

Section 4 Integrated Impact Assessment

Summary Report Template

Each of the numbered sections below must be completed

Interim report	<input checked="" type="checkbox"/>	Final report	<input type="checkbox"/>
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 (Tick as appropriate)

1. Title of proposal

Edinburgh Low Emission Zone

2. What will change as a result of this proposal?

This report provides an update to the IIA which was undertaken in June 2021, incorporating findings of the recent consultation. This IIA is supplemented by a detailed impact assessment and fleet analysis for the Edinburgh Travel to Work Area, providing more detail on the baseline and impacts of the proposed scheme.

Following on from initial consultation in 2019, the preferred LEZ scheme was advertised for 12 week public consultation from 28 June to 20 September 2021. As part of this process, further engagement was held with key stakeholders, both statutory and non-statutory, to ensure the LEZ is successful at achieving its objectives.

In 2015, the Scottish Government made a commitment to significantly improve Scotland's air quality through the 'Cleaner Air for Scotland' strategy, where Low Emission Zones (LEZ) were identified as a potential tool within the strategy. LEZs are to be introduced across Glasgow, Edinburgh, Dundee and Aberdeen between February 2022 and May 2022. Plans to implement LEZs were temporarily paused due to the COVID-19 outbreak, but work has now restarted.

The air quality standard the LEZs are based on are the Euro emissions standards. To enter/exit/operate within a LEZ in Scotland, a diesel vehicle will need to be Euro 6 (generally those registered from September 2015) and a petrol vehicle Euro 4 (generally those registered from January 2006).

Vehicles that do not meet the emission standard set for a LEZ will be penalised for entering the zone. A penalty charge will be payable by the vehicle's registered keeper when a non-compliant vehicle enters the LEZ. The initial penalty charge for all non-compliant vehicles is set at £60, reduced by 50% if it is paid within 14 days. A surcharge is also proposed whereby the penalty amount doubles with each subsequent breach of the rules detected in the same LEZ. The penalty charges are capped at £480 for cars and light goods vehicles (LGVs), and £960 for buses and heavy goods vehicles (HGVs). Where there are no further breaches of the rules detected within the 90 days following a previous violation, the surcharge rate is reset to the base tier of charge i.e. £60.

The proposed boundary is the originally proposed City Centre boundary as presented in 2019 for consultation with minor amendments. The Extended Urban Area (formally named 'Citywide') boundary, as presented in 2019, has been excluded from the proposal following options appraisal. The proposed grace period for all vehicles (for residents and non-residents) is two years, which differs from the 2019 proposal, where a one year grace period was proposed for commercial-type vehicles (HGVs, LGVs, buses and minibuses, coaches and taxis), with a proposal of four years for cars. Enforcement of the LEZ begins in 2024 after the grace period expires.

Exemptions apply consistently across all Scottish LEZs, as set out in the Regulations. The following exemptions must be applied to the LEZ at all times:

Vehicle type of classification Description	Vehicle type of classification Description
Emergency Vehicles	For or in connection with the exercise of any function of: -the Scottish Ambulance Service -the Scottish Fire and Rescue Service, -Her Majesty's Coastguard, and -the National Crime Agency.
Military Vehicles	-Vehicles belonging to any of Her Majesty's forces; or used for the purposes of any of those forces
Historic Vehicles	-Vehicles which are 30 years old or older.
Vehicles for Disabled Persons	-Vehicles registered with a 'disabled' or 'disabled passenger vehicles' tax class; and/or -Vehicles being used for the purposes of the 'Blue Badge Scheme'
Showman Vehicles	-Highly specialised vehicles used for the purposes of travelling showmen, where the vehicle is used during the performance, used for the purpose of providing the performance or used for carrying performance equipment

Several grants and loans are available which are funded Transport Scotland and administered by the Energy Saving Trust, to supports individuals and businesses affected by the LEZ.

- **Low Emission Zone Support Fund and Travel Better funding** – Offers a grant of £2000 for low-income households to take older, more polluting vehicles off the road. To be eligible, households must meet all the following criteria; be on specific means tested benefits (listed below), own a non-compliant car (which has been owned by them for at least 12 months with no outstanding finance), and live within a 20km radius of a planned LEZ.

The list of eligible benefits are as follows:

- Attendance Allowance
- Carer's Allowance
- Child Tax Credit; Council Tax Benefit (excluding 25 per cent discount)
- Disability Living Allowance
- Employment and Support Allowance
- Income-based Job Seeker Allowance
- Income Support; Pension Credit
- Personal Independence Payment
- Universal Credit
- Working Tax Credit.

Eligible households which have successfully claimed, can also apply for a further £1,000 Travel Better funding for sustainable travel alternatives. Eligible travel measures include bus passes, train season tickets, new and used bikes, as well as car club membership and credits.

- **Low Emission Zone Support Fund for Businesses** - Micro businesses and sole traders can apply for a £2,500 grant towards the safe disposal of vehicles that do not meet the zone standards. Businesses must meet all the following criteria; have an operating site within 20km of the planned zone, own a non-compliant vehicle (they must have owned the vehicle for at least 12 months and utilised it for business operational purposes) and meet the definition of a micro business (employ nine or fewer full-time employees and have a turnover of £632,000 or less, or a balance sheet of up to £316,000 in the preceding and current financial year).

- **Low Emission Zone Retrofit Fund** - Provides micro businesses and sole traders, who operate within 20km of the planned LEZ, with support to retrofit their existing non-compliant vehicles with Clean Vehicle Retrofit Accreditation Scheme (CVRAS) approved solutions that meet the minimum proposed standards of the LEZ. Businesses must meet all the following criteria; meet the definition of a microbusiness (employ nine or fewer full-time employees and have a turnover of £632,000 or less, or a balance sheet of up to £316,000 in the preceding and current financial year), must not be VAT registered, must own a non-compliant vehicle which is no more than 13 years old (they must have owned it for at least 12 months), and the vehicle must operate at least weekly in the planned LEZ. In addition, the vehicle must also have an approved CVRAS retrofit solution available for the exact make and model and be one of the following:

- Wheelchair accessible taxi
- Light commercial vehicles – vehicles designed to carry goods that weight less than 3.5 tonnes
- Heavy goods vehicles – vehicles designed to carry goods that weigh 3.5 tonnes or more
- Refuse collection vehicles – vehicles specially designed to collect and transport solid waste.

