
- Further to this are numerous mentions of addressing other issues across the city which it is felt would bring down congestion and therefore pollution levels. These specifically include Spaces for People and to a lesser extent the 20mph programme. Perhaps linked to this are a similar number of mentions of distrust and disillusionment with the Council.

Support for the boundary

- Issues pertaining to the 'edges' of the boundary were another paramount area of concern for people, with many of the view that the LEZ will simply displace both vehicles and pollution to other, mostly residential areas of the city, therefore causing congestion there, as well as parking issues and so on.
- Comments on the boundary itself concentrate on these more overall thoughts, with specifics more likely to relate to an individual's local area. However of note are the questions raised relating to other much polluted areas/roads (such as St John's Road), asking how they specifically can be addressed, especially as many lie outwith the confines of the proposed boundary.

Grace period approach

- Given the comments about financial implications it is perhaps not surprising that the grace period of 2 years is too short for many, especially businesses.
- Interestingly here when reviewing comments it can be seen that a proportion relate this back to the process starting in 2019 or earlier, whilst some see this consultation as the first time they have heard about the LEZ. This perception, of course will also have an impact on how this period is viewed.

Exemptions approach

 Exemptions cause less comment, most accepting, or not stating others. Of those who do state an additional exemption it can be seen that most thoughts go to broad brush groups – either all (those who simply do not want a LEZ), or city centre residents, or all trades and delivery vans.

Awareness of support grants

 Awareness of support grants and loans is generally low (23%-28%) and this would need to be addressed within any future LEZ communication campaign.

Adapting to the LEZ

- The interesting aspect of the responses to this question is the number of different options given (the largest of which was mentioned by 20%) and the feeling within the comments that many are simply unsure what they can do to enable them to use their vehicles within the LEZ. There is a definite feeling of resignation for some, but also worry for others, especially residents, as to how they can 'solve the problem' of complying given their current situation.
- This perhaps reflects that, unlike 2019 where 'use more public transport' received most mention (30%), in 2021 the most mention is for 'change my route' (19%), suggesting perhaps they wish to keep using their vehicles more than they wish to keep travelling through the zone.

Organisations

The thoughts from the businesses within the organisations sample were generally in line with the main sample, suggesting consistent concerns are apparent. However, of course, when reviewing the thoughts of the other organisations with vested interests in the environment or other modes of transport their specific views become clear with more comment about widening the LEZ and implementing the full scheme faster. Of interest are the thoughts from the neighbouring councils who ask that the implication of the LEZ for all sides be reviewed and considered.

2.2 Thoughts on the consultation process

In terms of the consultation process, and looking to future consultations the authors would suggest that the experience for the respondent and the quality of the data could be enhanced by:

- setting specific objectives for what the consultation needs to achieve, both for the Council and for the respondent to allow them to understand what they are being asked, why the consultation is being done and what their views may affect
- within this to review the terminology used for such an exercise what does 'consultation' mean – and ensuring the introduction to the exercise states this clearly so those who take part understand and are sure what their comments may, or may not affect
- allowing sufficient time prior to the start of the consultation to fully explore the design of the questionnaire in terms of the content in the light of the desired objectives and also building in time to check any online scripts for their flow and accuracy
- considering also within this how each respondent group is best approached for comment, looking at the more appropriate format – either via online survey or another means (and also whether different online surveys are needed for different audiences)
- planning the dissemination of the consultation to allow all audiences a similar time frame for response – and to build in responses to show these audiences and allow for their analysis
- building in sufficient time for analysis to allow review of all aspects of the findings.

3. Main findings

This section of the report details the main findings from the consultation. It starts with the background of those who took part and then reviews the main areas as detailed in the online survey:

- the LEZ proposal overall
- the boundary as described in the survey
- the grace period
- support grants
- exemptions
- adapting to the LEZ action taken as a result.

The tables for the main open-ended responses for the online survey can be found in a separate PDF document. A more inclusive table for Q6 can also be found in Appendix 1, including responses that only achieved between 0% and 3% each.

The following definitions should be noted when reviewing findings:

- '0%' shows something is mentioned, but by insufficient numbers to reach 1% of the pertinent sample
- '-' indicates that no one gave this response
- 'other' refers to responses not of specific note often individual mentions
- figures are rounded up to the next percentage, i.e. when x.5% and above
- 'dk' indicates a 'don't know' response
- 'nfs' is a generic response that has been 'not further specified'.

3.1 Respondent background

The first section of the report highlights those who took part in the consultation.

3.1.1 Resident status

A total of 4,976 respondents completed the online survey. Of these the vast majority, 86%, live in Edinburgh (38% city centre residents, 48% live in another part of Edinburgh). 45% said that they worked in the city centre and 64% visited for leisure, 8% (408) said they own a business within the city centre and 4% study in the city centre (Table 1).

Table 1: Resident / Work / Leisure

1	
	Total
	n=4,976
Live in Edinburgh city centre	38%
Live in another part of Edinburgh	48%
Live outside of Edinburgh	14%
Work in city centre	45%
Operate business/organisation located in city centre	8%
Study in city centre	4%
Visit city centre for leisure/shopping/etc	64%
None of the above	10%
Not answered	0%
04 0 02 1411:1 (11 (11 : 1 1 1 1 1 2	

Source: Q1. & Q2. Which of the following best describes you?

3.1.2 Demographics

The demographics of the online survey respondents show:

- an older audience (Q19 Age):
 - 36% under 45 years old (under 25: 3%, 25-34: 14%, 35-44: 19%)
 - 60% and over 45 years (45-54: 22%, 55-64: 21%, 65+: 17%)
 - 3% prefer not to say / 0% not stated.
- more male than female respondents (Q20 Gender):
 - 60% male
 - 33% female
 - 0% other gender identity
 - 6% prefer not to say / 0% not stated.
- 12% said they had a physical or mental health condition or illness lasting or expected to last 12 months or more that limits their daily activities (Q21), 79% did not, 8% prefer not to say, 0% not stated
 - of those who stated yes (604) 17% were Blue Badge holders (Q22) and 3% own a vehicle with adaptions for disabled users (Q23).

3.1.3 Use of transport and when travel in the city centre Respondents were asked about their usual forms of transport to travel to, from or around the city centre. Firstly, looking overall at what is used it can be seen that the car, walking and buses lead the way, for all sample groups (Table 2).

Table 2: Modes of transport used to travel to, from or around the city centre

		ı	· ·		, ,	1
	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Car	86%	84%	86%	86%	88%	90%
Walk	85%	93%	84%	87%	84%	78%
Bus or coach	71%	64%	68%	75%	60%	60%
Train	42%	49%	43%	44%	41%	38%
Taxi/private hire car	53%	56%	55%	55%	63%	56%
Tram	38%	40%	35%	41%	32%	31%
Bicycle or scooter	37%	36%	41%	39%	37%	33%
Light goods vehicle	6%	6%	7%	5%	12%	25%
Motorcycle or moped	4%	4%	5%	4%	5%	7%
Wheelchair (wheeling)	1%	1%	1%	1%	1%	1%
Heavy goods vehicle	1%	1%	1%	1%	2%	3%
Not stated	0%	0%	0%	0%	-	_

Source: Q3. Currently, how often do you use each of these forms of transport to travel to, from or around Edinburgh city centre – either for personal or business reasons?

Looking at this by the frequency the mode of transport is used (Table 3) shows some modes used more regularly than others. Not surprisingly LEZ residents say they walk every day most frequently at 72% followed by LEZ students 64%. This is compared to 44% of those who Work in the LEZ, 51% of those with a Business in the LEZ and 37% Businesses accessing the LEZ and also Visiting the LEZ for leisure. Use of cars every day is most frequent for LEZ Businesses 40% and Businesses who access it 35%, followed by those who live in the LEZ 30%, compared to 26% for those who work in the LEZ and 22% for those who Study there. Interestingly for the trams, the frequency is much lower, with only 11 people (0%) saying they use them every day, all of whom live outside the LEZ.

