



Appendix B: Responses to issues raised as part of our second consultation on the Clean Air Charging Zone (CAZ).

Last updated: 8th October 2018

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23. The timescales for taxi/private hire vehicles to upgrade their vehicles before the implementation of the CAZ is too short.
24. LCC should include liquefied petroleum gas (LPG) fuelled vehicles as a compliant form of vehicle as the NOx reductions are significant.
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26. LCC should raise the maximum age allowed for vehicles being first licensed, as there is a limited supply of second hand petrol-hybrid or electric vehicles.
27. Many petrol-hybrid vehicles have limited luggage capacity and are impractical for some common taxi functions (for example, airport runs).





28. LCC should ensure that taxi/private hire vehicles registered outside the authority will also be charged, as to do otherwise would be unfair.
29. The CAZ will be unfair to drivers who take temporary leave from work but still drive within the CAZ boundary.
30. LCC should ring-fence funding to ensure that it is shared equally among all taxi/private hire individuals and organisations rather than being dominated by larger companies.
31. Private hire drivers should be allowed to use bus lanes to reduce their need to idle in traffic.
32. The CAZ will be unfair to drivers of wheelchair-accessible vehicles as there are no petrol-hybrid or electric vehicles suitable for this purpose. Therefore, the policy will discriminate against disabled people.
33. The CAZ is unfair to taxi and private hire owners that have bought their vehicle on finance and are still paying monthly instalments. They cannot afford to upgrade their vehicle or pay charges.

Heavy Goods Vehicle (HGV) Operator Specific

34. The CAZ daily charge of £100 (announced in December 2016) for affected vehicles is too expensive.
35. The timescales for affected HGV operators to upgrade their vehicles before the implementation of the CAZ are too short and much shorter than typical replacement cycles.
36. LCC should phase in the minimum emissions standards for HGVs until 2022 to mitigate this.
37. A national intercity charging policy is essential for HGV operators.
38. LCC should offer support packages that help operators to upgrade their vehicles, rather than fund a retrofit solution, as upgraded vehicles would have a higher residual value.
39. There is a limited supply of second-hand EU6 vehicles and an increasing demand (partly due to the introduction of Clean Air Zones) which is raising





average prices and making them unaffordable for operators to buy without financial assistance.

40. The government should communicate with businesses at a national level and highlight the cities required to take action to encourage suppliers to upgrade their fleet, rather than passing on charges incurred or refusing to deliver to areas with CAZs.
41. LCC should exempt specialist HGVs if specific retrofitting solutions are not available.
42. LCC should ensure that HGVs registered outside the country will also be charged, as to do otherwise would be unfair.
43. LCC should introduce tapered/phased charging according to the emissions standard of the vehicle.
44. The CAZ will reduce the competitiveness of HGVs compared to LGVs.

Buses/Coaches Specific

45. The CAZ daily charge of £100 (announced in December 2016) for affected vehicles is too expensive.
46. Less profitable bus services will receive service cuts as a result of the CAZ charges.
47. The timescales for affected non-scheduled bus and coach operators to upgrade their vehicles before the implementation of the CAZ are too short and are much shorter than typical replacement cycles.
48. The CAZ charges for bus and coaches are unfair as bus and coaches help to remove a large number of private cars away from the road network.
49. It is unfair for the CAZ charges to affect buses and coaches but not cars. This will encourage more people to drive.
50. The CAZ boundary would place operators with depots within the zone at a commercial disadvantage compared to operators outside of the zone, as they cannot choose which vehicles to send within it.

Businesses Specific



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51. [The CAZ will negatively impact my business/businesses in Leeds.](#)
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Environmental Group Specific

55. [LCC should charge private vehicles that do not meet the minimum emissions standards by 2020.](#)
56. [LCC should charge light goods vehicles \(LGVs\) that do not meet the minimum emissions standards by 2020.](#)
57. [LCC should not have reduced the proposed £100 daily charge to £50 for buses, coaches and HGVs that do not meet the minimum emissions standards. LCC should offer more financial support instead.](#)
58. [LCC should minimise exemptions as much as possible to ensure that reductions in air pollution are maximised.](#)
59. [The proposed charge exemption for school buses EU3 and above is too lenient. Children are the worst affected by air pollution.](#)
60. [LCC should minimise diversions that enter the CAZ area to best improve air quality.](#)
61. [LCC should deliver anti-idling signage as well as effectively enforce idling offences—particularly in areas where members of society are most vulnerable to the effects of air pollution dwell \(i.e. outside schools and hospitals\).](#)
62. [LCC should invest in public transport infrastructure and promote active travel.](#)
63. [LCC should introduce more electric vehicle charge points in the city.](#)
64. [LCC should offer subsidised car club membership, free public transport season tickets, and/or interest-free loans for residents to purchase e-bikes.](#)



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65. LCC should introduce more ambitious policies to achieve further air quality improvements in the future, including the introduction of a ULEV zone and car-free days.
 66. LCC should implement the CAZ in 2019 to improve air quality sooner.
 67. LCC should not have reduced the proposed CAZ area as this will reduce the health impacts of the CAZ in some of the most deprived areas in Leeds.
 68. LCC should encourage major employers in Leeds to reduce the need for individual travel by supporting car share, work from home, flexible working policies.
 69. LCC should invest in broadband infrastructure to enable the wider rollout of work from home policies.
 70. LCC should implement a workplace parking levy (like Nottingham) and invest the revenue in subsidised transport and infrastructure investment.
 71. LCC should increase greenery across the city centre to absorb air pollution.
 72. LCC should encourage schools to promote walking buses.
 73. LCC should encourage cycling amongst staff by providing showering facilities and secure cycle storage in our workplaces.



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1. Improving air quality within the shortest possible timescale should be a priority for Leeds.

Our plans for a Clean Air Charging Zone will improve air quality in Leeds within the shortest possible time, reducing air pollution and protecting the health of everyone in the city. Tackling air pollution will require a citywide effort so whilst Leeds City Council has an important role to play, so do residents, local businesses, schools and those who work in the city.

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2. LCC should offer ‘sunset periods’ to help give some affected vehicle owners time to transition.

In some cases, LCC believe it is practical and fair to offer ‘sunset periods’ and exemptions. In our latest plans we outlined plans to offer ‘sunset periods’ which temporarily exempt vehicles from charges in the following circumstances:

1) Organisations or individuals who have placed an order for a compliant vehicle or retrofit solution within six months of our proposals being approved by the government but, due to increased market demand or a limited supply, have not been able to receive the compliant vehicle or retrofit solution before 6th January 2020. This sunset period will apply until the order has been delivered;

2) Taxi and private hire vehicles that have purchased their vehicle as part of a financial agreement prior to 17th October 2018 and who have an outstanding balance on this agreement as of January 2020. This sunset period will apply up to and including the 31st December 2021 or until the financial agreement is scheduled to end, whichever is soonest;



3) Taxi and private hire vehicles that can carry 8 or more passengers. This sunset period will apply up to and including 31st December 2021, after which a Euro 6 minimum emissions standard may apply;



4) Wheelchair Accessible Vehicles (WAVS) used for taxi and private hire. This sunset period will apply up to and including the 31st December 2021, after which a Euro 6 minimum emissions standard may apply.

For information on proposed exemptions, go to #4.

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3. LCC should provide ‘sunset periods’ to emergency service vehicles, charity vehicles, community transport vehicles and vehicles used by blue badge holders.

