

# Glasgow City Council LEZ Consultation Analysis Report November 2021





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# **Executive summary**

# **Background**

A public consultation on the preferred scheme design for the Glasgow Low Emissions Zone (LEZ) was designed, scripted and hosted online by Glasgow City Council (GCC) and was live from 24<sup>th</sup> June to 2<sup>nd</sup> September 2021. The consultation was open to the public, businesses and other stakeholder organisations. Some of the major stakeholder organisations submitted written responses rather than completing the online questionnaire.

#### Sample details

The vast majority of respondents identified as individuals rather than organisations (97%). One third (33%) lived either in or immediately adjacent to the proposed LEZ (12%) or close to it (21%). One third (33%) were female and 54% male, with one in ten (11%) preferring not to state their gender. The sample included a good spread of age groups, with a slight skew towards younger respondents (28% 16-34, 23% 35-44, 20% 45-54 and 15% 55-64). A smaller proportion (6%) were aged 65 years or older. The majority of respondents were white (84%), in particular white Scottish (63%). Three per cent identified as BAME (either Asian, Black or Chinese) and a further 3% identified as mixed race or other. One in ten (11%) reported having a disability.

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# **Use of Glasgow City Centre**

The most common reasons for using the city centre were work (40%) and shopping/leisure (40%). More than one in ten (14%) were city centre residents, with 4% both living and working in the city centre. The majority of respondents were frequent visitors to the city centre, with 76% visiting at least once a week. Two fifths were very frequent visitors, visiting at least 5 days a week, while 23% were infrequent visitors, visiting once a month or less often.

Walking and car were the most frequently used modes of transport to and/or within the city centre (used at least once a week by 35% and 46% of respondents respectively). Walking and car use were both particularly common amongst city centre residents (82% and 62% at least once a week).

#### Glasgow's LEZ Proposal

Views were fairly evenly split overall on LEZs in principle (48% support vs. 41% oppose). Visitors (53%) and those living and working in the centre (58%) were more likely to support them than those working in the city centre (44%). Those with disabilities were also less supportive (41% support vs. 52% without disabilities). Greater scepticism amongst city centre workers and people with disabilities run throughout the consultation findings.

Views on the proposed LEZ boundary were also split. Over one quarter (28%) agreed with the boundary as depicted on the map, with one in five (21%) saying the area covered was too large, and one in ten (11%) saying it was too small. Around one third (34%) said they do not support an LEZ in



Glasgow at all. City centre workers and people with disabilities were again generally less supportive than others. Respondents cited a wide range of reasons for their responses, particularly around negative impacts on people and the economy/businesses.

People tended to disagree with the proposed emissions standards (49% vs. 37% agree). City centre workers (53% disagree) and people with disabilities (52% disagree) were especially sceptical. Comments amongst those opposed included concerns around having to buy a new car and that the standards seemed unfair. Some wanted more exemptions and more allowances for older vehicles. There were also concerns voiced about the impact on people on lower incomes. However, a number of respondents who otherwise supported the proposed standards felt the proposals weren't strict enough.

Overall support for Glasgow's LEZ, having seen all the information presented throughout the survey, was 42%, compared with 51% opposed. People with disabilities were far less likely to support the LEZ overall than those without disabilities (34% vs. 45% support). Looking at reasons given for responses, 25% voiced support and 38% general opposition. One in ten (21%) talked about infrastructure issues, especially concerns about inadequate public transport (17%). One quarter (26%) were concerned about impacts on people and one in five (21%) were concerned about impacts on business and the economy.

## **Exemptions**

Views on national exemptions were again quite evenly split (44% agree vs. 40% disagree). Visitors were significantly more likely than all other types of city centre user to agree with the national exemptions outlined. The oldest age group (65+) was more likely to agree than most other age groups (54% vs. 46% aged 16-34, 43% aged 45-54 and 42% aged 55-64). Nearly half of open-ended comments provided (45%) were generally opposed to the exemptions as set out in the consultation. These comments tended to focus on a desire for more parity of exemptions, e.g. same rules for public sector vehicles and for showmen's vehicles, as for everyone else.

Regarding proposed exemptions for Glasgow's LEZ, there was a very even split (38% agree, 39% disagree). A large proportion (22%) were neutral, perhaps indicating uncertainty and need for more information. Again, those aged 65+ tended to be more likely to agree and less likely to disagree than younger age groups. The bulk of open-ended comments, as throughout the survey, tended to be opposed, with one in five (21%) taking the opportunity to voice general opposition to the LEZ and 16% proposing exemptions for specific vehicles or people.

#### **Enforcement**

Views were similarly split over grace periods as for other aspects of the proposed LEZ (45% disagree vs. 38% agree). Disagreement was especially strong amongst business owners (68%) although the small base size (34 respondents) needs to be borne in mind. As with exemptions, the oldest age group (65+) tended to view the proposed grace periods and timetable more favourably. Looking at reasons given for views, one quarter (24%) were generally supportive but wanted shorter or no grace periods. Over one third (36%) wanted either longer grace periods or were opposed to the LEZ. Concerns about negative impacts on people featured strongly again (24%).



Penalty charges were particularly unpopular, with approaching twice as many respondents disagreeing than agreeing with the proposals (57% vs. 31%). The strength of disagreement was also notable with 42% disagreeing strongly. Nearly three in five (58%) of those giving reasons for their answers voiced general opposition, with the largest single response (22%) concerned that the charges were a 'money-making scheme'. A number of respondents (15%) were concerned about the impact on people on low incomes.

# Introduction

# **Background and objectives**

Low Emission Zones (LEZ) set an environmental limit on certain road spaces, restricting access for the most polluting vehicles to improve air quality. This helps protect public health within towns and cities, making them more attractive places to be. A penalty charge will be payable by the vehicle's registered keeper if a vehicle enters a LEZ and does not meet the emission requirements. Glasgow is introducing an LEZ because in Glasgow city centre levels of harmful nitrogen dioxide are being recorded at levels which do not meet statutory expectations, predominantly caused by road transport.

Glasgow City Council was required in 2021 to undertake statutory consultation on the Glasgow Low Emission Zone preferred scheme design. This follows a previous public consultation to help shape these proposals conducted in March/April 2020. Progressive was engaged as a fully independent market research agency to analyse and report on findings from the 2021 consultation process

#### Method

#### Data included in the analysis

The feedback included in the analysis is primarily based on data from the online survey. There were 4,742 responses to the consultation survey, of which 1,801 were filtered out as only partially complete as they were not submitted. This left 2,941 valid responses, all of which are included in the analysis. The questionnaire was designed, scripted and hosted by Glasgow City Council (GCC) and was live from 24<sup>th</sup> June to 2<sup>nd</sup> September 2021.

A number of written responses were also submitted, mainly from larger organisations including charities and other neighbouring local authorities. Findings from these written responses are detailed in a separate section of the report after the online survey findings.

#### Data processing and analysis

The dataset was transferred by secure means to Progressive in batches during the consultation period. Data was imported into SNAP, a data analysis software package, checked and cleaned. Checks included quality and sense checks and checks to identify any campaign responses or duplicate responses. A specification for data tables and cross tabulations was agreed with GCC and comprehensive data tables produced, as well as a full raw, anonymised dataset. No weighting was applied to the data.



#### Analysis and coding of open-ended responses

In addition, responses to the open-ended survey questions were coded and analysed. Progressive's in-house team of coders, overseen by the executive team, undertook the coding in the following stages:

- 1. Review of a cross-section of responses for each open-ended question, identification of initial key themes.
- 2. First draft of the analytical framework based on the initial review of emerging themes. This was signed off by GCC
- 3. Full analysis and coding of responses, with any further codes and themes identified added to the analytical framework as necessary

The coded responses were also tagged with the following information at the respondent level:

- Demographic details
- Whether the respondent was responding as an individual or organisation
- Whether the respondent was happy to have their response published
- Area (the first part of their postcode)
- Overall support for the Glasgow LEZ proposal (from Q11 of the survey)

Data from the open-ended questions was then incorporated into the data tables.

#### Limitations of the findings

The online survey was generally not designed to prompt someone to respond before they could move on. Whilst this allows the respondent to complete the survey as they wished, it also means that there are a proportion of 'not answered' responses for each question. For the sake of consistency, the main sample sizes used and cited are those for the total number of surveys analysed, including 'not answered'. The sample sizes for each question state whether they are of the total (including 'not answered') or if they have also been re-calculated to remove these responses from the figures, as may be appropriate for the analysis of the question. However, this is also an advantage as it enables respondents to respond on areas of interest and expertise, without being forced to respond on issues they have no interest/views on.

It should be borne in mind that this was a consultation, not a representative survey. Therefore the findings reflect the views of respondents, but cannot be extrapolated to those of any particular group e.g. city centre residents, Glasgow residents, people who work in the city centre or business owners.



# Main findings

This section details the main findings from the consultation. The findings shown are primarily from the online survey with a section following these that specifically summarises the written responses received.

The main findings therefore start with the background of those who took part in the online survey and then reviews the main areas detailed in the survey: use of Glasgow city centre; support for LEZs; proposed LEZ boundary; emission standards; vehicle inclusions and exclusions; grace periods; and enforcement and penalties.

The online survey questionnaire can be seen in the Appendix of the report.

The following definitions should be noted when reviewing findings:

- 'not answered' indicates the question was left blank on the online survey and no response was given
- a number with a percent sign, e.g. 6%, indicates the percentage of responses, numbers in a bracket, e.g. (6), indicates the actual, absolute, number of responses
- '<1%' shows something is mentioned, but by insufficient numbers to reach 1% of the pertinent sample
- '-' indicates that no one gave this response
- 'other' refers to responses not of specific note often individual mentions
- figures are rounded up to the next percentage, i.e. when x.5% and above.

Each question is illustrated by:

- a chart comparing the overall result with subgroup results based on use of the city centre. City centre users are defined as follows:
  - City centre resident (lives in city centre) (Base: 275)
  - Works in the city centre (Base: 1,189)
  - Lives and works in the city centre (Base: 124)
  - Business owner (Base: 34)
  - Visitor (Base: 1,166)
  - Other (Base: 130)
- a table comparing results across key demographics:
  - Age
    - 16-34 (Base: 827)
    - 35-44 (Base: 675)
    - 45-54 (Base: 594)
    - 55-64 (Base: 450)
    - 65+ (Base: 177)
  - Gender
    - Female including trans (Base: 967)
    - Male including trans (Base: 1,585)
  - Ethnicity
    - White (Base: 2,458)
    - BAME (Base: 80)
    - Mixed/Other (Base: 92)



- Disability
  - Yes (Base: 317); No (Base: 2,278)

Any significant differences between subgroups are stated in the analysis under each chart and table. The analysis also highlights any differences based on respondents' area of residence. Differences are only reported if significant at the 95% confidence level.

An overall sample size of 2,941 provides a dataset with a margin of error of between  $\pm 0.36\%$  and  $\pm 1.8\%$ , calculated at the 95% confidence level.

Please note that any subgroup comparisons between business owners and others should be treated with caution as the base size for business owners is small (34 respondents).

#### Defining area of residence

It is worth noting how area of residence was defined in the consultation. Respondents were asked to provide only the first part of their postcode and their area of residence was defined as follows:

- In/immediately adjacent to LEZ: G1, G2, G3, G4
- Close to LEZ: G5, G11, G12, G20, G21, G22, G31, G40, G42
- Other City of Glasgow: G13, G14, G15, G23, G32, G33, G34, G43, G44, G45, G52, G53, G69, G71
- <u>Surrounding Glasgow</u>:
  - G60, G61, G62, G63, G64, G65, G66, G67, G68, G74, G75, G76, G77, G78, G81, G82,
     G83: covers most of North Lanarkshire, East Renfrewshire and East and West Dunbartonshire
  - PA1 PA12: approximately covers Renfrewshire
  - ML1 ML12: approximately covers South Lanarkshire
- Other: Any other postcodes not covered above

#### Sample details

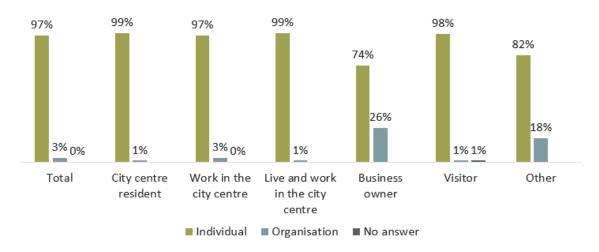
#### Type of respondent

The vast majority (97%) of respondents replied to the survey as individuals rather than on behalf of an organisation.

#### Chart 1: Type of respondent







The following differences emerged between city centre users:

- As would be expected, business owners were more likely than all others to respond as an organisation (26% vs. 3% overall)
- 'Other' users were also more likely to respond as an organisation (18% vs. 3% overall)

Table 1: Type of respondent by demographics

|              | Age       |           |           |           | Gender |        |      |       | /    | Disability       |     |     |
|--------------|-----------|-----------|-----------|-----------|--------|--------|------|-------|------|------------------|-----|-----|
|              | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+    | Female | Male | White | BAME | Mixed /<br>Other | Yes | No  |
| Individual   | 99%       | 97%       | 97%       | 96%       | 98%    | 99%    | 97%  | 97%   | 100  | 93%              | 98% | 97% |
| Organisation | 1%        | 3%        | 3%        | 4%        | 2%     | 1%     | 3%   | 2%    | -    | 5%               | 2%  | 2%  |
| No answer    | <1%       | <1%       | <1%       | <1%       | -      | <1%    | <1%  | <1%   | -    | 1%               | -%  | <1% |

Base: All (2,941)

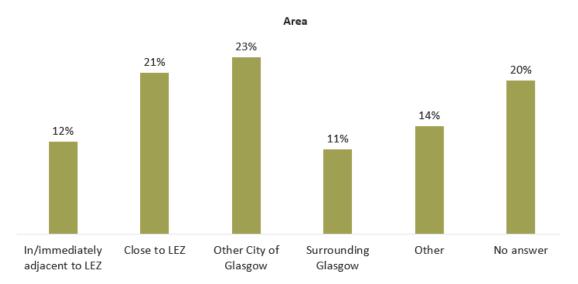
No significant differences emerged between demographic subgroups.

## Area of residence

There was a good spread of respondents in terms of where they lived, from 11% living around but not within the City of Glasgow area to 23% living in the City of Glasgow in areas not within or adjacent to the proposed LEZ. Two in five (21%) lived close to the proposed LEZ and 12% lived within or immediately adjacent to it.

#### Chart 2: Area of residence





#### Gender

The sample was skewed towards males, with over half of respondents (54%) male and one third (33%) female. The remainder of respondents did not wish to provide their gender or did not answer this question.

Table 2: Gender

|                       | Total | City<br>centre<br>resident | Work in<br>the city<br>centre | Live and<br>work in<br>the city<br>centre | Business<br>owner | Visitor<br>to city<br>centre | Other |
|-----------------------|-------|----------------------------|-------------------------------|---|-------------------|------------------------------|-------|
| Female (incl. trans)  | 33%   | 31%                        | 30%                           | 34%                                       | 21%               | 37%                          | 28%   |
| Male (incl. trans)    | 54%   | 53%                        | 58%                           | 48%                                       | 53%               | 50%                          | 58%   |
| Other                 | 1%    | 1%                         | 1%                            | -   | -                 | 1%                           | 5%    |
| Would not like to say | 11%   | 13%                        | 10%                           | 17%                                       | 26%               | 10%                          | 7%    |
| No answer             | 2%    | 1%                         | 1%                            | 1%  | -                 | 2%                           | 2%    |

Base: All (2,941)

Visitors were more likely to be female than workers (37% vs. 30%).

