

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP

EXECUTIVE COMMITTEE

16 NOVEMBER 2017

CONSULTATIONS

REPORT BY DIRECTOR

This report seeks approval of responses to Scottish Government consultations on Free Bus Travel for Older and Disabled People and Modern Apprentices and Building Scotland's Low Emission Zones.

1 RECOMMENDATIONS

1.1 That the Executive Committee:

- (i) approves the proposed response to Scottish Government's Consultation on Free Bus Travel for Older and Disabled People and Modern Apprentices, as detailed in Appendix A; and
- (ii) approves the proposed response to Scottish Government's Building Scotland's Low Emission Zones – A Consultation, as detailed in Appendix B.

2 BACKGROUND

- 2.1 The Scottish Government published [Consultation on Free Bus Travel for Older and Disabled People and Modern Apprentices](#) on 27 August 2017, with responses to be submitted by 17 November 2017.
- 2.2 The Scottish Government published [Building Scotland's Low Emission Zones – A Consultation](#) on 6 September 2017, with responses to be submitted by 28 November 2017.
- 2.3 At its meeting on 12 September 2017 the Partnership agreed to delegate authority to the Executive Committee to consider and approve responses to two Scottish Government consultations: Consultation on Free Bus Travel for Older and Disabled People and Modern Apprentices; and Building Scotland's Low Emission Zones – A Consultation (Report RTP/17/22 refers).

3 DISCUSSION

Consultation on Free Bus Travel for Older and Disabled People and Modern Apprentices

- 3.1 Scottish Government is seeking views on the future sustainability of the current concessionary travel scheme for older and disabled people and on proposals to extend the scheme to include Modern Apprentices.
- 3.2 Over 1.3 million bus pass holders currently benefit from the Scotland-wide free bus travel scheme for older and disabled people. They make around 145 million bus journeys each year representing around a third of all bus journeys made in Scotland.
- 3.3 Scottish Government has indicated that it is committed to continuing to provide free bus travel for those who need it the most, but want to look at options to ensure the longer-term sustainability of the scheme so that free bus travel can continue to benefit those who have the greatest need.
- 3.4 A number of proposals for increasing the age threshold for entry to the scheme are proposed, as outlined in Appendix A. It is proposed that the Partnership does not support the current proposals for revision to eligibility on grounds of age in the apparent absence of a wider economic and social analysis and understanding of the potential impacts and possible “unintended consequences”, particularly in relation to concerns that a simple cost-saving approach could result in significant contraction/withdrawal of bus services, increased fares, and/or additional cost pressures for public transport authorities as discussed in Appendix A. For these reasons the proposed response urges Scottish Government to reconsider alternative means of addressing long-term sustainability through options including imposing a modest charge(s) as a means of minimising the operator revenue impacts and the potential for “unintended consequences” which could result in damaging impacts on the wider bus network and those who are reliant on bus services.
- 3.5 Reflecting the particular challenges facing younger people Scottish Government is seeking views on a proposal to provide free bus travel to Modern Apprentices and how that might be taken forward. Scottish Government is also considering provision of free companion travel for eligible disabled children under the age of five who are not currently covered by the Scheme. These proposals are broadly supported as discussed in Appendix A, but with additional comments and concerns raised relating to policy effectiveness and equity in relation to the proposals around Modern Apprentices.
- 3.6 The consultation indicates a commitment that people who currently have a bus pass will continue to access the benefits of the scheme. In addition Scottish Government will not be making any adverse changes to the existing eligibility criteria for those with a disability.

- 3.7 The Partnership is asked to consider and approve the proposed response, as shown in Appendix A.

Building Scotland's Low Emission Zones – A Consultation

- 3.8 This consultation paper sets out the proposed arrangements and options to deliver a consistent approach to designing, building and managing Low Emission Zones (LEZs) in Scotland. It is an opportunity to shape the guiding principles the Scottish Government will adopt to put in place LEZs in 2018 and beyond.
- 3.9 The consultation document firstly sets the scene for LEZs and outlines the scope of the consultation, seeking views on the overall principle of LEZs as an effective air quality mitigation approach.
- 3.10 The proposed guiding principles for Scottish LEZs are then outlined and views sought on a selection of issues such as Euro emission criteria, LEZ hours of operation, enforcement, lead-in times and exemptions.
- 3.11 Views are also sought on measures that local or central government should consider in conjunction with LEZs to address the hotspots of air pollution in Scotland's towns and cities, including the interrelationship between air quality, congestion and sustainable transport.
- 3.12 The Partnership is asked to consider and approve the proposed response, as shown in Appendix B.