Leeds City Council have reflected upon this feedback in our final proposals for the Clean Air Charging Zone (CAZ) and our plans minimise and/or exempt these vehicle from charges:

1) Community transport and vehicles used by charities which are classified as minibuses or other light goods vehicles (LGVs) would not be subject to charges;

2) Emergency services vehicles will be fully exempt from charges;

3) All Wheelchair Accessible Vehicles (WAVs) used for taxi and private hire, will benefit from a sunset period up to and including 31st December 2021;

4) Private vehicles used by blue badge holders, like all private vehicles, will not be subject to charges.

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4. LCC should exempt some vehicles from paying charges

Leeds City Council's plans for a Clean Air Charging Zone (CAZ) follow government guidance (the National Clean Air Zone Framework) and exempt the following vehicles from charges:

- 1) Vehicles with a historic tax class (see <https://www.gov.uk/historic-vehicles> for eligibility);
- 2) Military vehicles;
- 3) Specialist vehicles that are non-road going but may drive on the public highway occasionally such as agricultural machines, digging machines, mobile cranes, etc.

In addition, our plans will also exempt the following vehicles from charges:

- 4) Showmen's guild vehicles (e.g. fairground and funfair vehicles);
- 5) Non-commercial vintage buses aged between 20 – 39 years old (for a fixed number of days per year—currently anticipated to be 10 days);
- 6) School buses above Euro 3 emissions standards;
- 7) Vehicles driving within the zone because of a road diversion who would otherwise not have entered the CAZ;
- 8) Emergency services vehicles.

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5. LCC should charge private vehicles that do not meet the minimum emissions standards by 2020.



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Leeds City Council's plans for a Clean Air Charging Zone (CAZ) in 2020 will not charge private vehicles of any emissions standard for driving within the zone for numerous reasons.

1) Our modelling shows that charging private vehicles is not necessary to reduce air pollution to within strict legal limits within the required timescale. By not charging private vehicles, we can reduce the economic impact of the Clean Air Charging Zone (CAZ) on the city whilst still achieving improvements in air quality.

2) Due to the sheer number of vehicles that would need to be replaced before 2020, charging private vehicles that do not meet the minimum emissions standard would simply be impractical.

3) By limiting the CAZ charge to a smaller group of vehicles we are able to use any government funding we receive to provide more generous support that will better help owners of affected vehicles upgrade to cleaner models. To maximise the effectiveness of this support it is logical to target the most polluting vehicles. On a per vehicle basis private cars tend to be less polluting than taxis, buses and HGVs due to their small engine size and relatively low mileage.

4) Independent testing of small vehicles has identified that the real-world emissions of many Euro 6 diesel cars are broadly similar to those of older vehicles. Therefore, encouraging drivers of older cars to switch to a Euro 6 diesel vehicle through charges would not significantly reduce their emissions. On the other hand, Euro 6 emissions engines in HGVs and buses have been demonstrated to be much less polluting.

5) The financial burden of charging private vehicles would disproportionately affect the city's less affluent communities who are more likely to have an older,





non-compliant vehicle. We do not think it would be acceptable to pass such a regressive policy.

6) There are some circumstances in which travelling by private car is the only realistic transport option, e.g. those who work irregular hours or who aren't frequently served by nearby public transport services. We do not believe that it would be fair to charge private vehicles until feasible and practical alternatives to driving are widely and easily available.

7) Charging private vehicles would encourage owners of non-compliant (mostly diesel) vehicles to purchase Euro 4 petrol vehicles as these would be the cheapest second-hand vehicles compliant with the minimum emission standards of the CAZ. While Euro 4 petrol vehicles do emit significantly less air pollution than diesel vehicles they also emit much greater levels of carbon dioxide (CO₂) — a greenhouse gas that contributes to climate change. This would work against the council's ambition of reducing carbon emissions across the city.

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6. LCC should charge private vehicles that do not meet the minimum emissions standards by 2030.

We will begin to consider the future of the zone and additional measures to improve air quality in 2020. Any changes or additional measures we propose will be subject to further public consultation.

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7. LCC are charging private vehicles that do not meet the minimum emissions standard.

This is incorrect. Private vehicles will not be charged for driving within the Clean Air Charging Zone (CAZ). Only the worst polluting buses, coaches, taxis, private hire, and heavy goods vehicles (HGVs) that do not meet our



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minimum emissions standards will be subject to charges.

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8. LCC should increase the number of low emissions vehicles in their fleet.

Leeds City Council recognise that we must lead the way in reducing our own contributions to air pollution and we are doing just that. Currently, the council have more electric vehicles in our fleet than any other local authority in England and we will be continuously moving our fleet to cleaner vehicles. We have a bold ambition to fully transition our fleet to zero or ultra-low emission vehicles by 2025.

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9. LCC should provide advice for affected vehicle owners to support air quality improvements.

Leeds City Council believe that it is important to support affected businesses in order for the Clean Air Charging Zone (CAZ) to be most successful and have the greatest impact on reducing air pollution.

Before and after the CAZ goes live in 2020, we will be working closely with all affected businesses to provide them with advice, recommendations and support. In our plans, we outlined a number of different financial support packages to help businesses upgrade or retrofit their vehicles, subject to funding by national government. More information about this support will be available on our website.

In addition, charge revenue collected from the implementation of the CAZ (in excess of any administration costs) will be used to further support affected businesses move to cleaner vehicles.

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10. The CAZ will negatively impact businesses in Leeds.

Like other cities, Leeds City Council has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale. As the first major city to announce and consult on our Clean Air Charging Zone (CAZ) proposals we have done our best to give affected businesses as much time to prepare as possible.

Nevertheless, we acknowledge that without adequate support there is a risk that some businesses could be financially affected by these proposals. We believe that it is important to support these businesses and that by doing so we can ensure that the CAZ most effectively improves air quality in the city.

Before and after the CAZ goes live in 2020, we will be working closely with all affected businesses to provide them with advice, recommendations and support. In our plans, we outlined a number of different financial support packages to help businesses upgrade or retrofit their vehicles, subject to funding by national government. More information about this support will be available on our website.

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11. The CAZ will negatively impact tourism and the visitor economy in Leeds.

Every year, tourists come from far and wide to experience everything Leeds has to offer—including our many world-class events. This visitor economy has a hugely positive impact on local businesses and helps to create and sustain jobs for people who live here.

Thankfully, we do not believe the Charging Clean Air Zone (CAZ) will have any significant impact on this valuable visitor economy.

The vast majority of tourists travel to—and within—Leeds by methods not



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affected by the proposed CAZ. In 2017, 72% of visitors came by plane, train or private car and when travelling around the city only 1% of visitors choose to get around by bus.



Before and after the CAZ goes live in 2020 we will be working closely with all affected businesses (including bus and coach companies) to provide them with advice, recommendations and support. In our plans, we outlined a number of different financial support packages to help businesses upgrade or retrofit their vehicles, subject to funding by national government. More information about this support will be available on our website.

We believe that by improving air quality across Leeds and making the city a cleaner and healthier place to dwell, Leeds' CAZ will make our city an even more attractive place to visit.

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12. LCC should provide more electric vehicle charging points.

Leeds City Council are working hard to do this. The council are working with a range of organisations, including the West Yorkshire Combined Authority (WYCA), to support the development of charge points for electric vehicles across the city. Procurement is currently underway for the installation of up to 88 new rapid electric vehicle charge points across West Yorkshire by 2020—30 of which will be installed in Leeds—as a result of a successful joint funding bid submitted to the government by the WYCA on behalf of the county's district councils.

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13. The purpose of the CAZ is to generate revenue for LCC.