Grants are available to cover up to 80% of the cost of a retrofit solution as follows:

- Up to £5,000 per light commercial vehicle and wheelchair accessible taxi installing retrofit exhaust after-treatment systems.
- Up to £10,000 per wheelchair accessible taxi installing re-powering technology.
- Up to £16,000 per heavy goods vehicle or refuse collection vehicle.

- **The Bus Emissions Abatement Retrofit (BEAR) Programme** – Four rounds of funding have been awarded to bus and coach operators to support the costs of installing retrofit technology to improve diesel emissions to a Euro VI standard or better, or to convert buses to electric drivetrains. This funding has been available to licensed bus and coach operators, local authorities and community transport operators located in or that operate on routes within Scotland's cities identified for LEZ's and/or one of Scotland's AQMAs. The most recent round closed to new applicants on 26 August 2021, where successful applicants could access grant funding towards both primary and ancillary costs up to a maximum of £1,995,000 per bidder.

Eligible vehicles were required to meet the following criteria:

- buses and coaches operating under a Public Service Vehicle (PSV) operator licence or used for voluntary, community or other non-profit making purpose
- less than 13 years old at time of application
- a remaining service life of at least 5 years in Scotland
- conforming to Euro IV or V emission standards from factory

A number of other grants and schemes are also available to individuals and businesses wishing to switch to more sustainable travel modes, which could be used to support those affected by the LEZ:

- **eBike Loan** - Interest-free loans to help individuals purchase a new electric bike, family cargo or ecargo bike, or adaptive bike. A wide range of models and adaptations are available including tricycles, tandems, hand cycles and recumbent cycles.
- **Used Electric Vehicle Loan** - The interest-free Used Electric Vehicle Loan offers up to £20,000 to cover the cost of purchasing a used electric car or up to £5,000 for the purchase of a used electric motorcycle or moped. The loan has a repayment term of up to five years.
- **Electric Vehicle Loan** - Interest-free loans of up to £28,000 to cover the cost of purchasing a new, pure electric vehicle or up to £10,000 to cover the cost of purchasing a new electric motorcycle or moped. The loan has a repayment term of up to six years.
- **Domestic charge point funding** - Energy Saving Trust and the Office for Zero Emission Vehicles currently offers applicants £350 towards the cost of a home charge point and Energy Saving Trust will provide up to £250 further funding on top of this, with an additional £100 available for those in the most remote parts of Scotland.
- **eBike Business Loan** - Interest-free loans of up to £30,000 are available to support organisations that want to reduce the carbon impact of their transport and travel arrangements with new and more efficient alternatives. The loan covers new pedal-assisted electric bikes (up to £3,000 per bike), new cargo bikes (up to £6,000 per bike) and new adapted cycles.
- **Low Carbon Transport Business Loan** - Interest-free loans of up to £120,000 are available to Scottish businesses. The loans can be used to meet the cost of a wide range of sustainable measures

to lower business transport carbon footprint including: pure electric vehicles cars (up to £28,000) and vans (up to £35,000) for each new electric vehicle, new electric motorcycles or scooters (up to £10,000 for each vehicle), new electric / plug-in hybrid HGVs, minibuses, coaches and buses (overall cap of £120,000).

- **Business charge point funding** - Funding to help organisations install electric vehicle (EV) charging infrastructure on their premises. Funding is currently available for charge points for sole use by occupiers, staff and visitors.
- **Switched on Taxi loan** - Interest-free loans of up to £120,000 are available to enable owners and operators of hackney cabs or private hire taxis to replace their current vehicle with an eligible ultra-low emission vehicle.
- **Used Electric Vehicle Loan for Business** - The interest-free Used Electric Vehicle Loan offers businesses in Scotland up to £20,000 to cover the cost of purchasing a used electric car, up to £20,000 for a used electric or plug-in hybrid electric van, up to £5,000 for a used electric motorcycle or moped.

3. Briefly describe public involvement in this proposal to date and planned

To ensure the LEZ is successful at achieving its objectives, two sets of consultation/engagement exercised have been undertaken with key stakeholders, both statutory and non-statutory.

Between May and July 2019, the Council publicly consulted on LEZ proposals in Edinburgh to explore key scheme aspects including: different boundaries at city centre and city-wide scales and various grace period options based on population and vehicle type and purpose. The consultation approach included an online survey (which received 2,793 responses), a series of sessions with key stakeholders, written responses from stakeholder groups and members of the public, engagement with primary school children and engagement with neighbouring local authorities.

Following on from initial consultation in 2019, the preferred LEZ scheme was advertised for a 12 week public consultation from 28 June to 21 September 2021. The consultation invited comment on key aspects of the LEZ scheme, including: overall scheme as proposed, city centre boundary, grace period approach and length, no local exemption approach and awareness of support funding available. An online questionnaire was presented to the general public and other stakeholders in 2021. The questionnaire received 4,976 individual responses. In addition to individuals who completed the questionnaire, 75 responses were received on behalf of organisations. An additional 26 written responses were received on behalf of organisations. Statutory stakeholders were approached directly and invited to comment on proposals, in accordance with the Transport (Scotland) 2019 Act. Multiple engagement workshops and meetings were hosted by the Council and written submissions received across all stakeholder groups.

Additionally, as part of the IIA undertaken in 2020, in-depth interviews were undertaken with business owners, business and trade representative organisations and community transport providers.