4 CONSULTATIONS

- 4.1 The draft responses outlined in this report have been compiled following initial consultation with relevant officers from the constituent Councils and with other RTPs, and are the subject of ongoing consultation. Any further comments or amendments to the proposed responses detailed in the appendices arising from ongoing consultations with constituent Council officers will be reported orally to the Executive Committee meeting, for consideration and amendment, as necessary.

5 RESOURCE IMPLICATIONS

- 5.1 This report has no direct Resource implications.

6 EQUALITIES IMPLICATIONS

- 6.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no material issues have been identified.

Eric Guthrie
Director

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NOTE

The following background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in preparing the above Report:

Report to Partnership RTP/17/22, General Consultations, 12 September 2017

Consultation on Free Bus Travel for Older and Disabled People and Modern Apprentices, Transport Scotland, August 2017

Building Scotland's Low Emission Zones – A Consultation, Transport Scotland, September 2017

Free Bus Travel for Older and Disabled People and Modern Apprentices Consultation Questions

Questions on National Concessionary Travel Scheme

Question 1			
Do you think we should retain the existing age Eligibility criteria for the Scheme?	Yes	X	No
<p>Comments:</p> <p>The need to consider the long-term sustainability of the scheme is acknowledged. However, the proposed focus solely on revision to the age-threshold for eligibility as the most effective means of addressing long-term sustainability without apparent regard to, or comparative assessment against, possible wider economic and societal impacts and costs which could arise from “unintended consequences” of measures targeted primarily at reducing scheme eligibility and costs, is fundamentally questioned.</p> <p>Notwithstanding the theoretical “no better/no worse off” assumptions underpinning current operator reimbursement mechanisms, there is concern that any reduction in eligibility and subsidy could result in significant reductions in existing bus patronage, leading in turn to real reductions in net operator revenue income compounding the current effects of general trend decline in bus patronage, in turn leading to possible further contraction of the commercially operated bus network and/or additional pressures on already stretched public transport authority budgets at a time when local authority finances are also under ever increasing pressure.</p> <p>The consultation references concerns over current decline in general bus usage (para. 2.16 refers) whilst the information contained in the consultation paper on concessionary travel indicates that, despite underlying demographic trends, the actual number of pass holders and the number of concessionary journeys made has been relatively “flat” over recent years, suggesting that increasing scheme costs are being driven more by fares inflation, linked with continuing reference to adult single fares, which tend to be the most expensive fare offering, as the basis for calculating operator revenue foregone.</p> <p>The consultation refers frequently to targeting the scheme on those in most need. The scheme currently delivers wide-ranging benefits including access to essential local or regional services and facilities such as employment, education, health, social and leisure facilities, whilst supporting achievement of other economic, environmental, social and health & wellbeing outcomes. All of these benefits, for both concessionary and non-concessionary passengers, would be threatened if revisions to scheme eligibility resulted in contraction in the scale and availability of the overall bus network. Consequently any change to current scheme eligibility and funding should only be implemented based upon a thorough analysis and understanding of potential wider impacts on the bus industry/network, the public sector, and associated wider economic, environmental and societal costs and impacts.</p>			

Question 2				
Are you in favour of raising age eligibility to female State Pension age in this way?	Yes	<input type="checkbox"/>	No	X
Please explain your answers: See response given to Q1 above. Raising the age of eligibility in one step would appear to be at odds with the Scottish Government's claimed support for WASPI (section 2.24 of consultation refers).				

Question 3				
Are you in favour of raising age eligibility to female State Pension age gradually over time?	Yes	<input type="checkbox"/>	No	X
At what rate?	By 1 year per year	<input type="checkbox"/>	By half a year per year	X
Please explain your answers: For the reasons outlined in answer to Q1 and Q2 above Tactran does not support raising the age threshold in isolation from a full assessment and understanding of the wider costs and implications of any "unintended consequences". However, should the Scottish Government resolve to implement changes to the qualifying age threshold, these should be implemented in the manner which imposes least disadvantage for those affected and in the manner which is likely to minimise the potential for impacting adversely on the sustainability and availability of the wider commercially operated and publicly supported bus network which the wider travelling public rely on, and which may come under threat of reduction or withdrawal as a result of any cost-saving measures.				