Table 3: Frequency of using modes of transport for city centre travel

Total	Never	Never	Less than	At least	At least	Every	Not
n=4,976	no	by	once a	once a	once a	day	stated
,	access	choice	month	month	week	,	
Car	6%	4%	12%	16%	38%	20%	4%
Walk	6%	3%	9%	12%	25%	39%	6%
Bus or coach	5%	14%	25%	22%	20%	3%	10%
Train	25%	15%	31%	8%	2%	0%	18%
Taxi/private hire car	10%	22%	34%	15%	4%	1%	15%
Tram	23%	21%	28%	7%	3%	0%	17%
Bicycle or scooter	32%	13%	8%	8%	15%	6%	18%
Light goods vehicle	70%	3%	2%	1%	2%	2%	20%
Motorcycle or moped	68%	4%	1%	1%	1%	1%	24%
Wheelchair (wheeling)	64%	1%	0%	0%	0%	0%	34%
Heavy goods vehicle	76%	2%	0%	0%	0%	0%	21%

Source: Q3. Currently, how often do you use each of these forms of transport to travel to, from or around Edinburgh city centre – either for personal or business reasons?

Respondents were asked when they usually travel to, from or around the city centre. Overall 41% said they travelled to, from or around the city centre 'Every day (Monday to Sunday)', 13% 'Weekdays only (Monday to Friday)', 6% 'Weekend only (Saturday and Sunday)' and 39% 'Other mix of days'.

Table 4: When normally travel to, from or around the city centre

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Every day (Mon-Sun)	41%	71%	54%	38%	66%	56%
Weekdays (Mon-Fri)	13%	6%	17%	10%	12%	16%
Weekends (Sat-Sun)	6%	3%	2%	8%	1%	1%
Other mix of days (nfs)	39%	19%	26%	44%	20%	26%
Not stated	0%	0%	0%	0%	0%	0%

Source: Q4. When do you normally travel to, from or around the city centre for personal and/or business reasons?

3.2 The Edinburgh Low Emission Zone (LEZ)

The online survey contained a link to the document 'Edinburgh's Proposal to make a Low Emission Zone' which provided information on the LEZ (the full print version of the online survey can be seen in Appendix 2).

3.2.1 Levels of support for the Edinburgh LEZ

Based on the information given in the online survey respondents were asked to state the extent to which they were in favour of the proposal for the LEZ. Overall, 48% said they were in favour (strongly or somewhat) and 48% said they were opposed (strongly or somewhat). (Table 5)

Looking at the strength of opinion it can be seen however that the largest response was for 'strongly opposed' at 34%. This is especially notable for businesses, both located in the LEZ (56% 'strongly oppose') and those who access the LEZ (57% 'strongly oppose'). Likewise 42% of LEZ residents stated 'strongly oppose', as did 40% of those who Work in the LEZ. Overall it is the large numbers of Visitors to the LEZ that lower the overall figure as 31% of this groups were strongly opposed.

Demographically it can be seen that those over 35 are more likely to 'strongly oppose' than those under 35 years old, with 37% of the 45-54 age group stating 'strongly oppose'. Males are also more likely to 'strongly oppose' the LEZ, at 35% compared to Females at 27%.

Table 5: Levels of support for the Edinburgh LEZ

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Strongly in favour	27%	26%	25%	29%	15%	13%
Somewhat in favour	21%	18%	19%	23%	18%	13%
Neither/don't know	3%	2%	2%	3%	0%	2%
Somewhat opposed	14%	12%	14%	14%	10%	15%
Strongly opposed	34%	42%	40%	31%	56%	57%
Not stated	0%	0%	0%	0%	0%	-

Source: Q5. To what extent are you in favour of the Edinburgh LEZ as proposed?

3.2.2 Reasons why oppose the Edinburgh LEZ

Respondents who opposed the Edinburgh LEZ or who were unsure (neither/don't know) were asked to give reasons for their views and space to write in their responses. These have been distilled and the themes drawn together for analysis.

Of the 2,570 (52%) who did not support or were unsure of the LEZ, it can be seen that there are a myriad of reasons for not supporting the LEZ, many of which are very specific to the individual (Table 6 page 12 and Appendix 1).

However when reviewing the 19 reasons which receive most mentions, by 4% or more respondents (i.e. around 100+ mentions each) it is clear that the main concerns are the broader issues for those affected within the zone.

Following this are perceived issues for the areas on the boundary and further afield in Edinburgh, as well as views that congestion has other causes and that these need addressing, as well as questioning the Council's intentions with the scheme and whether a LEZ has sufficient proven benefits.

- Implications/issues for those affected (61% of mentions) highlighting cost implications for all concerned and the viability of alternatives to use instead of cars:
 - discriminatory to low income households/workers (14%)
 - can't afford to upgrade vehicle/object to being put to the expense (13%)
 - detrimental to businesses based in LEZ (7%)
 - will stop people visiting/using the city/go elsewhere to shop (7%)
 - detrimental/discriminatory to residents (4%)
 - public transport insufficient/limited (8%)
 - electric vehicle charging point infrastructure not sufficient build it up (5%)
 - need car, no alternative work, leisure, appointments, help people (4%)
- Implications as a result of the LEZ area (20%) concerns here about the congestion and pollution that will result in the areas around the boundary:
 - will move/cause congestion in surrounding streets/areas (9%)
 - will move/cause pollution in surrounding streets/areas (7%)
 - will cause longer journeys to avoid LEZ/more pollution (4%)
- Other causes of congestion, and pollution (20%) views concern other issues within Edinburgh that are perceived to be a bigger cause of congestion and therefore pollution, mainly those to do with the flow of traffic through the city:
 - Spaces for People has caused issues/remove it (9%)
 - spend money on road maintenance/keeping traffic flowing (6%)
 - congestion is due to other issues (5%)
- Perceptions of the Council (17%) views here lead to people being distrustful of the intentions behind the LEZ and the ability to implement it well:
 - money making scheme/stealth tax (8%)
 - dislike/distrust/issue with the Council (6%)
 - simply an anti-car policy (4%)
- Views of the need for a LEZ (9%) some feel the benefits of a LEZ are not sufficiently proven, or have questions about this:
 - not needed pollution levels not justified/proven/have no impact (5%)
 - scrapping usable cars is a waste/worse for environment (4%)

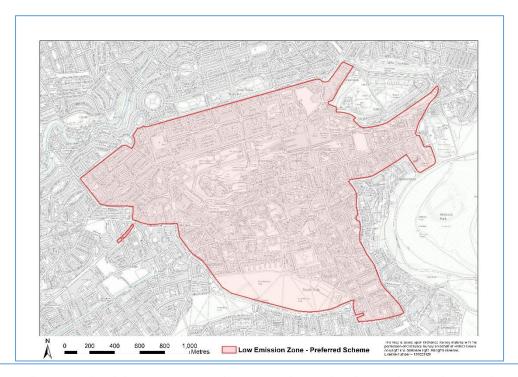
Table 6: Reasons for opposing the proposed Edinburgh LEZ

rable of Reasons for opposing the proposed Edinburgh LEZ	
	Oppose & Neither/don't
	know
	n=2,570
Discriminatory to low income households/workers	14%
Can't afford to upgrade vehicle/object to being put to the expense	13%
Spaces for People has caused issues/remove it	9%
Will move/cause congestion in surrounding streets/areas	9%
Public transport insufficient/limited	8%
Money making scheme/stealth tax	8%
Will stop people visiting/using the city/go elsewhere to shop	7%
Will move/cause pollution in surrounding streets/areas	7%
Detrimental to businesses based in LEZ	7%
Dislike/distrust/issue with the Council	6%
Spend money on road maintenance/keeping traffic flowing	6%
Not needed – pollution levels not justified/proven/have no impact	5%
EV charging point infrastructure not sufficient – build it up	5%
Congestion is due to other issues	5%
Simply an anti-car policy	4%
Will cause longer journeys to avoid LEZ/more pollution	4%
Detrimental/discriminatory to residents	4%
Need car, no alternative, work, leisure, appointments, help people	4%
Scrapping usable cars is a waste/worse for environment	4%

Source: Q6. Why are you not in favour/unsure of the Edinburgh LEZ as proposed? Full table of all responses in Appendix

3.3 LEZ Boundary

The online survey contained the information and visual shown below about the LEZ boundary as well as the information in the previously mentioned LEZ proposal link (see Appendix 2 for the full print version of the online survey).



The Scottish Environmental Protection Agency (SEPA) helped the Council model the air quality and traffic impacts of different boundary options. The primary aim in choosing the most suitable option, was to target air pollution in the worst areas. Another key consideration was to provide a logical and clearly sign-posted diversion for traffic wishing to avoid the Zone.

A road network management strategy will be developed alongside the LEZ to ensure traffic is managed around the boundary.