#### Age

Over one quarter (28%) of respondents were in the 16-34 age group. Nearly a further quarter (23%) were aged 35-44, and one in five (20%) were aged 45-54.

Table 3: Age

|       | Total | City<br>centre<br>resident | Work in<br>the city<br>centre | Live and<br>work in<br>the city<br>centre | Business<br>owner | Visitor<br>to city<br>centre | Other |
|-------|-------|----------------------------|-------------------------------|---|-------------------|------------------------------|-------|
| 16-24 | 5%    | 7%                         | 4%                            | 7%  | -                 | 6%                           | -     |



| 25-34             | 23%  | 31% | 23%  | 47% | 12%  | 21% | 14% |
|-------------------|------|-----|------|-----|------|-----|-----|
| 16-34 NET         | 28%  | 37% | 26%  | 54% | 12%  | 27% | 14% |
| 35-44             | 23%  | 25% | 25%  | 19% | 24%  | 22% | 12% |
| 45-54             | 20%  | 13% | 25%  | 9%  | 24%  | 18% | 27% |
| 55-64             | 15%  | 12% | 14%  | 7%  | 18%  | 16% | 28% |
| 65-74             | 5%   | 6%  | 2%   | 1%  | 6%   | 8%  | 8%  |
| 75+               | 1%   | 1%  | -    | -   | -    | 1%  | 2%  |
| 65+ NET           | 6%   | 7%  | 2%   | 1%  | 6%   | 10% | 10% |
| Would not like to | 7%   | 5%  | 7%   | 10% | 18%  | 6%  | 9%  |
| say               | 7 70 | 3%  | 1 70 | 10% | 1070 | 0%  | 370 |
| No answer         | 1%   | <1% | <1%  | -   | -    | 1%  | 1%  |

Base: All (2,941)

Respondents aged 16-34 were most likely to be city centre residents (37%) or live and work in the city centre (54%).

# **Ethnicity**

The majority of respondents were white (84%), in particular white Scottish (63%). Three per cent identified as BAME (either Asian, Black or Chinese) and a further 3% identified as mixed or other.



**Table 4: Ethnicity** 

| Table 4. Ethnicity                      | Total | City<br>centre<br>resident | Work in<br>the city<br>centre | Live and<br>work in<br>the city<br>centre | Business<br>owner | Visitor<br>to city<br>centre | Other |  |
|---|-------|----------------------------|-------------------------------|---|-------------------|------------------------------|-------|--|
| White                                   | 84%   | 84%                        | 84%                           | 78%                                       | 71%               | 84%                          | 88%   |  |
| White Scottish                          | 63%   | 57%                        | 65%                           | 54%                                       | 56%               | 64%                          | 66%   |  |
| White British                           | 15%   | 18%                        | 13%                           | 16%                                       | 9%                | 15%                          | 16%   |  |
| White Irish                             | 1%    | 3%                         | 1%                            | 2%  | 3%                | 1%                           | 3%    |  |
| Other white background                  | 4%    | 6%                         | 4%                            | 6%  | 3%                | 4%                           | 3%    |  |
| Mixed background                        | 1%    | 2%                         | 1%                            | -   | -                 | 1%                           | -     |  |
| Asian                                   | 2%    | 1%                         | 2%                            | 3%  | -                 | 2%                           | 1%    |  |
| British Indian /<br>Indian              | 1%    | <1%                        | 1%                            | 2%  | -                 | 1%                           | -     |  |
| British Pakistani /<br>Pakistani        | 1%    | 1%                         | 1%                            | 1%  | -                 | 1%                           | 1%    |  |
| British<br>Bangladeshi /<br>Bangladeshi | <1%   | <1%                        | -                             | -   | -                 | -                            | -     |  |
| Other Asian background                  | <1%   | -                          | <1%                           | -   | -                 | <1%                          | -     |  |
| Black                                   | <1%   | <1%                        | <1%                           | 1%  | -                 | <1%                          | -     |  |
| British Caribbean<br>/ Caribbean        | <1%   | -                          | <1%                           | -   | -                 | -                            | -     |  |
| British African /<br>African            | <1%   | <1%                        | <1%                           | 1%  | -                 | <1%                          | -     |  |
| Other black background                  | <1%   | -                          | <1%                           | -   | -                 | <1%                          | -     |  |
| Chinese                                 | <1%   | 1%                         | <1%                           | 2%  | -                 | 1%                           | -     |  |
| Other                                   | 2%    | 3%                         | 2%                            | 2%  | 6%                | 2%                           | 2%    |  |
| Would not like to say                   | 10%   | 9%                         | 10%                           | 14%                                       | 24%               | 9%                           | 8%    |  |
| No answer                               | 1%    | -                          | 1%                            | -   | -                 | 1%                           | -     |  |
|   |       |                            |                               |   |                   |                              |       |  |
| WHITE                                   | 84%   | 84%                        | 84%                           | 78%                                       | 71%               | 84%                          | 88%   |  |
| BAME                                    | 3%    | 3%                         | 3%                            | 6%  | -                 | 3%                           | 1%    |  |
| MIXED/OTHER                             | 3%    | 5%                         | 3%                            | 2%  | 6%                | 3%                           | 2%    |  |

Base: All (2,941)

Business owners were less likely than other types of user to be white (71% vs. 84% overall) but this may be driven by the fact they were more likely to not state their ethnicity (24% would not like to say vs. 10% overall). Those who live and work in the city centre were also less likely than overall to be white (78%).

# Disability



One in ten (11%) reported having a disability, fairly evenly split between mobility-related (5%) and other (6%) disabilities.

**Table 5: Disability** 

|                       | Total | City<br>centre<br>resident | Work in<br>the city<br>centre | Live and<br>work in<br>the city<br>centre | Business<br>owner | Visitor<br>to city<br>centre | Other |
|-----------------------|-------|----------------------------|-------------------------------|---|-------------------|------------------------------|-------|
| Yes - Mobility        | 5%    | 3%                         | 3%                            | 6%  | 3%                | 7%                           | 6%    |
| Yes - Other           | 6%    | 8%                         | 6%                            | 3%  | 9%                | 5%                           | 6%    |
| No                    | 77%   | 78%                        | 79%                           | 75%                                       | 68%               | 77%                          | 72%   |
| Don't know            | 1%    | 1%                         | 1%                            | 2%  | 3%                | 1%                           | 2%    |
| Would not like to say | 10%   | 10%                        | 11%                           | 13%                                       | 18%               | 9%                           | 12%   |
| No answer             | 1%    | 1%                         | <1%                           | -   | -                 | 1%                           | 1%    |

Base: All (2,941)

Business owners were less likely than overall to say they didn't have a disability (68% vs. 77%) but again this seems to be driven by a greater likelihood to prefer not to say (18% vs. 10% overall).

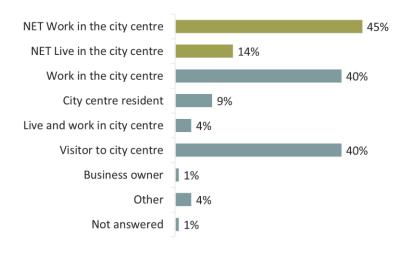
# **Use of Glasgow City Centre**

#### Type of use

Most respondents either worked in the city centre (40%) or visited (40%). Over one in ten (14%) were residents, with 4% both living and working in the city centre.

Chart 3: Use of Glasgow city centre<sup>1</sup>

Q1. Which of the following best describes your use of Glasgow city centre?



Base: All (2941)

<sup>&</sup>lt;sup>1</sup> NET Work in the city centre = all who selected 'work in city centre' either exclusively or with other options. Similarly, NET Live in the city centre = all who selected 'live in city centre' either exclusively or with other options.





#### **Demographics**

The following table details reported use of the city centre by demographic group.

Table 6: Use of Glasgow city centre by demographics

| Table 6: Use of Glasgow City centre by demographics |           |           |           |           |     |        |      |       |                  |                 |       |        |
|---|-----------|-----------|-----------|-----------|-----|--------|------|-------|------------------|-----------------|-------|--------|
|   |           |           | Age       |           |     | Gen    | der  |       | <b>Ethnicity</b> |                 | Disal | bility |
|   | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME             | Mixed<br>/Other | Yes   | No     |
| NET Live<br>in the<br>city<br>centre                | 20%       | 14%       | 8%        | 9%        | 11% | 13%    | 13%  | 13%   | 19%              | 16%             | 13%   | 13%    |
| NET<br>Work in<br>the city<br>centre                | 46%       | 47%       | 51%       | 40%       | 17% | 42%    | 47%  | 44%   | 48%              | 42%             | 38%   | 45%    |
| City<br>centre<br>resident                          | 12%       | 10%       | 6%        | 7%        | 10% | 9%     | 9%   | 9%    | 9%               | 14%             | 9%    | 9%     |
| Work in city centre                                 | 38%       | 44%       | 49%       | 38%       | 16% | 37%    | 43%  | 40%   | 38%              | 40%             | 35%   | 41%    |
| Live /<br>work in<br>city<br>centre                 | 8%        | 4%        | 2%        | 2%        | 1%  | 4%     | 4%   | 4%    | 10%              | 2%              | 4%    | 4%     |
| Business<br>owner                                   | <1%       | 1%        | 1%        | 1%        | 1%  | 1%     | 1%   | 1%    | -                | 2%              | 1%    | 1%     |
| Visitor   | 38%       | 39%       | 35%       | 42%       | 64% | 45%    | 37%  | 40%   | 41%              | 35%             | 46%   | 40%    |
| Other   | 2%        | 2%        | 6%        | 8%        | 7%  | 4%     | 5%   | 5%    | 1%               | 3%              | 5%    | 4%     |

Base: All (2,941)

The following subgroup differences emerged:

- Age: The oldest age group, 65+, was more likely than overall to say they visited (64% vs. 40%) and least likely to work in the city centre, not surprising given their age (16% vs. 40%). Those aged 45-54 were the most likely age group to work in the city centre (49%).
- Gender: Women were more likely than men (45% vs. 37%) to be visitors and less likely to work in the city centre (37% vs. 43%).
- Ethnicity: BAME respondents (10%) were more likely than white (4%) and mixed/other (2%) respondents to live and work in the city centre.
- <u>Disability</u>: People with disabilities were more likely to be visitors than those without (46% vs. 40%) and less likely to work in the city centre (35% vs. 41%).

#### Frequency of use

The majority of respondents were frequent visitors to the city centre, with 76% visiting at least once a week. Two fifths were very frequent visitors, visiting at least 5 days a week, while 23% were infrequent visitors, visiting once a month or less often.



Chart 4: Frequency of use of Glasgow city centre



Comparing types of user, patterns of frequency of use were much as would be expected. Residents (72%) and those who live and work in the city centre (65%) were much more likely than overall to visit every day. Visitors were especially likely to visit once a month (31% vs. 14% overall) or once or twice a week (38% vs. 23% overall). Those who work in the city centre tended to visit five or six times a week (40% vs. 19% overall) or three to four times a week (23% vs. 14%).

centre

#### **Demographics**

Results by demographic subgroup are detailed in the table below.

Table 7: Frequency of use by demographics

|                                 | Age       |           |           |           |     | Gen    | der  |       | Ethnicity | ,               | Disability |     |
|---------------------------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|-----------|-----------------|------------|-----|
|                                 | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME      | Mixed/<br>Other | Yes        | No  |
| Less<br>than<br>once a<br>month | 6%        | 9%        | 8%        | 12%       | 20% | 10%    | 8%   | 9%    | 11%       | 7%              | 13%        | 8%  |
| Once a month                    | 13%       | 13%       | 16%       | 13%       | 21% | 18%    | 12%  | 14%   | 14%       | 11%             | 15%        | 14% |
| 1-2<br>times a<br>week          | 25%       | 22%       | 20%       | 24%       | 30% | 24%    | 23%  | 23%   | 25%       | 18%             | 21%        | 24% |
| 3-4<br>times a<br>week          | 16%       | 15%       | 16%       | 10%       | 10% | 14%    | 15%  | 15%   | 6%        | 16%             | 12%        | 15% |
| 5-6<br>times a<br>week          | 19%       | 22%       | 24%       | 16%       | 6%  | 18%    | 21%  | 19%   | 21%       | 18%             | 21%        | 19% |
| Every<br>day                    | 21%       | 19%       | 17%       | 25%       | 14% | 16%    | 21%  | 19%   | 23%       | 24%             | 18%        | 20% |



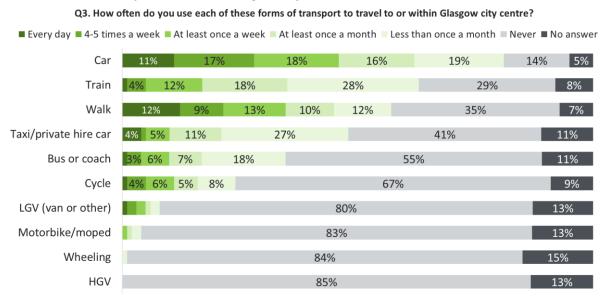
Base: All (2,941)

Comparing age groups, older respondents tended to visit less frequently than younger ones. This could largely be explained by older people being more likely to be retired and therefore less likely to be visiting the city centre regularly for work. For example one in five (20%) of those aged 65+ visit less than once a month compared with just 6% aged 16-34, whilst 6% aged 65+ visit 5-6 times a week compared with 19% aged 16-34.

#### **Transport**

Car, by train and walking were the most popular forms of transport overall to and within the city centre. Car was the most prevalent form of transport overall: four in five (81%) travelled by car in the city centre, with 11% using their car every day. Nearly two thirds (63%) used the train to access the city centre, whilst around one third of respondents (34%) used a bus or coach. A number of respondents mentioned active travel options, such as walking (58%) and cycling (24%). Almost half (48%) travelled by taxi, although this tended to be fairly infrequently. Very few respondents drove an LGV, HGV, used a motorbike/moped or wheeled at all.

Chart 5: Use of transport to/within Glasgow city centre



Base: All (2,941)

#### Use of city centre

Comparing use of modes of transport used at least once a week by city centre users, the car overall is most likely to be used at least once a week (46%) followed by walking (35%) and by train (17%). Around one in ten cycle (11%), use a taxi or private hire car (10%) or a bus or coach (9%) at least once a week. Motorbike/moped use, wheeling or HGV use are all very rarely used on a weekly basis (1% each).

