

Dear REC members,

Having followed the evidence sessions of the Transport Bill closely, I wanted to send some further research which might be of interest in relation to Low Emission Zones.

There is strong evidence that Low Emission Zones in other countries, of sufficient size and with appropriate restriction standards, are successful in reducing air pollution, as detailed in Malina and Scheffler's 'The impact of Low Emission Zones on particulate matter concentration and public health'¹.

Recent research on London's Low Emission Zone, cited in a recent Committee meeting, shows there has been a reduction in pollution in the area covered by the LEZ, with potential for much further improvements if restriction standards are raised.²

It is true that some Low Emission Zones have not reduced air pollution to a significant extent - though research from Transport & Environment shows this is in large due to the poor performance of Euro standards on the road, as opposed to their factory performance³. The difference between factory and 'real-world' emissions is one of the factors underlying the Volkswagen scandal⁴. In light of this, Scotland's proposed Low Emission Zone provisions would benefit from periodic review of the restrictions, for example every 3 years.

Finally, there was some confusion in evidence sessions about the distinction between a congestion charge system - as operates in London - and the penalty system that is proposed for the Low Emission Zones in the Transport Bill.

In a congestion charge model, any driver can pay the charge and drive their car within the boundaries. The charge may work as a disincentive to drive and reduce congestion, although in London this was a short-term dip in congestion and traffic ultimately reached pre-congestion charge levels⁵. This model, while often generating significant revenue, allows people to pay to pollute. Richer drivers will be more able to pay, while poorer communities suffer more harms from air pollution, so there is inherent unfairness in this system.⁶

In the penalty model that Glasgow, Edinburgh, Aberdeen, and Dundee will operate, it would be a driving offence for cars to enter the Low Emission Zone if they do not meet the

¹ <https://www.sciencedirect.com/science/article/pii/S0965856415001159>

² [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(18\)30202-0/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(18)30202-0/fulltext)

³

https://www.transportenvironment.org/sites/te/files/publications/TE%20Air%20Quality%20Report_FIN_AL_12032018%20NEW.pdf

⁴ <https://www.telegraph.co.uk/cars/comment/vw-emissions-scandal-the-authorities-have-encouraged-cheating/>

⁵ <https://www.theguardian.com/politics/2008/aug/07/congestioncharging.transport>

⁶ <https://uk->

air.defra.gov.uk/assets/documents/reports/cat09/0701110944_AQinequalitiesFNL_AEAT_0506.pdf

emissions standard. This system means that wealthier drivers can't merely continue to pollute, and ensures an equitable approach.

Should you wish to discuss any of the above issues any further, please do not hesitate to contact me.

Regards

Gavin Thomson
Air Pollution Campaigner.
Friends of the Earth Scotland