3.3.1 Levels of support for the Edinburgh LEZ boundary shown Based on the information given in the online survey respondents were asked to state whether they were in favour of the boundary for the Edinburgh LEZ. Overall, 40% said they were in favour (strongly or somewhat) and 52% said they were opposed (strongly or somewhat). (Table 7 overleaf)

Looking again at the strength of opinion it can be seen that the largest response was for 'strongly opposed' at 37% and again this is especially notable for businesses at 61% 'strongly oppose' for both those located in the LEZ and who access the LEZ. Likewise 45% of LEZ residents stated 'strongly oppose', as did 44% of those who Work in the LEZ.

Demographically the same groups are more likely to oppose the boundary, with those over 35 more likely to 'strongly oppose' than those under 35 years old, with 40% of the 45-54 and 55-64 age groups stating 'strongly oppose'. Males are also more likely to 'strongly oppose' the LEZ, at 38% compared to Females at 31%.

Table 7: Levels of support for the Edinburgh LEZ boundary

_ : 45:0	3 p 	rable 71 Levels of support for the Lambargit LLL boardary									
	Total	LEZ	Work in	Visit LEZ	Business	Business					
		resident	LEZ	for leisure	in LEZ	access LEZ					
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470					
Strongly in favour	17%	18%	16%	19%	11%	9%					
Somewhat in favour	23%	17%	21%	25%	16%	12%					
Neither/don't know	7%	5%	5%	7%	3%	5%					
Somewhat opposed	15%	14%	14%	15%	9%	13%					
Strongly opposed	37%	45%	44%	33%	61%	61%					
Not stated	0%	-	0%	0%	_	_					

Source: Q7. To what extent are you in favour of the boundary for the LEZ in Edinburgh as proposed?

3.3.2 Reasons why do not agree with Edinburgh LEZ boundary Respondents who opposed the Edinburgh LEZ boundary or who were unsure (neither/don't know) were asked to give their reasons and space to write in responses. These have been distilled and the themes drawn together for analysis.

Of the 2,936 who did not support the boundary, it can be seen in Table 8 overleaf that only 44% of the comments given were about the boundary specifically.

In terms of the boundary comments, there were many responses regarding different inclusions or exclusions near respondent's own specific locations.

However, by far the most frequent comments were those made relating to the concern of increased congestion and pollution in the streets around the boundary and across other roads as people find alternative routes to travel to avoid the LEZ. Linked to this were comments about routes North/South and East/West being affected by the LEZ and again the potential alternatives that would be used, causing longer journeys and more pollution:

- cause congestion elsewhere/other routes (12%)
- create longer journeys and more pollution (6%)
- East/West & North/South routes affected too much (4%)

Interestingly in terms of the LEZ's size around the same number overall felt it was either too big (7%) or too small (6%).

Table 8: Reasons for opposing the proposed Edinburgh LEZ boundary

<u> Table 8: Reasons for opposing the proposed Edinburgh LEZ boundar</u>	У
	Oppose or
	Neither/don't know
	n=2,936
Mentions not specific to boundary	56%
Not in favour of LEZ/reasons why	39%
Not answered	10%
Comments about other things/other	6%
Don't know/not sure/no comment	1%
Mentions specific to boundary	44%
Cause congestion elsewhere/other routes	12%
Too big/should be smaller	7%
Create longer journeys and more pollution	6%
Too small/should be bigger	6%
East/West & North/South routes affected too much	4%
Should be the whole city/to the bypass/all or nothing	3%
Cause issues/parking problems on boundary	2%
Insufficient data/work done to know/justify	2%
More polluted streets elsewhere need it more	2%
Arbitrary/odd areas/random/don't see why	1%
Will just creep out once it starts!	1%
Car parks within area a bad idea (e.g. St James)	0%
Some areas not covered/covered well by public transport	0%
Why exclude AQMA zones?	0%
Focus on exit/entry points, Drumbrae/Queensferry/Maybury Rds	0%
Not residential areas (proposal includes these)	0%
Boundaries are mainly by residential areas	0%
Suggested additions/inclusions	
Include: Holyrood Park; all New Town/Stockbridge/to Ferry Rd;	1% each
out to Leith/North; further south, e.g. Morningside/Grange/	
Blackford; St John's Rd/Corstorphine	
Include: Gorgie/Dalry; out to Haymarket; Queensferry Rd;	0% each
Queen St; Randolph Crescent to Moray Place; Clerk St/East of	
Melville Drive; Scottish Parliament building; Dumbiedykes;	
Tollcross; Regent Terrace/London Rd/Easter Rd	
Suggested reductions/exclusions	40/
Not Western Approach/Lothian Rd/Charlotte Sq/West End; Too	1% each
much in the South/reduce this area; Only Princes St/George	
St/Queen St; Don't make boundary Preston St Primary School	0% each
Only include Old and New Town; Should be no access to St	U% edCf1
Andrew's House/Parliament/Council offices; Not around Holyrood Park; Not where NHS facilities are (e.g. Eye Pavilion); Not	
Melville Drive; Not Atholl Crescent/Canning St Lane; Not	
Newington; Need access to Waverley Station	
remington, recu access to waveney station	

Source: Q8. Why are you not in favour/unsure of the boundary as proposed?

3.3.3 Respondent status within the LEZ boundary as shown

Of the 4,976 respondents who completed the online survey 11% stated they lived within the LEZ boundary the vast majority (88%) therefore travel into the area. Indeed 74% said they visit the LEZ for leisure/shopping etc, whilst 36% work in the area and 15% said they operate a business located within the area or that requires access to it (Table 9).

Table 9: Resident / Work / Leisure - status within proposed Edinburgh LEZ

able 31 Residency Work / Leisare Status Milling Proposed Lar	
	Total
	n=4,976
Live within proposed LEZ	11%
Live outside in proposed LEZ	88%
Not answered	1%
Operate business/org. located within proposed LEZ	6%
Operate business/org. that requires access to proposed LEZ	9%
Work within the proposed LEZ	36%
Study within the proposed LEZ	4%
Visit proposed LEZ for leisure/shopping/etc	74%
None of the above	7%
Not answered	0%

Source: Q9. & Q10. When you look at the boundary map as shown here, which of the following best describes you?

3.4 Grace Period

The online survey gave the following information regarding grace periods:

Grace Period

Edinburgh's proposed LEZ is due to be introduced on 31st May 2022, if approved by Councillors and Scottish Ministers.

A 2-year grace period will then commence. No penalties (fines) will be issued until 1st June 2024, when enforcement within the Zone begins.

The grace period aims to provide time for individuals and businesses to prepare especially in terms of recovering from the COVID19 pandemic, while supporting the protection of public health and the most vulnerable.

The Scottish Government's regulations on LEZs require a minimum grace period of 1 year. The Council has proposed a period of 2-years grace taking account of the City's recovery from the COVID19 pandemic.

The proposed 2-year grace period will also apply equally to residents, non-residents and for all types of vehicles included in the scope of the LEZ. Note there are exemptions specified later in the 'Proposal to make a LEZ' document and later in the questionnaire, which includes disabled blue badge holders.

The survey asked to what extent respondents were in favour of the approach which applies the grace period equally to residents, non-residents and all vehicle types and findings show overall 54% were in favour to some extent and 35% opposed (Table 10).

Table 10: Levels of support for the grace period approach

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Strongly in favour	31%	26%	31%	31%	30%	30%
Somewhat in favour	23%	20%	21%	24%	18%	16%
Neither/don't know	12%	8%	11%	12%	15%	13%
Somewhat opposed	13%	13%	12%	13%	7%	10%
Strongly opposed	22%	32%	24%	20%	30%	30%
Not stated	1%	1%	0%	0%	1%	0%

Source: Q11. To what extent are you in favour of this approach which applies the grace period equally to residents, non-residents and all vehicle types?

The survey also asked respondents if they considered the grace period to be 'too short', 'about right', 'too long', or that they 'don't know'. Findings show only 24% feel the 2-year period is the right length, with 43% considering it too short and 23% too long. This is highlighted for businesses with 55% of those located in the LEZ saying 2 years is too short and 64% of those who need access to the LEZ. (Table 11)

Table 11: Views on the grace period length

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
2 years is too short	43%	49%	48%	39%	55%	64%
2 years is about right	24%	19%	21%	25%	16%	14%
2 years is too long	23%	22%	22%	25%	16%	11%
Don't know enough to say	10%	9%	9%	9%	11%	9%
Not answered	1%	1%	1%	1%	2%	1%

Source: Q12. Which of the following best fits your views on the length of the grace period?