Table 8: Use of transport to/within Glasgow City Centre (at least once a week\*) by city centre use





| Car                      | 46% | 62% | 60% | 56% | 59% | 27% | 38% |
|--------------------------|-----|-----|-----|-----|-----|-----|-----|
| Walk                     | 35% | 82% | 38% | 81% | 32% | 19% | 9%  |
| Train                    | 17% | 14% | 25% | 21% | 18% | 12% | 4%  |
| Cycle                    | 11% | 19% | 13% | 25% | 6%  | 7%  | 2%  |
| Taxi or private hire car | 10% | 10% | 15% | 13% | 24% | 4%  | 12% |
| Bus or coach             | 9%  | 12% | 11% | 10% | 3%  | 8%  | 6%  |
| LGV                      | 5%  | 2%  | 8%  | 8%  | 12% | 2%  | 12% |
| Motorbike/<br>moped      | 1%  | 3%  | 2%  | 1%  | -   | 1%  | -   |
| Wheeling                 | 1%  | -   | 1%  | 2%  | 6%  | <1% | -   |
| HGV                      | 1%  | <1% | 1%  | 1%  | 3%  | <1% | 8%  |

Base: All (2,941)

Comparing city centre users, the following subgroup differences emerge:

- City centre residents are especially likely to walk (82% vs. 35% overall) and use a car (62% vs. 46% overall) at least once a week.
- Those who live and work in the city centre are also particularly likely to walk (81%) and drive (56%).
- Those who work in the city centre are not significantly more likely than overall to walk (38%) but are more likely to drive than overall (60% vs. 46%).
- City centre residents and those who live and work in the city centre are more likely than overall to cycle (19% and 25% vs. 11%)
- Those who work in the city centre are most likely to use the train (25% vs. 17% overall)
- Business owners are more likely to use an LGV (12% vs. 5%) overall, which would be expected assuming they need to deliver supplies to or from their business.

#### **Demographics**

Transport use by demographic subgroup is detailed in the table below.

Table 9: Use of transport to/within Glasgow City Centre (at least once a week) by demographics

|                          |           | ·         | Age       |           |     | Gen    | der  |       | Ethnicity | ,               | Disability |     |  |
|--------------------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|-----------|-----------------|------------|-----|--|
|                          | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME      | Mixed/<br>Other | Yes        | No  |  |
| Walk                     | 44%       | 36%       | 31%       | 30%       | 28% | 32%    | 38%  | 35%   | 38%       | 39%             | 32%        | 36% |  |
| Car                      | 49%       | 51%       | 47%       | 40%       | 27% | 45%    | 46%  | 45%   | 60%       | 46%             | 56%        | 44% |  |
| Taxi or private hire car | 8%        | 7%        | 9%        | 18%       | 13% | 6%     | 12%  | 10%   | 11%       | 9%              | 7%         | 10% |  |
| Train                    | 22%       | 18%       | 16%       | 14%       | 9%  | 16%    | 19%  | 18%   | 16%       | 14%             | 14%        | 18% |  |
| Bus or coach             | 10%       | 7%        | 8%        | 11%       | 20% | 10%    | 10%  | 10%   | 14%       | 5%              | 11%        | 9%  |  |
| Cycle                    | 14%       | 11%       | 13%       | 6%        | 6%  | 8%     | 14%  | 11%   | 11%       | 15%             | 9%         | 12% |  |
| LGV                      | 4%        | 6%        | 4%        | 6%        | 5%  | 1%     | 7%   | 5%    | 1%        | 5%              | 3%         | 5%  |  |
| Motorbike/<br>moped      | 1%        | 1%        | 1%        | 2%        | -   | <1%    | 2%   | 1%    | 1%        | 1%              | -          | 1%  |  |
| Wheeling                 | <1%       | 1%        | <1%       | 1%        | 1%  | 1%     | 1%   | 1%    | 1%        | -               | <1%        | 1%  |  |

<sup>\*&#</sup>x27;At least once a week' aggregates the following responses: Every day, 4-5 times a week and At least once a week.



| HGV | 1% | 1% | 1% | 1% | 1% | <1% | 1% | 1% | - | 2% | 1% | 1% |
|-----|----|----|----|----|----|-----|----|----|---|----|----|----|

Base: All (2,941)

The following differences between subgroups were found:

- Age: Some differences emerged that again were not unexpected.
  - Older people were less likely to drive at least once a week than younger people.
     Around one quarter (27%) aged 65+ drive significantly fewer than all other age groups (e.g. 40% aged 55-64, 51% aged 35-44)
  - Younger people were more likely to walk at least once a week (44% aged 16-34 walk vs. 28% aged 65+ and 30% aged 55-64)
  - Those aged 65+ were more likely than all the other age groups to use the bus or coach at least once a week (20% vs. e.g. 10% aged 16-34)
- Ethnicity: 60% BAME drive at least once a week vs. 45% white and 46% mixed/other

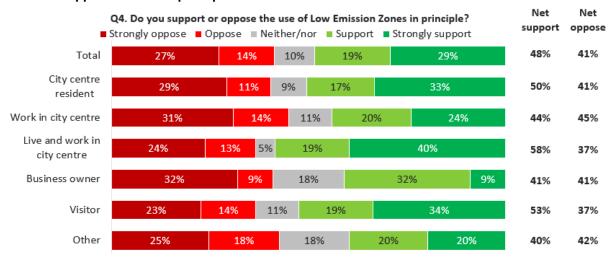
# Glasgow's Low Emission Zones (LEZs) Proposal

This section looks at consultation respondents' views of LEZs in general and the proposals for Glasgow's LEZs in particular.

#### Views of LEZs in principle

Overall, views were fairly evenly split on support for LEZs in principle, but with more in favour than opposed (48% vs. 41%). Support and opposition both tended towards similarly strong positions, with 27% strongly opposed and 29% strongly supportive. One in ten (10%) were neutral.

**Chart 6: Support for LEZs in principle** 





Those who live and work in the city centre (58% strongly support/support) and visitors (53%) were more likely to support LEZs than those who work in the city centre (44%) and other users (40%). Two in five (40%) of those living and working in the city centre were strongly supportive.

#### **Demographics**

Demographic subgroup findings are detailed in the table below.

Table 10: Views of LEZ in principle by demographics

|                |           |           | Age       |           |     | Gender |      |       | Ethnicity | Disability      |     |     |
|----------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|-----------|-----------------|-----|-----|
|                | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME      | Mixed/<br>Other | Yes | No  |
| NET<br>Support | 51%       | 50%       | 50%       | 47%       | 46% | 52%    | 50%  | 51%   | 46%       | 41%             | 41% | 52% |
| NET<br>Oppose  | 41%       | 41%       | 37%       | 40%       | 40% | 36%    | 41%  | 38%   | 48%       | 52%             | 45% | 38% |

Base: All (2941)

Overall support and opposition was broadly similar across age groups. The following differences emerged amongst other groups:

- Gender: Men more likely to oppose LEZs than women (41% vs.36%)
- Ethnicity: White respondents less likely to oppose than mixed/other ethnicity (38% vs. 52%)
- <u>Disability</u>: People with a disability more likely to oppose (45% vs. 38%) and less likely to support (41% vs. 52%) LEZs than those with no disability

Proposed boundary for Glasgow's LEZ



Respondents were shown a map of Glasgow city centre with the proposed LEZ boundary on it.

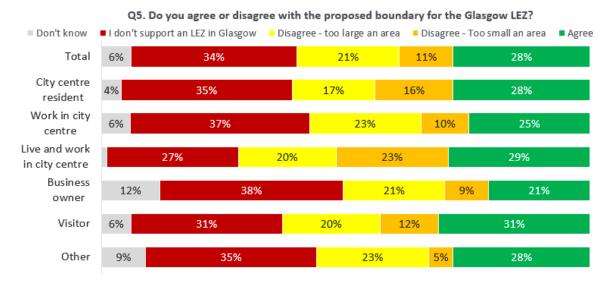
The proposed LEZ boundary is shown in the map below and comprises the majority of the city centre bounded by the M8, the Clyde and Saltmarket / High St.

A higher resolution copy of the boundary map, along with a listing of affected streets is available here.

Again, views on the boundary were split. Over one quarter (28%) agreed with the boundary as depicted on the map, while one in five (21%) said the area covered by the LEZ was too large, and one in ten (11%) said it was too small. Around one third (34%) overall said they do not support an LEZ in Glasgow at all.

#### Chart 7: Views on proposed LEZ boundary





The following differences in opinions between city centre users emerged:

- Those who work in the city centre (37%) were more likely than visitors (31%) and those who live and work in the city centre (27%) to say they do not support an LEZ in Glasgow (it is worth recalling that 60% of those who work in the city centre use their cars to travel to or within the city centre at least once a week, compared with 46% overall)
- City centre workers were also more likely than residents to think the area proposed was too large (23% vs. 17% residents)
- Those who live and work in the city centre were more likely than other users to feel the proposed boundary was too small (23% vs. 10% work in the city centre, 12% visitors and 5% other users)
- Visitors were more likely than city centre workers to agree with the boundary (31% vs. 25%)

#### **Demographics**

The views of demographic subgroups on the proposed LEZ boundary are detailed in the table below.

Table 11: Views on proposed LEZ boundary by demographics

|                              |           |           | Age       |           |     | Gend   | der  | Ethnicity |      |                 | Disability |     |
|------------------------------|-----------|-----------|-----------|-----------|-----|--------|------|-----------|------|-----------------|------------|-----|
|                              | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White     | BAME | Mixed/<br>Other | Yes        | No  |
| Agree                        | 29%       | 30%       | 27%       | 29%       | 31% | 29%    | 31%  | 30%       | 28%  | 22%             | 20%        | 31% |
| Disagree – too small an area | 15%       | 12%       | 10%       | 9%        | 7%  | 9%     | 13%  | 12%       | 11%  | 11%             | 11%        | 12% |
| Disagree - too large an area | 20%       | 19%       | 26%       | 21%       | 23% | 25%    | 19%  | 21%       | 21%  | 12%             | 27%        | 20% |



| I don't<br>support<br>an LEZ in<br>Glasgow | 31% | 34% | 31% | 34% | 34% | 29% | 33% | 31% | 39% | 49% | 37% | 31% |
|--|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Don't<br>know                              | 4%  | 5%  | 6%  | 8%  | 6%  | 8%  | 4%  | 6%  | 1%  | 7%  | 5%  | 6%  |

Base: All (2,941)

There were a number of differences in views between demographic subgroups as follows:

- Age: The younger the age group the more likely they were to think the area is too small (15% of 16-34 year olds compared to 7% aged 65+).
- <u>Gender</u>: Whilst 33% of men did not support an LEZ at all (vs. 29% of women), they were less likely to think the proposed area was too large (19% vs. 25%) and more likely to think it was too small (13% vs. 9%).
- Ethnicity: Mixed/other respondents were more likely than other ethnicities to not support an LEZ in Glasgow at all (49% vs. 31% white).
- <u>Disability</u>: People with disabilities were less likely than those without disabilities to agree with the proposed LEZ boundary (20% vs. 31%), and more likely to feel it was too large an area (27% vs. 20%). They were also more likely to say they didn't support an LEZ in Glasgow at all (37% vs. 31%).

#### Reasons for agreeing or disagreeing with proposed boundary

Respondents were asked to give reasons for their response regarding the proposed LEZ boundary. Overall, 18% of comments were generally supportive, with 12% saying the proposed LEZ should be bigger. Negative impacts on people and on business and the economy were mentioned by over a third each (36% and 34% respectively). Tying in with generally lower levels of agreement throughout the survey amongst those who work in the city centre, the most commonly mentioned negative impact on people was on those who work in the LEZ area (12%). Public transport issues were also mentioned by over one quarter (28%), with one in five (19%) citing inadequate public transport.



Table 12: Reasons for views on proposed LEZ boundary

| Response:   | %   |
|---|-----|
| General support                                     | 18% |
| It should be bigger                                 | 12% |
| General positive/agree                              | 4%  |
| Addresses pollution/health                          | 3%  |
| A good start  | 2%  |
| Addresses congestion/traffic/safety                 | <1% |
| General oppose                                      | 20% |
| Ineffective/unworkable                              | 6%  |
| Money-making scheme                                 | 6%  |
| Oppose (general)                                    | 5%  |
| Too large   | 3%  |
| Political pandering                                 | 3%  |
| Not evidence-based                                  | 1%  |
| Impacts on people                                   | 36% |
| Hurts people who work in the LEZ                    | 12% |
| Hurts low-income people                             | 9%  |
| Hurts disabled people                               | 7%  |
| Affects access to schools/hospitals/university etc. | 5%  |
| Hurts people who drive in their job                 | 5%  |
| Will cost drivers money                             | 4%  |
| Hurts people who live in the LEZ                    | 4%  |
| Impacts on business/economy                         | 34% |
| General business/economy impact                     | 16% |
| Causes city centre degeneration                     | 9%  |
| Moves traffic/congestion elsewhere                  | 7%  |
| Will increase emissions                             | 4%  |
| Causes unnecessary car buying                       | 4%  |
| Causes overparking outside LEZ                      | 3%  |
| Deliveries/drop-offs affected                       | 3%  |
| Public transport issues                             | 28% |
| Public transport inadequate (general)               | 19% |
| Parking issues                                      | 7%  |
| Public transport expensive                          | 6%  |
| Public transport dirty                              | 2%  |
| Public transport unsafe                             | 2%  |
| Unsafe/too far to walk                              | 2%  |
| Need cycling routes/infrastructure                  | 2%  |
| Other   | 31% |
|   |     |
| Suggestions – specific locations                    | 9%  |
| Punishes owners of older/non-compliant cars         | 7%  |
| General suggestions/proposals                       | 6%  |
| Buses and taxis cause more pollution                | 5%  |
| Doesn't include M8                                  | 5%  |
| Covid-related comments                              | 5%  |
| Need more information/question unclear              | 3%  |
| Suggestions re. traffic flow systems                | 2%  |
| EV infrastructure/charging points insufficient      | 2%  |
| Other   | 9%  |

Base (All providing a response): 1,096



#### Proposed emission standards for Glasgow's LEZ

Consultation respondents were shown the following information on the proposed vehicle emission standards for the Glasgow LEZ and asked for their views.

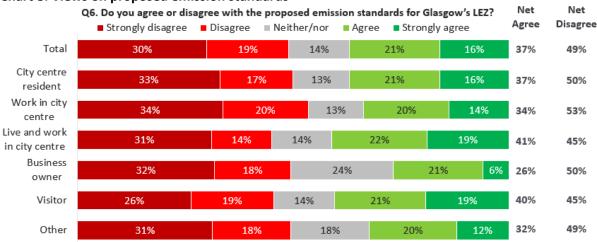
Glasgow's Low Emission Zone will apply to ALL vehicles unless exempt (exemptions are detailed in a later question). Motorcycles, mopeds, motorised tricycles and quadricycles are also scoped out of LEZs in Scotland.

The proposed emission standards are:

- Euro 4 standard for petrol vehicles (generally vehicles registered from 2006 onwards)
- Euro 6 standard for diesel vehicles (generally vehicles registered from September 2015 onwards)
- Euro VI standard for heavy duty diesel vehicles such as buses / coaches and HGVs (generally vehicles registered from September 2015 onwards)

Vehicles which have been appropriately modified or retrofitted to meet or exceed these emission standards will also be permitted entry to the LEZ.

Significantly more disagreed than agreed with the emission standards overall (49% disagree vs. 37% agree). Strength of disagreement was considerable with 30% strongly disagreeing compared with one in five (19%) selecting 'disagree'. Only 16% agreed strongly, about half as many as strongly disagreed. Over one in ten (14%) were neutral.



**Chart 8: Views on proposed emission standards** 

Across all city centre user types, a greater proportion disagreed than agreed. City centre workers were more likely than visitors to disagree (53% vs. 45%) and less likely to agree (34% vs. 40%). Business owners were less likely than all other users to agree (26% vs. 37% overall).