This is incorrect. The purpose of the Clean Air Charging Zone (CAZ) is to reduce air pollution and protect the health of everyone in Leeds. Any net revenue from the CAZ over and above the expenses incurred in connection



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with the scheme can only be used to facilitate the achievement of our local transport policies. Government legislation restricts the council from using charge revenue for any other purpose.

Our objective is to encourage owners of the worst polluting, non-compliant vehicles upgrade or retrofit their vehicles to comply with the minimum emissions standards and therefore not be subject to charges. Therefore, we are proposing a range of support packages (subject to government funding) that will be available to owners of affected vehicles to assist them in doing this. More information about this support will be available on our website.

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14. LCC should invest in cycling infrastructure to encourage modal shift.

Leeds City Council has a long-term ambition to make Leeds a cycle-friendly city by investing in cycling infrastructure and embracing cycling as a normal, everyday activity for everyone. Published in June 2017, the "[Leeds Cycling Starts Here Strategy](#)" outlines the ambition of Leeds City Council and partners to develop a full network of cycle routes within the city and encourage more people to cycle regularly. Leeds is currently constructing the next phase of the CityConnect Cycle Route that delivers segregated cycle facilities between the Leeds Outer Ring Road at Cross Gates to Bradford.

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15. The CAZ will increase the average cost of bus fares.

As part of the city's "Connecting Leeds" transport strategy, all three major bus companies (First Leeds, Arriva and Transdev) have committed to ensuring their vehicles meet the latest emissions standards by 2020. Each company has already begun to phase in these newer, less polluting vehicles. These vehicles comply with the minimum emissions standards set out by the Clean Air Charging Zone (CAZ) and therefore would not be subject to CAZ charges. It is also worth noting that bus passengers are exposed to some of the highest



levels of air pollution and therefore will experience some of the biggest health benefits resulting from the CAZ.



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16. LCC need to improve public transport/congestion in Leeds/need a mass transit system.

Leeds City Council are working hard to improve public transport and congestion in Leeds as part of the “Connecting Leeds” transport strategy developed in partnership with the West Yorkshire Combined Authority (WYCA).

We’ve made a good start with cleaner buses, park and ride hubs, major highways improvements, cycling infrastructure and new train stations but the council has even more ambitious plans including more train stations, new bus stops, a new high frequency bus network, increased park and ride space, the East Leeds Orbital Road and much more.

As part of the “Connecting Leeds” and longer-term transport strategy for the wider region led by the WYCA, work continues on proposals for a mass transit system with initial findings due to be released later this year.

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Taxi/Private Hire Specific

17. The CAZ is unfair to drivers who drive their vehicle within the city on non-working days.

Leeds City Council have listened to these concerns and developed a solution that takes them into account. As an alternative to paying daily charges, drivers licensed by Leeds City Council will also have the option of instead paying an advance charge of £50 to cover a seven-day period. This represents a discount equivalent to three days of daily charges.



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However, it remains our preference that no taxi or private hire vehicle will need to be charged. Subject to government funding, we will be offering a range of support packages to affected drivers. This includes an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

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18. The CAZ daily charge of £12.50 for affected taxi/private hire vehicles is too high.

Leeds City Council have set the daily charge for non-compliant taxi and private hire vehicles driving within the Clean Air Charging Zone (CAZ) at £12.50 per day as this will effectively incentivise drivers to upgrade their vehicles. As an alternative to paying daily charges, drivers licensed by Leeds City Council will also have the option of instead paying an advance charge of £50 to cover a seven-day period. This represents a discount equivalent to three days of daily charges. However, it remains our preference that no taxi or private hire vehicle will need to be charged. Subject to government funding, we will be offering a range of support packages to affected drivers. This includes an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

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19. LCC should provide financial support (including grants and interest free loans) to help affected taxi/private hire owners upgrade their vehicles.

Leeds City Council have announced multiple support packages (subject to





government funding) that will help owners upgrade their non-compliant vehicles and help reduce their contribution to air pollution. These support packages include an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

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20. Light goods vehicles (LGVs) that do not meet the minimum emission vehicles should also be charged.

Leeds City Council have taken the decision not to charge LGVs because our modelling shows that doing so is not necessary to reduce air pollution to within strict legal limits within the required timescale, and this will reduce the economic impact of the Clean Air Charging Zone (CAZ) on the city. In addition, by limiting the charge to a smaller group of vehicles we will be able to use any government funding we receive to provide more generous support packages that will better help owners of affected non-compliant vehicles upgrade to cleaner models.

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21. The CAZ is unfair to taxi/private hire owners as the minimum standard for emissions goes beyond those set out in the government's Clean Air Zone Framework.

Leeds City Council have decided to set the minimum emissions standard for most taxi and private hire vehicles capable of carrying four passengers or fewer beyond the standard set out in the National Clean Air Zone Framework because our modelling shows that doing so is necessary. If we did not set the minimum emissions standard for these taxi and private hire vehicles at ultra-low emission vehicle (ULEV) level or equivalent, the proposed Clean Air Charging Zone (CAZ) would not reduce air pollution levels to within strict legal



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limits in the required timescale.


By limiting the charge to a smaller group of affected vehicles we are able to use any government funding we receive to provide more generous support packages that will help drivers upgrade their affected non-compliant vehicles to cleaner vehicles that will not be charged. These support packages include an interest-free loan (up to the value of £10,000) and an additional grant (up to the value of £3,000) to help drivers upgrade to a hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

Furthermore, the council had concerns about the environmental benefits of the Euro 6 diesel and Euro 4 petrol minimum emission standards set out by the national framework. Owners of non-compliant diesel taxi/private hire vehicles would be most likely to replace their vehicle with Euro 4 petrol vehicles as these would be the least expensive second-hand vehicles that comply with the standards required by the CAZ. Euro 4 petrol vehicles do emit significantly less air pollution than diesel vehicles, however, they also emit much greater levels of carbon dioxide (CO₂) which is a major contributor to climate change. This would therefore obstruct the council's ambition to reduce CO₂ emissions across the city. Similarly, the environmental benefits of transitioning to Euro 6 vehicles is insignificant as independent testing has identified the real-world emissions of many Euro 6 diesel cars as broadly similar to those of older vehicles.

To support drivers with the transition to the ULEV minimum emission standard, Euro 6 diesel and Euro 4 petrol vehicles that are already licenced will be temporarily exempt from charges up to and including the 31st December 2021.

Finally, the council recognises that there is a limited supply of ultra-low





emission or electric vehicles capable of carrying 5 or more passengers and we have reflected this feedback in our final proposals. Because of this, we have set the minimum emissions standard for Leeds licensed executive vehicles and vehicles capable of carrying between 5 and 7 passengers at Euro 6 diesel and Euro 4 petrol emissions standard rather than ultra-low emission standard. Our proposals also include sunset periods for all taxi/private hire vehicles capable of carrying 8 or more passengers. This sunset period will only apply to vehicles licensed before or on the 17th October 2018 and is proposed to expire after 31st December 2021.

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22. The minimum standards for emissions proposed by LCC should be reduced, as existing electric charging infrastructure can't support so many petrol-hybrid or electric vehicles by 2022.

There are four types of vehicle that will comply with the Clean Air Charging Zone's (CAZ) minimum emission standards that will apply to most taxi and private hire vehicles capable of carrying four or fewer passengers by 2022: petrol-hybrid vehicles, plug-in hybrid vehicles, electric vehicles and liquefied petroleum gas (LPG) fuelled vehicles.

