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# Operationalising just sustainability

A comparative analysis of justice  
discourses around low emission zones in  
London and Brussels

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LEVERHULME  
TRUST



## What is a LEZ?

**Definition:** A defined (urban) zone where certain vehicles are not permitted any longer based on their emission standard

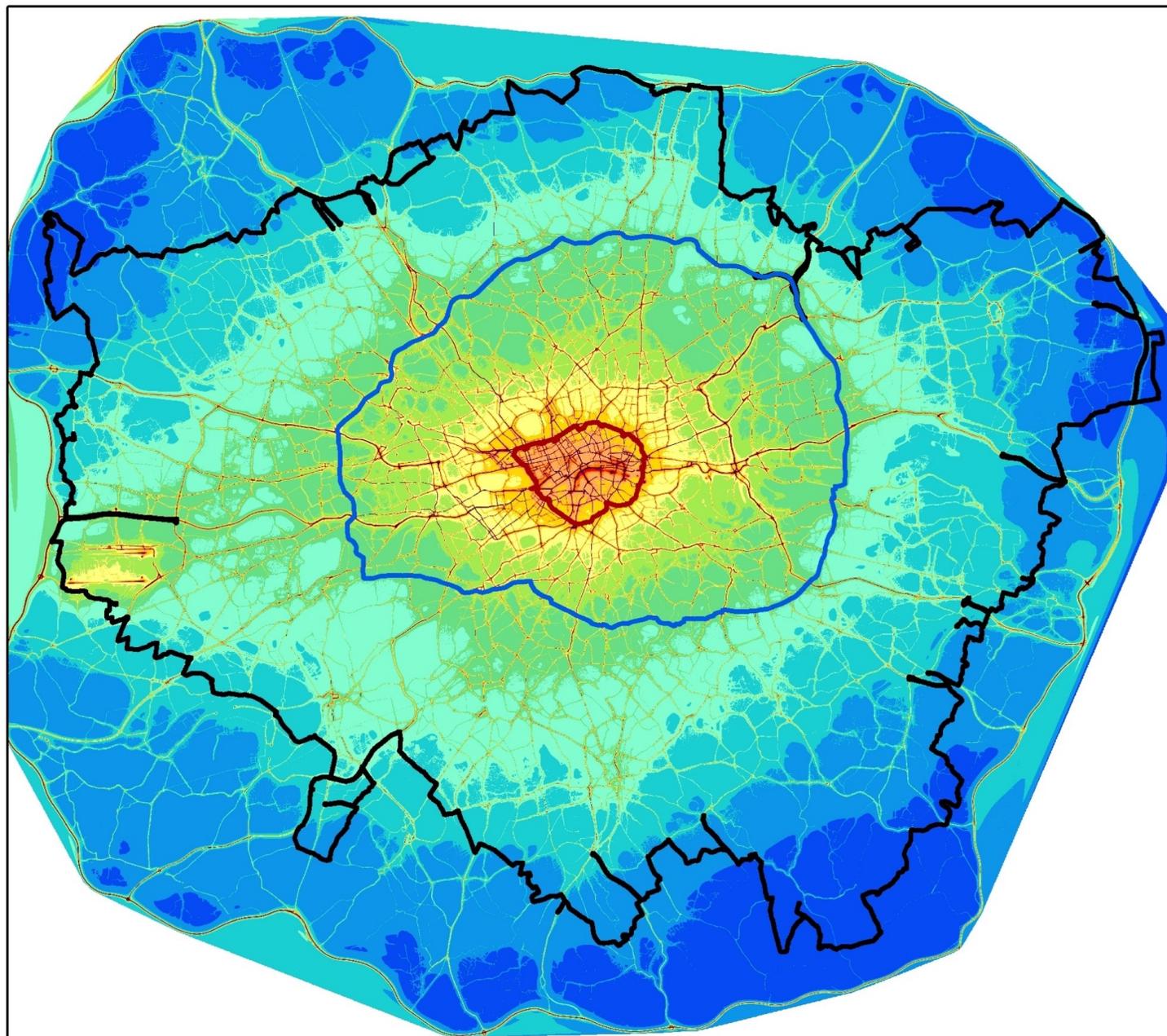
**Aim:** Tackling traffic-related peak levels of air pollution in cities, mainly black carbon (BC) and nitrogen dioxide (NO<sub>2</sub>)