#### **Demographics**

Demographic subgroup results for net agree and disagree are shown in the table below.

Table 13: Views on proposed emission standards by demographics

|                 |           |           | Age       |           |     | Gender |      |       | Ethnicity | Disability      |     |     |
|-----------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|-----------|-----------------|-----|-----|
|                 | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME      | Mixed/<br>Other | Yes | No  |
| NET<br>Agree    | 39%       | 38%       | 37%       | 35%       | 41% | 39%    | 39%  | 39%   | 43%       | 30%             | 29% | 40% |
| NET<br>Disagree | 47%       | 48%       | 47%       | 50%       | 46% | 44%    | 48%  | 46%   | 50%       | 55%             | 52% | 46% |

Base: All (2,941)

There were some differences in views by gender and disability.

- <u>Gender</u>: Men were more likely than women to disagree with the proposed emission standards (48% vs. 44%).
- <u>Disability</u>: Those with a disability are less likely to agree (29% vs. 40%) and more likely to disagree (52% vs. 46%).

#### Reasons for views on proposed emissions standards

The largest proportion of comments about emissions standards expressed a negative view. Two in five (41%) voiced their opposition for a variety of reasons, with the single largest proportion (12%) mentioning the cost of upgrading or buying a new vehicle. One in five (21%) responses were from those who disagreed with the standards, but made suggestions on how they could be changed, in particular allowing older vehicles (9%) into the LEZ. Just over a third (35%) of comments were supportive and felt the standards could actually go further, with 16% saying the emissions standards were not strict enough and one in ten (9%) wanting action on pollution from buses as well.

Table 14: Reasons for views on proposed emissions standards

| Response:                             | %   |  |  |  |  |  |
|---------------------------------------|-----|--|--|--|--|--|
| General support – it could go further | 35% |  |  |  |  |  |
| Not strict enough                     | 16% |  |  |  |  |  |
| Deal with bus pollution               |     |  |  |  |  |  |
| General positive/agree                | 7%  |  |  |  |  |  |
| Restrict certain types of vehicle     | 7%  |  |  |  |  |  |
| Encourage electric vehicles           | 6%  |  |  |  |  |  |
| General oppose                        |     |  |  |  |  |  |
| Expensive to purchase/upgrade vehicle |     |  |  |  |  |  |
| General negative/disagree             | 9%  |  |  |  |  |  |
| Unfair/unjust/unreasonable            | 7%  |  |  |  |  |  |
| Technical flaws in the standards      | 5%  |  |  |  |  |  |
| Causes car buying                     | 5%  |  |  |  |  |  |
| Not evidence-based                    | 4%  |  |  |  |  |  |
| Unworkable                            | 2%  |  |  |  |  |  |
| Money-making scheme                   | 2%  |  |  |  |  |  |



| Political pandering                    | 2%  |  |  |  |  |
|--|-----|--|--|--|--|
| Too strict                             | 2%  |  |  |  |  |
| Oppose – suggestions for changes       | 21% |  |  |  |  |
| Allow older vehicles                   | 9%  |  |  |  |  |
| Allow older vehicles if clean          | 4%  |  |  |  |  |
| More exemptions                        | 4%  |  |  |  |  |
| Diesel used to be encouraged           | 3%  |  |  |  |  |
| Need a subsidy                         | 3%  |  |  |  |  |
| Should be nationwide standards         | <1% |  |  |  |  |
| Impacts on people                      |     |  |  |  |  |
| Hurts low-income people                | 13% |  |  |  |  |
| Hurts people who work in the LEZ       | 5%  |  |  |  |  |
| Hurts people who drive in their job    | 4%  |  |  |  |  |
| Hurts disabled people                  | 2%  |  |  |  |  |
| Hurts people with car finance          | 1%  |  |  |  |  |
| Other comments                         |     |  |  |  |  |
| Need more information/question unclear | 6%  |  |  |  |  |
| Covid-related comments                 | 3%  |  |  |  |  |
| Other                                  | 8%  |  |  |  |  |
| Don't know/not sure                    | 1%  |  |  |  |  |

Base: All providing an answer (782)

# **Exemptions**

The consultation sought views on national exemptions and on exemptions in relation to Glasgow's LEZ. As with other aspects of the LEZ, views tended to be fairly evenly split in terms of agreement and disagreement. Business owners were especially sceptical, although the small base size for business owners should be borne in mind.

#### Views on national exemptions

Consultation respondents were shown the following information on national exemptions prior to answering the question on the extent to which they agreed or disagreed.



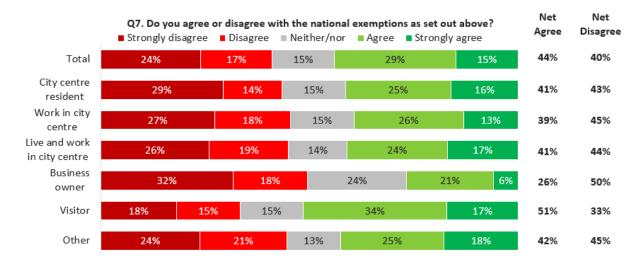
Glasgow's LEZ proposals will apply to all vehicles unless exempt. Motorcycles, mopeds, motorised tricycles and quadricycles are also scoped out of LEZs in Scotland.

The Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021 are set at a national level and exempt certain vehicle types from LEZ requirements. These include:

- Vehicles for disabled persons (including blue badge holders)
- Police vehicles
- Ambulance and emergency vehicles
- Scottish Fire and Rescue
- Her Majesty's Coastguard
- National Crime Agency
- Military vehicles
- Historic vehicles
- Showman's vehicles

Slightly more agreed than disagreed overall with the national exemptions (44% vs. 40%). However, disagreement tended to be strong with one quarter (24%) disagreeing strongly. Agreement tended to be milder: only 15% strongly agreed. The same proportion (15%) were neutral.

**Chart 10: Views on national exemptions** 





Visitors were significantly more likely than all other types of user to agree (51%), and business owners less likely than all other user groups to agree (26%). Indeed, one third (32%) of business owners strongly disagreed.

#### **Demographics**

Details of net agreement and disagreement by demographic subgroup are set out in the table below.

Table 17: Views on national exemptions by demographics

|                 |           |           | Age       |           | Gender |        |      |       | Disability |                 |     |     |
|-----------------|-----------|-----------|-----------|-----------|--------|--------|------|-------|------------|-----------------|-----|-----|
|                 | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+    | Female | Male | White | BAME       | Mixed/<br>Other | Yes | No  |
| NET<br>Agree    | 46%       | 48%       | 43%       | 42%       | 54%    | 50%    | 44%  | 47%   | 48%        | 35%             | 49% | 46% |
| NET<br>Disagree | 41%       | 38%       | 40%       | 41%       | 27%    | 34%    | 41%  | 38%   | 44%        | 51%             | 36% | 38% |

Base: All (2,941)

There were some differences in opinions between demographic subgroups as follows:

- Age: The oldest age group, aged 65+, were less likely than all other age groups to disagree with the national exemptions (27% vs. 38% to 41%) and more likely to agree than most (54% vs. 46% aged 16-34, 43% aged 45-54 and 42% aged 55-64).
- <u>Gender</u>: Women were more likely to agree than men (50% vs. 44%) and less likely to disagree (34% vs. 41%).
- Ethnicity: White respondents were more likely to agree than mixed/other respondents (47% vs. 35%) and less likely to disagree (38% vs. 51%).

#### Reasons for views on national exemptions

Approaching half (45%) of comments were generally opposed to exemptions. The largest proportions wanted some kind of parity of exemptions – for everyone (same or no exemptions, 12%) or for the public sector (15%). Eight percent generally felt it was unfair/unequal. Over one quarter (27%) suggested that certain types of vehicles should not be exempt, in particular showman's vehicles (14%). One in ten (10%) mentioned impacts on people, such as negative impacts for people living or working in the LEZ.

Table 18: Reasons for views on national exemptions

| Response:                                  | %   |  |  |  |  |  |
|--|-----|--|--|--|--|--|
| General support                            | 12% |  |  |  |  |  |
| Agree with disabled exemption              | 4%  |  |  |  |  |  |
| Agree with emergency/government exemption  |     |  |  |  |  |  |
| General positive/agree                     | 3%  |  |  |  |  |  |
| Agree with historic exemption              | 3%  |  |  |  |  |  |
| General oppose                             |     |  |  |  |  |  |
| Should be same standards for public sector | 15% |  |  |  |  |  |
| Same standards for everyone/no exemptions  | 12% |  |  |  |  |  |
| It's unfair/unequal                        | 8%  |  |  |  |  |  |
| Don't want an LEZ                          | 6%  |  |  |  |  |  |
| Exempted vehicles are big polluters        |     |  |  |  |  |  |
| Will be abused/used as a loophole          | 4%  |  |  |  |  |  |



| Unworkable                              | 2%  |
|---|-----|
| General negative/disagree               | 1%  |
| Suggestions for non-exemptions          | 27% |
| Showman's vehicles should not be exempt | 14% |
| Historic should not be exempt           | 10% |
| Disabled should not be exempt           | 7%  |
| Motorbikes/mopeds should not be exempt  | 3%  |
| Military should not be exempt           | 3%  |
| Impacts on people                       | 10% |
| Hurts people who work in the LEZ        | 5%  |
| Hurts people who live in the LEZ        | 4%  |
| Hurts people who drive in their job     | 3%  |
| Other suggestions                       | 26% |
| Other specific exemptions               | 17% |
| Key worker exemption                    | 7%  |
| Grace periods                           | 2%  |
| Want subsidy                            | 1%  |
| Other                                   | 10% |
| Need more information/question unclear  | 6%  |

Base: All providing an answer (874)

#### Views on proposed exemptions for Glasgow's LEZ

Respondents were shown the information below on exemptions in relation to Glasgow's LEZ.

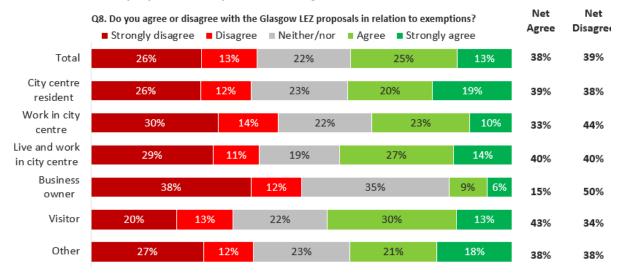
In addition to LEZ exemptions set nationally by the Scottish Government, Glasgow City Council also has the power to issue 'time-limited' (temporary) exemptions in respect of specific vehicle types/categories. This could mean an exemption period of up to one year which would then require renewal if the exemption were to be continued.

It is proposed that the Glasgow LEZ does not include such general exemptions. However, a mechanism for exemptions will be put in place whereby exemptions may be granted in advance of entry for exceptional circumstances. This may be granted for one off entry by specialist vehicles or for a specialist purpose. Exemptions WILL NOT be considered for general travel or commercial operations.

Regarding the proposed exemptions for Glasgow's LEZ, proportions agreeing and disagreeing were very evenly split (38% and 39%). Over one in five (22%), however, were neutral indicating potential uncertainty or lack of knowledge regarding the exemptions. Once again, disagreement tended to be strong, with one quarter (26%) strongly disagreeing, whilst only 13% strongly agreed.



Chart 11: Views on proposed exemptions for Glasgow's LEZ



Business owners were especially unlikely to agree, less than any other user type (15% agree vs. 33% to 43% of other users), and more likely to disagree overall (50% vs. 39% overall) and particularly disagree strongly (38% vs. 26% overall).

#### **Demographics**

Results by demographic subgroup regarding proposed exemptions for Glasgow's LEZ are set out in the table below.

Table 19: Views on proposed exemptions for Glasgow's LEZ by demographics

|                 |           |           | Age       |           |     | Gender |      |       | Ethnicity | Disability      |     |     |
|-----------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|-----------|-----------------|-----|-----|
|                 | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME      | Mixed/<br>Other | Yes | No  |
| NET<br>Agree    | 37%       | 40%       | 36%       | 40%       | 56% | 38%    | 41%  | 40%   | 38%       | 38%             | 33% | 41% |
| NET<br>Disagree | 40%       | 37%       | 40%       | 38%       | 27% | 35%    | 38%  | 37%   | 45%       | 46%             | 44% | 36% |

Base: All (2,941)

Similar patterns emerged between age groups regarding Glasgow's LEZ exemptions as around national exemptions. Again, the oldest age group, aged 65+, was less likely than all other groups to disagree with the exemptions (27% vs. 37% to 40% for other age groups) and more likely to agree (56% vs. 36% to 40%).

People with disabilities were also more likely to disagree (44% vs. 36% without disabilities) and less likely to agree (33% vs. 41% without disabilities).

#### Reasons for views on exemptions for Glasgow's LEZ

Around one quarter (24%) made supportive comments in favour of specific proposed exemptions. Most of those stating opposed sentiments to the exemption proposal expressed general opposition to the LEZ rather than to the specific exemptions. One in ten (10%) wanted the same rules for all and/or no exemptions at all, while 18% suggested other types of exemptions that could be applied.



Table 20: Reasons for views on exemptions for Glasgow's LEZ

| Response:                                      | %   |  |  |  |  |  |
|--|-----|--|--|--|--|--|
| Support  | 24% |  |  |  |  |  |
| Favour grace periods                           | 7%  |  |  |  |  |  |
| Generally favour exemptions                    | 6%  |  |  |  |  |  |
| Favour one-off exemptions                      | 6%  |  |  |  |  |  |
| Favour yearly/broad exemptions                 | 6%  |  |  |  |  |  |
| Generally opposed                              | 35% |  |  |  |  |  |
| Oppose LEZ                                     | 21% |  |  |  |  |  |
| Oppose all exemptions/want same rules for all  | 10% |  |  |  |  |  |
| Exemptions defeat the purpose/harm environment |     |  |  |  |  |  |
| Oppose specific exemptions                     | 8%  |  |  |  |  |  |
| Oppose yearly/broad exemptions                 |     |  |  |  |  |  |
| Oppose grace periods                           |     |  |  |  |  |  |
| Oppose on-off exemptions                       | 1%  |  |  |  |  |  |
| Oppose – suggested alternative exemptions      | 18% |  |  |  |  |  |
| Exemptions for specific people/vehicles        | 16% |  |  |  |  |  |
| Exemptions at certain times of day             | 2%  |  |  |  |  |  |
| Concerns                                       | 16% |  |  |  |  |  |
| May be abused/exploited                        | 8%  |  |  |  |  |  |
| May be unfairly applied                        | 7%  |  |  |  |  |  |
| May lead to bureaucratic issues                |     |  |  |  |  |  |
| Other comments                                 |     |  |  |  |  |  |
| Other  | 10% |  |  |  |  |  |
| Need more information/question unclear         | 8%  |  |  |  |  |  |

Base: All providing an answer (345)

#### **Enforcement**

The survey asked for views on proposed grace periods and timings for these, and on penalty charges for non-compliant entry into the LEZ. By and large respondents, in particular business owners, tended to disagree with proposed grace periods and penalty charges. Strength of disagreement with proposed penalty charges was particularly marked.