To provide input specifically to the IIA, meetings were held in May/June 2021 with representatives from the Edinburgh Access Panel and Inclusion Scotland, as well as Officers working on the Council's Poverty Action Plan.

4. Is the proposal considered strategic under the [Fairer Scotland Duty](#)?

Yes

5. Date of IIA

A full scoping meeting on the original proposals was held in 24/06/2019. As a considerable amount of time has passed since the previous IIA was carried out and changes have been made to the proposed scheme, a second meeting was held on 20/05/21.

6. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)

Name	Job Title	Date of IIA training
Suzanne Hunter	Transport Officer	01 Nov 2018
Shauna Clarke	Environmental Health Officer	
Greg McDougal	Transport Officer	

7. Evidence available at the time of the IIA

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Data on populations in need	Census 2011 The National Records of Scotland 2017 and 2018 DfT, April 2019 Jacobs, Edinburgh Low Emission Zone Integrated Impact Assessment, 2020	The City of Edinburgh has one of the fastest growing populations of any city in the UK. Although the city has a lower share of its population over 65 years of age (12%), the wider city region has a significantly higher share (22%) than Edinburgh and Scotland (19%). Based on 2011 Census Data, the wards with the highest number of health conditions (including Deafness, Blindness, Physical, mental health conditions, learning disabilities etc.) were Portobello/Craigmillar and Liberton/Gilmerton wards. Both had 31% of their total reporting health conditions. The City Centre had the lowest proportion (22%). According to The National Records of Scotland 2017 mid-year estimate, 15% of inhabitants in

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>Edinburgh reported a limiting long-term health problem or disability that limited their day-to-day activities</p> <p>The total number of vehicles in the City of Edinburgh with Disabled Tax Code (Class code 78) was 7,000 and the total number of vehicles in the City classed as Disabled Passenger Carrying Vehicles were about 100.</p> <p>Higher proportion of disabled tax vehicles are present in Portobello/Craigmillar ward and Liberton/Gilmerton ward located along the south eastern side of Edinburgh.</p>
Data on service uptake / access	<p>Census 2011</p> <p>Transport Scotland, 2019, Scottish Transport Statistics (No 32-37) Editions 2012 to 2018</p> <p>Transport Scotland, 2019, Scottish Transport Statistics, 2018 (No 37)</p> <p>DVLA (2018). Number of licensed vehicles at the end of the quarter by bodytype, fuel type and estimated euro status, Edinburgh City UA.</p> <p>AECOM, 2014. Van travel trends in Great Britain, prepared for RAC foundations,</p> <p>RHA, Clean Air Zones and HGVs – factsheet (BVRLA,FTA, NFDA and RHA,</p> <p>Scottish Government, 2018, Businesses in Scotland</p> <p>Clean Air Zones and HGVs – factsheet, 2019 (BVRLA,FTA, NFDA and RHA)</p> <p>Transport Scotland, 2019, Scottish Transport Statistics (No 32-37) Editions 2012 to 2018)</p> <p>National Atmospheric Emissions Inventory (2018), Vehicle fleet composition projections</p>	<p>Car use in Edinburgh is the joint lowest of all Scottish cities. In 2010 of the 191,000 people living and working in Edinburgh, 63,500 commuted to work by car and a further 63,300 commuted by car from other local authority areas.</p> <p>LGVs are the fastest growing vehicle category in Scotland, up by 26% over the past ten years, to reach 294,000 vehicles in 2018. This trend is also evident across Great Britain where every tenth vehicle on the road is an LGV. Small enterprises represent over 90% of businesses in Edinburgh. 63% of companies rely upon vehicles, most likely LGVs, to deliver goods or drive to clients to provide a service.</p> <p>In the UK, 53% of LGVs are privately owned and 47% are commercially owned, however it is likely that many privately owned LGVs are also used for business purposes. For company-owned LGVs, most vehicle kms travelled are for collecting or delivering goods (35%), while for privately owned LGVs, most vehicle kms travelled are for travelling to and from work.</p> <p>On average LGVs are 6.6 years old in Scotland. The vast majority of LGVs (96%) are fuelled by diesel.</p> <p>The sectors that are most dependent on LGVs vehicles are construction; wholesale and retail trade; accommodation and food service activities; and transportation and storage. There are around 6,025 business across Edinburgh that fall within these sectors.</p> <p>Below is traffic survey data obtained in February 2020 for Euro VI vehicles or better (compliant vehicles);</p> <ul style="list-style-type: none"> • HGVs: 76-95% Euro VI or better • Buses & coaches:

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	DVLA database on vehicles registered in the Edinburgh TTWA	<p>61% operators - excluding Lothian Buses Lothian Buses commitment to be 100% LEZ compliant by the end 2021.</p> <ul style="list-style-type: none"> • LGV: 48% Euro VI or better (increase from 7% in 2016) <p>It is predicted that in 2023, the number of non-compliant vehicles in Edinburgh Travel to work area will be:</p> <ul style="list-style-type: none"> • ~16,000 cars • ~3610 LGV • ~120 HGV • ~120 bus <p>By 2029 it is predicted that all vehicle types will be compliant with current LEZ emissions standards due to natural fleet turnover, furthermore, for most types this is expected to be achieved by 2025.</p> <p>Transport Scotland has been monitoring transport trends during the COVID-19 outbreak. This information provides a snapshot of travel across main modes. For the period 19 - 25 April 2021, compared against a pre-pandemic baseline, we saw:</p> <ul style="list-style-type: none"> • Walking journeys up by 15% • Cycling journeys up by 10% • Concessionary bus journeys down by 55% • Rail journeys down by 80% • Ferry journeys down by 75% • Air journeys down by 80% • Car journeys down by 20%
Data on socio-economic disadvantage e.g. low income, low wealth, material deprivation, area deprivation.	Scottish Index of Multiple Deprivation (SIMD)	Transport accessibility is lowest around the periphery of the city, for example, Niddrie, Baberton, Clermiston and Granton. Many of these are areas of high deprivation as ranked by the SIMD.
Data on equality outcomes	<p>Hands Up Scotland Survey 2019: National Summary Report</p> <p>Transport Scotland, Transport and Travel in Scotland, 2017</p> <p>Sustrans, Bike Life, Sustrans, 2019</p>	<p>A survey undertaken 2019, found that 25.5% of school pupils in Scotland stated they normally travelled to school using only private motorised mode of travel compared with 47.8% who normally use active modes.</p> <p>Women were more likely than men to walk or catch the bus to work and men were more likely to cycle to work or travel by rail.</p> <p>In Scotland twice as many men as women cycle once or twice a week for transport. In addition, people in lower income households were more likely to walk or take the bus whereas people in</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>higher income households were more likely to drive.</p> <p>7.5% of commuters living in Edinburgh cycle to work with over 15.3 million trips made by bike in 2017.</p> <p>In the city black and minority ethnic (BAME) communities, women and over 65s are underrepresented when it comes to cycling.</p>
Research / literature evidence	Yes	<p>The Edinburgh LEZ is being progressed in close alignment with several strategies aiming to enhance placemaking and connectivity in Edinburgh, including:</p> <p>City Mobility Plan National Transport Strategy Strategic Transport Projects Review National Planning Framework Regional Transport Strategy Edinburgh City Vision 2050 2030 Sustainability Strategy City Plan 2030 Edinburgh City Centre Transformation</p>
Public / patient / client experience information	<p>An online survey Carried out in 2019 (2,793 responses received).</p> <p>An online survey carried out in 2021 (5051 responses received)</p> <p>Two series of sessions (undertaken in both 2019 and 2021) with key stakeholder including the representatives from the taxi and private hire car sectors, the bus and coach sectors, and with freight sectors though the Council's ECO Stars scheme</p> <p>Engagement with wider general stakeholder groups (including health and environmental, and wider interest groups, community councils, and residents).</p> <p>Written responses from stakeholder groups and members of the public. Four stakeholder workshops (attendees including the representatives from the taxi and private hire car sectors, the</p>	<p>Findings from the consultation in 2019 showed that cleaner air is important to all, but there were mixed views as to the suitability of the LEZ and to its specific aspects. General public and commercial audiences agree, albeit with differing priorities. For all however, vital questions to consider are the cost of LEZ compliance to them; the cost to life in Edinburgh (clean air, goods/services); and looking at a bigger, city and regional picture to tackle underlying issues (traffic flow, public transport, etc).</p> <p>In the 2019 questionnaire, the main issues voiced were worry about increased traffic and pollution in neighbouring streets/parks; the desire to make the area larger; and to include New Town/up to Ferry Road. Worries were voiced about the financial effect on businesses and individuals. Comments were mainly about considering exemptions, like motorbikes/scooters, buses/public transport, private cars, deliveries/ tradesmen</p> <p>Twelve percent of those who completed the 2021 online questionnaire 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. Of those who stated they did, 17% were Blue Badge holders and 3% own a vehicle with adaptations for disabled users.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
	<p>bus and coach sectors, and with freight sectors through the Council's ECO Stars scheme).</p> <p>Engagement with 60 primary school children</p> <p>Engagement with neighbouring local authorities in the South East Scotland region.</p> <p>Meetings were held in May/June 2021 with representatives from the Edinburgh Access Panel and Inclusion Scotland, as well as Officers working on the Council's Poverty Action Plan.</p> <p>Weekly Poll – Low Emission Zone (Blue Badge Exemptions), Disability Equality Scotland 2021</p>	<p>The 2021 consultation found that 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. Similar concerns to those in the 2019 consultation were voiced.</p> <p>Results from the Weekly Poll – Low Emission Zone (Blue Badge Exemptions) show that an overwhelming majority of respondents believed that the Low Emission Zone exemption application for Blue Badge holders must be available in a variety of accessible formats. This will ensure that applications embed inclusive communication principles and are available in a format that matches the communication strengths and preferences of each individual. There was recognition that not all Blue Badge holders will be able to access an online application, due to factors related to digital exclusion. This includes lacking digital skills or confidence to get online, as well as limited resources and money to pay for devices or internet access. Respondents highlighted the importance of having a paper version of the application, which is also available in a variety of different accessible information formats, such as Braille, Easy Read, large text and plain text. A call centre was identified as another alternative for people who face digital exclusion, as well as the ability to complete a face-to-face application. A number of respondents believed that Low Emission Zone exemptions must align very closely with the existing Blue Badge application process.</p>
Evidence of inclusive engagement of people who use the service and involvement findings	As above	As above
Evidence of unmet need	As above	As above
Good practice guidelines	Yes	<p>The Transport (Scotland) Act 2019</p> <p>The Low Emission Zones (Scotland) Regulations 2021</p> <p>National Transport Strategy (NTS)</p> <p>Cleaner Air for Scotland (CAFS) Strategy</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
		<p>National Low Emissions Framework (NLEF)</p> <p>Inclusive Communication Hub: www.inclusivecommunication.scot</p>
Carbon emissions generated / reduced data	<p>Jacobs, Edinburgh Low Emission Zone, Revised Fleet Composition, Traffic Modelling Report, February 2021</p> <p>SEPA, Air Modelling Results, March, 2021</p>	<p>Scottish Government is monitoring the impact of COVID 19 social distancing and lockdown actions, which includes air quality. Evidence will continue to be collected on carbon emissions/air quality by the Council and Scottish Government as lock down measures are relaxed.</p> <p>A series of transport modelling tests have been undertaken to assess the impact of the LEZ on travel patterns across the city. Outputs from this have been provided to SEPA to undertake supporting air quality impact analysis. Further detail can be found in the Transport Modelling Report by Jacobs and in SEPA's report on Air Modelling.</p>
Environmental data	<p>Scottish Government, Cleaner Air for Scotland: The Road to a Healthier Future, 2015</p> <p>Public Health England, Estimating Local Mortality Burdens associated with Particulate Air Pollution, 2014.</p> <p>City of Edinburgh Council, Air Quality Annual Progress Report (APR) for City of Edinburgh Council, 2019</p> <p>SEPA, The Clearer Air for Scotland – National Modelling Framework, Air Quality Evidence Report – Edinburgh, November 2018</p> <p>City of Edinburgh Council, 2019 Air Quality Annual Progress Report (APR)</p>	<p>Poor outdoor air quality can result from contamination of the outdoor atmosphere by gaseous and particulate pollutants.</p> <p>Based on modelling, the estimated mortality burden on the population in Scotland in 2010 showed that there were around 2,000 premature deaths and a total of around 22,500 life years lost across the population which can be attributed to anthropogenic (man-made) fine particle pollution. In Edinburgh, this can be related to 205 premature deaths and 2,300 life-years lost.</p> <p>The Scottish Environment Protection Agency (SEPA) provided robust evidence of traffic pollution exceeding accepted levels in Edinburgh</p> <p>Edinburgh has five AQMAs due to NO₂ legal limit exceedances mainly due to road traffic; the sixth AQMA relates to fine particulates (PM₁₀) exceedance of the legal limit. These readings are recorded using monitoring stations around Edinburgh at different roadside placements (pavement level, lamppost, building façade etc). Road transport is primarily responsible for NO₂ concentrations at the roadside.</p> <p>The Council's Air Quality Annual Progress Report in 2019, reported a continuing trend towards compliance with legal limits. However, exceedances remained across the city, with the Central AQMA having the highest concentration of sites that exceed legal limits.</p>