3.4.1 Reasons why do not agree with grace period approach

All respondents were asked to give comments if they disagreed with or were not sure about (neither/don't know) the grace period approach and given space to write in their responses. These have been distilled and the main themes drawn together for analysis. Of the 46% (2,282) who did not support or were not sure of the approach, it can be seen in Table 12 that 48% of mentions were about the grace period approach.

The most frequently mentioned view of the approach were the 18% of mentions that surrounded the thought that the grace period is too short and should be longer, whilst 13% overall felt that it is too long in some way. Otherwise 11% stated that there should be no grace period and 3% said that residents should be exempt.

Table 12: Reasons for opposing the grace period approach

able 12. Reasons for opposing the grace period approach	Oppose or
	Neither/don't know
	n=2,282
Not in favour of LEZ	29%
Not answered /	13%
Comment not applicable to question	8%
Don't know enough to say / No comment	2%
Mentions specific to grace period	48%
	11%
No grace period/why wait?/do it now	1170
2 years too short - to save funds/replace vehicle	9%
2 years too short - covid impact/recovery	3%
Longer period for residents	3%
Too short (nfs)	1%
Should be 5 years	1%
Businesses need longer	1%
Up to 2030 (when new cars must be electric)	0%
Should be 3 years	0%
2 years too long	7%
Should be 1 year	4%
Shorter/no period for non-residents	2%
6 months at most	1%
Too long for commercial/business	1%
2 years residents, 1 year all others	0%
Residents should be exempt	3%
Stop most polluting vehicles first, then others	1%
Alongside roll out of EV charge points	1%
No grace period for cars; No grace period for diesel; Lothian Buses	0% each
no grace period; Businesses should be exempt; Existing vehicles	0 /0 €0€11
in LEZ should be exempt; Should be by vehicle type/ emissions	

Source: Q13. Why are you not in favour/unsure of a grace period that applies equally to residents, non-residents and all vehicle types, as proposed?

3.5 Support grants

The online survey gave the following information regarding support grants:

Support Grants

To support adaptation to the LEZ, support funds are available for those most in need and located within 20km (12 miles) of the Zone:

- small businesses, sole traders https://energysavingtrust.org.uk/grants-and-loans/low-emission-zone-support-fund-for-businesses/
- members of low-income households https://energy.savingtrust.org.uik/grants-and-loans/low-emission-zone-support-fund-for-households/

The funds, provided by the Scottish Government and delivered by the Energy Savings Trust, encourage the certified disposal of non-compliant vehicles and provides vouchers to be used towards more sustainable forms of transport.

Other sustainable travel grants and loans are available https://energysavingtrust.org.uk/travel/financiai-support/grants-and-loans/ to support the shift towards more sustainable transport, including e-bike and electric vehicle loans.

3.5.1 Awareness of support grants for small businesses, low-income households The survey asked if respondents were aware of the LEZ support funds for small businesses and low income households that were available. 28% were aware and knew of them and 63% were not aware. (Table 13). Awareness was highest for Businesses in the LEZ (35%) and those accessing the LEZ (33%).

Table 13: Awareness of support grants

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Yes, aware	28%	32%	31%	27%	35%	33%
No, not aware	63%	58%	60%	65%	57%	59%
Don't know/unsure	8%	9%	8%	8%	8%	8%
Not stated	0%	0%	0%	0%	0%	0%

Source: Q14. Were you aware of the LEZ support funds for small businesses and low-income households that are available?

3.5.2 Awareness of other sustainable travel grants and loans

The survey also asked about awareness of other sustainable travel grants and loans and here 23% were aware and knew of them and 66% were not aware. (Table 14). Again awareness was highest for Businesses in the LEZ (30%) and those accessing the LEZ (29%), although awareness for those who Work in the LEZ was not far behind at 28% and 27% for LEZ residents.

Table 14: Awareness of other sustainable travel grants and loans

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Yes, aware	23%	27%	28%	23%	30%	29%
No, not aware	66%	62%	61%	68%	60%	61%
Don't know/unsure	10%	11%	10%	9%	9%	9%
Not stated	0%	0%	0%	0%	1%	0%

Source: Q15. Were you aware of other sustainable travel grants and loans that are available?

3.6 Exemptions

The online survey then looked at exemptions from the LEZ, the survey showing respondents the following information:

Exemptions

National exemptions will apply consistently across all of Scotland's LEZs to protect specific groups that cannot adapt to the changes. They include:

- · Vehicles for disabled persons (including blue badge holders)
- Historic vehicles (vehicles over 30 years old, no longer in production and preserved in original state)
- Emergency vehicles
- Others as detailed in the 'Proposal to make an LEZ' document.

The Council has the power to issue local 'time-limited' (temporary) exemptions to the Zone in exceptional and unique circumstances. Exemptions can only apply for a period of up to one year, which may be renewed on an ad hoc basis.

No local exemptions are proposed to ensure air pollution that harms vulnerable groups, is reduced to safe and legal levels.

This approach considers the proposed 2-year grace period which treats everybody equally. National exemptions apply to groups identified who cannot adapt, and funds available to identified impacted groups to support adaptation.

3.6.1 Support for the local exemption approach

The survey asked to what extent respondents were in favour of the approach for exemptions and the findings show overall 58% in favour and 23% opposing the approach for exemptions. (Table 15).

Whilst the overall figures show a positive view it should be noted that again Businesses are less positive, with only 44% in favour for both those in the LEZ and those who access it. This compares to 54% for those who Work in LEZ, 56% for LEZ residents, and 60% Visit LEZ for leisure.

Table 15: Levels of support for the exemptions approach

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Strongly in favour	29%	29%	27%	30%	22%	25%
Somewhat in favour	29%	27%	27%	30%	24%	19%
Neither/don't know	19%	15%	20%	18%	23%	25%
Somewhat opposed	8%	6%	8%	8%	5%	7%
Strongly opposed	15%	22%	17%	13%	24%	22%
Not stated	1%	1%	1%	1%	2%	1%

Source: Q16. Overall, to what extent are you in favour of this local exemption approach?

3.6.2 Other groups of people or types of vehicle that should be exempt The next question was open and asked if there were any other groups of people or types of vehicle than those listed that should be exempt. These responses were collated (Table 16 overleaf). Overall 30% gave further thoughts on exemptions, the most frequently mentioned being more all-encompassing groups, rather than smaller and more specific groups of people or vehicle types.

The most mentioned groups were all vehicles/everyone exempt (5%); city centre residents (4%); and trades/delivery vans (4%). These were followed by low income/those who can't afford it (2%); NO exemptions at all (2%); NOT historic/classic (2%); disabled/DLA families/those who support/drive etc. (2%); work in LEZ (2%); and Edinburgh residents (the broader city) (2%).

Table 16: Other groups of people/types of vehicle types that should be exempt

Table 16: Other groups of people/types of vehicle types that sh	ould be exempt
	Total
	n=4,976
No further exemptions given	70% (3,471)
Nothing stated	60%
None / no more (stated)	1%
Answer more pertinent to previous questions	8%
Further exemptions given (multiple responses)	30% (1,505)
All vehicles/everyone exempt	5%
City centre residents	4%
Trades/delivery vans	4%
Low income/those who can't afford it	2%
There should be NO exemptions at all	2%
NOT historic/classic	2%
Disabled/DLA families/those who support/drive. Etc.	2%
Work in LEZ	2%
Edinburgh residents	2%
People: Care workers and unpaid carers; NHS staff;	1% each
Pensioners; Businesses in LEZ; Taxis/chauffeurs;	
Infrequent/occasional use	
Vehicles: Motorcycles/mopeds; Proven low emissions (MOT compliant); Old cars/upgraded, less than 30 years; Diesel - so not penalised for doing as asked!; Electric vehicles; Public transport/buses; All cars; Specific models (mix – mostly their own!)	
People: Charities/volunteer workers; Families with children; Medical appointments; Student drop off; Vulnerable/ shielding from covid; Live 12 miles+ out of city; Musicians/ people putting on gigs etc.; War injured veterans; Armed forces; Driving instructors; Live where there is poor public transport; Attending religious services; Under 25s; NOT Blue Badge/ disabled	0% each
Vehicles: Camper vans; Small engines; Vehicles if live where no EV charging; School vehicles (i.e. trips); Wedding and funeral vehicles; Tour buses/drop off; Old petrol cars; LPG vehicles; Newish cars/still under lease/good life left; Euro 4 and over; Low volume manufacturers (e.g. TVR); Wheelchair accessible vehicles (WAV); Old tourist buses; Breakdown/recovery; Euro 6 standard (regardless of year); Specialist vehicles (e.g. cranes, chilled/freezer trucks); non-emergency patient transport; ONLY emergency exempt; NOT emergency; NOT tour buses/old buses; NOT showman vehicles	

Source: Q17. Are there any other groups of people of types of vehicle you think should be exempt from the LEZ? Which and why?