#### **Grace periods**

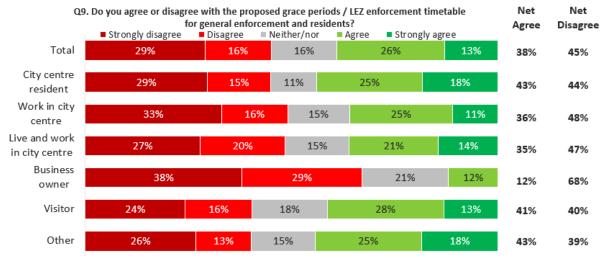
Consultation respondents were given the following information about proposed grace periods and timetable and were asked to indicate their agreement or disagreement.

Glasgow's LEZ is already in effect for scheduled service buses, with full compliance expected by the end of 2022. For all other vehicles unless exempt, Glasgow's LEZ will be legally implemented in May 2022. Additional time to prepare known as 'grace periods' will be in place however for a period of one year from implementation, which means that enforcement of Glasgow's LEZ would not start until 1 June 2023. An extended grace period of two years from implementation is proposed for individuals whose vehicle is registered at a residential property within the zone area, with enforcement for these vehicles starting on 1 June 2024.



Overall, more respondents disagreed than agreed with the proposals (45% vs. 38%). Strength of disagreement was again especially marked (29% strongly disagree vs. 16% disagree) and agreement much milder (13% strongly agree vs. 26% agree), meaning respondents were more than twice as likely to strongly disagree than strongly agree. Sixteen per cent were neutral.

Chart 12: Views on proposed grace periods



Business owners were especially strongly opposed (68% disagreed, 38% strongly). City centre residents tended to be more positive towards the proposed grace periods than those working in the city centre (43% vs. 36% agree). Visitors were similarly well disposed compared to city centre workers (41% agree).

#### **Demographics**

Demographic subgroup results by net agreement and net disagreement are shown in the table below.

Table 21: Views on proposed grace periods by demographics

|                 |           | Age       |           |           |     | Gender |      |       |      |                 | Disability |     |
|-----------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|------|-----------------|------------|-----|
|                 | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME | Mixed/<br>Other | Yes        | No  |
| NET<br>Agree    | 40%       | 40%       | 36%       | 40%       | 48% | 41%    | 40%  | 40%   | 33%  | 39%             | 32%        | 41% |
| NET<br>Disagree | 45%       | 45%       | 46%       | 42%       | 31% | 41%    | 44%  | 43%   | 49%  | 46%             | 49%        | 43% |

Base: All (2941)

As with exemptions, the oldest age group (65+) tended to view the proposed grace periods and timetable more favourably. Only 31% disagreed compared with 42% to 46% for other age groups.

#### Reasons for views on proposed grace periods

Around one quarter (24%) supported the grace periods but would want them to be shorter or to have none at all, while 18% expressed more general support. Again, however, comments were predominantly opposed. Over one third (36%) wanted longer grace periods and/or opposed the LEZ altogether, and again a large minority (24%) took the opportunity to emphasise again the potential



negative impacts on people, in particular those on low incomes (12%) and those who live in the LEZ (10%).

Table 22: Reasons for views on proposed grace periods

| Response:   | %   |
|---|-----|
| Support   | 18% |
| Climate/pollution needs immediate action          | 10% |
| Agree with resident grace period                  | 5%  |
| General positive/agree                            | 4%  |
| Support – but want reduction to grace periods     | 24% |
| Want shorter grace period                         | 18% |
| Want no grace periods                             | 7%  |
| Oppose - want extension to grace periods / no LEZ | 36% |
| Want longer grace period                          | 14% |
| Oppose the LEZ                                    | 11% |
| Want longer grace period for residents            | 9%  |
| Want longer grace period for workers              | 3%  |
| Oppose – negative impacts on people               | 24% |
| Hurts low-income people                           | 12% |
| Hurts people who live in the LEZ                  | 10% |
| Hurts people who work in LEZ                      | 3%  |
| Hurts people with car finance                     | 1%  |
| Hurts people who drive in their job               | 1%  |
| Other concerns related to LEZ                     | 25% |
| Business/economy impact                           | 6%  |
| Want subsidies/grants                             | 6%  |
| Covid-related comments                            | 6%  |
| Unfair/unequal                                    | 5%  |
| Requires better infrastructure/public transport   | 5%  |
| Causes unneeded car buying                        | 5%  |
| Other comments                                    |     |
| Other   | 11% |
| Need more information/question unclear            | 1%  |

Base: All providing an answer (725)

# **Penalty charges**

Consultation respondents were given the following information about proposed penalty charges and were asked to indicate their agreement or disagreement.



Penalty charges for non-compliant entry to a LEZ in Scotland are set by national regulations and increase for repeated entries. Set at national level by the Scottish Government for consistency, the initial penalty charge for all non-compliant vehicles entering a Low Emission Zone in Scotland will be £60 - reduced by 50% if it is paid within 14 days. The penalty amount doubles with each subsequent entry by a non-compliant vehicle detected in the same LEZ and are capped at £480 for cars and light goods vehicles, and £960 for buses and 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.

Respondents tended to be strongly opposed to the proposed penalty charges. They were almost twice as likely to disagree with them than agree (57% vs. 31%) and nearly three times as likely to strongly disagree than disagree (42% vs. 15%).

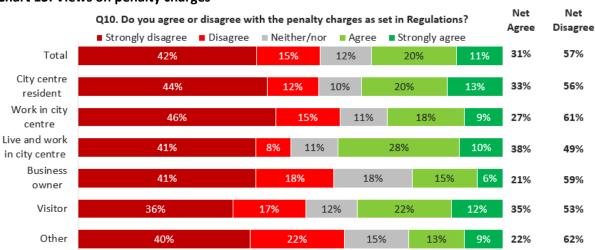


Chart 13: Views on penalty charges

As with exemptions and grace periods, business owners and 'other' users were less likely than overall to agree (21% and 22% respectively vs. 31% overall). Those who work in the city centre (61%) were more likely than those living and working in the city centre (49%) and visitors (53%) to disagree.

#### **Demographics**

Demographic subgroup findings by net agree and net disagree are detailed in the table below.

Table 23: Views on penalty charges by demographics

|                 |           |           | Age       |           |     | Gender |      | Ethnicity |      |                 | Disability |     |
|-----------------|-----------|-----------|-----------|-----------|-----|--------|------|-----------|------|-----------------|------------|-----|
|                 | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White     | ВАМЕ | Mixed/<br>Other | Yes        | No  |
| NET<br>Agree    | 34%       | 36%       | 29%       | 29%       | 32% | 32%    | 33%  | 33%       | 26%  | 30%             | 27%        | 34% |
| NET<br>Disagree | 56%       | 54%       | 57%       | 58%       | 53% | 55%    | 55%  | 54%       | 65%  | 63%             | 63%        | 54% |

Base: All (2941)



Agreement was fairly uniform across demographic subgroups, although those aged 35-44 were more likely than those 45-54 and 55-64 to agree with the penalty charges (36% vs 29% and 29% respectively).

# Reasons for views on proposed penalty charges

The majority of comments (58%) expressed opposition to penalty charges, with the largest single concern expressed (22%) being the belief it was a 'money-making scheme'. Concern was expressed again regarding the impact on low-income people (15%).

Table 24: Reasons for views on proposed penalty charges

| Response:                                      | %   |
|--|-----|
| Support – suggestions for improvement          | 17% |
| Too lenient                                    | 8%  |
| Cap should be higher/unlimited                 | 4%  |
| Agree/general positive comments                | 3%  |
| Initial charge should be higher                | 3%  |
| Too lenient for heavy vehicles                 | 1%  |
| Oppose – suggestions for improvement           | 23% |
| Too harsh                                      | 15% |
| Cap should be lower                            | 3%  |
| Initial charge should be lower                 | 3%  |
| Start with a warning                           | 3%  |
| Oppose – general                               | 58% |
| Money-making scheme                            | 22% |
| Hurts low-income people                        | 15% |
| Oppose the LEZ                                 | 8%  |
| Will catch out the unwary                      | 7%  |
| Won't deter the well-off                       | 5%  |
| Oppose fines totally                           | 5%  |
| Drivers already pay a lot                      | 4%  |
| Money raised will be wasted                    | 3%  |
| Make penalty proportional to income            | 3%  |
| Won't deter businesses from emitting pollution | 1%  |
| Information suggestions                        | 9%  |
| Needs clear signage/markings                   | 4%  |
| Needs proper/fair enforcement                  | 3%  |
| Needs awareness campaign                       | 2%  |
| Other suggestions                              | 11% |
| Want pre-payment option for fees               | 3%  |
| Alternative punishment suggestions             | 2%  |
| Other suggestions/proposals                    | 7%  |
| Other comments                                 |     |
| Other  | 8%  |

Base: All providing an answer (800)

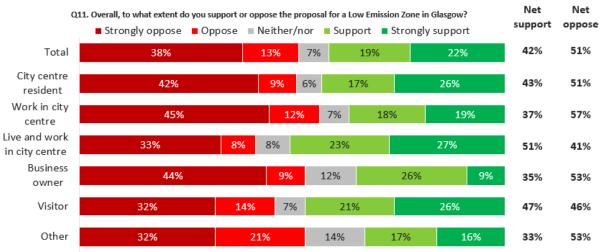
# **Overall support**

Overall support for Glasgow's LEZ proposal



Towards the end of the survey, having been shown information about the different aspects of the LEZ, respondents were asked about their overall support or opposition for the proposal. Half (51%) opposed Glasgow's LEZ overall, with opposition tending to be strong: 38% strongly opposed, nearly three times as many as opposed (13%). Just over two fifths supported Glasgow's LEZ proposals, with 22% strongly supporting.

Chart 9: Overall views of Glasgow's LEZ



However, there was some variation between different city centre users. Those who work in the city centre were less likely to support it than those who live and work in the city centre, those who only live there and visitors (37% workers support vs. 51% live and work, 43% residents and 47% visitors). Strength of opposition was particularly keen amongst city centre workers (45% strongly opposed) and business owners (44% strongly opposed).

#### **Demographics**

Demographic subgroup results in terms of net overall support and opposition are detailed in the table below.

Table 15: Overall support for Glasgow's LEZ by demographics

|                |           |           | Age       |           |     | Gend   | der  |       | Ethnicity | ,               | Disal | bility |
|----------------|-----------|-----------|-----------|-----------|-----|--------|------|-------|-----------|-----------------|-------|--------|
|                | 16-<br>34 | 35-<br>44 | 45-<br>54 | 55-<br>64 | 65+ | Female | Male | White | BAME      | Mixed/<br>Other | Yes   | No     |
| NET<br>Support | 44%       | 44%       | 42%       | 41%       | 45% | 43%    | 45%  | 44%   | 38%       | 37%             | 34%   | 45%    |
| NET<br>Oppose  | 49%       | 49%       | 52%       | 51%       | 46% | 49%    | 48%  | 48%   | 55%       | 59%             | 57%   | 48%    |

Base: All (2,941)

People with disabilities were less likely to support the LEZ overall than those without disabilities (34% vs. 45% support), and more likely to oppose it (57% vs. 48%). This pattern of lower support amongst people with disabilities runs throughout the consultation findings.

Reasons for overall views on Glasgow's LEZ



One quarter (25%) of those providing reasons for their reply voiced general support for the LEZ. Most comments (18%) noted general support, with 8% suggesting the LEZ would address pollution and health. There was a wide range of comments voicing opposition and/or concern. Infrastructure was mentioned by one in five (21%), in particular inadequate public transport (17%). There was also concern regarding impacts on people living/working in the LEZ (14%) and those on low incomes (13%). One in five (21%) were concerned about potential negative impacts on business and the economy.

Table 16: Reasons for overall views on Glasgow's LEZ

| Response:   | %   |
|---|-----|
| General support                                       | 25% |
| Support LEZ (general)                                 | 18% |
| Addresses pollution/health                            | 8%  |
| Addresses climate change                              | 2%  |
| Addresses congestion/traffic/safety                   | 1%  |
| Support – suggestions for improvement                 | 13% |
| Should be bigger/go further                           | 7%  |
| Should happen sooner/shorter grace period             | 3%  |
| Standards should be stricter                          | 3%  |
| Fewer exemptions                                      | 1%  |
| Harsher penalties                                     | 1%  |
| General oppose  | 38% |
| Oppose LEZ (general)                                  | 11% |
| Money-making scheme                                   | 8%  |
| Ineffective/unworkable                                | 6%  |
| Political pandering/agenda-driven                     | 6%  |
| Should deal with business pollution (including buses) | 6%  |
| Not evidence-based                                    | 5%  |
| Penalties too harsh                                   | 3%  |
| Too large   | 2%  |
| Standards too strict                                  | 1%  |
| Technical issues re. standards                        | 1%  |
| Will catch out the unwary                             | 1%  |
| Oppose – impacts on people                            | 26% |
| Hurts people who work/live in the LEZ                 | 14% |
| Hurts low-income people                               | 13% |
| Will cost drivers money                               | 3%  |
| Hurts people who drive in their job                   | 3%  |
| Hurts disabled people                                 | 2%  |
| Oppose – suggestions for improvement                  | 8%  |
| More exemptions                                       | 7%  |
| Subsidies/grants                                      | 2%  |
| Oppose – impacts on business/economy                  | 21% |
| General business/economy impact                       | 18% |
| Causes city centre degeneration                       | 8%  |
| Other concerns  | 9%  |
| Moves traffic/congestion elsewhere                    | 4%  |
| Causes unnecessary car-buying                         | 3%  |
| Will increase emissions                               | 1%  |
| Creates overparking outside the LEZ                   | 1%  |
| Infrastructure improvements needed                    | 21% |
| Public transport inadequate                           | 17% |
| Need cycling/pedestrian infrastructure                | 5%  |
| Not enough accessible parking                         | 3%  |
| Not enough electric chargers                          | 3%  |
| Unsafe to walk  | 2%  |



| Other comments             | 21% |
|----------------------------|-----|
| Proposals and suggestions  | 10% |
| Covid-related comments     | 5%  |
| Other                      | 7%  |
| Survey/consultation issues | 4%  |

Base: All providing an answer (639)



# Additional material: written responses

In addition to the responses submitted via the online consultation survey, fourteen responses were submitted directly to the Council from public/social and third sector organisations (11 responses) and commercial interests (3 responses). These responses were in non-standard formats (emails, letters, short reports), focusing on the issues of specific interest to the organisation, and only in a few cases conforming to the broad structure of the consultation questionnaire. None answered the closed questions. The analysis set out below draws together the general comments raised in these responses, together with any key specific issues raised.

#### The introduction of the LEZ (Question 4)

Several respondents commented they supported the proposal to introduce an LEZ in Glasgow. Some simply noted their support. The main reasons given by the others were that the LEZ will make a significant contribution to improving air quality, and as a consequence make the city a healthier place to live and more attractive environment for active travel.

There was also support from a number of organisations, in particular Nature Scotland and Paths for All, that the LEZ should be progressed in association with a wider array of measures to enable a shift away from private car use and encourage active travel and public transport use within the city.

One respondent (a business respondent, operating within the transport sector) commented that, while they have largely been in support of the proposals, the economic consequences of the coronavirus pandemic on the industry compromised businesses' capacity to afford the investment required to meet LEZ standards.