Evidence	Available – detail source	Comments: what does the evidence tell you with regard to different groups who may be affected?
Risk from cumulative impacts		Cumulative impacts may come about as a result of the City Mobility Plan, Edinburgh City Centre Transformation and City Plan 2030 policies which are being developed in parallel with LEZ. Cumulative impacts will likely to be positive in relation to traffic and congestion management and active travel investment under City Mobility Plan and Edinburgh City Centre Transformation policies, and sustainable land use strategy as set out in emerging City Plan 2030. Cumulative impacts from this work will be included in due course once impact assessments of these policies/proposals have been undertaken.
Other (please specify)		
Additional evidence required		

8. In summary, what impacts were identified and which groups will they affect?

Equality, Health and Wellbeing and Human Rights	
Positive	Affected populations
The LEZ will discourage the most polluting vehicles from enter/exit/operating within the LEZ. This will reduce emissions and improve air quality and in turn have a positive effect on health on everyone, particularly of those most at risk of respiratory illness including older people/pensioners and children (including unborn children). This is the most significant positive impact of the LEZ and will have health and wellbeing benefits for a large population of residents, workers, and visitors to the area over a long period of time; therefore, the magnitude of the effect is substantial.	All, particularly children, pregnant women, disabled people and older people.
The LEZ is likely to encourage a modal shift from cars to public transport and active travel. This will result in air quality improvements, as well as benefitting the health of individuals from increased activity levels.	All
Reduction in vehicles within the boundary may improve access to services for those travelling by modes other than private car, including public transport or active travel	All, particularly relevant to those who are unemployed/on low income/people on benefits and those with mobility impairments who rely on public transport
Negative	
Bus operators may increase the price of bus tickets as a result of the increased costs to their operations arising from the need to replace or	Unemployed, people on benefits, single parents,

<p>upgrade buses, so they are compliant with the LEZ. For some bus passengers the increase in price may make the journey unaffordable and result in them foregoing their journey. This may affect people's ability to engage in activities and access services or places of work, which in turn will affect their wellbeing/social activity.</p> <p>Mitigation: <i>This effect will not be applicable to holders of free travel passes including older people/pensioners, disabled and subsidised travel; therefore, the effect on most of the impacted population will be mitigated. The Council will continue to engage with bus operators to determine their proposed reactions to the LEZ. If bus operators make use of funding for upgrading and retrofitting vehicles (such as the Energy Savings Trust's BEAR retrofit fund), they may not have to increase the price of tickets. The funding options available will be clearly communicated to Transport Providers.</i></p>	<p>homeless people, carers, part-time workers, students, young people, disabled people who rely on public transport, staff vulnerable to falling into poverty.</p>
<p>Bus operators may remove non-profitable routes in response to LEZ related costs to upgrade fleet. This may negatively impact those who rely on those services to engage in activities and access services or places of work, which in turn will affect their wellbeing/social activity.</p> <p>Further work/mitigation: <i>The Council will continue to engage with bus operators to determine their proposed reactions to the LEZ. If bus operators make use of funding for upgrading and retrofitting vehicles (such as the Energy Savings Trust's BEAR retrofit fund), they may not have to remove services. The funding options available will be clearly communicated to Transport Providers.</i></p>	<p>Unemployed people, people on benefits, single parents, homeless people, carers, part-time workers, students, young people, disabled people, staff vulnerable to falling into poverty.</p>
<p>Non-English speaking people or people with low literacy/numeracy may experience negative impacts if they do not understand the implications of the LEZ. Impacts may affect permanent residents who don't understand the changes but it could also affect temporary overseas visitors who do not hold a British driving licence and are unable to speak English. The impact on overseas visitors is likely to be more prevalent when visitor numbers are higher for large cultural events.</p> <p>Mitigation: <i>The communications strategy will ensure that all impacted groups are reached where possible. Clear communications will be provided around LEZ implementation across different media in plain English, a range of languages as well as Braille. The Council also offers an Interpretation and Translation service, which provides interpreters and translations in different languages including British Sign Language. Equalities groups will be encouraged to disperse information on the proposals to their members.</i></p>	<p>People with low literacy/numeracy, tourists, minority ethnic people (including non-English speakers).</p>
<p>People with a disability who do not use public transport or rely on carers who own a non-LEZ compliant vehicle and cannot afford to upgrade, may choose to forego their journey into the City Centre. This will potentially adversely affect their opportunity to access community and leisure facilities and have a negative impact on their social activity.</p> <p>Mitigation: <i>This impact can be mitigated through exemption for disabled tax class and Blue Badge holders. The LEZ support fund could also help disabled drivers and carers who are on means tested benefits (which includes Carer's Allowance and Disability Living Allowance) and meet the other 4 criteria to upgrade or retrofit their vehicle. Those affected could also apply for the electric vehicle loan to purchase a new or used compliant electric vehicle. Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p>	<p>Disabled people and carers.</p>