Petrol and LPG are widely available at existing fuel stations. The council are working with a range of organisations, including the West Yorkshire Combined Authority (WYCA), to support the development of charge points for electric vehicles across the city. Procurement is currently underway for the installation of up to 88 new rapid electric vehicle charge points across West Yorkshire by 2020—30 of which will be installed in Leeds—as a result of a successful joint funding bid submitted to the government by the WYCA on behalf of the county's district councils.

Each of the rapid charge points in this scheme will have two parking bays: one



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bay available for use by the general public and another for the sole use of taxi/private hire operators. This new infrastructure will make it easier and more practical for taxi and private hire operators to switch to ultra-low emission vehicles (ULEVs).



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23. The timescales for taxi/private hire vehicles to upgrade their vehicles before the implementation of the CAZ is too short.

Leeds City Council understand the concerns that many taxi and private hire drivers have, and we are working hard to support all affected businesses.

Like other cities, Leeds has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale.

Working within these parameters, we have done our best to give affected businesses as much time to prepare as possible. We were the first major city to announce and consult on our CAZ proposals and are giving affected businesses the maximum time to prepare.

We have also announced multiple support packages that will help drivers upgrade their affected non-compliant vehicles to cleaner vehicles that will not be charged. These support packages, subject to government funding, include an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option. To further support drivers with the transition to the ULEV minimum emission standard, Euro 6 diesel and Euro 4 petrol vehicles that are already licenced will be temporarily exempt from charges up to and including the 31st December 2021.



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Finally, the council recognises that there is a limited supply of ultra-low emission or electric vehicles capable of carrying 5 or more passengers and we have reflected this feedback in our final proposals. Because of this, we have set the minimum emissions standard for Leeds licensed executive vehicles and vehicles capable of carrying between 5 and 7 passengers at Euro 6 diesel and Euro 4 petrol emissions standard rather than ultra-low emission standard. Our proposals also include sunset periods for all taxi/private hire vehicles capable of carrying 8 or more passengers. This sunset period will only apply to vehicles licensed before or on the 17th October 2018 and is proposed to expire after 31st December 2021.

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24. LCC should include liquefied petroleum gas (LPG) fuelled vehicles as a compliant form of vehicle as the NOx reductions are significant.

Leeds City Council have listened to and considered this suggestion and we have updated our final proposals to accept liquefied petroleum gas (LPG) fuelled vehicles as compliant with the minimum emissions standards for the Clean Air Charging Zone (CAZ). Additionally, we have updated our support packages (subject to government funding) to include interest-free loan support for LPG conversions.

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25. LCC should assist affected taxi/private hire owners by reducing costs associated with licensing of new vehicles.

Leeds City Council's licensing department is currently reviewing areas raised in feedback from the CAZ consultation including age criteria, emission standards, engine size conditions, spare wheel conditions and anti-glare glass (window tint) conditions. We have also announced multiple support packages, subject to government funding, that will help owners upgrade their non-





compliant vehicles and reduce their contribution to air pollution. These support packages include an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

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26. LCC should raise the maximum age allowed for vehicles being first licensed, as there is a limited supply of second hand petrol-hybrid or electric vehicles.

Leeds City Council's licensing department is currently reviewing areas raised in feedback from the CAZ consultation including age criteria, emission standards, engine size conditions, spare wheel conditions and anti-glare glass (window tint) conditions. We have also announced multiple support packages, subject to government funding, that will help owners upgrade their non-compliant vehicles and reduce their contribution to air pollution. These include an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

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27. Many petrol-hybrid vehicles have limited luggage capacity and are impractical for some common taxi functions (for example, airport runs).

There are four types of vehicle that will comply with the Clean Air Charging Zone's (CAZ) minimum emission standards that will apply to most taxi and private hire vehicles capable of carrying four or fewer passengers by 2022: petrol-hybrid vehicles, plug-in hybrid vehicles, electric vehicles and liquefied petroleum gas (LPG) fuelled vehicles.





Like any vehicle, each of these vehicle types has its own advantages and disadvantages. We recommend that drivers choose the most suitable vehicle type for them based on their typical journeys and the way they work.

Additionally, the council's licensing department is currently reviewing spare wheel conditions as part of an expedited licensing review. If these conditions are relaxed, capacity for luggage would be increased in all taxi/private hire vehicles licensed by Leeds City Council.

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28. LCC should ensure that taxi/private hire vehicles registered outside the authority will also be charged, as to do otherwise would be unfair.

Leeds City Council agree that it would be unfair to charge local taxi/private hire drivers without ensuring that non-compliant vehicles licensed by other local authorities will also be charged. Therefore, we will not charge any taxi/private hire vehicles until we can do so fairly using a national taxi database.

The council is currently making representations to the government on the essential nature of a national taxi database being ready for the CAZ live date: 6th January 2020. Without a national taxi database provided by the government, our automatic number plate recognition (ANPR) systems will not be able to identify—and therefore we would not be able to charge—non-compliant taxi/private hire vehicles licensed by other authorities.

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29. The CAZ will be unfair to drivers who take temporary leave from work but still drive within the CAZ boundary.

Unfortunately, there is currently no practical way for our automatic number plate recognition (ANPR) system to recognise when a taxi or private hire vehicle is being driven for work or for private use. As a result, any non-



compliant taxi or private hire vehicle driving within the Clean Air Charging Zone (CAZ) will be subject to either the daily or weekly charge.



It remains our preference, however, that no taxi or private hire vehicle will need to be charged. Subject to government funding, we will be offering a range of support packages including an interest-free loan up to the value of £10,000 and an additional grant up to the value of £3,000 to help drivers upgrade to a petrol-hybrid or electric vehicle. Alternatively, we will be offering an interest-free loan to help drivers convert their vehicle to run on liquefied petroleum gas (LPG) should they prefer this option.

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30. LCC should ring-fence funding to ensure that it is shared equally among all taxi/private hire individuals and organisations rather than being dominated by larger companies.

Leeds City Council understand the concerns that some smaller operators and individual drivers in the taxi and private hire sector have fed back to us. We are currently developing a policy that will enable us to distribute support for the sector to achieve compliance in the most equitable way possible and also comply with all relevant regulation and legislation.

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31. Private hire drivers should be allowed to use bus lanes to reduce their need to idle in traffic.

Both the emissions per passenger and the road space taken up per passenger of buses is much lower than other vehicles; they help tackle both air pollution and congestion in the city. Because of this, it is a key ambition of Leeds City Council to double bus patronage by 2027.

Whilst we understand that bus lanes are sometimes less convenient for drivers, we believe that limiting the number of vehicles that can use bus lanes



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is vital to their effectiveness to ensure that buses are as quick, reliable and attractive as possible. That way, traffic congestion will be minimised for the benefit of everyone.

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32. The CAZ will be unfair to drivers of wheelchair accessible, vehicles as there are no petrol-hybrid or electric vehicles suitable for this purpose. Therefore, the policy will discriminate against disabled people.

Leeds City Council have listened to the concerns and we agree that it would be unfair to force drivers of wheelchair accessible vehicles (WAVs) to pay a daily charge as there is a very limited supply of ultra-low emission vehicles (ULEV) suitable for wheelchairs currently available. We also recognise the valuable service these vehicles offer to disabled people. Therefore, our final proposals exempt from charges all WAVs used for taxi/private hire up to and including the 31st December 2021.

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33. The CAZ is unfair to taxi and private hire owners that have bought their vehicle on finance and are still paying monthly instalments. They cannot afford to upgrade their vehicle or pay charges.