#### The proposed LEZ boundary (Question 5)

Several respondents commented they supported the proposed boundary because it covers the city centre, the area with the greatest levels of congestion in the city. None of the respondents suggested the boundaries should be drawn more tightly, while a few indicated they would be supportive of the boundary being extended in the future.

#### Some issues were raised:

- Displacement: A few respondents highlighted the potential risks of displacement; whereby polluting vehicles simply move to nearby areas. One response was received from a community council representing an area adjacent to the LEZ, expressing considerable concern. They fear that rather than upgrade their vehicles, many owners of polluting vehicles will simply avoid the LEZ, increasing congestion and the level of pollution in LEZ-adjacent areas including theirs.
- Specific issues: Some respondents highlighted a number of specific issues with the map, which
  they considered needed review. For example, the Stirling Road triangle appears to be on the
  ArcGIS boundary but not on the map, inconsistent access north and southbound on the Albert
  Bridge, and some examples of zone entry points prior to a junction which could cause
  confusion.

#### **Emission standards (Question 6)**



A few respondents commented on the emission standard. They indicated that they agreed with the proposals. One respondent expanded on their response to comment that further measures to reduce NOx emissions from buses in the city centre are required, to include stricter standards and/or reduction in the service levels.

#### **Exemptions (Questions 7 and 8)**

Several respondents commented on proposals for exempting vehicles from the LEZ requirements. A number of concerns were raised:

- Police Scotland sought confirmation that 'emergency vehicles' covered all their vehicles on duty, including marked and unmarked emergency vehicles, and cars on routine patrol in the city centre
- The exemptions are applied to vehicles, however in some cases, the relevant subject is a person. How/will this work? For example, Blue Badges are assigned to individuals, not vehicles. Is the exemption transportable and if so, how? Will it apply to police personnel who need to use a non-police vehicle in an emergency (for example to take someone to hospital)?
- SPT asked for confirmation about ongoing provision for exemptions for Buchannan Bus Station, in particular to enable companies from outside the city to continue to provide services into the station.
- SPT and North Lanarkshire Council also highlighted the potential need to grant a time limited exemption to community transport vehicles, which provide essential services to vulnerable residents across the Greater Glasgow area, on a very tight budget.

One respondent commented they disagreed with the exemptions proposed on the grounds that these are some of the most polluting vehicles.

#### Grace periods and penalty charges

A few respondents commented on proposals for grace periods and a number of issues were raised.

One business respondent commented that, while their vehicle replacement programme had been progressing to schedule, ongoing interruptions to the supply chain may put the timetable at risk. They note the wider industry is faced with similar challenges, and should this situation continue, a further grace period may be required.

A few respondents, however, consider the grace period to be sufficient if not generous: they note that people and businesses have had ample warning, the LEZ has already been postponed, and is widely known.

Two respondents commented on the penalty charges for vehicles that fail to comply with LEZ standards. They agreed with the charges proposed, with one suggesting that there was scope to increase charges for repeated entries.

#### **Public transport**

Two respondents raised concerns that the LEZ would impact residents in neighbouring authorities and their ability to travel into Glasgow city centre. It was suggested there may be a significant number of neighbouring authority residents who own cars which not meet the LEZ standards. These residents will have to adopt alternative means of transport into Glasgow city centre, with associated issues of



cost, availability, frequency of services, journey times/multi-stage journeys. Concerns were also raised as to whether public transport could cope with increased demand.



# **Conclusions**

A number of key themes emerged from the analysis of consultation responses.

- Compared with the 2020 consultation on the different proposed boundary options, emissions standards, vehicle types, grace periods and any unintended consequences, support for LEZs in general and Glasgow's LEZ in particular has declined.
- Views on the proposals were mixed, with more tending to disagree than agree with the proposals. Penalty charges in particular elicited some strong disagreement.
- Key concerns expressed often regarded the potential impact of the LEZ proposals on people. This was reiterated in open-ended responses throughout the survey, with the impact on people on low incomes of particular concern. There were also worries about the impact on people who travel into the city centre to work, most of whom reported using their car at least once a week to travel to or within the city centre.
- Opposition tended to be strongest amongst those who work in the centre and amongst business owners. It should be noted however that the subsample of business owners was small, with only 34 respondents, so findings should be treated with caution.
- People with disabilities also tended to be more concerned than those without, possibly reflecting some unease around how the LEZ might disproportionately impact them. This could be to do with issues regarding infrastructure, especially ensuring adequate public transport, which emerged as a general concern in the consultation. It may also be that people with disabilities are more likely to be reliant on their vehicles, so anything that may make that more difficult is likely to cause unease.
- Despite the above points focusing on opposition and concern about the LEZ, it should be noted
  that large numbers of respondents also supported it. It may be that targeting the concerns of
  particular groups such as city centre workers (who tend to use the city centre most frequently
  and use their cars to access it), people on low incomes and those with disabilities with more
  information and reassurance could help with the smooth implementation of the LEZ.



# Appendix I: Consultation questionnaire

# 1. PART 1: YOUR USE OF GLASGOW CITY CENTRE

| 1. Which of the following best describes your use of Glasgow city centre? (please tick all that apply) |
|--|
| City centre resident   |
| Work in the city centre  |
| Visit the city centre for shopping / leisure   |
| Own a business in the city centre  |
| Study in the city centre   |
| Other (please specify):  |
|  |
| 2. How often do you visit / use Glasgow city centre?   |
|  |
| Less than once a month   |
| Less than once a month  Once a month   |
|  |
| Once a month   |
| Once a month  1-2 times a week   |
| Once a month  1-2 times a week  3-4 times a week   |



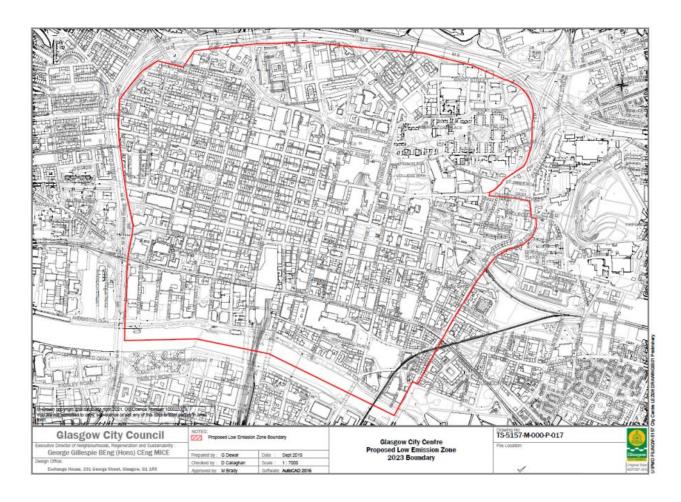
|  | Never                     | Less than once a month | At least once a month      | At least once a week | 4-5 times a<br>week | Every day    |
|--|---------------------------|------------------------|----------------------------|----------------------|---------------------|--------------|
| Walk   |                           |                        |                            |                      |                     |              |
| Cycle  |                           |                        |                            |                      |                     |              |
| Wheeling   |                           |                        |                            |                      |                     |              |
| Bus or coach   |                           |                        |                            |                      |                     |              |
| Train  |                           |                        |                            |                      |                     |              |
| Taxi or private hire car   |                           |                        |                            |                      |                     |              |
| Motorbike / moped  |                           |                        |                            |                      |                     |              |
| Car  |                           |                        |                            |                      |                     |              |
| Light Goods Vehicle (van or other)   |                           |                        |                            |                      |                     |              |
| Heavy Goods Vehicle  |                           |                        |                            |                      |                     |              |
| <ul><li>2. PART 2: LO</li><li>4. Low Emission Zones air pollution and suppovehicles to a designate</li></ul> | s are used<br>ort sustail | I in the UK a          | nd in many<br>ort. LEZs re | cities arou          | und the work        | st polluting |
| principle?  Strongly support   |                           |                        |                            |                      |                     |              |
| Support  |                           |                        |                            |                      |                     |              |
| Neither support nor o  | oppose                    |                        |                            |                      |                     |              |
| Oppose   |                           |                        |                            |                      |                     |              |
| Strongly oppose  |                           |                        |                            |                      |                     |              |

# 3. PART 3: GLASGOW'S LOW EMISSION ZONE PROPOSALS



The proposed LEZ boundary is shown in the map below and comprises the majority of the city centre bounded by the M8, the Clyde and Saltmarket / High St.

A higher resolution copy of the boundary map, along with a listing of affected streets is available here.



5. Do you agree or disagree with the proposed boundary for the Glasgow LEZ? \*

| Yes, agree with the proposed boundary                       |
|---|
| No, disagree with the proposed boundary – Too large an area |
| No, disagree with the proposed boundary – Too small an area |
| Don't know  |
|   |

Please feel free to give reasons for your preference (optional)

#### **OFFICIAL**

I don't support a LEZ in Glasgow

| progressive  |
|--|
|  |
|  |
|  |
| Glasgow's Low Emission Zone will apply to ALL vehicles unless exempt (exemptions are detailed in a later question). Motorcycles, mopeds, motorised tricycles and quadricycles are also scoped out of LEZs in Scotland. |
| The proposed emission standards are:   |
| <ul> <li>Euro 4 standard for petrol vehicles (generally vehicles registered from 2006 onwards)</li> <li>Euro 6 standard for diesel vehicles (generally vehicles registered from September 2015 onwards)</li> </ul>     |
| <ul> <li>Euro VI standard for heavy duty diesel vehicles such as buses / coaches and HGVs<br/>(generally vehicles registered from September 2015 onwards)</li> </ul>   |
| Vehicles which have been appropriately modified or retrofitted to meet or exceed these emission standards will also be permitted entry to the LEZ.   |
| 6. Do you agree or disagree with the proposed emission standards for Glasgow's LEZ?  |
| Strongly agree   |
| Agree  |
| Neither agree nor disagree   |
| Disagree   |
| Strongly disagree  |
| Please feel free to give a reason for your response (optional).  |
|  |
|  |
|  |



# 4. PART 3: GLASGOW'S LOW EMISSION ZONE PROPOSALS

Glasgow's LEZ proposals will apply to all vehicles unless exempt. Motorcycles, mopeds, motorised tricycles and quadricycles are also scoped out of LEZs in Scotland.

The Low Emission Zones (Emission Standards, Exemptions and Enforcement) (Scotland) Regulations 2021 are set at a national level and exempt certain vehicle types from LEZ requirements. These include:

- Vehicles for disabled persons (including blue badge holders)
- Police vehicles
- Ambulance and emergency vehicles
- Scottish Fire and Rescue
- Her Majesty's Coastguard
- National Crime Agency
- Military vehicles
- Historic vehicles
- Showman's vehicles

**OFFICIAL** 

In addition to LEZ exemptions set nationally by the Scottish Government, Glasgow City Council also has the power to issue 'time-limited' (temporary) exemptions in respect of specific vehicle types/categories. This could mean an exemption period of up to one year which would then require renewal if the exemption were to be continued.



It is proposed that the Glasgow LEZ does not include such general exemptions. However, a mechanism for exemptions will be put in place whereby exemptions may be granted in advance of entry for exceptional circumstances. This may be granted for one off entry by specialist vehicles or for a specialist purpose. Exemptions WILL NOT be considered for general travel or commercial operations.

| 8. Do you agree or disagree with the Glasgow LEZ proposals in relation to exemptions?  |
|--|
| Strongly agree   |
| Agree  |
| Neither agree nor disagree   |
| Disagree   |
| Strongly disagree  |
| Please feel free to give reasons for your response (optional).   |
|  |
|  |
|  |
| 5. PART 3: GLASGOW'S LOW EMISSION ZONE PROPOSALS   |
| 9. GRACE PERIODS AND LEZ ENFORCEMENT Glasgow's LEZ is already in effect for scheduled service buses, with full compliance expected by the end of 2022. For all other vehicles unless exempt, Glasgow's LEZ will be legally implemented in May 2022. Additional time to prepare known as 'grace periods' will be in place however for a period of one year from implementation, which means that enforcement of Glasgow's LEZ would not start until 1 June 2023. An extended grace period of two years from implementation is proposed for individuals whose vehicle is registered at a residential property within the zone area, with enforcement for these vehicles starting on 1 June 2024. Do you agree or disagree with the proposed grace periods / LEZ enforcement timetable for general enforcement and residents? |
| Strongly agree   |



| Agree  |
|--|
| Neither agree nor disagree   |
| Disagree   |
| Strongly disagree  |
|  |
| Please feel free to give a reason for your response (optional).  |
|  |
|  |
|  |
|  |
|  |
| regulations and increase for repeated entries. Set at national level by the Scottish Government for consistency, the initial penalty charge for all non-compliant vehicles entering a Low Emission Zone in Scotland will be £60 - reduced by 50% if it is paid within 14 days. The penalty amount doubles with each subsequent entry by a non-compliant vehicle detected in the same LEZ and are capped at £480 for cars and light goods vehicles, and £960 for buses and 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. Do you agree or disagree with the penalty charges as set in Regulations? |
| Strongly agree   |
| Agree  |
| Neither agree nor disagree   |
| Disagree   |
| Strongly disagree  |
| Please feel free to give reasons for your response (optional).   |
|  |
|  |
|  |
|  |



| 11. Having read the proposals for the Low Emission Zone in Glasgow in this questionnaire and the accompanying document, overall, to what extent do you support or oppose the proposal for a Low Emission Zone in Glasgow? * |
|---|
| Strongly support  |
| Support   |
| Neither support nor oppose  |
| Oppose  |
| Strongly oppose   |
| Please feel free to give your reasons for your opinion on the proposed details of a Low Emission Zone in Glasgow (optional).  |
|   |
|   |
| 6. PART 4: ABOUT YOU  |
| 6. PART 4: ABOUT YOU  12. Are you responding as an Individual or Organisation?  |
|   |
| 12. Are you responding as an Individual or Organisation?  |
| Individual  |
| 12. Are you responding as an Individual or Organisation?  Individual  Organisation  |



| No   |
|--|
| 14. First part of postcode (i.e. G2, G53, G31, etc.) (optional). |
|  |
| 15. What is your gender?   |
| Female (including trans)   |
| Male (including trans)   |
| Other  |
| Would not like to say  |
| 16. Which age group do you belong to?                            |
| 16 – 24  |
| 25 – 34  |
| 35 – 44  |
| 45 – 54  |
| 55 – 64  |
| 65-74  |
| 75+  |
| Would not like to say  |
| 17. What ethnic group do you belong to?                          |
| White Scottish   |
| White British  |
| White Irish  |
| Other white background   |



| Mixed background                      |
|---------------------------------------|
| British Indian / Indian               |
| British Pakistani / Pakistani         |
| British Bangladeshi / Bangladeshi     |
| Other Asian background                |
| British Caribbean / Caribbean         |
| British African / African             |
| Other black background                |
| Chinese                               |
| Would not like to say                 |
| Any other background (please specify) |
|                                       |
| 18. Do you have a disability?         |
| Yes - Mobility                        |
| Yes - Other                           |
| No                                    |
| Don't know/No opinion                 |
| Would not like to say                 |



# Appendix II: Written responses

These are the full written responses received by the 11 organisations that gave permission to publish their responses.

#### Organisation

#### Written response

# Asthma UK – British Lung Foundation

At some point in our lives, one in five of us will have a lung disease. Across the UK millions more are at risk. We are the only UK charity looking after the lungs of Scotland, and we aim to bring the needs of people with lung conditions to the forefront of policy-making.