Questions on free bus travel for Modern Apprentices

Question 4				
Are you in favour of providing free bus travel to Modern Apprentices?	Yes	X	No	<input type="checkbox"/>
Should this be targeted at Modern Apprentices under Age 21?	Yes	<input type="checkbox"/>	No	X
Is there a better way to provide support to help with the travel costs of Modern Apprentices?	Yes	X	No	<input type="checkbox"/>
Please explain your answers: Extension of the availability of free travel to young people seeking entry to employment and training is supported in principle. However, as with the current scheme for older and disabled people, the benefits to these users will be limited to the accessibility afforded by the available local bus network. As indicated in answer to Q1 above, there is concern that significant reductions to wider scheme eligibility, funding and usage could result in contraction in the bus network, potentially reducing/inhibiting the intended benefits of this proposed extension. Any such impact is likely to be more acute in rural areas, where bus networks and public transport services are generally more limited and relatively expensive, potentially compounding existing transport poverty and inequalities for the wider travelling public/communities. More generally, the equity and policy coherence of advancing proposals to extend the scheme to include free travel for 16 – 21/24 year-olds when seeking to withdraw these benefits from older people in the 60 – 66 age range, at a time when economically active older people may also be facing the prospect of having to work				

much longer including potentially having to re-train in later life to secure a decent living/pension, is also questioned, as is the principle of funding extension of benefits to Modern Apprentices from savings generated by withdrawing existing benefits from older people, which appears to lack policy consistency in terms of equality of opportunity for Modern Apprentices and other economically challenged citizens.

Question on companion cards for disabled children under age 5

Question 5				
Are you in favour of providing a companion card for disabled under 5s where this is needed?	Yes	X	No	
<p>Please explain your answer: Whilst recognising that all young children require assistance and accompaniment when travelling by public transport this additional assistance for families with disabled children who may be required to make multiple journeys for health and welfare reasons is supported.</p>				

Other Comments

Question 6				
Do you have any other comments about the issues raised in the consultation?	Yes	X	No	
<p>Comments: As outlined in answer to Q1 above, any change to concessionary travel eligibility and associated funding should only be implemented if under-pinned by a comprehensive analysis and understanding of wider economic, environmental and societal costs and impacts, including potential “unintended consequences” particularly any negative impacts upon the existing commercially operated and publicly subsidised bus networks.</p> <p>Transport Scotland should review the reliance on adult single fares as the principal reference for determining “no better/no worse off” in negotiations/agreements with operators. Based on information contained in the consultation paper these current reimbursement assumptions appear to be the main driver of increasing costs. Adult single fares are relatively expensive for occasional users and may have a disproportionate influence on user behaviour in any expansion or reduction to scheme benefits and costs, including acting as an inhibiting effect on bus patronage.</p> <p>As indicated above, Tactran does not support implementation of revisions to scheme eligibility based upon a narrow consideration of potential cost savings to the concessionary travel budget. However, should the Scottish Government press ahead with revisions to eligibility, any net savings generated should be re-invested in measures designed to ensure maintenance and improvement of the bus network, including measures aimed at addressing the current general decline in bus usage. The commercial bus network is shrinking and services funded by public transport authorities are also reducing. A bus pass without a decent bus service is of limited value.</p> <p>See also answers to questions in Part 3 and Annex C below.</p>				

Questions on Assessing Impact

Question – Equality Impacts

Are there any likely impacts the proposals contained within this Consultation may have on particular groups of people, with reference to the ‘protected characteristics’ listed above? Please be as specific as possible.

Comments:

Previously stated concerns relating to potential “unintended consequences” arising from reductions in scheme eligibility and costs/subsidy have the potential to impact on all public transport users/communities and, therefore, all “protected characteristics”.

Increasing the age threshold will have obvious impacts on older people within the affected age ranges/categories through loss of anticipated benefits. This is likely to have additional gender impacts as women, including those over age 60, are generally more likely to be reliant on and have increased propensity to travel by public transport and will, therefore, be more heavily impacted by any increase in the qualifying age threshold.