3.7 Adapting to the LEZ

Assuming the Edinburgh LEZ was implemented as proposed, respondents were asked what, if anything, they would do differently as a result of it coming into force. Just under a quarter of respondents said their vehicle would comply, so they would do nothing. However, this drops to 15% for Businesses who access the LEZ and 17% for LEZ residents. Perhaps not surprisingly, Businesses' most frequently mentioned action would be to upgrade their vehicle, with 17% of those who access the LEZ and 16% for those located in the LEZ stating this. Otherwise the most frequently mentioned actions were to change route, use more public transport, walk or bike more, alongside upgrade the vehicle.

The main point to note here however is the myriad of responses. The fact that none are mentioned by more than 20% of respondents would indicate that there is not an 'obvious' solution to the implementation of the LEZ for those whose vehicles would not comply. Indeed 10% simply said they did not know what they would do as there would appear to be no apparent solution to their worries over the implementation of the LEZ.

Table 17: Action if implemented

	Total	LEZ	Work in	Visit LEZ	Business	Business
		resident	LEZ	for leisure	in LEZ	access LEZ
	n=4,976	n=561	n=1,774	n=3,703	n=304	n=470
Nothing	18%	26%	20%	18%	19%	15%
Nothing, my vehicle complies	24%	17%	20%	26%	18%	15%
Nothing, don't travel through	3%	1%	1%	3%	1%	1%
city centre						
Don't know/no apparent	10%	13%	11%	8%	13%	16%
solution						
Not answered	1%	0%	1%	1%	1%	1%
Change my route	19%	6%	18%	21%	12%	21%
Use public transport more	18%	10%	14%	20%	9%	7%
Walk more	15%	13%	13%	16%	9%	7%
Upgrade my vehicle	13%	16%	14%	12%	16%	17%
Cycle more	13%	10%	13%	14%	9%	5%
Choose alternative destination	12%	4%	10%	15%	10%	15%
Use taxi/private hire more	5%	4%	5%	6%	6%	5%
Apply for other sustainable	4%	6%	4%	3%	7%	10%
travel grants						
Give up my vehicle	3%	6%	4%	3%	5%	4%
Apply for LEZ support funds	3%	5%	3%	2%	13%	15%
for small businesses/sole						
traders						
Apply for LEZ support funds	3%	6%	4%	2%	8%	8%
for low income households						
Join a car club	2%	2%	2%	2%	3%	1%
Use more park and ride	2%	0%	2%	2%	1%	0%
Car share in compliant vehicle	1%	1%	1%	1%	0%	1%

Source: Q18. If the LEZ is implemented as proposed, what if anything, would you do differently? Tick all that apply

Looking at the further actions that respondents included themselves in addition to the list pf potential actions given it can be seen that the most frequently mentioned of these include quite fundamental life changes, such as moving house, work or their business:

- move and live somewhere else (5%)
- avoid Edinburgh city centre (4%)
- work elsewhere, move job/business (3%)
- shop elsewhere/out of town (3%)

The remaining suggestions as to what they would do include the following and at this point is should be noted that of all the potential actions only very few mention positive outcomes of the LEZ such as enjoying better air and better travel conditions within the LEZ:

- carry on regardless (1%)
- protest, complain, petition (1%)
- drive around LEZ (longer and more polluting!) (1%)
- vote for someone else (1%)
- consider/go electric BUT charging points? (1%)
- already have no car/use public transport/cycle (1%)
- accept paying fines (0%)
- not visit people in city centre (0%)
- breathe better air (0%)
- cycle more/more safely/pleasantly (0%)
- visit more, enjoy less cars (0%)
- lobby to extend the zone (0%)
- park just outside, walk/bus in (0%)
- give up charity/volunteer work (0%)
- buy/use and older classic car (exempt) (0%)
- need to check if car complies (0%)
- use car less (0%)
- work/earn less due to increased public transport time (0%)
- cry/worry/be upset (0%)

3.8 Responses from Organisation representatives

The following section highlights views of representatives of organisations who gave their comment to the consultation. These were in the form of 75 responses via the online survey and 22 email responses (whose comments gave some but may not have answered all of the online responses specifically).

The organisation data is shown at total level due to the small base size and concentrates on questions pertaining to the LEZ specifically, taking them as the organisation's response (whereas the personal demographic questions represent the individual completing the survey). Organisations were shown the same LEZ information, therefore, for the sake of brevity, this detail is not repeated.

3.8.1 Type of organisation

The types of organisation that took part were as follows:

Private sector 39% (29)
Transport/logistics 23% (17)
Lobby/policy/charity 17% (13)
Community group 12% (9)
Education 7% (5)
Public sector 3% (2)

3.8.2 Support for the LEZ

Overall, 50% said they were in favour and 43% said they were opposed:

strongly in favour
somewhat in favour
neither/don't know
somewhat oppose
strongly oppose
not answered
21% (16)
29% (22)
4% (3)
15% (11)
28% (21)
3% (2)

Looking at the strength of opinion it can be seen however that organisations also have the largest response for 'strongly opposed' at 28%. This is especially notable for Private sector at 45% and for Transport/logistics at 29%.

Organisations who opposed the Edinburgh LEZ or who were unsure (neither/don't know) were asked to give reasons for their views. Of the 35 who did not support or were unsure of the LEZ, it can be seen that there are various reasons given for not supporting the LEZ, but that the largest concern is clearly the implications and issues for businesses/organisations affected.

- Implications/issues for businesses/organisations affected:
 - can't afford to upgrade business vehicles (16 mentions) (46%)
 - detrimental to businesses working in/through LEZ (7)
 - will stop businesses working in LEZ (6)
 - can't afford more costs post covid (6)
 - covid timing not appropriate post covid (4)
 - will force businesses out of Edinburgh (3)
 - delivery issues (3)
 - detrimental to businesses based in LEZ (2)
 - electric vehicles still too expensive, needs to be encouraged (2)
 - EV charging point infrastructure not sufficient build it up (2)
 - timescale to introduction too short (1)

- Other causes of congestion, and pollution:
 - Spaces for People has caused issues/remove it (5)
 - congestion due to other issues (4)
- Views of specifics of the boundary of the LEZ:
 - zone too small, should cover more (3)
 - should be all of Edinburgh/out to the bypass (2)
 - boundary don't include Preston Street Primary School (2)
 - excludes most polluted roads/routes (1)
- Implications as a result of the LEZ area:
 - will move/cause congestion in surrounding streets/areas (4)
 - will more/cause pollution in surrounding streets (3)
- Views of the need for a LEZ:
 - not needed pollution levels not justified/proven/have no impact (2)
 - not well thought through/designed/not practical (1)
 - scrapping usable cars is a waste/worse for the environment (1)
 - insufficient information to comment (1)
- Implications/issues for others affected:
 - detrimental/discriminatory to residents (1)
 - exclusive/elitist/the 'rich part of town'/only for rich people (1)

These views were reiterated in the 22 email responses, which were generally in favour of the idea of LEZs and better air quality. However the majority of these responses also raised issues of the likely increases in congestion, parking issues and pollution around the boundary; as well as the desire for the grace period to be shorter (and a query why they are different to Glasgow); questions regarding the exemption of historic vehicles; and the need for more financial support than proposed. They also raised further questions and issues that included:

- the LEZ does not go far enough, it should cover more/all of Edinburgh, some noting that it must include areas of high pollution such as Corstorphine (8)
 - also here the thought was raised that the LEZ may be more likely to simply encourage a swap to a compliant car, rather than encouraging the use of other forms of transport (i.e. using cars less)
- thought needs to be given to issues pertaining to surrounding areas and the need for individuals and businesses from these areas to access Edinburgh (3)
 - potential loss of business/inability to compete for small businesses
 - public transport links into Edinburgh (such as from Borders, Fife, East Lothian) must be optimised and encouraged to allow easy and affordable travel; and consideration given that people may not wish to travel this way after dark and that this limits participation in evening activities
 - thought must be given to private buses/minibuses who travel into the city to allow and facilitate this (or risk routes becoming unviable and dropped)
 - consideration of the possible displacement of non-compliant vehicles to areas out of Edinburgh within the second-hand car market (and the consequent view that pollution is simply being shifted out of the city)
 - consideration of extending the area where financial support can be obtained
- boundary issues for businesses who need to deliver to the city, including the availability of areas to stop and swap goods from HGVs to compliant/smaller vehicles for the last stage of their delivery journey (final mile delivery) (2)

- consideration for taxis/private hire vehicles and how the LEZ will work bearing in mind the usual longer periods taken in this industry to pay for vehicles (and therefore the longer turnaround time for replacing vehicles) (1)
- consideration for the areas around the boundary in terms of signage and cameras, ensuring that they do not impinge on the city's aesthetics (1).