As we've seen with the COVID-19 crisis, acute respiratory symptoms can literally bring countries to a standstill and can cause thousands of deaths. The recent pandemic has highlighted the need for clear and robust guidelines and support for people with a lung condition, as well as the need to reduce air pollution across the country, such as the reductions we witnessed in the first wave of the pandemic. We are campaigning for clean air, better services and investment in research and innovation. One day, everyone will be able to breathe clean air with healthy lungs.

- 1. Which of the following best describes your use of Glasgow city centre? Asthma UK and British Lung Foundation (AUK-BLF) Scotland is a national charity representing the 1 in 5 people living with lung conditions. Our staff are now home-based due to the pandemic, and we encourage all to use public transport when travelling to Glasgow for work and social purposes.
- **2.** How often do you visit/use Glasgow city centre? See answer above.
- 3. How often do you use each of these forms of transport to travel to or within Glasgow city centre? N/A.
- 4. Low Emission Zones are used in the UK and in many cities around the world to reduce air pollution and support sustainable transport. LEZs restrict entry by the most polluting vehicles to a designated area.

Do you support or oppose the use of Low Emission Zones in principle? Strongly support.

**5.** Do you agree or disagree with the proposed boundary for the Glasgow LEZ? Yes, we agree with the proposed boundary. AUK-BLF welcomes the size of the proposed boundary as it takes in the vast majority of the city centre. In the near future, we would like to see Glasgow City Council expand the boundary to include residential areas outside the boundary and to include areas of high congestion and air pollution, such as the West End (Byres Road, Great Western Road etc.) and Southside (Tradeston, Gorbals, Pollokshaws, Pollokshields etc.)



6. Do you agree or disagree with the proposed emission standards for Glasgow's LEZ?

Agree.

- **7. Do you agree or disagree with the national exemptions as set out above?**Disagree. During the passing of the Transport (Scotland) Act 2019, AUK-BLF
  Scotland and other charities and third sector orgs raised concerns about some of the national exemptions and we remain concerned around the exemption for historic vehicles, which are some of the worst polluting vehicles.
- 8. Do you agree or disagree with the Glasgow LEZ proposals in relation to timelimited exemptions? Agree.
- 9. Do you agree or disagree with the proposed grace periods / LEZ enforcement timetable for general enforcement and residents?

Disagree. AUK-BLF Scotland wants the shortest grace periods possible to be introduced for Low Emission Zones across Scotland, including Glasgow. We support the introduction of the LEZ in 2022, however the two-year grace period for residents should be reduced to one year. It should be noted that although the LEZ will be installed in 2022, the council should be clear on how it will make the LEZ work if fines are not applicable for one or two years.

- **10.** Do you agree or disagree with the penalty charges as set in Regulations? Strongly Agree
- 11. Having read the proposals for the Low Emission Zone in Glasgow in this questionnaire and the accompanying document, overall, to what extent do you support or oppose the proposal for a Low Emission Zone in Glasgow? Strongly Support. Asthma UK and British Lung Foundation Scotland welcomes the opportunity to engage with Glasgow City Council on the proposals for a Low Emission Zones in the city centre.

Air pollution levels in our cities are too high. We envisage a world in which everyone can breathe clean air with healthy lungs. Tackling transport emissions is central to our goal as poor air quality can be linked to a number of lung conditions, including asthma, chronic obstructive pulmonary disorder and lung cancer. Alongside other negative health impacts, exposure to polluted air is also linked to premature death. It is clear from this that we must do more to tackle unhealthy air.

When people are exposed to high pollution levels, for example on a busy road or during a high pollution episode, they breathe in these toxic materials into their lungs. Many people initially experience immediate symptoms such as irritated airways, feeling out of breath, and coughing. Such toxins can exacerbate symptoms, including triggering an asthma attack or a COPD flare-up. People with asthma may notice that they need to use their reliever inhaler more than normal when pollution levels are high.



We would like to see the Council set out what it plans to do after the introduction of the LEZ, and in particular the end of the grace periods, to further reduce air pollution in Glasgow, such as what plans it has to expand the Low Emission Zone, further promote active and public transport and engage with the public over the grace period to raise awareness of the need of a Low Emission Zone.

Gareth Brown

Policy & Public Affairs Officer

Asthma UK and British Lung Foundation Scotland

### Dennistoun Community Council

Whilst the coverage of the city centre Paramics model encompasses fully both proposed LEZ boundaries, the coverage does not include fully routes which non-compliant vehicles may be displaced onto and is apparently just moving the problem to residential areas near the eastern boundary

Despite the consultation to understand the impacts of displaced vehicles within the city centre and wider area the assumption appears to be that by 2023 the majority of vehicles on the road needing access to the LEZ area will be compliant.

That is a big assumption and if this assumption is incorrect the area to the east of the LEZ ie Dennistoun will be used as a park and ride for people accessing the city centre unless the proposed Restricted Traffic programme has reached Dennistoun before 2023.

The Route A map which has been selected indicates that traffic displaced from High Street onto John Knox Street would then turn left onto Duke Street onwards to Barrack Street and also perhaps Bellgrove (not shown on the map). The traffic would then have to weave its way through residential areas to get to Greendyke Street and the Albert Bridge heading south.

The speed of traffic from Motorway is very high currently on High Street and John Knox Street and there is a huge back up of traffic on John Knox Street at certain times of day even without the displaced traffic.

This traffic also runs past sheltered housing. Both John Knox Street and Wishart Street have no pedestrian crossings apart from bottom and top of both streets at the traffic lights. This puts people in danger crossing to access the bus stop, the Glasgow Necropolis, Drygate etc

The traffic situation in both these streets is shambolic at present and using the proposed LEZ boundary A rather than B will make things considerably worse. Regards

Angela Bretherton Chair DCC



#### East Renfrewshire Council

Dear Glasgow LEZ team,

Thank you very much for your request for feedback on Glasgow City Council's Phase 2 Low Emission Zone (LEZ) Consultation.

On behalf of East Renfrewshire Council, I can confirm we have no detailed comments to make on the contents of the consultation document.

Notwithstanding, please find attached evidence gathered through last year's East Renfrewshire Citizens Panel survey. This suggests 37% of respondents felt that a LEZ would have some impact on their travel to and from work.

Hope these insights are of some use.

Kind regards

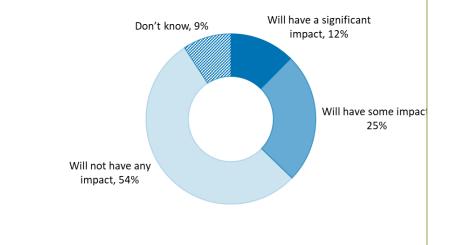
John Shelton, Senior Strategy Officer - Roads & Transportation

#### Travel to and from work (from East Renfrewshire Citizens Panel survey)

Nearly three quarters of those in employment (73%) indicated that they usually travel to and from work by car, including 5% who car shared. Around 1 in 5 respondents (19%) indicated that they usually travel to work by bus or train, and 2% walk.

Panel members were also asked about the extent to which a proposed Low Emission Zone in Glasgow would affect their travel. As Figure 11 shows, more than a third of respondents (37%) felt that it would have some impact on their travel. This included 12% of respondents who felt a Low Emission Zone would have a significant impact on their travel. Males and those in the Newton Mearns North and Neilston area were more likely to feel that they would be affected by a Low Emission Zone.

Figure 1: Extent to which a Low Emission Zone in Glasgow would affect respondents' travel





Panel members were invited to provide further comment on how a Low Emission Zone in Glasgow might affect their travel. The most common points raised were:

Making more use of public transport into Glasgow, including a number of respondents who already use these options for some journeys;

Reducing travel to Glasgow, for respondents who did not see public transport options as a viable alternative. This included some who referred to the prohibitive cost of public transport, to unreliable or infrequent services, and to lengthy, multi-stage journeys by public transport; and

Some respondents were not clear on whether their vehicle would meet Low Emission requirements – including those with hybrid vehicles and those with new petrol or diesel cars.

#### **Glasgow Taxis**

#### LEZ indicative timeline concerns

You may be aware that Glasgow Taxis Limited have largely been in support of the introduction of a Low Emission Zone in Glasgow throughout the discussion and implementation phases. This is despite the extreme pressures on the trade from other impacting factors.

Throughout 2020 we have engaged in a positive, pragmatic manner and repeatedly delivered a presentation to Glasgow City Council elected members and officers in a manner designed to achieve a positive outcome for both the taxi trade and the city. The overarching message in our presentation is without the support of Glasgow city Council and others the public hire taxi trade will cease to exist by 2030. Our presentation is designed to be informative, thought provoking and supportive to Glasgow. We have offered solutions to problems and are presently waiting to present to the leader of the Council Cllr Susan Aitken.

The LEZ formed part of our presentation, and whilst recognising it as a major challenge to the trade our support remained intact.

Our concern is that the indicative timeline for implementation of the enforcement phase of the LEZ (1 June 2023) in relation to taxis is unachievable for many taxi operators. We request that this is reconsidered.

Our concerns rise from the effect of the CoVid 19 pandemic and the devastating effect it continues to have on the taxi trade. Pre pandemic the required investment from taxi operators to achieve compliant vehicles was largely achievable, however the trade was amongst the worst affected and least supported sectors of business. Glasgow City Council acknowledged this by allowing licence holders to 'park up' and SORN cabs, reduced vehicle inspection frequency and removed tariff update payments.

Whilst acknowledging the availability of funding support via Energy Savings Trust our opinion is that this funding should have been made directly available to



upgrade cabs rather that retro-fit old cabs to reach compliance. The LPG conversion option (£12,500 cost £10,000 supported) will fail due to exorbitant running costs and the decision of LPG providers to cease production. The retro fit of 'adblue' systems to Mercedes vehicles is a stop gap solution with no business sustainability underpinning. (£6234 cost £4987.20 supported) The retro fit of 'adblue' to Peugeot taxis is still a work in progress and like the Mercedes option is only a stop gap.

The retrofit of an exhaust system to the TX is still a concept with nothing approved.

All these examples explain the poor uptake in support funding as they are viewed as stop gap measures.

As a result of the pandemic, the availability of second hand compliant taxis is virtually non existent.

A major catalyst to submitting this letter was an advert received yesterday by LEVC for a new Electric Hybrid cab (advert attached). Titled 'Your flexible way out of Lockdown' it offers:

- Cash Price £60,695
- Deposit £3034.75
- 1st 6 months £500pm
- 2nd 6 months £750pm
- Further 48 months £1084.79pm
- Optional final payment £19,232
- Total £82,436.64

This example highlights the level of investment required to achieve a sustainable taxi business in Glasgow that is not a stop gap measure. Clearly this level of investment is currently unrealistic.

To return to my primary point, the CoVid pandemic is currently 15 months in duration and continuing.

To extend the LEZ enforcement date by 5 months is unrealistic and unachievable by most.

I request that this date be reviewed in relation to taxis.

Thank you Dougie McPherson Chairman

## High Street Reference Group

Dear Sir/Madam,

I am writing on behalf of the High Street Reference Group, comprised of elected members representing Wards 9, 10 and 22. The Reference Group oversees the implementation of the High Street Area Strategy and is concerned with the regeneration of the High Street Corridor from Castle Street to the Clyde.



As a group, we strongly welcome the inclusion of the High Street within the proposed Low Emission Zone. We believe it is imperative for the economic, social and environmental wellbeing of this historic area that it benefits from the protections offered by the LEZ. We further believe that any exclusion (while neighbouring city centre areas were included) would exacerbate existing issues whereby the High Street Corridor is treated as part of a city centre ring road, or a missing link for the motorway, by some motorists.

Therefore, in response to the public consultation on the proposed terms of the LEZ, we are supportive of the scope of LEZ as it affects the High Street area. We offer no further comment on the proposed terms of the LEZ.

Many thanks,

Cllr Angus Millar

Chair, High Street Reference Group

#### Historic Environment Scotland

Dear Glasgow LEZ,

#### **Glasgow Low Emission Zone (LEZ)**

Thank you for your consultation of 28 July 2021 seeking any representations on the proposed Low Emission Zone scheme for Glasgow.

We note the proposed boundary for the Glasgow Low Emission Zone and its supporting consultation document and can confirm that we have no comments to offer.

Please contact us if you have any questions about this response. The officer managing this case is Andrew Stevenson who can be contacted by phone on 0131 668 8960 or by email on <a href="mailto:andrew.stevenson2@hes.scot">andrew.stevenson2@hes.scot</a>.

Yours faithfully

#### Historic Environment Scotland

#### NatureScot

Thank you for consulting NatureScot on the preferred scheme design of the second phase of Glasgow's Low Emission Zone (LEZ).

We support the use of Low Emission Zones in principle, and are content with the proposed boundary for the Glasgow LEZ.

We agree that introduction of the LEZ can contribute to the Strategic Plan themes of A Vibrant City, A Healthier City and A Sustainable and Low Carbon City. We would advise that implementation of the LEZ is progressed alongside delivery of greener travel corridors and promotion of active travel choices. This will help to achieve emissions reduction targets by reducing the need for private car use; and will improve the amenity of Glasgow by creating more pleasant environments for people to live, work and enjoy leisure time in.



I hope that these comments are helpful. Please get in touch if you would like to discuss anything further.

Best wishes, Alison Shand - Planning Adviser NatureScot

## NHS Greater Glasgow & Clyde

#### Comments re Low Emission Zone (LEZ) in Glasgow City

- 1. The primary aim of Glasgow City Council in creating the Low Emission Zone (LEZ) was to improve air quality in parts of the area of Glasgow City Council. Specifically, the aim was to bring the concentration of nitrogen dioxide (NO<sub>2</sub>) into compliance with Air Quality standards.
- In terms of a conventional model of health determinants, the aim is to improve health by manipulation of the physical environment. The LEZ is a type of population intervention that has been widely used in urban settings to improve air quality. LEZs have been implemented in several other British cities, including London, and also in other European countries, especially Germany.
- 3. As road traffic is the main source of NO<sub>2</sub>, interventions designed to reduce NO<sub>2</sub> need to address emissions of motor vehicles in the area of the LEZ.
- 4. A secondary aim is to improve levels of population health. Air Quality is recognised as an important aspect of the physical environment in any model of health. It is assumed that any improvement in air quality associated with the LEZ would carry a population health benefit. It is important to be able to link environmental improvements to health outcomes in the population.
- 5. The Low Emission Zone is a circumscribed area broadly bounded by the M8 Motorway to the west and north, the River Clyde in the south and the High Street in the east. The population resident in the LEZ is approximately 20, 107. This comprises approximately 3.2% of the total population of the Glasgow City Council area. This underlines the fact that the LEZ is a highly specific population intervention which has been designed to improve the physical environment in the target population considered most at risk of air pollution.
- 6. Populations can be considered by the proportions that fall into different SIMD deprivation categories. In the SIMD system, the unit of population is the datazone. Datazones are allocated a deprivation score (1 to 5) according to deprivation status. The most deprived Quintiles are Quintiles 1 and 2. In the area of the LEZ, about 35.8% of the population belongs to Quintiles 1 and 2. In the population of Glasgow City Council overall, 61.7% of the population belonged to Quintiles 1 and 2. On the whole, the population of the LEZ was less deprived in material terms than that of Glasgow City overall. This shows that the population exposed to the highest levels of air pollution did not correspond to the most deprived population.
- 7. The LEZ will also cause reductions in other air pollutants, especially Particulate Matter,  $(PM_{10})$ .



