



24 February 2020

Air Quality
Roads Directorate
Transport Scotland
Buchanan House
4th Floor
58 Port Dundas Road
GLASGOW
G4 0HF
E: lezconsultation@transport.gov.scot

Castle House
6 Castle Drive
Carnegie Campus
Dunfermline
KY11 8GG

Customer Helpline
T: 0800 0 778 778
W: www.scottishwater.co.uk
E: Regulation@ScottisWater.co.uk

Dear Air Quality Team,

Scotland's Low Emission Zones: consultation on regulations and guidance

Scottish Water is happy to support the introduction of Low Emissions Zones (LEZs). The drivers for, and provisions within, the proposals are very much in line with Scottish Water's own position. From a greenhouse gas emissions perspective Scottish Water has already announced its ambition to reach net zero emissions by 2040.

We are reviewing our fleet and the current vehicle replacement cycle, as we note that utility vehicles, including emergency repair vehicles, are not exempt. As older vehicles are replaced, they will become Euro 6 compliant. We know that based on current replacement cycles some of our fleet of vehicles will not be Euro 6 standard by the proposed LEZ go-live dates. Further work is required to assess how we can mitigate this risk and the potential business impacts. In addition to these vehicles, there will also be an impact on emergency repair vehicles belonging to our contractors.

Utilities will continue to have a fundamental need to access these areas to provide core services. We would recommend a further impact assessment is undertaken as the ability to meet the LEZ requirements will be contingent on the rate of technology development for zero emission vehicles.

We would welcome the opportunity to discuss this further and if you have any further questions about or comments, or want to send further information, please use the email address above.

Yours faithfully

Simon Parsons
Director of Strategic Customer Service Planning

- End of Document -