Leeds City Council have listened to the concerns of drivers who have purchased their vehicles on finance agreements and are still paying monthly instalments. As a result, we have announced sunset periods for drivers who have entered into an existing financial agreement prior to 17th October 2018 and have an outstanding balance on their finance agreement as of January 2020. This sunset period will apply up to and including the 31st December 2021 or until the financial agreement is scheduled to end, whichever is soonest.

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Heavy Goods Vehicle (HGV) Operator Specific



34. The CAZ daily charge of £100 (announced in December 2016) for affected vehicles is too expensive.

Leeds City Council have listened to these concerns and halved the daily charge to £50 per day for non-compliant heavy goods vehicles (HGVs), buses and coaches. Additionally, we have also announced several financial support packages—including grants worth up to £16,000—that will help non-compliant HGV operators transition to less polluting vehicles. These support packages are subject to government funding.

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35. The timescales for affected HGV operators to upgrade their vehicles before the implementation of the CAZ are too short and much shorter than typical replacement cycles.

Leeds City Council understand the concerns that many HGV operators have and we are working hard to support all affected businesses.

Like other cities, Leeds has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale. Because of this, a phased in approach will not be possible.

Working within these parameters we have done our best to give affected businesses as much time to prepare as possible. We were the first major city to announce and consult on our CAZ proposals and, by proposing for it go live from January 2020, we are giving affected businesses the maximum time to prepare.

Our latest proposals also include several financial support packages—including grants worth up to £16,000—to help affected businesses transition to cleaner vehicles within these short timescales. These support packages are



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subject to government funding.

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36. LCC should introduce tapered/phased in charging for HGVs based on the minimum emissions standards of vehicles.

Leeds City Council have considered requests for the implementation of either a phased in or tapered approach to charging heavy goods vehicles (HGVs). However, as there are only small differences in the emissions between Euro 3 to Euro 5 emissions standards a tapered or phased in approach would mean charging some vehicles less money (or at a later date) despite vehicles emitting broadly equivalent levels of pollution. A tapered or phased in approach would therefore impact on the effectiveness of the Clean Air Charging Zone (CAZ) to reduce air pollution levels in Leeds to within legal limits in the shortest possible timescale. Subject to government funding, we will be offering financial support packages worth up to £16,000 to HGV operators affected to help them transition to less polluting vehicles. In addition to using funding towards retrofit solutions, operators may alternatively be able to use our financial assistance towards the cost of a new vehicle should the government accept our latest proposals.

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37. A national intercity charging policy is essential for HGV operators.

We understand and appreciate these concerns. Leeds City Council is currently making representations to the government—who are taking responsibility for a national payment system—on the essential nature of an intercity charging policy.

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38. LCC should offer support packages that help operators to upgrade their vehicles, rather than fund a retrofit solution, as upgraded vehicles would have a higher residual value.



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Leeds City Council have heard these concerns and we have proposed giving operators of affected heavy goods vehicles (HGVs) greater flexibility in how they use our financial support, worth up to £16,000. As an alternative to using our funding towards retrofit solutions operators will also be able to use the money towards the cost of a new vehicle. Applications for funding will each be assessed on a case by case basis and all financial support is subject to government funding.

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39. There is a limited supply of second-hand EU6 vehicles and an increasing demand (partly due to the introduction of Clean Air Zones) which is raising average prices and making them unaffordable for operators to buy without financial assistance.

Leeds City Council have heard these concerns and, subject to government funding, we will be offering financial support packages worth up to £16,000 to affected heavy goods vehicle (HGV) operators to help them transition to less polluting vehicles. In addition to using funding towards retrofit solutions, operators may alternatively be able to use our financial assistance towards the cost of a new vehicle should the government accept our latest proposals.

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40. The government should communicate with businesses at a national level and highlight the cities required to take action to encourage suppliers to upgrade their fleet, rather than passing on charges incurred or refusing to deliver to areas with CAZs.

Leeds City Council have listened to these concerns and have fed them back to the government for their consideration.

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41. LCC should exempt specialist HGVs if specific retrofitting solutions are not available.

Leeds City Council have heard these concerns and we have proposed giving operators of affected heavy goods vehicles (HGVs) greater flexibility in how they use our financial support, worth up to £16,000. As an alternative to using our funding towards retrofit solutions or where retrofit solutions are not available, operators will also be able to use support funding towards the cost of a new vehicle. Applications for funding will each be assessed on a case by case basis and all financial support is subject to government funding.

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42. LCC should ensure that HGVs registered outside the country will also be charged, as to do otherwise would be unfair.

Leeds City Council agree that it would be unfair to charge British heavy goods vehicles (HGVs) without ensuring that non-compliant vehicles licensed overseas will also be charged. We have received assurances from the government that there is a working party currently looking at the best solution to resolve this issue. Without a solution, our automatic number plate recognition (ANPR) systems will not be able to identify—and therefore we would not be able to charge—non-compliant HGVs that were licensed overseas.

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43. LCC should introduce tapered/phased charging according to the emissions standard of the vehicle.

Leeds City Council have considered requests for the implementation of either a phased in or tapered approach to charging heavy goods vehicles (HGVs). However, as there are only small differences in the emissions between Euro 3 to Euro 5 emissions standards a tapered or phased in approach would mean charging some vehicles less money (or at a later date) despite vehicles emitting broadly equivalent levels of pollution. A tapered or phased in



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approach would therefore impact on the effectiveness of the Clean Air Charging Zone (CAZ) to reduce air pollution levels in Leeds to within legal limits in the shortest possible timescale. Subject to government funding, we will be offering financial support packages worth up to £16,000 to HGV operators affected to help them transition to less polluting vehicles. In addition to using funding towards retrofit solutions, operators may alternatively be able to use our financial assistance towards the cost of a new vehicle should the government accept our latest proposals.

44. The CAZ will reduce the competitiveness of HGVs compared to LGVs.

Like other cities, Leeds City Council has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale.

Throughout this process we will be working closely with all heavy goods vehicle (HGV) operators to provide them with advice, recommendations and support to ensure their competitiveness. We will be offering financial support packages worth up to £16,000 to affected HGV operators to help them transition to less polluting vehicles. In addition to using funding towards retrofit solutions, operators may alternatively be able to use our financial assistance towards the cost of a new vehicle should the government accept our latest proposals. More information about these support packages will be available on our website.

In addition, charge revenue collected from the implementation of the CAZ (in excess of any administration costs) will be used to further support affected businesses move to cleaner vehicles.

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Buses/Coaches Specific



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45. The CAZ daily charge of £100 (announced in December 2016) for affected vehicles is too expensive.

Leeds City Council have listened to these concerns and have halved the daily charge to £50 per day for non-compliant heavy goods vehicles (HGVs), buses and coaches. Additionally, we have also announced several financial support packages, subject to government funding, that will help non-compliant bus and coach operators transition to less polluting vehicles.

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46. Less profitable bus services will receive service cuts as a result of the CAZ charges.

This is very unlikely. As part of the city's Connecting Leeds transport strategy, all three major bus companies (First Leeds, Arriva and Transdev) have committed to ensuring their vehicles meet the latest emissions standards by 2020. With the help of £4.2 million in financial support managed by the West Yorkshire Combined Authority (WYCA), each of the three major bus companies have already begun to phase in their newer, less polluting vehicles. These vehicles comply with the minimum emissions standards set out by the Clean Air Charging Zone (CAZ) and therefore would not be subject to CAZ charges. Additionally, bus passengers are exposed to some of the highest levels of air pollution and therefore will experience some of the biggest health benefits resulting from the CAZ.