- 8. Evidence from evaluation of LEZs elsewhere is that LEZ may cause a small but significant reduction in levels of NO<sub>2</sub>.
- 9. The adverse health effects of air pollutants are routinely expressed as an increase in mean annual mortality from all causes (all cause mortality) associated with a given increment in level of the contaminant.
- 10. Mortality rate is a commonly-used measure of general health in defined populations. In the year 2020, the number of deaths in the LEZ population from any cause was 145. This is equivalent to a crude mortality rate of 7.2 per 1,000 population. The mortality rate in the overall population of Glasgow City Council was 11.5 per 1,000 population. These mortality rates are crude and have not been standardised for differences in age-structures of the two populations but the lower level of mortality in the population of the LEZ probably reflects the greater degree of material affluence in the LEZ population compared with that in the council's population overall.
- 11. The effects of air pollution on population health are given as a percentage increase in all cause mortality per increment of 10  $\mu g$ . m<sup>-3</sup> in level of the contaminant, for example, NO<sub>2</sub>.
- 12. The evidence for effects of NO<sub>2</sub> on health is considerably less robust that that for PM<sub>10</sub> and PM<sub>2.5</sub>. Concentrations of Particulate Matter and NO<sub>2</sub> often increase and decline together which gives rise to a problem of covariance. This which makes it difficult to distinguish the effects of NO<sub>2</sub> from those of other pollutants, especially PM.
- 13. Evidence for effects of air pollutants on health has been reviewed and published by COMEAP. In the most recently published evidence for the effects of  $NO_2$  on health, an unadjusted coefficient for  $NO_2$  was 1.023 was agreed by the majority of members. This means that an increase in mean  $NO_2$  concentration of 10  $\mu$ g. m<sup>-3</sup> would be associated with an average increase in mortality of 2.3% in the exposed population. Conversely, a reduction in mean  $NO_2$  level would be associated with decrease in mortality of 2.2%.
- 14. The lack of consensus in agreeing the coefficient is reflected in the fact that three members of the panel dissented from this view.
- 15. The effectiveness of LEZs in different cities has been reviewed in a Transport and Environment briefing. The reported effectiveness has varied greatly in different cities. In Madrid, a 32% reduction in levels of  $NO_2$  were reported between years 2018 and 2019 after implementation of the LEZ.
- 16. This information can be used to calculate an index of improved health from the planned LEZ. The calculations are shown in the table. The effect of the LEZ would be to reduce the overall mortality rate in the LEZ population from 7.2 per 1,000 per year to 7.01 per 1,000 per year,

| Assumption   | Value                 | Comment                     |
|--|-----------------------|-----------------------------|
| 1. All-cause mortality in LEZ in year 2020         | 7.2 per<br>1,000      | Source: Routine measurement |
| 2. NO <sub>2</sub> concentration in LEZ (Kerbside) | 36 μg m <sup>-3</sup> | Source: Routine statistics  |



|  | 3. Effectiveness of LEZ in reducing NO₂ concentration                             | 32%                        | Reported Taken from literature (Madrid) |
|--|---|----------------------------|---|
|  | 4. Predicted NO₂ concentration  | 24.5 μg<br>m <sup>-3</sup> | Calculated as 36 * 0.32                 |
|  | 5. Difference in NO <sub>2</sub> concentration                                    | 11.5 μg<br>m <sup>-3</sup> |   |
|  | 6. Mortality coefficient per 10<br>μg m <sup>-3</sup> increase in NO <sub>2</sub> | 1.023                      | Source: COMEAP                          |
|  | 7. Mortality coefficient per 10 μg m <sup>-3</sup> decrease in NO <sub>2</sub>    | 0.978                      | Source: COMEAP                          |
|  | 8. Units of 10 μg m <sup>-3</sup>   | 1.15                       |   |
|  | 9. Predicted mortality in LEZ   | 7.01 per<br>1,000          | Calculated as 7.2*(0.978)               |
|  | 10. Difference in mortality   | 0.19 per                   |   |
|  | rates   | 1,000                      |   |

#### Paths for All

We welcome the opportunity to make a submission to this consultation. Our comments are limited to those aspects that have direct relevance to the work and objectives of Paths for All. We are not able to give detailed comments.

We support LEZs in Scotland to improve air quality and contribute to healthy and thriving cities and towns. This supports the Government intention to make our towns and cities friendlier and safer places for walking, wheeling, and cycling.

Air pollution quite clearly continues to contribute to the early deaths of many people in Scotland. Some of the most vulnerable people (living in poverty and people with disabilities) are affected more by pollution – it makes our society less equal.

LEZs have been shown to be the most effective method of improving air quality quickly. They should be introduced alongside measures to support modal shift away from the car to walking, cycling, and public transport.

LEZs should benefit the environment hugely - delivering cleaner air, that will benefit our health. Cleaner air will also benefit the natural environment. LEZs also have the potential to deliver carbon reductions.

There is a risk that if LEZs are too small they will simply encourage polluting vehicles to operate outside the LEZ pushing up the levels of pollution in different areas that have not experienced it before.

LEZs should be introduced alongside measures enabling modal shift away from the private car to walking, wheeling, cycling, and public transport.

Bus travel is declining in Scotland and reversing this will be key to reducing car use. Most trips by bus also involve walking so this is important in terms of active travel and health and wellbeing. There should be a concerted effort to enable more use of buses.



Generally, we must make it easier for people to walk in their communities and make it harder to use a car in our urban areas.

Urban Design Frameworks should favour the pedestrian rather than the car. Urban realm improvements should be aimed at reducing car use, not encouraging it.

#### **Benefits**

- Reduced costs due to air pollution through days lost at work and NHS.
- Reduced physical inactivity and associated costs.
- Better places for people to live and work and associated economic benefits

We must allocate road space to modes of transport that are more space efficient and less polluting – i.e., walking, wheeling, cycling, and public transport. Poor air quality along with poorly maintained public footways/pavements can be a barrier to people adopting active travel.

We support an emphasis on greater use of public transport, green infrastructure, walking, wheeling, and cycling in tackling air pollution. As well as being a part of the solution, walking, wheeling, and cycling become more pleasant and therefore more likely to be adopted as air quality improves – creating a "virtuous circle".

Improving air quality can play a part in creating better quality walking, wheeling, and cycling environments throughout Scotland – and so will support delivery of the Scottish Government's Active Scotland Outcomes Framework, National Walking Strategy, The Cycling Action Plan for Scotland, and the Long-term Vision for Active Travel in Scotland.

Our interest in air quality and low emissions is as they relate to walking and promoting walking. Our main objective is to increase the number of people walking for the health benefits, but also there is an environmental benefit as well from people moving to walking from driving etc. The impact of air quality on health is often underestimated. Improved air quality is a good example of preventative spend – with the health benefits accruing over time.

#### Paths for All

Paths for All is a Scottish charity founded in 1996. We champion everyday walking as the way to a happier, healthier Scotland. We want to get Scotland walking: everyone, everyday, everywhere.

Our aim is to significantly increase the number of people who choose to walk in Scotland - whether that's for leisure or walking to work, school, the shops or to a nearby public transport hub. We want to create a happier, healthier Scotland where increased physical activity improves quality of life and wellbeing for all. We work to develop more opportunities and better environments not just for walking, but also for cycling and other activities, to help make Scotland a more active, more prosperous, greener country.

Our work supports the delivery of the Scottish Government's Active Scotland Outcomes Framework, National Walking Strategy, The Cycling Action Plan for



Scotland and the Long-term Vision for Active Travel in Scotland, community and workplace health walking, path network development and active travel policy development. We are a partnership organisation with 30 national partners. Our funders include the Scottish Government, Transport Scotland, NatureScot, and The Life Changes Trust.

#### Smarter Choices, Smarter Places

The Smarter Choices, Smarter Places (SCSP) Programme is Paths for All's grant scheme to support behaviour change initiatives to increase active and sustainable travel. The programme is funded through Transport Scotland and aims to make walking and cycling the modes of choice for short local trips and encourage sustainable travel choices for longer journeys.

We are happy for our comments to be made publicly available and would be pleased to provide further information if that would be of help.

Paths for All August 2021

## Strathclyde Passenger Transport (SPT)

Thank you for the opportunity to comment on the Council's LEZ Phase 2 plans. SPT would make the following comments:

#### **Exemption for buses accessing Buchanan Bus Station**

We note that the previous Phase of the LEZ included an exemption for vehicles accessing Buchanan Bus Station via Dobbies Loan. There doesn't appear to be any reference to this exemption in the current proposals and we would welcome clarification on whether such an exemption will continue under Phase 2. This is an important consideration since knowledge of the compliance level of coaches is more patchy than that of the local bus network. Coaches travel from a wide variety of destinations, UK-wide and beyond, therefore it would be expedient to keep the routing into and out of BBS available for non-Euro VI vehicles.

## Time-limited exemptions for Community Transport operators

SPT considers that Community Transport vehicles should be given a time limited exemption from the LEZ given that they provide an essential service for vulnerable residents. Some Community Transport operators may not be in a financial position to replace or convert non-compliant vehicles in the short term and we would welcome consideration being given to such an exemption.

Best regards
John Binning

**Principal Policy Officer** 

SPT

# University of Strathclyde

## **Glasgow Low Emission Zone Consultation: UoS Reponse**

Our comments are noted below. The University is supportive of the aims of the LEZ and the work of the GCC Transport Team. We will continue to work with GCC on related air quality aspects via our work with city stakeholders and the Sustainable Glasgow Board.

5. Do you agree with the proposed Boundary? (+Comments)

Neither Agree nor Disagree

**COMMENTS** 



We are unsure why the congested and so-called Stirling Road Triangle and GRI and University residences area seems to be excluded.

- Stirling road triangle seems to be included in ArcGIS boundary but not in this map. As this is right next to our student residences, library, and sports centre, as well as giving a link to the green space in the necropolis we believe it should be included to bring the air quality benefits to this area. It is a highly congested set of junctions.
- The University is content with the decision to include High Street within the boundary for similar reasons, not least the alignment with the work that we are leading on the creation of a Climate Neutral Innovation District. In fact, the technical work that informs the Climate Neutral Innovation District Feasibility has already proposed that High Street becomes an Avenue so that it can enable the delivery of a suite of climate solutions such as district energy; active travel; climate adaptation; digital connectivity; community greenspace; air quality improvements.

# **6. Do you agree with the proposed emission standards?** *Agree*

#### **COMMENTS:**

- SEPA data indicates that Cathedral Street is in the top 20% of roads for NOx emissions from buses. This road runs right through the University of Strathclyde campus and City of Glasgow College with very high foottraffic throughout the day as students travel around campus. A stricter standard and phase in period is needed for traffic (much of it single occupancy in nature) in the city to tackle this and other similar (even worse) areas throughout the city.
- An intervention that reduces traffic numbers along cathedral Street is required. This could begin with the removal of X Buses that do not stop along Cathedral Street. It could also be assisted now with the creation of a segregated set of cycle ways that reduce speeds along Cathedral Street and takes four lanes down to two.
- Is the city's vehicle fleet on target to achieve 80% compliance by December 2021 as outlined in the summary report? https://www.glasgow.gov.uk/CHttpHandler.ashx?id=53674&p=0
- It is not entirely made clear what the potential benefits of higher standard for petrol cars would be. It is noted that a large number of vehicles are EURO 4,5 for petrol so could that help to further reduce emissions and city centre car journeys?
- **7.** Do you agree or disagree with the national exemptions as set out below? *Agree*
- 8. Do you agree or disagree with the Glasgow LEZ proposals in relation to time-limited exemptions?

Aaree

9. GRACE PERIODS AND LEZ ENFORCEMENT

Agree

**COMMENTS:** 



- Full year grace period is too slow for the scale of action needed. The LEZ
  has already been postponed and this is widely known. Do we really need
  another full 2 years for change to come into effect with further delay to
  air quality improvements?
- Alternative to a grace period could be that within the first year, only your first infraction is overlooked i.e. the first time a vehicle enters within the first year they are informed of the change directly issued a warning notice but no charge, then subsequently will be charged.
- Residential grace period is more understandable as those people are more restricted by their vehicle choice.
- 10. Penalty charges for non-compliant entry to a LEZ in Scotland are set by national regulations, and increase for repeated entries. The initial penalty charge for all non-compliant vehicles entering a Low Emission Zone in Scotland will be £60 reduced by 50% if it is paid within 14 days.

  Agree

#### **COMMENTS:**

- Why should a 50% reduction apply to repeat non-compliant entries?
- Has consideration been given to a tiered charging structure based on car values – this could level out the impact to those on lower incomes and further dissuade
- The proposed 90 Day reset period seems a bit too relaxed?
- 11. Having read the proposals for the Low Emission Zone in Glasgow in this questionnaire and the accompanying document, overall, to what extent do you support or oppose the proposal for a Low Emission Zone in Glasgow? \* Agree

#### **COMMENTS:**

- Overall agree with the proposal, but think it could be a bit more ambitious in its timescale and standard of compliant vehicles.
- Grace period just seems to delay for a year when there are other "soft landing" type procedures that could be used to ease in to the scheme more quickly



# Appendix III: Technical appendix

#### Method

- 1. The data was collected by online survey designed, scripted and hosted by Glasgow City Council. A number of written responses were also received by email.
- 2. The consultation survey was open to all general public, stakeholder organisations and businesses.
- 3. 2,941 valid responses were received via the online consultation.
- 4. The consultation was live from 24th June to 2nd September 2021.
- 5. Respondents to internet self-completion surveys and consultations are self-selecting and complete the survey without the assistance of a trained interviewer. This means that the consultation is not representative of the population of Glasgow or surrounding areas, or of any particular subgroup.
- 6. An overall sample size of 2,941 will provide a dataset with a margin of error of between ±0.36% and ±1.8%, calculated at the 95% confidence level (market research industry standard). Each sub sample of 500 will provide a dataset with a margin of error of between ±0.87% and ±4.38%.
- 7. All research projects undertaken by Progressive comply fully with the requirements of ISO 20252, the GDPR and the MRS Code of Conduct.

#### Data processing and analysis

- 8. Raw data was imported into Progressive's SNAP analysis software package in batches every 2-3 weeks. Responses were checked for completeness and sense, and for campaign responses.
- 9. A computer edit of the data carried out prior to analysis involves both range and inter-field checks. Any further inconsistencies identified at this stage are investigated by reference back to the raw data on the questionnaire.
- 10. Responses to open-ended questions were spell and sense checked. They were then grouped using a code-frame and incorporated into the data tables.
- 11. A SNAP programme was set up with the aim of providing the client with useable and comprehensive data. Cross breaks were discussed with the client in order to ensure that all information needs are met.

#### Analysis of written responses

- 12. Fourteen responses were submitted directly to the Council from public/social and third sector organisations (11 responses) and commercial interests (three responses). These responses were in non-standard formats (emails, letters, short reports), focusing on the issues of specific interest to the organisation, and only in a few cases conforming to the broad structure of the consultation questionnaire. None answered the closed questions.
- 13. These responses were analysed by the executive team and key themes and issues drawn out. These findings were written up and presented in a separate section in the report.