**Motivation:** EU Air Quality Directive, evidence base on health impact, growing public awareness, changing views on urban transport

### Lack of uniformity, every LEZ is unique

- Central urban area vs large metropolitan area
- Camera-based vs sticker-based
- Permanent vs only at certain hours
- All vehicles vs only heavy traffic vs ...
- Big differences in access conditions, exemptions, and support measures





**London (LAEI 2016)**

**London**

ULEZ 2019

ULEZ 2021

LEZ 2008

**Brussels**

LEZ 2018

**NO<sub>2</sub> (µg/m<sup>3</sup>)**

< 16

16 - 19

19 - 22

22 - 25

25 - 28

28 - 31

31 - 34

34 - 37

37 - 40

40 - 43

43 - 46

46 - 49

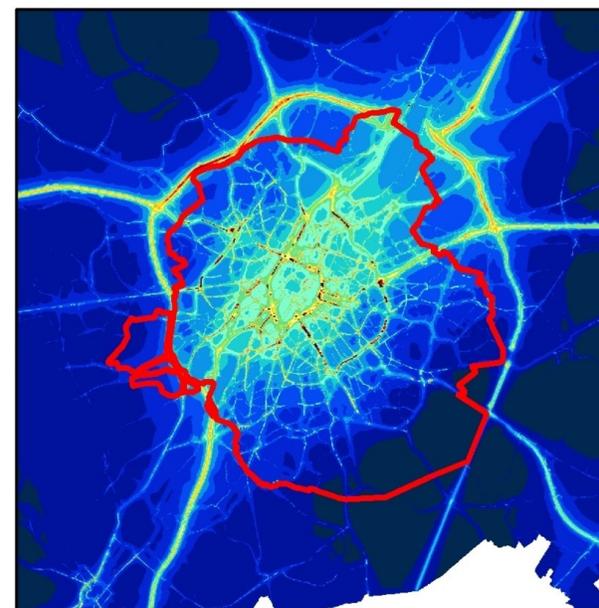
49 - 52

52 - 55

55 - 58

> 58

10 km



**Brussels (ATMO-Street 2018)**

# Shaun Bailey: Expanded Ulez will hurt poorer Londoners



Shaun Bailey is Conservative candidate for Mayor of London / Alex Lentati

By [Shaun Bailey](#) | 23 April 2019



## Air quality action will benefit the poorest Londoners most

**News** 11 Jan 2019 by SmartCitiesWorld news team

London will launch the world's first ultra low emission zone in April in the central congestion zone



The London mayor has a range of measures in place to improve the city's air quality

## Environmental justice

Principle: everyone has the right to a healthy environment, including clean air.

Argument: LEZs benefit more deprived communities in particular, because they are more exposed and contribute less to air pollution.



## Transport justice

Principle: everyone has the right to a minimal access to an adequate transport network, because accessibility is essential for social inclusion.

Argument: LEZs unevenly constrain spatial accessibility and place disproportional financial burdens on disadvantaged socio-economic groups.

Just sustainability dilemma: what is a “fair” or “just” balance?

# Analysis of justice discourses

## Implementation of just sustainability

- Justice as a 'legitimizing game' (Dobson, 1998): whose version, concept, interpretation of justice counts?
- *"Justice is inevitably political, and politics involves disagreement, competing perspectives and active work to persuade others of your point of view"* (Walker, 2012)

Research question:

**How is justice interpreted and operationalised in the implementation of low emission zones, when trade-offs exist between different goods and bads?**

## 33 semi-structured interviews

CATEGORY	BRUSSELS	LONDON
Public servants	2	2
Local politicians	4	4
Environmental movements	2	2
Sustainable transport associations	2	2
Motorist associations	2	2
Business organisations	2	2
Trade unions	2	2
Anti-poverty movement	1	/
<b>TOTAL</b>	<b>17</b>	<b>16</b>