Question – Children and Young People

Do you think the proposals contained within this Consultation may have any additional implications on the safety of children and young people?

Comments:

Any revision which results in a reduction in public transport usage and availability is likely to increase reliance on, and usage of, the private car for essential and non-essential travel, leading to the potential for increased traffic congestion, air pollution and reduced road safety within communities.

Question – Business Impacts

Do you think the proposals contained in this Consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible.

Comments:

As indicated in earlier responses reducing concessionary travel funding has the potential to increase the financial burden placed on bus operators, leading to reductions in commercial public transport provision and/or additional pressures on public transport authority budgets for delivery of socially necessary bus services.

The consultation paper highlights the existing influence of the scheme in improving older people’s access to a range of services, facilities and social networks, including many trips which may not have previously been made, with attendant economic, social and health & wellbeing benefits. A proportion of these trips which support and are of economic benefit to various sectors of the wider economy – e.g. health, leisure, tourism, retail etc. – have the potential to reduce.

Question – Privacy Impacts

Are there any likely impacts the proposals contained in this Consultation may have upon the privacy of individuals? Please be as specific as possible.

Comments:

None currently envisaged.

Questions on options not favoured by the Scottish Government

Annex C - Options not favoured by the Scottish Government

The Scottish Government is not minded to adopt the following options:

1. Requiring card holders to make a small financial contribution towards the cost of each concessionary journey.
2. Levying an annual charge for access to free bus travel.
3. Restricting use of a bus pass during peak travel times.
4. Having a cap on the value of individual journeys which can be free.

Use the box below to provide comments on these or any other way in which you believe the long-term sustainability of concessionary travel could be achieved, as well as other comments you may wish to make for improvements to the scheme.

Comments:

Options 1 and 2 above are considered to be worthy of serious consideration on the basis that they offer the potential to generate cost savings with an ability to offset the impact of these on operators (either directly or indirectly) through creation of an income stream(s) from the introduction of modest charges to users, thus reducing the potential for “unintended consequences”. Both of these options could be implemented on the basis of retaining free travel for eligible disabled groups, in line with the stated “most in need” objective, whilst introducing a relatively modest charge for those qualifying on grounds of age.

Option 3, restricting use of a bus pass during peak travel times is not supported, nor is any reduction in the current general utility of the card, which enables free travel at all times throughout Scotland, by placing any travel time or geographic restrictions on current availability.

Option 4, placing a cap on the number or value of journeys made, is not supported for the reasons of administrative and user complexity outlined.

**Building Scotland's Low Emission Zones
A Consultation
Consultation Questions**

Number	Consultation Question
1	<p>Do you support the principle of LEZs to help improve Scottish air quality? Please be as specific as possible in your reasoning.</p>
	<p>Tactran is supportive of the general principles of LEZs, delivered as part of a sustainable transport strategy.</p> <p>Within the Tactran area there are 3 Air Quality Management Areas (AQMA): the whole of Dundee, Perth central area and the trunk road route through Crieff. Our Regional Transport Strategy (RTS) sets an objective to meet or better all statutory air quality requirements in the Tactran region and, in addition, has incorporated a number of Scottish Government's "Cleaner Air for Scotland" (CAFS) actions into the Tactran RTS Delivery Plan.</p> <p>It is recognised that the timescale for introducing LEZ's into Scotland's four biggest cities by 2020 and into all other AQMAs by 2023 is extremely challenging given the requirements of National Modelling Framework (NMF) and associated National Low Emission Framework (NLEF), combined with regulatory/legislative requirements, funding needs and stakeholder involvement. It is important that due consideration is given to a realistic timescale for effective implementation, including in particular consideration of the costs and impacts upon the bus industry and other providers of more sustainable transport options.</p> <p>As noted above it is important that LEZ's are not introduced in isolation and are aligned with Economic Development Plans, Local and Strategic Development Plans, Local and Regional Transport Strategies and takes cognisance of the review National Transport Strategy, as well as forming an integrated solution which could include such measures as traffic management, bus priority, park & ride/choose, active travel, etc. for any given AQMA.</p> <p>It must also be recognised that cities are ever evolving and any LEZ must take into account future infrastructure and economic developments. For example the Central Waterfront Development at Dundee, the Cross Tay Link Road in Perth, and other proposals contained in both the Tay Cities and Stirling & Clackmannanshire City Deals, will have significant influence on the future prosperity of the respective cities and city-regions as well as their relevant AQMAs.</p>
2	<p>Do you agree that the primary objective of LEZs should be to support the achievement of Scottish Air Quality Objectives? If not, why not?</p>
	<p>The overall objective should be the betterment of quality of life for all</p>