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47. The timescales for affected non-scheduled bus and coach operators to upgrade their vehicles before the implementation of the CAZ are too short and are much shorter than typical replacement cycles.

Leeds City Council understand the concerns that many bus and coach operators have regarding timescales and we are working hard to support all affected businesses.



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Like other cities, Leeds has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale. Because of this, a phased in approach will not be possible.

Working within these parameters we have done our best to give affected businesses as much time to prepare as possible. We were the first major city to announce and consult on our CAZ proposals and, by proposing for it go live from January 2020, we are giving affected businesses the maximum time to prepare.

Our latest proposals also include financial support packages (subject to government funding) worth up to £16,000 that will help affected businesses retrofit their vehicles to achieve compliance within these short timescales.

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48. The CAZ charges for bus and coaches are unfair as bus and coaches help to remove a large number of private cars away from the road network.

Leeds City Council recognise that coaches and buses offer a vital service to residents in Leeds and play an important role in reducing the number of private cars on our roads.

However, the council also recognise that buses and coaches are some of the worst polluting vehicles on the city's roads in terms of pollution per vehicle. If we did not charge the worst polluting buses and coaches our modelling shows that the proposed Clean Air Charging Zone (CAZ) would not reduce air pollution to within legal limits.

It remains our preference that no bus or coach will need to be charged. We will be offering a range of support packages (subject to government funding) to help operators upgrade their older vehicles to compliant vehicles and avoid



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charges.

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49. It is unfair for the CAZ charges to affect buses and coaches but not cars.

This will encourage more people to drive.

Leeds City Council's plans for a Clean Air Charging Zone (CAZ) in 2020 will not charge private vehicles of any emissions standard for driving within the zone for numerous reasons.

1) Our modelling shows that charging private vehicles is not necessary to reduce air pollution to within strict legal limits within the required timescale. By not charging private vehicles, we can reduce the economic impact of the Clean Air Charging Zone (CAZ) on the city whilst still achieving improvements in air quality.

2) Due to the sheer number of vehicles that would need to be replaced before 2020, charging private vehicles that do not meet the minimum emissions standard would simply be impractical.

3) By limiting the CAZ charge to a smaller group of vehicles we are able to use any government funding we receive to provide more generous support that will better help owners of affected vehicles upgrade to cleaner models. To maximise the effectiveness of this support it is logical to target the most polluting vehicles. On a per vehicle basis private cars tend to be less polluting than taxis, buses and HGVs due to their small engine size and relatively low mileage.

4) Independent testing of small vehicles has identified that the real-world emissions of many Euro 6 diesel cars are broadly similar to those of older vehicles. Therefore, encouraging drivers of older cars to switch to a Euro 6 diesel vehicle through charges would not significantly reduce their emissions.



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On the other hand, Euro 6 emissions engines in HGVs and buses have been demonstrated to be much less polluting.

5) The financial burden of charging private vehicles would disproportionately affect the city's less affluent communities who are more likely to have an older, non-compliant vehicle. We do not think it would be acceptable to pass such a regressive policy.

6) There are some circumstances in which travelling by private car is the only realistic transport option, e.g. those who work irregular hours or who aren't frequently served by nearby public transport services. We do not believe that it would be fair to charge private vehicles until feasible and practical alternatives to driving are widely and easily available.

7) Charging private vehicles would encourage owners of non-compliant (mostly diesel) vehicles to purchase Euro 4 petrol vehicles as these would be the cheapest second-hand vehicles compliant with the minimum emission standards of the CAZ. While Euro 4 petrol vehicles do emit significantly less air pollution than diesel vehicles they also emit much greater levels of carbon dioxide (CO₂) — a greenhouse gas that contributes to climate change. This would work against the council's ambition of reducing carbon emissions across the city.

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50. The CAZ boundary would place operators with depots within the zone at a commercial disadvantage compared to operators outside of the zone, as they cannot choose which vehicles to send within it.

Leeds City Council understand the concerns of operators based within the Clean Air Charging Zone (CAZ).



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Having listened to the concerns of many businesses expressed as part of our first consultation, we have reduced the boundary of the CAZ to mitigate the economic impact on businesses whilst still ensuring improvements in air quality both inside (and outside) of the CAZ.

We are currently exploring whether minor adjustments can be made to the proposed boundary to further support businesses by excluding a small number of non-residential areas on the borders of the boundary with compliant levels of air quality. These adjustments will only be implemented if we are confident that they will not impact the effectiveness of the CAZ.

Other than minor adjustments, the council cannot reduce the boundary any further without impacting the effectiveness of the CAZ. We are unable to make this trade-off due to our legal obligation to improve air quality.

Like other cities, Leeds City Council has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale.

Throughout this process we will be working closely with all affected businesses to provide them with advice, recommendations and support. We have outlined a number of different financial support packages to help businesses upgrade or retrofit their vehicles and avoid charges, subject to funding by the government. Importantly, this support will be prioritised to help business located within the CAZ boundary. More information about these support packages will be available on our website.

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Businesses Specific



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51. The CAZ will negatively impact my business/businesses in Leeds.

Leeds City Council believe that it is important to support affected businesses in order for the Clean Air Charging Zone (CAZ) to be most successful at reducing air pollution in the city.

Having listened to the concerns of many businesses expressed as part of our first consultation, we have reduced the boundary of the CAZ to mitigate the economic impact on businesses whilst still ensuring improvements in air quality inside (and outside) of the CAZ.

We are currently exploring whether minor adjustments can be made to the proposed boundary to further support businesses by excluding a small number of non-residential areas on the borders of the boundary with compliant levels of air quality. These adjustments will only be implemented if we are confident that they will not impact the effectiveness of the CAZ.

Other than minor adjustments, the council cannot reduce the boundary any further without impacting the effectiveness of the CAZ and we are unable to make this trade-off due to our legal obligation to improve air quality.

Like other cities, Leeds City Council has a legal obligation directed by the government to reduce air pollution levels to within legal limits in the shortest possible timescale.

Throughout this process we will be working closely with all affected businesses to provide them with advice, recommendations and support to ensure the competitiveness of businesses based inside the zone. We have outlined a number of different financial support packages to help businesses upgrade or retrofit their vehicles and avoid charges, subject to funding by the government. Importantly, this support will be prioritised to help business located within the CAZ boundary. More information about these support



packages will be available on our website.

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52. Businesses need funding to implement measures that would reduce air pollution.

Before and after the CAZ goes live in 2020, we will be working closely with all affected businesses to provide them with advice, recommendations and support.

In our proposals, we have outlined a number of different financial support packages to help businesses upgrade or retrofit their vehicles, subject to funding by national government. More information about these support packages will be available on our website.

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53. LCC should offer businesses ‘sunset periods’ to give them time to adjust to charges.

In some cases, LCC believe it is practical and fair to offer ‘sunset periods’ and exemptions (see below). In our latest plans we outlined plans to offer ‘sunset periods’ in the following circumstances:

1) Organisations or individuals who have placed an order for a compliant vehicle or retrofit solution within six months of our proposals being approved by the government but, due to increased market demand or a limited supply, have not been able to receive the compliant vehicle or retrofit solution before 6th January 2020. This sunset period will apply until the order has been delivered;

2) Taxi and private hire vehicles that have purchased their vehicle as part of a financial agreement prior to 17th October 2018 and who have an outstanding balance on this agreement as of January 2020. This sunset period will apply



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up to and including the 31st December 2021 or until the financial agreement is scheduled to end, whichever is soonest;

3) Taxi and private hire vehicles that can carry 8 or more passengers. This sunset period will apply up to and including 31st December 2021, after which a Euro 6 diesel/Euro 4 petrol minimum emissions standard may apply;

4) Wheelchair Accessible Vehicles (WAVs) used for taxi and private hire. This sunset period will apply up to and including the 31st December 2021, after which a Euro 6 diesel/Euro 4 petrol minimum emissions standard may apply.

