

RURAL ECONOMY AND CONNECTIVITY COMMITTEE

TRANSPORT (SCOTLAND) BILL

SUBMISSION FROM RAC FOUNDATION

The RAC Foundation is an independent transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and motoring. The Foundation carries out independent and authoritative research with which it promotes informed debate and advocates policy in the interests of responsible road users.

The Foundation is supportive of the development of ultra-low and zero tailpipe emission vehicles that help improve air quality and reduce greenhouse gas emissions.

Unfortunately we are not able to attend the Committee to give evidence in person, but we would wish to offer views, below, for the Committee's consideration.

Response

Low Emissions Zones (LEZ) in Scotland are being defined differently to Clean Air Zones (CAZ) in England – despite the similar objectives of both initiatives. Although there is clearly a need for schemes to be designed to match local circumstances in terms of geographic coverage and times of operation, we would favour a more standard UK-wide approach to avoid confusion for those driving around the country.

In England the proposals for Clean Air Zones envisage a daily charge for a vehicle entering a CAZ that does not meet certain criteria. This system is intended to create a deterrent to regular entry in a non-compliant vehicle, as the costs add up. But does not prevent infrequent, 'one-off' type trips, that are often not possible by other modes.

Scotland's LEZ system would ban all vehicles that do meet the criteria for entry, backed up with severe penalties levied if banned vehicles do enter. Whilst we recognise the policy intent that wealthier people should not be able to 'buy' their way past the restrictions, we are concerned that a ban could create a huge barrier to those who may need to enter a zone for rare 'one-off' type trips where other modes may not be possible. This could particularly affect low-income households running older vehicles.

The scale of the problem will depend on the scale of each LEZ – the larger the area and the more streets included the greater the issue. But we can foresee particular issues if, for example, LEZs contain hospitals and care facilities that need to be accessed by many, infrequently, rather than employment or retail areas attracting multiple repeat visits.

We could see this being a problem for those in rural communities where the air quality issue is not significant, and hence the case for encouraging or forcing an 'upgrade' to newer, cleaner – but more expensive – vehicles does not stand up.