<p>Minibuses providing community transport services (care providers, youth groups, school groups, elderly care providers) could be negatively impacted. Any impacts experienced by those providing care support for vulnerable people may also adversely affect those receiving care.</p> <p>Mitigation: <i>Community transport providers were eligible to claim funding from the Bus Emissions Abatement Retrofit (BEAR) programme. LGV owners can also apply for other schemes such as the Low Carbon Business Loans to purchase new electric vehicles. The Council will engage with Community Transport Providers to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.</i></p>	<p>Older people/pensioners, children, disabled people, care providers, youth groups, school groups.</p>
<p>People who use their own cars which are fitted with adaptive features (such as swivel chairs) to access community and leisure facilities within the City Centre may not be able to afford the cost of transferring the adaptive features onto LEZ compliant cars as the costs range between £500 to £30,000. This in turn potentially can adversely affect their social activity/ day to day activity.</p> <p>Mitigation: <i>Mitigated through exemption for disabled tax class and Blue Badge holders. Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare. To reduce potential impacts on disabled drivers who do not qualify for a Blue Badge – consideration will be given to individual time limited exemptions from LEZ Regulations, in accordance with Section 17 of the Transport (Scotland) Act 2019, for people with disabilities not recognised by the Blue Badge Scheme, but who may be at a substantial disadvantage (under Section 20 of the Equality Act).</i></p>	<p>Disabled people and carers.</p>
<p>Private Hire Vehicle and Taxi/Black cab owners on the H2S (Home to School) contract with City of Edinburgh Council to transport school children with a non-compliant LEZ vehicle may not be able to afford to upgrade their vehicle. This may impact on the H2S services offered by the Council and potentially affect school children.</p> <p>Mitigation: <i>The Council has an existing licensing regime to improve emissions standards of PHV and Taxi/Black cab which may help reduce the impact but a residual negative impact on children is possible. The Council will align this regime with the LEZ to ensure mitigation of potential impacts. Taxi owners can also make use of the funding for upgrading and retrofitting vehicles, or apply for the Switched on Taxi loan to replace their vehicle with an ultra low-emission vehicle. The funding options available will be clearly communicated to Transport Providers</i></p>	<p>Children and disabled children</p>
<p>There is a potential for people who currently use their own cars to access leisure facilities for employment and recreation to be negatively impacted if they perceive there to be personal security concerns with public transport or active travel modes. As a result, passengers may forego their journey into the City Centre, particularly at night.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p>	<p>All, particularly minority ethnic people, disabled people, non-binary, Transgender, women, those involved in the criminal justice system, older people.</p>
<p>There are around 25 locations for religious congregation and places of worship that are located within the City Centre. If most of the visitors live</p>	<p>People with different religious belief/ faith</p>

<p>outside of the City Centre and are reliant on cars, their activity may be adversely affected if they forego their journey.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p>	
<p>Users of the Travellers site and Travelling Showman sites in Edinburgh may own non-compliant vehicles and therefore will face fines when entering the LEZ.</p> <p>Mitigation: <i>This can be mitigated through exemptions as showman's vehicles are included within the national exemption of the LEZ implementation. There are no traveller sites in the boundary so access would not be impacted by the LEZ. Travelling Showman sites are sometimes situated in the city centre. To make the Travelling groups aware, targeted engagement will take place with the Travelling and Travelling showmen communities to make them aware of the proposals.</i></p>	<p>Minority ethnic group (Travellers)</p>
<p>For some people it may not be financially viable to upgrade their vehicle. This may prevent people from having control of their social and work environment as well as reduce the equality of opportunity to access services (such as the Department for Work and Pensions, Citizens Advice Bureau etc) or employment opportunities. Some affected may not be in receipt of means tested benefits so would not be exempt.</p> <p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable).</i></p> <p><i>As part of the Council's Adaptation and Renewal Programs, the Wellbeing and Equalities priority includes an outcome to introduce 20 minute neighbourhoods. This would provide opportunities for people to access services, facilities and workplaces within a 20 minute walk or wheel of their homes which would reduce the need to travel by car.</i></p> <p><i>The City Mobility Plan includes a policy to review the city's bus network to improve inclusion, accessibility, integration and reduce congestion in the city centre. In addition, the ALEO reform proposals will create a single company to deliver future public transport services in Edinburgh, which would realise a number benefits for users. Improving public transport will encourage people to use it to access the services they need rather than private car.</i></p> <p><i>Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare. Targeted engagement will take place with the affected communities.</i></p>	<p>Low income households, people on benefits, unemployed, vulnerable families, older people, pensioners, low income carers, single parents and students.</p>
<p>Rural/semi-rural communities that require frequent access to LEZ areas (e.g. work, leisure, education) may be negatively impacted as a result of the financial implications of penalty charges or the cost of upgrade/replacement of their private vehicle.</p>	<p>Rural/semi-rural communities</p>