Whilst not everyone will be eligible to qualify for sunset periods, we will be working closely with all affected businesses before and after the CAZ goes live to provide them with advice, recommendations and financial support. In our plans, we outlined a range of generous support packages to help businesses upgrade or retrofit their vehicles, subject to funding by national government.

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54. The CAZ will negatively impact charities based in and working within Leeds and could threaten their operation.

Leeds City Council have identified that most vehicles used by charities are classified as either private vehicles or light goods vehicles (LGVs) and therefore will not be subject to charges.

We have also outlined a number of different financial support packages to help affected organisations upgrade or retrofit their vehicles and avoid charges, subject to funding by the government. Importantly, this support will be prioritised to help those located within the CAZ boundary. More information about these support packages will be available on our website.

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55. LCC should charge private vehicles that do not meet the minimum emissions standards by 2020.

Leeds City Council's plans for a Clean Air Charging Zone (CAZ) in 2020 will not charge private vehicles of any emissions standard for driving within the zone for numerous reasons.

- 1) Our modelling shows that charging private vehicles is not necessary to reduce air pollution to within strict legal limits within the required timescale. By not charging private vehicles, we can reduce the economic impact of the Clean Air Charging Zone (CAZ) on the city whilst still achieving improvements in air quality.
- 2) Due to the sheer number of vehicles that would need to be replaced before 2020, charging private vehicles that do not meet the minimum emissions standard would simply be impractical.
- 3) By limiting the CAZ charge to a smaller group of vehicles we are able to use any government funding we receive to provide more generous support that will better help owners of affected vehicles upgrade to cleaner models. To maximise the effectiveness of this support it is logical to target the most polluting vehicles. On a per vehicle basis private cars tend to be less polluting than taxis, buses and HGVs due to their small engine size and relatively low mileage.
- 4) Independent testing of small vehicles has identified that the real-world emissions of many Euro 6 diesel cars are broadly similar to those of older vehicles. Therefore, encouraging drivers of older cars to switch to a Euro 6 diesel vehicle through charges would not significantly reduce their emissions. On the other hand, Euro 6 emissions engines in HGVs and buses have been





demonstrated to be much less polluting.

5) The financial burden of charging private vehicles would disproportionately affect the city's less affluent communities who are more likely to have an older, non-compliant vehicle. We do not think it would be acceptable to pass such a regressive policy.

6) There are some circumstances in which travelling by private car is the only realistic transport option, e.g. those who work irregular hours or who aren't frequently served by nearby public transport services. We do not believe that it would be fair to charge private vehicles until feasible and practical alternatives to driving are widely and easily available.

7) Charging private vehicles would encourage owners of non-compliant (mostly diesel) vehicles to purchase Euro 4 petrol vehicles as these would be the cheapest second-hand vehicles compliant with the minimum emission standards of the CAZ. While Euro 4 petrol vehicles do emit significantly less air pollution than diesel vehicles they also emit much greater levels of carbon dioxide (CO₂) — a greenhouse gas that contributes to climate change. This would work against the council's ambition of reducing carbon emissions across the city.

Leeds City Council's plans for a Clean Air Charging Zone (CAZ) in 2020 will not charge private vehicles of any emissions standard for driving within the zone. Due to the sheer number of vehicles that would need to be replaced within such a short timescale, charging private vehicles that do not meet the minimum emissions standard within this timeframe would be impractical. In addition, the financial burden of doing so would also disproportionately affect the city's less affluent communities who are more likely to have an older, non-compliant vehicle.



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56. LCC should charge light goods vehicles (LGVs) that do not meet the minimum emissions standards by 2020.

Leeds City Council have taken the decision not to charge LGVs because our modelling shows that doing so is not necessary to reduce air pollution to within strict legal limits within the required timescale and this will reduce the economic impact of the Clean Air Charging Zone (CAZ) on the city.

In addition, by limiting the charge to a smaller group of vehicles we are able to use any government funding we receive to provide more generous support packages that will better help owners of affected non-compliant vehicles to upgrade or retrofit their vehicles.

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57. LCC should not have reduced the proposed £100 daily charge to £50 for buses, coaches and HGVs that do not meet the minimum emissions standards. LCC should offer more financial support instead.

Leeds City Council believe that it is important to support affected businesses in order for the Clean Air Charging Zone (CAZ) to most effectively reduce air pollution in the city. We have outlined a range of generous support packages to help businesses upgrade or retrofit their vehicles.

As a council, we believe that the primary objective of CAZ charges is to create an economic incentive that encourages business to reduce their own contribution to air pollution; it is not to punish businesses who cannot afford to upgrade their vehicle.

Dozens of businesses from across the bus, coach and HGV sectors have raised concerns that daily charges of £100 for non-compliant vehicles would have a serious financial impact on their business. Our own analysis suggests



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that a £50 charge would be just as effective at encouraging businesses to upgrade their vehicles. Therefore, we believe that reducing the daily charge to £50 is the best approach.



Any financial support that we are able to offer is based on a finite amount of government funding. We cannot spend more than the funding we receive. Consequently, there are practical limits on the level of financial support that we are able to provide.

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58. LCC should minimise exemptions as much as possible to ensure that reductions in air pollution are maximised.

Leeds City Council will only grant exemptions in cases where we believe it is practical and fair to do so. These exemptions will not significantly affect our ability to achieve air quality improvements in the shortest possible timescale.

Our plans for a Clean Air Charging Zone (CAZ) follow government guidance (the National Clean Air Zone Framework) and exempt the following vehicles from charges:

- 1) Vehicles with a historic tax class (see <https://www.gov.uk/historic-vehicles> for eligibility);
- 2) Military vehicles;
- 3) Specialist vehicles that are non-road going but may drive on the public highway occasionally such as agricultural machines, digging machines, mobile cranes, etc.

In addition, our plans will also exempt the following vehicles from charges:



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- 4) Showmen's guild vehicles (e.g. fairground and funfair vehicles);
- 5) Non-commercial vintage buses aged between 20 – 39 years old (for a fixed number of days per year—currently anticipated to be 10 days);
- 6) School buses above Euro 3 emissions standards;
- 7) Vehicles driving within the zone because of a road diversion who would otherwise not have entered the CAZ;
- 8) Emergency services vehicles.

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59. The proposed charge exemption for school buses EU3 and above is too lenient. Children are the worst affected by air pollution.

School buses provide a vital service for schools and due to their low mileage, their overall contribution to air pollution is minimal.

Any financial impact on this sector would mean schools diverting spending away from local students and would directly impact the ability for schools to deliver extracurricular activities for pupils, many of whom would not otherwise have access to these opportunities. As such, we believe that this proposed exemption is reasonable.

In addition, any net revenue from the CAZ over and above any expenses incurred in connection with the scheme will only be used to facilitate the achievement of local transport policies. Government legislation restricts the council from using charge revenue for any other purpose. Upgrading school buses to cleaner vehicles is one of our top priorities for this money.



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60. LCC should minimise diversions that enter the CAZ area to best improve air quality.