3.8.3 Support for the boundary

In terms of the boundary for the Edinburgh LEZ, overall, 36% said they were in favour and 48% said they were opposed:

```
strongly in favour
somewhat in favour
neither/don't know
somewhat oppose
strongly oppose
16% (12)
16% (12)
16% (12)
37% (28)
```

Strength of opinion here also shows that the largest response was for 'strongly opposed' at 37% and again this is especially notable for Private sector at 55%.

Organisations who opposed to/unsure of the boundary were asked for their reasons. Of the 48, 22 gave a specific comment on the boundary and most responses pertain to the impact of the boundary on journey time, the creation of congestion in other areas and the increase in pollution with both of these:

- create longer journeys and more pollution (8 mentions)
- cause congestion elsewhere/other routes (7)
- cause issues/parking problems on the boundary (7)
- too small/should be bigger (5)
- should be the whole city/to the bypass/all or nothing (3)
- too big/should be smaller (3)
- don't make the boundary Preston St Primary School (2)
- 1 each: arbitrary/odd areas/random/don't see why; more polluted streets elsewhere need it more; not around Holyrood Park.

3.8.4 Support for the grace period approach

The approach to the grace period applying equally to residents, non-residents and all vehicle types shows overall 56% were in favour to some extent and 28% opposed:

•	strongly in favour	36% (27)
•	somewhat in favour	20% (15)
•	neither/don't know	13% (10)
•	somewhat oppose	11% (8)
•	strongly oppose	17% (13)
•	not answered	3% (2)

In terms of the 2-year length of the grace period the largest response was for this being too short a time period for these organisations:

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• 2 years is too short 43% (32) (59%: Private sector & Transport/logistics)
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    2 years is about right
    2 years is too long
    don't know enough
    not answered
    29% (22)
    20% (15)
    4% (3)
```

Twenty of the 31 organisations who opposed/were not sure about the grace period approach gave a reason for this, most noting the period was too short:

- too short:
 - 2 years too short to save funds/replace vehicle (8 mentions)
 - 2 years too short covid impact/recovery (1)
 - businesses need longer (1)
 - longer period for residents (1)
- too long:
 - no grace period/why wait?/do it now (3)
 - 6 months at most (3)
 - should be 1 year (1)
 - 2 years too long (1)
 - shorter/none for non-residents (1)
- other:
 - alongside roll out of EV points (1)
 - don't know about it enough to say (1)

3.8.5 Awareness of grants and loans

Organisations were asked if they were aware of the available LEZ support funds for small businesses and low income households and 52% (39) were aware and 41% (31) not aware (don't know/not sure 4% (3) / not answered 3% (2)).

Organisations were also asked if they were aware of other sustainable travel grants and loans and again 52% (39) were aware, with 37% (28) not aware (don't know/not sure 8% (6) / not answered 3% (2)).

3.8.6 Support for the local exemption approach

Thoughts on exemptions show overall 61% of organisations in favour and 20% opposing the approach:

•	strongly in favour	40% (30)
•	somewhat in favour	21% (16)
•	neither/don't know	15% (11)
•	somewhat oppose	7% (5)
•	strongly oppose	13% (10)
•	not answered	4% (3)

41 of the 75 organisations then mentioned other groups of people or types of vehicle than those listed that should be exempt. This included a wide list, with most mentions being for trades and delivery vans and businesses in the LEZ:

•	trades/delivery vans	(12 mentions)
•	businesses in the LEZ	(7)
•	NOT buses/tour buses	(4)
•	specialist vehicles (e.g. cranes, chilled/freezer trucks)	(3)
-	NOT historic/classic	(3)
•	all vehicles/everyone exempt	(3)
•	NOT emergency	(2)
•	NOT Blue Badge/disabled	(2)
•	Disabled/DLA families/ those who support/drive etc.	(2)

• 1 each: autistic people; public transport workers; LCVs; public transport/ buses; taxis/chauffeurs; motorcycles/mopeds; charities/volunteer workers; low income/those who can't afford it; ONLY emergency exempt.

3.8.7 Adapting to the LEZ

In terms of what would be done if the LEZ was implemented as proposed, 17 of the 75 organisations (23%) said they would do something, the two most frequently mentioned actions being to work elsewhere, move job/business or to apply for LEZ support funds for small businesses/sole traders.

- Do something 17 of 75 (23%)
 - work elsewhere, move job/business (13 mentions) (17%)
 - apply for LEZ support funds for small businesses/sole traders (13) (17%)
 - upgrade vehicle (8)
 - use public transport more (8)
 - walk more (7)
 - change route (4)
 - apply for other sustainable travel grants (4)
 - downsize/lay people off (3)
 - choose alternative destination (3)
 - cycle more (3)
 - move and live somewhere else (2)
 - reduce service/work in LEZ (2)
 - apply for LEZ support funds for low income households (2)
 - give up vehicle (1)
 - use taxis/private hire cars more (1)
 - use more park and ride (1)
 - protest, complain, petition (1)
 - charge customers more (1)
- Do nothing/no (specific) response 58 of 75 (77%)

nothing	13% (10)
nothing – vehicle complies	20% (15)
nothing – don't travel through city centre	7% (5)
don't know/no apparent solution	13% (10)
not answered	5% (4)
answer not applicable to 'do differently'	19% (14)

APPENDIX

- 1. Table 6 including minor responses (2%, 1%, 0%)

 Note: full tables can be found in a separate PDF document
- 2. Online survey (print version)

Appendix 1 – table 6 including minor responses (2%, 1%, 0%)

Table 6: Reasons for opposing the proposed Edinburgh LEZ

Table 6: Reasons for opposing the proposed Edinburgh LEZ	
	Oppose &
	Neither/don't
	know n=2,570
Discriminatory to low income households/workers	14%
Can't afford to upgrade vehicle/object to being put to the expense	
Spaces for People has caused issues/remove it	9%
	9%
Will move/cause congestion in surrounding streets/areas	8%
Public transport insufficient/limited	
Money making scheme/stealth tax	8%
Will stop people visiting/using the city/go elsewhere to shop	7%
Will move/cause pollution in surrounding streets/areas	7%
Detrimental to businesses based in LEZ	7%
Dislike/distrust/issue with the Council	6%
Spend money on road maintenance/keeping traffic flowing	6%
Not needed – pollution levels not justified/proven/have no impact	
EV charging point infrastructure not sufficient – build it up	5%
Congestion is due to other issues	5%
Simply an anti-car policy	4%
Will cause longer journeys to avoid LEZ/more pollution	4%
Detrimental/discriminatory to residents	4%
Need car, no alternative, work, leisure, appointments, help people	4%
Scrapping usable cars is a waste/worse for environment	4%
	+
Diesel, told to get it, then told not to! Too stringent/not fair	3%
Not needed – time will reduce polluting vehicles on roads	3%
Not well thought through/designed/not practical	3%
Discriminatory to disabled/don't qualify for Blue Badge	3%
Should be an exemption for residents	2%
Financial support offered insufficient/biased/not fair	2%
Need car, can't use public transport	2%
Will affect travel to/through the LEZ	2%
Discriminatory to care/health workers/unpaid carers	2%
Exclusive/elitist/the `rich part of town'/only for rich people	2%
Timescale to introduction too short	2%
Discriminatory to those with older vehicles	2%
Not in favour of LEZ (nfs)	2%
Covid – timing not appropriate post covid	2%
Spend money on other things	2%
Not needed/no benefit	2%
Buses are the biggest polluters	2%
Pollution in city centre is due to other measures	2%
20mph has caused issues	2%
Need car for work purposes (delivery, carer, trades)	2%
Zone too small – should cover more	2%
Covid – fears/don't want to risk public transport	1%
Detrimental to Edinburgh generally (nfs)	1%

Will force people out of the city/have to move out	1%
Will just get bigger and bigger/expand over time	1%
Will cause rat runs through residential areas	1%
Cyclists and cycle ways cause congestion/danger	1%
Other areas in Edinburgh have much higher levels	1%
Need car, can't walk distance/cycle	1%
Need car, transport for children's activities/pick ups	1%
Public transport too expensive (e.g. trains)	1%
Discriminatory to shift workers	1%
Will cause workers to lose/have to move jobs	1%
Prohibits travel to NHS facilities (e.g. PAEP, WGI)	1%
Have classic car and live/drive in LEZ	1%
Need more/better parking (outside zone)	1%
Carrot, not stick best approach	1%
It's my right, should be free to drive where I want	1%
Detrimental to businesses working in/through LEZ	1%
Will force businesses out of Edinburgh	1%
Will stop businesses working in LEZ	1%
Can't afford to upgrade business vehicles	1%
Delivery issues	1%
Should be based on actual emissions, not age/Euro 6 status	1%
Electric vehicles still too expensive, needs to be encouraged	1%
All pass emissions test/MOT/pay road tax – enough!	1%
Should be stricter overall (all or nothing)	1%
Do it by number of journeys, not blanket ban	1%
Should be all of Edinburgh/out to the bypass	1%
Excludes most polluted roads/routes	1%
Zone too big – should be less	1%
North/South routes will be restricted	1%
West/East routes will be restricted	1%
,	
Excludes Air Quality Management Areas	0%
Taxis cause pollution	0%
Will put prices up for trades in city centre	0%
Have campervan and live/drive in LEZ	0%
Shouldn't be 24/7/peak only	0%
More info needed/not sure which vehicle applies to	0%
Fines too high	0%
More/better cycle lanes needed	0%
Can't afford more costs post covid	0%
Discriminatory for private hire cars	0%
Hinders/stops voluntary work	0%
CO2 from making new cars worse than continued use of old	0%
Vehicle classed as fuel efficient, low road tax, why change?	0%
Taxis should be exempt	0%
Council's own vehicles shouldn't be exempt	0%
Cost of the scheme is a concern	0%
Will cause drivers lots of inconvenience/adversely affect	0%
You're forcing us onto buses/conflict of interest, you own them	0%
Congestion charge by the back door (voted against it)	0%
congestion charge by the back door (voted against it)	

What are the alternatives?	0%
HGVs worst/commercial vehicles (not private cars)	0%
Live on the boundary – pollution will be worse	0%
Goes too far south	0%
Live/park on/over boundary	0%
Boundary – include New Town	0%
Boundary – include more West, St Johns Rd	0%
Boundary – include Queen St	0%
Boundary – include London Rd	0%
Boundary – include Holyrood Park	0%
Boundary – include York Place	0%
Boundary – include Calton Hill/Royal Terrace	0%
Boundary – don't include Western Approach Rd	0%
Boundary – don't include Preston St Primary School	0%
Boundary – don't include historic vehicles	0%
Boundary – don't include city workers, such as tourist guides	0%
Boundary – don't include West End outwards	0%
Boundary – don't include out to Abbeyhill/London Road	0%
Boundary – don't include Waverley Station/allow access	0%
Boundary – don't include car parks at Omni/St James' centre	0%
Don't have boundary as Melville Drive/Meadows	0%
Two wheelers should be exempt/motorcycles/scooters	0%
How will you enforce it?	0%
Other	2%
No comment/Don't know/Can't say	3%
Insufficient information to comment	1%

Source: Q6. Why are you not in favour/unsure of the Edinburgh LEZ as proposed?

Appendix 2 – the online survey (print version)

Edinburgh's Proposed Low Emission Zone

Overview

The City of Edinburgh Council aims to reduce air pollution, since it presents a significant threat to public health. It is especially harmful to young children, the elderly and those suffering from pre-existing conditions, including heart and lung diseases.

Low Emission Zones (LEZs) are being introduced across Scottand's four largest cities: Edinburgh, Giasgow, Aberdeen and Dundee in response to dangerous levels of air poliution, primarily nitrogen dioxide (NO2), generated by road traffic.

Low Emission Zones (LEZs) aspire to improve public health, by discouraging the most poliuting vehicles from entering an area. If a vehicle entering a LEZ does not meet the minimum exhaust emission standard, then a penalty fine is issued. The Zone is intended to only target the most poliuting vehicles.

Why your views matter

We are seeking views on the following proposed aspects of the Edinburgh LEZ:

- city centre zone boundary
- 2 -year grace period
- local exemptions and considerations for impacted groups

We are also seeking to understand knowledge of LEZs, related support funds. Full scheme details are available in the 'Proposal to make a LEZ' or you can find a summary on our website.

The survey should take around 10 minutes to complete.

Responses, comments or feedback can also be emailed to: low.emission.zone@edinburgh.gov.uk , or posted to: Low Emission Zone, Waverley Court G3, 4 East Market Street, Edinburgh, EH8 8BG

Your Data

This online survey is being run by the City of Edinburgh Council and the findings will be analysed by an independent market research agency.

Responses you give in the survey will be treated confidentially and no comments you make can or will be linked directly to you, unless responding on behalf of an organisation. You can view our Privacy Notice for Transport and Infrastructure here.

Once you have completed the survey and clicked submit, the survey will be sent to a secure City of Edinburgh Council server where your personal data will be held. The data will be sent by secure means to the market researcher team for analysis. No personal data will be included in this data set and personal data will be deleted.