<p>Mitigation: <i>The LEZ Support fund could help these communities (if those affected are on means tested benefits incomes and meet the other 4 criteria) to upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.</i></p> <p><i>The Council will ensure the LEZ project aligns with the Councils strategic policies on commuting. The City Mobility Plan includes a policy to review the city's bus network to improve inclusion, accessibility, integration, and reduce congestion in the city centre. In addition, the ALEO reform proposals will create a single company to deliver future public transport services in Edinburgh, which would realise a number of benefits for users. Improving public transport will encourage people to use it to access the services they need rather than private car. In addition, measures such as introducing a Mobility as a Service system and enhancing existing or introducing new park and ride/choose facilities to enable car commuters to access low emission public transport or active modes prior to entering a LEZ will assist.</i></p>	
<p>Those who lease cars using the Motability scheme may find that their lease does not expire until after the LEZ scheme is implemented and their vehicle is not compliant.</p> <p>Mitigation: <i>The Council has engaged with the Motability scheme provider to establish the age of the vehicles for lease. The scheme provider confirmed that the majority of vehicles for lease are new or nearly new (the oldest vehicles are 5 years old) which means that all vehicles would be compliant with LEZ standards.</i></p>	Disabled people
<p>The LEZ may result in the displacement of traffic to areas surrounding the boundary. In particular, concerns were raised in the 2021 consultation about Preston Street Primary being on the boundary and the impact on school children. The Edinburgh assessment work shows that there is potential for localised impact on some boundary streets e.g. Palmerston Place and Chester Street. Traffic on these streets would increase and the proportion of non-complaint vehicles would also increase. In turn this may result in increased traffic and a reduction of air quality of those areas which could impact those living on the boundary streets. Modelling analysis indicates that in the long-term (future scenario) the impact on Palmerston Place and Chester Street is not sustained. This is likely to be due to less non-compliant traffic needing to use the diverted route, as well as vehicle standards generally improving.</p> <p>Mitigation: <i>To reduce the impact of traffic displacement on the boundary streets, mitigation measures are being developed through the network management strategy and will include measures such as junction improvements, road changes, optimised signal and improved signing. These will be reviewed regularly to ensure LEZ demand is accommodated. Monitoring of air quality has been increased in the predicted worse affected areas and further consideration will be given to future monitoring as the Scheme decision is progressed. It is proposed that pavements are permanently widened around Preston Street Primary School for safety, active travel and to lessen LEZ impacts.</i></p>	All, particularly those living on the boundary streets suffering from chronic respiratory illness and young children

Environment and Sustainability including climate change emissions and impacts	
Positive	Affected populations
Implementing LEZ will improve vehicle standards which in turn will bring air quality improvements and health & wellbeing improvements, particularly those population groups which are most sensitive to poor air quality such as those suffering from chronic respiratory illness and young children.	All, particularly those suffering from chronic respiratory illness and young children.
Interventions that reduce local air pollution are also likely generate a positive effect on reducing factors contributing to climate change through reduced greenhouse gas emissions.	All
LEZ is likely to promote sustainable forms of transport via modal shift from cars to buses, shared cars, bicycles or walking, which in turn will have a positive impact on air quality. This may also have a positive effect on the health and well-being of people due to physical activity (cycling/walking) and exposure to outdoor spaces.	All
Quieter (alternatively fuelled) vehicles and reduced traffic flows caused by modal shift towards public transport and active travel, are likely to lead to a reduction in inner-city background noise. Lower noise pollution is anticipated to have health and productivity benefits.	All
There are potential benefits from a reduction in air pollution deposition on habitats through reduced traffic.	All
Fewer vehicular trips into urban areas covered by a LEZ and increases in the use of sustainable modes should provide opportunities to improve the quality of public spaces/public realm for non-car users.	All
Negative	
<p>The LEZ may result in the displacement of traffic to areas surrounding the boundary. The Edinburgh assessment work shows that there is potential for localised impact on some boundary streets e.g. Palmerston Place and Chester Street. Traffic on these streets would increase and the proportion of non-complaint vehicles would also increase. In turn this may result in increased traffic and a reduction of air quality of those areas. Modelling analysis indicates that in the long-term (future scenario) the impact on Palmerston Place and Chester Street is not sustained. This is likely to be due to less non-compliant traffic needing to use the diverted route, as well as vehicle standards generally improving.</p> <p>Mitigation: To reduce the impact of traffic displacement on the boundary streets, mitigation measures are being developed through the network management strategy and will include measures such as junction improvements, road changes, optimised signal and improved signing. These will be reviewed regularly to ensure LEZ demand is accommodated. Monitoring of air quality has been increased in the predicted worse affected areas and further consideration will be given to future monitoring as the Scheme decision is progressed.</p>	All, particularly those living on the boundary streets suffering from chronic respiratory illness and young children

<p>A shift towards compliant vehicles would lead to redundant non-compliant vehicles being removed from the fleet. The scrappage of these surplus vehicles may cause environmental harm if not disposed of correctly (e.g. battery disposal).</p> <p>Mitigation: Consult with local waste management facilities in addition to relevant stakeholders (e.g. Zero Waste Scotland) regarding waste management strategies to ensure vehicle components are disposed/recycled sustainably that minimise environmental impact.</p>	All
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Economic including socio-economic disadvantage	
Positive	Affected populations
Increased economic activity for a number of sectors: second hand car traders, vehicle scrappage, vehicle leasing operators, active-travel distributors/repairers, and public transport operators through increased patronage.	Business communities, staff
Decreased traffic and cleaner atmosphere in the city may lead to higher quality of public spaces in the city. This could lead to more opportunities for businesses as more people are attracted to the city/city centre due to less polluted area becoming more attractive.	Business communities, staff
The development of the retrofitting and Low Emission Vehicle (LEV) industries as a result of the LEZ may create employment opportunities throughout the supply chain. Jobs involving the manufacture, maintenance, and sales/operation of lease or rental vehicles should be created.	Business communities, staff
A reduction in inner-city congestion will impact the efficiency of the public transport network. Reduced congestion should lessen delays, lower the time taken for public transport (i.e. buses) to complete their routes, and improving the efficiency of travel for both commuters and leisure seekers and encouraging mode shift.	All
Potential benefit to restaurants/cafes within LEZ areas due to improvements in air quality may encourage increase patronage.	Business communities, staff
Improved air quality may make areas within LEZs more pleasant places to work particularly for those working outdoors (e.g. market traders, street cleaners etc) including staff of restaurants/cafes with outdoor seating areas.	Business communities, staff
Negative	
<p>Decreased access to the city centre due to the LEZ vehicle standards may cause certain members of society (lower income households) to be dissuaded from applying for a job in the city. This will have a negative effect on the size and diversity of the potential workforce in Edinburgh.</p> <p>Mitigation: The LEZ Support fund could help these communities (if those affected are on means tested benefits and meet the other 4 criteria) to</p>	Unemployed, people on benefits, single parents, homeless people, carers, part-time workers, students, young people, disabled people, staff