Leeds City Council will only divert motorists into the Clean Air Charging Zone (CAZ) area where it is the most reasonable diversion to make. We expect that briefly diverting vehicles into the CAZ on occasion will have an insignificant impact on the city achieving its air quality targets.

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61. LCC should deliver anti-idling signage as well as effectively enforce idling offences—particularly in areas where members of society most vulnerable to the effects of air pollution dwell (i.e. outside schools and hospitals).

Leeds City Council are taking a range of action to raise awareness and reduce the number of vehicles idling at schools and taxi ranks across the city:

1) To raise awareness, schools will hold competitions where pupils will design anti-idling posters with the best entry being used for posters erected outside of schools. This will also be supported by a focused communications campaign across all schools in Leeds.

2) Department for Transport (DfT) approved advisory signs will be erected at taxi ranks and other idling hot-spots around the city.

3) Leeds City Council's civil enforcement officers will be patrolling these areas and handing out leaflets intended to promote behaviour change and improve understanding of the consequences of poor air quality. This approach has been used in London and has been successful in changing the behaviour of idling drivers. By working together as a city to stop idling, we can all help tackle air pollution and protect the health of people in Leeds.



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62. LCC should invest in public transport infrastructure and promote active travel.

Leeds City Council are working hard to improve public transport and congestion in Leeds as part of the “Connecting Leeds” transport strategy developed in partnership with the West Yorkshire Combined Authority (WYCA).

We’ve made a good start with cleaner buses, park and ride hubs, major highways improvements, cycling infrastructure and new train stations but the council has even more ambitious plans including more train stations, more bus stops, a new high frequency bus network, increased park and ride space, the East Leeds Orbital Road and much more.

As part of the “Connecting Leeds” and longer-term transport strategy for the wider region led by the WYCA, work continues on proposals for a mass transit system with initial findings due to be released later this year.

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63. LCC should introduce more electric vehicle charge points in the city.

Leeds City Council are working with a range of organisations, including the West Yorkshire Combined Authority (WYCA), to support the development of charge points for electric vehicles across the city. Procurement is currently underway for the installation of up to 88 new rapid electric vehicle charge points across West Yorkshire by 2020—30 of which will be installed in Leeds—as a result of a successful joint funding bid submitted to the government by the WYCA on behalf of the county’s district councils.

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64. LCC should offer subsidised car club membership, free public transport season tickets, and/or interest-free loans for residents to purchase e-bikes.

Leeds City Council fully support and actively encourage the use of car clubs, public transport and active travel as great ways for individuals to reduce their own impact on the environment. However, our support packages are based on a limited amount of government funding and we believe that it is fairest to prioritise financial support on those businesses and individuals directly impacted by the Clean Air Charging Zone (CAZ).

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65. LCC should introduce more ambitious policies to achieve further air quality improvements in the future, including the introduction of a ULEV zone and car-free days.

Our second consultation explained that Leeds City Council intended to take additional measures to further reduce air pollution by 2030 and asked respondents to share their views on a range of different ideas.

We will begin to consider the future of the zone and additional measures to improve air quality in 2020. Any changes or additional measures we propose will be subject to further public consultation.

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66. LCC should implement the CAZ in 2019 to improve air quality sooner.

Due to the scale of implementing a Clean Air Charging Zone (CAZ) that covers more than half of Leeds, it is not practical to implement the CAZ in 2019.

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67. LCC should not have reduced the proposed CAZ area as this will reduce the health impacts of the CAZ in some of the most deprived areas in Leeds.





Before reducing the boundary of the proposed Clean Air Charging Zone (CAZ) Leeds City Council undertook detailed modelling and analysis to determine what impact this would have on air pollution. We found that reducing the boundary would not have a significant impact on air quality improvements (inside or outside of the zone) but would mitigate the economic impact on businesses within Leeds. Therefore, we believed that reducing the original boundary was the most reasonable action.

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68. LCC should encourage major employers in Leeds to reduce the need for individual travel by supporting car share, work from home, flexible working policies.

Leeds City Council agree that businesses and other employers in the city have an important role to play in helping to realise our ambition for cleaner air in Leeds.

Many businesses within the city have already pledged their commitment to tackling air pollution as a result of our ongoing engagement with the private sector and our work continues. We are currently putting together an employer toolkit with lots of advice and information on what businesses can do to help improve air quality in Leeds. This will include promoting car share, work from home and flexible working options.

By working with local business and employers, we can protect the health of everyone in Leeds from the effects of polluted air.

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69. LCC should invest in broadband infrastructure to enable the wider rollout of work from home policies.

As well as working in partnership with Openreach to deliver the Superfast West Yorkshire and York programme across Leeds and West Yorkshire,



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Leeds City Council is working with broadband infrastructure providers to encourage investment in extensive broadband infrastructure networks so that households and businesses benefit from faster and more reliable internet connections. We are also encouraging employers to follow the council's lead and implement work from home policies where appropriate. By helping to reduce commuter journeys into the city where appropriate, businesses can help reduce air pollution and protect the health of everyone in Leeds.

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70. LCC should implement a workplace parking levy (like Nottingham) and invest the revenue in subsidised transport and infrastructure investment.

Our second consultation explained that Leeds City Council intended to take additional measures to further reduce air pollution by 2030 and asked respondents to share their views on a range of different ideas. We will consider this idea, and others, after we have successfully delivered and implemented the Clean Air Charging Zone in 2020.

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71. LCC should increase greenery across the city centre to absorb air pollution.

Leeds City Council understand that access to nature and open spaces helps brings cities to life, improves our wellbeing and can also absorb air pollution. The council have already announced plans for more than 4 hectares of new green space in the city centre as part of South Bank Leeds, and we will be soon be announcing a new 'Our Spaces' strategy that sets out our vision for a greener, more accessible and more sustainable city centre. Finally, it remains the long-term ambition of the council to further develop green space in Leeds' wider communities as well as the city centre.

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72. LCC should encourage schools to promote walking buses.

Leeds City Council are working closely with schools to raise awareness of air quality and encourage pupils and staff to travel sustainably. Every state school and academy in Leeds has a school travel plan setting out how the school will promote safe and sustainable school travel. Walking buses are one of many initiatives included within these plans. Other initiatives include Walk on Wednesday, Scootember, bike week, the Schools Yorkshire Tour and many more.

The council are developing a toolkit for primary schools, to be downloadable from the Clean Air Leeds website that is packed with curriculum related lesson plans and handouts that can be used throughout the year to educate children about air pollution and its effects.

We're encouraging schools in Leeds to sign up to the Modeshift STARS accreditation scheme which encourages schools across the country to join in a major effort to encourage sustainable and active school travel in order to improve the health and wellbeing of children and young people. The council is also offering practical skills, training and travel plan support to schools.

We regularly run competitions and other incentives for Leeds schools to get involved with. Dozens of schools participated in our Schools Yorkshire Tour, 'Green Miles' and 'Clean Air Leeds Champions' competitions to encourage sustainable travel and raise awareness of air pollution, respectively.

Finally we're giving hundreds of scooters to primary schools across Leeds as part of the 'Scoot the Route' scheme, which will encourage children to swap four wheels for two and scoot to school instead of being driven.

By working together as a city, we can best protect the health of everyone in Leeds.





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73. LCC should encourage cycling amongst staff by providing showering facilities and secure cycle storage in our workplaces.

Leeds City Council recognizes the many benefits of cycling, including its positive health effects and its role as an emission-free way to travel. To make it easier for our staff to leave the car at home and cycle to work instead a majority of our workplaces are equipped with cycle storage and showering facilities. In addition, council employees can also access an annual cycle to work scheme.

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