	<p>people living, working, and visiting cities, of which supporting the achievement of Scottish Air Quality Objectives is a primary objective. There needs to be a balanced approach recognising that LEZ's are one option in delivering air quality improvements, with other options such as traffic management, bus priority, and park & ride/choose, active travel, etc. also available.</p>
3a	<p>Do you agree with the proposed minimum mandatory Euro emission criteria for Scottish LEZs?</p>
	<p>Tactran is in agreement with the minimum mandatory Euro emission criteria and that it should be applied consistently across all Scottish LEZs.</p> <p>Also see answer to Q14 regarding CO2 emissions.</p>
3b	<p>Do you agree with the proposal to use the NMF modelling in tandem with the NLEF appraisal to identify the vehicle types for inclusion within a LEZ?</p>
	<p>As with any modelling, its purpose is to provide the decision makers with enough information to make an informed decision. Therefore, although it is agreed that NMF modelling and NLEF appraisal should be used, there will be other factors that also need to be considered.</p> <p>The NMF modelling that is currently being undertaken provides information on broad brush policy decisions e.g. which vehicle types are to be included in a LEZ. However, this needs to be combined with suitable traffic modelling to ensure there are no unintended consequences i.e. traffic diverts onto other roads to avoid LEZ and causes air quality and other issues on diverted routes.</p>
3c	<p>Should emission sources from construction machinery and/or large or small van refrigerated units be included in the LEZ scope, and if so should their inclusion be immediate or after a period of time?</p>
	<p>Recognising the importance of these types of vehicles in supporting economic growth and activity they should be exempt initially and phased in over time, where a need to do so has been identified. There may also be difficulties in enforcing these emission sources.</p>
4	<p>What are your views on adopting a national road access restriction scheme for LEZs across difference classes of vehicles?</p>
	<p>Tactran agrees that a national penalty scheme for LEZs that is consistent across all LEZs in Scotland should be introduced.</p> <p>Care will need to be taken to ensure the driving public are aware of the need for an LEZ, to ensure the penalty scheme is not seen as another "road user tax".</p>
5	<p>What are your views on the proposed LEZ hours of operation, in particular whether local authorities should be able to decide on LEZ hours of operation for their own LEZs?</p>
	<p>Tactran agrees with the Scottish Government's preference for LEZs to</p>

	operate continuously, 24 hours a day, seven days a week, all year round, throughout all Scottish LEZs for general consistency and public/road user familiarity.
6	What are your views on Automatic Number Plate Recognition enforcement of LEZs?
	<p>Tactran agrees with the Scottish Government preference for ANPR to monitor and enforce LEZs, as this will provide the most complete enforcement. However, there are cost implications in setting up and maintaining this facility that will require to be fully funded.</p> <p>Other benefits in terms of traffic data collection could assist with the business case for such equipment.</p>
7a	What exemptions should be applied to allow LEZ to operate robustly? Please be as specific as possible in your reasoning.
	<p>Tactran agrees that exemptions of the type identified within the document could be merited and will need careful consideration and only allowed where there is good reason and where it does not undermine the LEZ objectives.</p> <p>Mention is made of consideration of equality and socio-economic factors to ensure that LEZs do not create unintended consequences for society. One of the exemption examples regarding shift working states evidence will be required from the vehicle owner that no alternative public transport options exist. There is significant risk to equality in this regard not just for shift workers. In general within city/urban areas, public transport is available, but in rural areas there is very often inadequate or no public transport option. Many rural hinterland areas surrounding cities have populations which have lower socio-economic demographics, but rely on access to the city to provide employment and other essential services and social needs. People, particularly those suffering from transport poverty, in these areas could suffer disproportionately as they may not be able to afford vehicles with the required Euro engine standard to access a LEZ, and there may be no public transport alternative available. Consideration would need to be given as to whether public transport options can be made available, for example Park & Ride/Choose, prior to a LEZ being introduced, with funding implications an additional consideration.</p>
7b	Should exemptions be consistent across all Scottish local authorities?
	Tactran agrees that exemptions should be consistent across all Scottish Local Authorities for general consistency and public/road user understanding and familiarity.
8	What are your views on LEZ lead-in times and sunset periods for vehicle types shown in Table 2?
	Tactran is supportive of LEZ lead-in times and sunset periods. As outlined within the document, Belgium and France as well as other UK LEZ's have adopted a 4 year lead in time. Given this experience Scotland should adopt a similar timeframe.