<p><i>upgrade or retrofit their vehicle and provide Travel Better vouchers. Those affected could also apply for the electric vehicle loan, electric vehicle charging point grant or eBike loan (if affordable). Clear communications will be provided around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare. Wider Council policies on parking are designed to dissuade people from parking in the City Centre and use more sustainable modes of transport.</i></p>	<p>vulnerable to falling into poverty.</p>
<p>Vehicle users, especially LGV, bus, and HGV, have relatively long turnover periods, requiring users to change earlier than anticipated. The need to purchase compliant vehicles and sell/scrap their non-compliant vehicle means that the users will incur additional financial cost.</p> <p>Mitigation: <i>Businesses can make use of schemes such LEZ Support Fund to dispose of non-compliant vehicles, the Low Emission Retrofit Fund to upgrade their existing vehicles, or the Low Carbon Transport Business Loan to purchase electric vehicles. CEC will engage with Businesses to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.</i></p>	<p>Business communities</p>
<p>Small and medium sized enterprises who rely on LGVs to deliver goods or drive to clients to provide a service could be disproportionately affected due to the level of non-compliance (non-compliance rates are 48%) and the economic impacts associated with the commercial-type vehicles sector. This may negatively impact business owners, particularly small enterprises which represent over 90% of business in Edinburgh.</p> <p>Mitigation: <i>Businesses can make use of schemes such LEZ Support Fund to dispose of non-compliant vehicles, the Low Emission Retrofit Fund to upgrade their existing vehicles, or the Low Carbon Transport Business Loan to purchase electric vehicles. CEC will engage with Businesses to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.</i></p>	<p>Business communities</p>

9. Is any part of this policy/ service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?

Where contractors are used, as part of the Council’s procurement process due regard is required to be given to all equalities and right, environmental and sustainability impacts when undertaking work on behalf of the Council.

10. Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.

A range of communication tools will be used to reach out to all types of people regardless of their age, disability or language etc. Direct communication has been and will continue to be undertaken with stakeholders in the form of written communication, meetings, workshops and messages will be issued through the Council’s social media channels. We will contact equalities organisations to distribute information to members. Formats will be designed to be understood by a range of population groups.

The Council also offers an Interpretation and Translation service, which provides interpreters and translations to people who cannot speak English, have problems understanding English, or have a sight or hearing loss. The translations and interpretations are available in a wide range of different languages including British Sign Language, Braille, Large print and Audio.

11. Is the policy likely to result in significant environmental effects, either positive or negative? If yes, it is likely that a [Strategic Environmental Assessment](#) (SEA) will be required and the impacts identified in the IIA should be included in this.

Strategic Environmental Assessment screening in 2019 highlighted the need for the LEZ to be assessed as a part of the wider Edinburgh City Centre Transformation programme and City Mobility Plan work. The SEA concluded that the cumulative impacts of introducing the LEZ along with other policies and strategies, such as the City Mobility Plan and Edinburgh City Centre Transformation, would generally be positive.

12. Additional Information and Evidence Required

If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.

13. Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Continue to engage with bus operators to determine their proposed reactions to the LEZ.	George King	ongoing	January 2022
Continue to implement communications strategy to ensure that all impacted groups are reached where possible	George King	ongoing	January 2022
Provide clear communications around the LEZ implementation across different media to raise awareness and ensure people have sufficient time to prepare.	George King	ongoing	January 2022
Engage with Community Transport Providers to effectively communicate LEZ proposals and on potential impact to help them prepare for the change.	George King	ongoing	January 2022
Communicate clearly the funding options available to Transport Providers. This is also a national action for Transport Scotland.	George King	ongoing	January 2022

Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts)	Who will take them forward (name and job title)	Deadline for progressing	Review date
Targeted engagement will take place with affected communities/population groups.	George King	June 2021	January 2022
Ensure appropriate mitigation measures are implemented and monitored, to reduce the impact of traffic displacement on the boundary streets	George King	ongoing	January 2022
Consult with local waste management facilities in addition to relevant stakeholders (e.g. Zero Waste Scotland) regarding waste management strategies to ensure vehicle components are disposed/recycled sustainably that minimise environmental impact.	George King	June 2021	January 2022

14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?

No

15. How will you monitor how this proposal affects different groups, including people with protected characteristics?

The recent period of statutory engagement and consultation included engagement with the affected groups, as well as an online public consultation survey. During the engagement process, questions on equalities formed part of the public questionnaire to obtain views and to ensure a representative sample of the impacted populations were reached.

While working with Transport Scotland and the Energy Savings Trust, the Council will continue to monitor the uptake of LEZ Support Funds and other related retrofit funds.

16. Sign off by Head of Service/ NHS Project Lead

Name - Gareth Barwell

Date – 7/10/21

17. Publication

Completed and signed IIAs should be sent to strategyandbusinessplanning@edinburgh.gov.uk to be published on the IIA directory on the Council website www.edinburgh.gov.uk/impactassessments