



# Friends of the Earth Scotland Response to Consultation on Edinburgh Labour's Draft Manifesto

28 February 2017

We welcome the opportunity to comment on Edinburgh Labour's Draft Manifesto. We restrict our comments to air pollution, community energy, divestment, and fracking:

## (1) Air pollution

We welcome Labour's recognition that air pollution is one of the most significant threats to the 'quality of life' we currently enjoy in our Capital City, although the proposed actions particularly on a Low Emission Zone could be stronger.

In terms of proposed actions, our comments are as follows:

### (a) Low Emission Zones

We would like to see a firmer proposal, and a commitment to "push forward with proposals for a Low Emission Zone (LEZ)" in the city rather than simply to run a consultation on whether to introduce such a Zone. This is required given the scale and the urgency of tackling the air pollution crisis, which according to Public Health England is responsible for over 200 premature deaths in the Capital every year.

The Scottish Government has committed to introducing Scotland's first Low Emission Zone in 2018 and is under pressure now from the European Commission to come up with improved air quality plans in the next two months following a final warning issued against the UK for ongoing breaches of European air quality legal limits including in Scotland. Because air quality is devolved to Scotland, the Scottish Government will have to come up with fresh and improved plans for air quality improvement, so the time is ripe to push forward on Low Emission Zones. It is much more likely that funding will be forthcoming for the first zone than for subsequent zones (although we will continue to campaign for funding to be made available for all Low Emission Zones across Scotland, which must be introduced in all major cities with pollution problems.)

Low Emission Zones can take different forms. In our view, a Low Emission Zone for Edinburgh would, by 2018, apply Euro VI emissions standards to lorries, buses, and vans, with emissions standards applying to cars and other

vehicles from 2020. We consider the previously devised inner congestion charging zone would be an appropriate starting point to designate the area for the zone. In terms of enforcement, we consider that automatic number plate recognitions (ANPR) technology could be used to enforce the zone.

There are over 200 Low Emission Zones across Europe, and the Mayor of London has recently strengthened London's Low Emission Zone and will introduce a "Toxicity Charge" on pre-2006 cars which will come into force by October 2017.

**(b) Active travel:** Edinburgh has an excellent track record on active travel. We support and applaud your commitment to "continue to fund cycle revenue and capital expenditure, at 10% of the overall Transport Budget, for the duration of the next Council Term 2017-2022" although we reiterate that active travel is only one part of the solution to air pollution. We support Spokes' calls for more dedicated cycle routes on protected main-road routes including the East-West Route, and a bike-friendly and pedestrian-friendly Princes Street.

**(c) Work Place Parking levies:** We welcome your commitment to lobby the Scottish Government to introduce the power for local authorities to implement workplace parking levies and emissions surcharges, but ask that you also lobby the Scottish Government to introduce a power to local authorities to implement other parking levies for large car parks (which would apply, for example, to shop car parks).

We also consider that your commitment on WPLs could be worded more firmly. You could commit in principle to introducing such charges if and when the relevant legislative changes take place.

**(d) Buses and the trams:** We welcome your commitment to keeping the buses and trams in public ownership, and we welcome the commitment to extending the tram to the North.

## **(2) Community Energy**

In terms of promoting green energy, we welcome your commitment to support the Edinburgh Solar Cooperative and agree that it is an excellent example of a successful green energy project but we would like to see a commitment to expanding the use of even more Council buildings for solar energy. We would also like to see a commitment to set community energy targets to help drive the development of more local community energy initiatives.

The Scottish Government has recently increased its targets for community energy schemes across Scotland and is developing ways for communities to be part of larger schemes. Ambitious local targets for community energy generation will help local authorities maximise the benefits of attracting central government support to community energy schemes.

By working with community groups local authorities can help facilitate access to land or other spaces needed to develop projects (e.g. rooftops of publicly owned buildings) and equitable distribution of benefits e.g. by ensuring that profits generated do not exclude households or citizens unable to invest in local schemes.

### **(3) Divestment**

We ask that you work with the Pensions Committee to divest Lothian Pension Fund from fossil fuels and invest instead in renewable energy and social housing.

Globally, fossil fuel companies are responsible for major human rights violations and the burning of fossil fuels is the main driver of climate change. Through their pension funds Scottish councils invest £1.7 billion in fossil fuel companies.

Councils should make a public commitment to divest from fossil fuels, whose value will tumble as we move away from using coal, oil and gas. In place of these risky investments councils could invest in things that benefit Scottish communities, like social housing and renewable energy.

Councils can invest their pension funds in housing associations which give dependable returns over a long time period and could provide homes for the 335,000 households on council house waiting lists.

With 25 per cent of Europe's potential wind energy resource Councils can also invest in renewable energy, including funding community renewable projects.

Some Scottish council pensions have already begun to invest in infrastructure that benefits local communities. With a recent regulatory change enabling higher investment of this kind, now is the time to divest from dirty energy and put that money back into Scottish communities.

There are examples of councils investing for the future. In September 2016 the London Borough of Waltham Forest became the first council in the UK to divest from fossil fuels, voting to sell its entire £24 million stake in oil, gas and coal.

Other funds are moving in the same direction. South Yorkshire's pensions are divested from coal and the UK government environment workers' fund is shedding fossil fuel investments.

As well as shifting away from dirty energy some local council funds are investing positively. Glasgow Council runs the Strathclyde Pension Fund which invests £10 million in renewable energy, the Falkirk Pension Fund has invested £30 million in social housing, and Haringey Council invests £220 million of its fund in a low-carbon index fund

#### **(4) Fracking and new fossil fuels**

We ask that you commit to opposing new fossil fuels including shale gas and oil, and coalbed methane.

Opening up new frontiers of fossil fuels like fracked gas is completely irresponsible in the context of the global climate crisis. Additionally, the many serious public health risks associated with the onshore unconventional oil and gas extraction demand that this industry must not be allowed to go ahead on the basis of the precautionary principle.

The Scottish Government has put a temporary stop to onshore oil and gas extraction. Only a total ban will protect communities and the climate from this dirty, unnecessary industry.

Councils, particularly those in areas currently under license for onshore oil and gas extraction, should oppose fracking and new fossil fuels and call for a legislative ban to prevent the industry going ahead.