9	<p>What are your views about retrofitting technology and an Engine Retrofitting Centre to upgrade commercial vehicles to cleaner engines, in order to meet the minimum mandatory Euro emission criteria for Scottish LEZs?</p>
	<p>The short timescales proposed for introduction of LEZs will be challenging and lead fleet and bus operators to retrofit vehicles, rather than pursue a programmed purchase of newer cleaner vehicles once current vehicles are time expired. This in the long run could lead to extending the life of older, more polluting vehicles, rather than new low emission vehicles.</p> <p>The views and compliance capacity of fleet (freight and passenger transport) and local bus operators, regarding cost and timing of LEZ introduction and compliance, in both the short and longer-term, should be sought and considered before implementation.</p>
10	<p>How can the Scottish Government best target any funding to support LEZ implementation?</p>
	<p>Any LEZ introduced would need to be fully funded by the Scottish Government, including the set up costs, additional infrastructure (direct and indirect), enforcement regime and on-going running costs. Additionally, expert personnel support, either through consultants or the provision of additional funding to employ staff, is required to support the development of a Business Case and other associated elements of the National Low Emission Framework process.</p> <p>It should be noted that although a LEZ is likely to be implemented within one local authority area, it will have influence on the population of a wider catchment, regionally and nationally, for private car drivers and commercial vehicles as well as bus operators.</p> <p>Bus operators will also require significant financial assistance for low emission vehicles and additional/increased funding support and incentives, along the lines of the Green Bus Fund, are likely to be required from Government to encourage the early and increased uptake of cleaner private and commercial vehicles.</p>
11	<p>What criteria should the Scottish Government use to measure and assess LEZ effectiveness?</p>
	<p>Tactran agrees with the Scottish Government proposal to utilise the existing network of air quality sensors and diffusion tubes, in tandem with NMF model datapoints, to evaluate the effectiveness of LEZ actions.</p> <p>In addition it is assumed that ANPR enforcement could provide valuable information on number of vehicles, vehicle km and vehicle types entering and moving within LEZ zones. This would allow further correlation between vehicle trips and air quality, to assess whether the LEZ is having the desired outcome or whether there are factors other than traffic emissions affecting air quality.</p> <p>There may also be a need to assess impact on city centre economic performance (either positive or negative) as part of this assessment.</p>

12	What information should the Scottish Government provide to vehicle owners before a LEZ is put in place, during a lead-in time and once LEZ enforcement starts?
	<p>Tactran is supportive of the Scottish Government proposal to use the Scottish Air Quality website as the central repository for information related to LEZ, with clear links to local authority and RTP websites.</p> <p>In addition to clear information on the LEZ locations and geographical boundaries, hours of operation, vehicles' applicability, etc., during lead-in times clear information on the objectives of LEZ, the alternatives considered and the full package of measures being put in place will be required to ensure buy-in and supportive compliance from the general public.</p> <p>Once LEZ's are in place, vehicle owners must have very clear information as to whether their vehicle is suitable to enter the LEZ or if not, what the alternatives are. Again clear links to local authority and RTP websites would be beneficial as they provide advice and information on sustainable and active travel alternative to car use.</p>
13	What actions should local or central government consider in tandem with LEZs to address air pollution?
	<p>Tactran agrees that LEZs should operate in a complementary manner with existing and future transport and placemaking policies and action plans, in order to support delivery of the CAFS 2020 compliance target and achievement of other national, regional and local strategy/plan objectives and outcomes.</p> <p>This holistic approach will ensure the need for LEZs are considered alongside complementary measures such as freight consolidation centres, traffic management, parking policy, park & ride/choose, active travel, promotion of public transport etc. These need to be consistent with the relevant National, Regional and Local Transport Strategies, as well as Local and Strategic Development Plans, Economic and Health & Wellbeing Strategies etc.</p>
14	How can LEZs help to tackle climate change, by reducing CO2 emissions in tandem with air pollution emissions?
	<p>Tactran recognises that LEZs will also contribute towards reducing greenhouse gas emissions.</p> <p>However, there is a concern that by specifying a higher Euro engine standard for diesel compared to petrol engines, this may result in a greater number of lower standard petrol engines vehicles being driven with consequences on greenhouse gas emissions. It is understood that although diesel engines have a more detrimental effect on air quality, petrol engines are more damaging to CO2 greenhouse gas. It is suggested that a more "equal" minimum standard of diesel and petrol engines, which recognise and reflect the relative climate change and air quality impacts of petrol and diesel engines should be set.</p>