If you have any question about how we gather and manage personal data, please get in touch, or contact the council's information. Governance team, <u>information.compilance@edinburgh.gov.uk</u>

About You

The Council uses this information to ensure responses to consultations are genuine and that each person is submitting only one response. No names or email addresses will be shared with any 3rd party, and will be deleted.

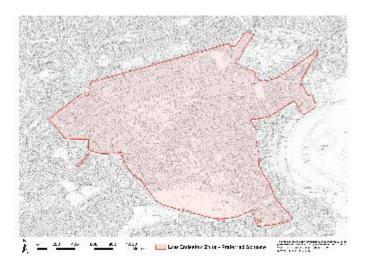
First Name			
(Required)			
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I work in the city centre I operate a business/organisation that is located within the city centre I study in the city centre	
_	
I visit the city centre for leisure/shopping/etc	

	Everyday	At least once a week	At least once a month	Less than once a month	Never - could use, but choose not to	Never - do not have access to this
Walk Please select only oneitem	\circ	\circ	\circ	\circ	\circ	\circ
Wheelchair (wheeling) Please select only oneitem	0	\circ	\circ	\circ	\circ	\circ
Bicycle or scooter Please select only one item	\circ	\circ	\circ	\circ	\circ	\circ
Bus or coach Please select only one item	0	\circ	0	\circ	\circ	\circ
Motorcycle or moped Please select only one/tem	0	0	\circ	\circ	\circ	\circ
Car Please select only one item	0	\circ	0	\circ	\circ	\circ
Tram Please select only one item	0	\circ	\circ	\circ	\circ	\circ
Train Please select only one/tem	0	0	\circ	\circ	\circ	0
Taxi or private hire car	0	\circ	\circ	\circ	0	\circ
Please select only one-item	~					_
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Light goods vehicle Please select only one item Heavy good vehicle Please select only one item When do you normally tend to Please select only one item Every day (Monday to Sunday)	travel to, from or a	oround the city ce	ntre, for persor	al and/or busi	ness reasons?	0

Edinburgh's Proposed Low	Emission Zone (LEZ)
	ublic health, by discouraging the most poliuting vehicles from entering an area. If a vehicle entering a LEZ does ion standard, then a penalty fine is issued. LEZs are designed to only target the most poliuting vehicles.
	n reducing levels of harmful air pollution, but measures could go further. The Council proposes targeted action in in Zone, which aims to tackie air pollution in areas where levels remain above legal standards.
Benefits of this proposed Zone will ext reduction of greenhouse gases across	tend beyond the city centre: improving air quality, encouraging more sustainable travel and supporting the sithe city.
Full scheme details are available in th	e 'Proposal to make a LEZ' document.
To what extent are you in favou	r of the Edinburgh LEZ as proposed?
Strongly in favour Somewh	hat in favour Neither/don't know Somewhat oppose Strongly oppose
Edinburgh's Proposed Low	
Why are you not in favour/unsu Write in your thoughts here:	re of Edinburgh LEZ as proposed?

Proposed LEZ Boundary



The Scottish Environmental Protection Agency (SEPA) helped the Council model the air quality and traffic impacts of different boundary options. The primary aim in choosing the most suitable option, was to target air poliution in the worst areas. Another key consideration was to provide a logical and clearly sign-posted diversion for traffic wishing to avoid the Zone.

A road network management strategy will be developed alongside the LEZ to ensure traffic is managed around the boundary.

Please select only one item				
Strongly in favour	O Somewhat in favour	Neither/don't know	O Somewhat oppose	Strongly oppose

To what extent are you in favour of the boundary for the LEZ in Edinburgh as proposed?

Proposed LEZ Boundary Why are you not in favour / unsure the boundary as proposed?

Proposed LEZ Boundary When you look at the boundary map as shown here, which of the following best describes you? Choose one that applies to you. ase select only one item I live within the proposed Edinburgh City Centre LEZ When you look at the boundary map as shown here, which of the following best describes you? Choose any that apply to you. ase select all that apply I operate a business/organisation that is located within the proposed Edinburgh City Centre LEZ I operate a business/organisation that requires access to the proposed Edinburgh City Centre LEZ I work within the proposed Edinburgh City Centre LEZ 🔲 I study within the proposed Edinburgh City Centre LEZ I visit the proposed Edinburgh City Centre LEZ for leisure/shopping/etc None of the above

Grace Period	
Edinburgh's proposed LE	EZ is due to be introduced on 31st May 2022, if approved by Councillors and Scottish Ministers.
A 2-year grace period wi	I then commence. No penalties (fines) will be issued until 1st June 2024, when enforcement within the Zone begins.
	provide time for individuals and businesses to prepare especially in terms of recovering from the COVID19 pandemic, while of public health and the most vulnerable.
	t's regulations on LEZs require a minimum grace period of 1 year. The Council has proposed a period of 2-years grace of s recovery from the COVID19 pandemic.
	ce period will also apply equally to residents, non-residents and for all types of vehicles included in the scope of the LEZ. as specified later in the 'Proposal to make a LEZ' document and later in the questionnaire, which includes disabled blue
To what extent are y residents and all veh	ou in favour of this approach which applies the grace period equally to residents, non- icle types?
Please select only one item	
Strongly In favour	Somewhat In favour Neither/don't know Somewhat oppose Strongly oppose
Which of the followin	g best fits your views on the length of the grace period? Choose one response.
_	a time period 2 years is about right and should be sufficient time 2 years is too long atime period
O Don't know enough	204
Grace Period Why are you not in f	avour/unsure of a grace period that applies equally to residents, non-residents and all
Grace Period	avour/unsure of a grace period that applies equally to residents, non-residents and all
Grace Period Why are you not in fivehicle types, as pro	avour/unsure of a grace period that applies equally to residents, non-residents and all
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Grace Period Why are you not in for the vehicle types, as profused by the support Grants To support adaptation to small businesses, members of low-life funds, provided by the support adaptation to the funds, provided by the funds, provided by the funds.	avour/unsure of a grace period that applies equally to residents, non-residents and all posed? the LEZ, support funds are available for those most in need and located within 20km (12 miles) of the Zone: sole traders https://energysavingtrust.org.uk/grants-and-loans/low-emission-zone-support-fund-for-businesses/>
Grace Period Why are you not in for the vehicle types, as proport Grants To support adaptation to a small businesses, members of low-increases and provides voother sustainable trave	avour/unsure of a grace period that applies equally to residents, non-residents and all posed? the LEZ, support funds are available for those most in need and located within 20km (12 miles) of the Zone: sole traders https://energysavingtrust.org.uk/grants-and-loans/low-emission-zone-support-fund-for-businesses/ ne Scottish Government and delivered by the Energy Savings Trust, encourage the certified disposal of non-compilant
Grace Period Why are you not in fivehicle types, as pro Support Grants To support adaptation to members of low-liter sustainable traves shift towards more sustainable traves	the LEZ, support funds are available for those most in need and located within 20km (12 miles) of the Zone: sole traders https://energysavingtrust.org.uk/grants-and-loans/low-emission-zone-support-fund-for-businesses/ ne Scottish Government and delivered by the Energy Savings Trust, encourage the certified disposal of non-compilant uchers to be used towards more sustainable forms of transport.
Grace Period Why are you not in fivehicle types, as pro Support Grants To support adaptation to members of low-liter sustainable traves shift towards more sustainable traves	the LEZ, support funds are available for those most in need and located within 20km (12 miles) of the Zone: sole traders https://energy/savingtrust.org.uk/grants-and-loans/low-emission-zone-support-fund-for-households/ ne Scottish Government and delivered by the Energy Savings Trust, encourage the certified disposal of non-compilant uchers to be used towards more sustainable forms of transport. It grants and loans are available https://energy/savingtrust.org.uk/travel/financial-support/grants-and-loans/">https://energy/savingtrust.org.uk/travel/financial-support/grants-and-loans/ to support the nable transport, including e-bike and electric vehicle loans.

Please select only one item	
Yes ONO () Don'tknow/unsure
Exemptions	
lational exemptions wi	apply consistently across all of Scotland's LEZs to protect specific groups that cannot adapt to the changes. They include:
	ied persons (Including blue badge holders) rehicles over 30 years old, no longer in production and preserved in original state) es
 Others as detailed 	in the 'Proposal to make an LEZ' document.
	wer to issue local 'time-limited' (temporary) exemptions to the Zone in exceptional and unique circumstances. Exemptions car If up to one year, which may be renewed on an ad hoc basis.
lo local exemptions are	proposed to ensure air poliution that harms vuinerable groups, is reduced to safe and legal levels.
	s the proposed 2-year grace period which treats everybody equally. National exemptions apply to groups identified who s available to identified impacted groups to support adaptation.
	ent are you in favour of this local exemption approach?
Please select only one item Strongly in favour	Somewhat in favour Neither/nor/don't know Somewhat oppose Strongly oppose
J Subrigry in Tavour	Somewhat in layour Convenienhousent know Somewhat oppose Strongly oppose
why?	groups of people or type of vehicle you think should be exempt from the LEZ? Which and see type and your reason why here:
why?	
why? Write in the group/vehic	
why? Write in the group/vehic	ele type and your reason why here:
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why? Write in the group/vehic	sie type and your reason why here:
why? Write in the group/vehic	sie type and your reason why here:

	LEZ implemented as proposed, what, if anything, would you do differently? Choose any that apply.
Please s	elect all that apply
No	thing Nothing – my vehicle complies Nothing – I don't travel through the city centre Upgrade my vehicle
GI	re up my vehicle
=	oose an alternative destination Walk more Cycle more Use public transport more (buses, tram, train)
=	e taxis / Private Hire cars more Use more park and ride (drive + public transport)
= .	ply for LEZ support funds for small businesses/sole traders Apply for LEZ support funds for low income households businesses ply for other sustainable travel grants Don'tiknow
	pry for other sustainable daver grants born innow nething else (write in)
Abou	You
astly,	we would like to ask a few questions about you to gain a picture of who has responded to the survey and help with the interpretation of the
Indings	
What	age group are you in?
Please s	elect only one item
O ur	der 16 16-24 25-34 35-44 45-54 55-64 55-74 75+ Prefer not tosay
•	
What	is your gender?
	alect only one item
-	male Male Non-binary Transgender Intersex Another identity description Prefer not tosay
() Fe	male O Male O Non-olnary O Transgenoer O Intersex O Another Identity description O Prefer not to say
_	
	u have a physical or mental health condition or illness lasting or expected to last 12 months or more that your daily activities?
	•
_	elect only one item
Ų Ye	s () No () Prefer not tosay
Abou	You
Are yo	ou a blue badge holder?
Please s	elect only one item
O Ye	s No Prefer not tosay
lf you	own a vehicle, does it have any adaptations for disabled users?
Please s	elect only one item
() Ye	s No Prefer not to say
_	~ ·