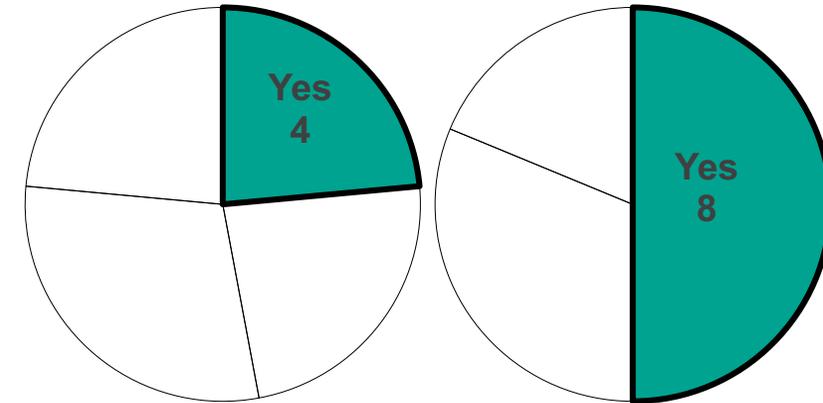
## Is the LEZ a fair measure? Yes

- B&L** Proportionality at population level
- B&L** Clean air as a human right, “polluter pays”
- B&L** Correcting an existing injustice
- L** The mayor got re-elected, very little protest
- L** It is effective, positive cost-benefit analysis

*“If you combine the very little individual car use per Brussels resident with the negative consequences of car use, which weigh disproportionately on the poorer population, you have to conclude that the low emission zone is the only solution.”*  
(local politician – Brussels)

Brussels (n=17)

London (n=16)

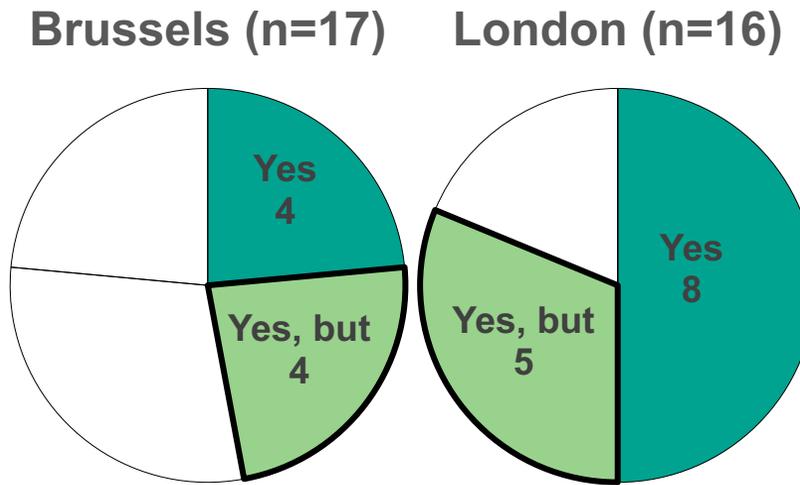


*“Well, I think the answer is that the mayor got elected, so I think the judgment of London is that it has been on balance a good thing or the right thing to do.”*  
(environmental movement – London)

*“Actually, if you do a cost-benefit analysis and work out how many fewer hospital visits would be taking place, it's probably also worth it in financial terms, as well as in the cost-benefit health analysis alone. So, yes, definitely.”*  
(local politician – London)

## Is the LEZ a fair measure? Yes, but

- B&L** It can be unfair for specific individuals or locations
- B&L** More support and recognition needed for those affected
- B&L** Symbolic value more important than concrete effect
- B** Winners are hard to identify, social impact immediately felt
- B** Not fair as a standalone measure
- L** Money raised needs to be hypothecated
- L** It could be fairer