	<p>Linked to the above comment, Tactran notes and welcomes the Scottish Government's proposal to work with local authorities, Regional Transport Partnerships and other partners and stakeholders to evaluate the scope for urban-wide low emission zones with a specific focus on climate change (CO2) emissions, as well as air pollution more generally. However, if all urban areas are to become low emission zones in their entirety, this is in effect a national low emission zone, as at one time or another, the vast majority of vehicles will enter an urban area. Given this, it may be simpler and more effective/efficient to introduce a nation low emission scheme. Tactran looks forward to further discussion with Scottish Government in this regard.</p>
15	<p>What measures (including LEZs) would make a difference in addressing both road congestion and air pollution emissions at the same time?</p>
	<p>Tactran welcomes the Scottish Government's proposal to incorporate congestion management into all stages of LEZ design and operation. As outlined in the document this encompasses technology solutions such as low carbon vehicles and demand management measures to reduce congestion and increase urban traffic speeds. Promotion of public transport, active travel, reducing the need to travel, travel planning, car clubs and providing information on alternative to private car use all have a contribution to reducing emissions and are integral to Tactran's RTS and current priorities for RTS delivery.</p>
16	<p>Do you have any other comments that you would like to add on the Scottish Government's proposals for LEZs</p>
	<p>As part of monitoring LEZs it would be useful if research could be undertaken on the economic impact of introducing a LEZ. For example for a city centre LEZ, will it be seen as an impediment to accessing the city centre or will the placemaking benefits of improved air quality be seen as an attraction?</p>
17	<p>What impacts do you think LEZs may have on particular groups of people, with particular reference to the 'protected characteristics' listed in paragraph 5.2? Please be as specific as possible in your reasoning.</p>
	<p>LEZs are likely to have beneficial health effects on people who reside within LEZ zones, particularly the young and old benefiting from better air quality.</p> <p>However, there is concern that LEZs will impact disproportionately on the less affluent in society, as those more affluent are able to afford vehicles which meet LEZ Euro engine standards.</p> <p>Lower socio-economic groups may not be able to afford LEZ compliant vehicles and will therefore need alternative transport arrangements to access employment, health, social and leisure requirements. In general, in urban areas buses provide this alternative. However, in many rural hinterlands, people who rely on access to cities do not have access</p>

	(availability, frequency and possibly financial) to a suitable bus service to provide alternative transport and could therefore be excluded from accessing employment, training, health, social, leisure and other opportunities. Other measures such as park & ride/choose may need to be introduced and funded.
18	Do you think the LEZ proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector? Please be as specific as possible in your reasoning.
	<p>The proposals have the potential to increase cost burdens on bus operators, fleet owners and the general public by requirement for upgraded vehicles. There is a concern that additional cost burdens on bus operators must not lead to the “unintended consequence” of contraction/withdrawals in the overall bus network, with wider socio-economic and environmental impacts in communities which are directly and indirectly affected/covered by LEZs.</p> <p>There will be an additional and ongoing cost burden on Local and Scottish Government for implementation, maintenance and enforcement of LEZs, including the introduction and maintenance of complementary measures such as ongoing monitoring and delivery and ongoing operation of measures such as park and ride/choose.</p>
19	What impacts do you think LEZs may have on the privacy of individuals? Please be as specific as possible in your reasoning.
	No comment
20	Are there any likely impacts the proposals contained in this consultation may have upon the environment? Please be as specific as possible in your reasoning.
	There may be pollution, noise and road safety implications in areas surrounding LEZs as a result of traffic and parking displacement.