



Reply to: Dr Richard Dixon Director
Friends of the Earth Scotland
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City Administration Committee
Glasgow City Council
Monday 11 June 2018

Dear Glasgow City Administration Committee,

LOW EMISSION ZONE

In advance of your consideration of Glasgow's Low Emission Zone at Committee, we, the undersigned, would like to make the following recommendations to help tackle Glasgow's pollution crisis:

1) Road user charging

We are supportive of road user charging, subject to it being part of an integrated, fair, green transport strategy, and would support a decision at the City Administration Committee to refer road user charging to go to the Environment Committee for a detailed assessment of options within a year.

2) Retain a LEZ compliance date of April 2021

The bringing forward of the compliance date from December 2022 to April 2021 at the Environment Committee meeting was a progressive step which should be retained.

Given that Glasgow's LEZ was officially announced in September 2017, there can be no justification for a December 2022 date for all vehicles to be compliant. This would be five years after the announcement, which itself came after 7 years of deliberation and 7 years after the lapse of the EU legal deadline for clean air. It would not reflect the urgency required to tackle the air pollution health crisis

Even if this CAC meeting date is taken as the decision time for the vehicles to be included in the Zone, a three year notice period would bring us to June 2021.

3) Bus ambition

SEPA modelling shows that even when 100% of buses in the city centre are Euro VI, there will remain illegal levels of pollution in some places.

The Scottish Government's target date for compliance with European air quality limits is 2020 (the legal deadline was 2010 so 2020 is already a decade late).

The Scottish Government has confirmed a LEZ budget of £10.8m/year, 70% of which has been dedicated to bus improvement in Glasgow in the first year. This money would cover the full costs of 440 bus retrofits - meaning that 75% of all buses running through Glasgow city centre could be Euro VI or equivalent compliant by Spring 2019. Even more could be achieved if bus companies were to invest their own profits into fleet improvements. The Transport Bill may be bringing in tighter controls over buses which would give the Council greater leverage to make this happen.

It is therefore incredibly disappointing that all buses will only be Euro VI compliant by 2022 as per the Traffic Regulation Condition application which was submitted last month.

We would ask you to use the CAC meeting to clearly state a commitment to accelerate the timetable for the phase out of dirty buses, with a caveat about timely access to the Scottish Government funding, if you thought that necessary. This would complement the existing Traffic Regulation Condition application and make sure Glasgow is committed to moving as quickly as the funding now allows.

Thanks again for your consideration of these points and we hope that you will commit to ambitious, effective action to tackle pollution.

Yours sincerely,

Joseph Carter, Head of Devolved Nations, British Lung Foundation
Dr Lizzie Reather, Chair, Cycling UK Scotland
Roger Geffen, Policy Director, Cycling UK
Sara Barry, Coordinator, Friends of the Earth Glasgow
Dr Richard Dixon, Director, Friends of the Earth Scotland
Ellie Harrison, Campaigner, Get Glasgow Moving
Liz Murray, Head of Scottish Campaigns, Global Justice Now
Iona Shepherd, Co-convenor, GoBike
Jen Anderson, Chief Officer, Scottish Environment Link
Tom Ballantine, Chair, Stop Climate Chaos Scotland
Dr Sam Gardner, Acting Director, WWF Scotland

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