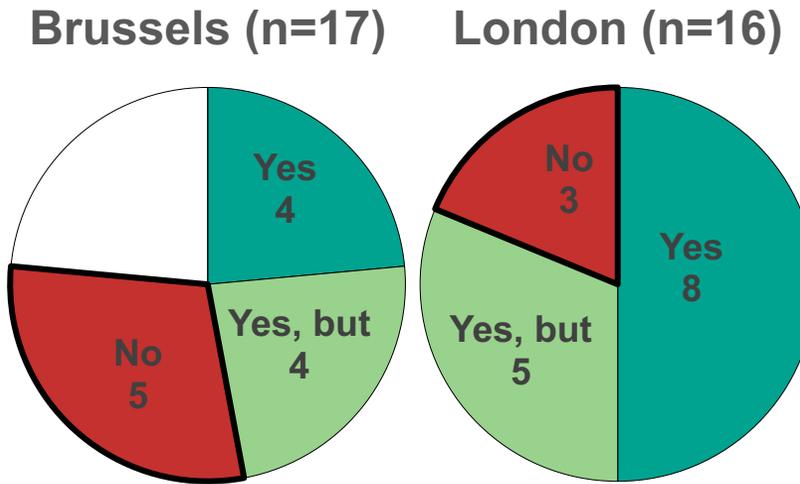


*“It's not as fair as it could be, it's a middle ground that's been chosen. It's not unreasonable, but it's not what I would have done. I would have done something bigger, and fairer, and smarter.”*  
(local politician – London)

*“I think it is not a fair measure if it's a standalone measure. If you only look at the milestones, then of course people have to get rid of their car. Sometimes the people that get rid of their car are not the people that will benefit the most. So sometimes it's maybe not fair at an individual level, but I think that globally it's very fair.”*  
(ministerial cabinet – Brussels)

## Is the LEZ a fair measure? No

- B&L** We should focus on other sources of pollution
- B&L** Effect is too small
- B&L** Not enough alternatives
- B&L** Too much focus on individual, rich people aren't affected
- B** Imposed too quickly
- L** We need incentives not charges
- L** Unfair to focus on London

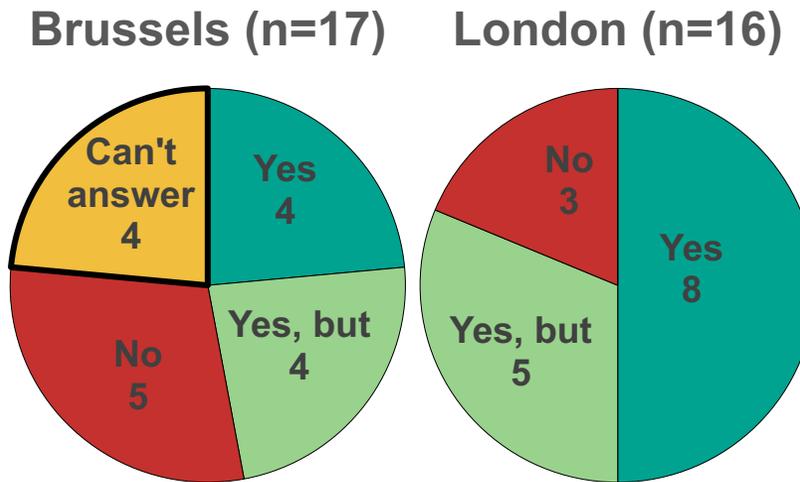


*"If you could say: "Since the low emission zone, we can prove that the air has become 25% cleaner." Then we can say, "Okay, it's been worth it." But I bet we don't even see a 5% or 2% difference in air quality if you look at the parameters correctly."  
(motorist association – Brussels)*

*"If you are 72 [...] you can't change your vehicle because you simply don't have the capital [...] And that is why I think the egregious impact on those people outweighs the wider benefit, which wasn't great, and will be there anyway. Because vehicle standards improve and people change their vehicles all the time."  
(local politician – London)*

## Is the LEZ a fair measure? Can't answer

- B** Too early to evaluate, no data (yet)
- B** It will be impossible to single out its effect
- B** It's a different answer for every socio-economic group
- B** The measure only pretends to care about social justice



*“They will say that low emission zones are socially fair, but in fact they don’t care! In terms of the fight against poverty and the fight against inequalities, this will have no impact, or even a negative impact. The public money that is spent for this low emission zone, in particular via the Brussel’air allowance [a system to support those that get rid of their car], is public money that can not go in the direction of less inequalities in the Brussels region.”*  
*(anti-poverty movement – Brussels)*

## Spatial scales ...

- Asked about the fairness of the spatial boundaries ...

*“If you focus purely on air quality, we can say that including Uccle, for example, would not be necessary. You can argue that. But that wouldn't be so fair ... if you look at it from a social perspective, in that case you don't impose the measure on the zones with the richest people. From the point of view of justice, it is best that it is **equal for everyone**.” (public servant – Brussels)*

... but who is “everyone”? ⇒ everyone **within** the region

- What about commuters and visitors?

*“The people who live outside - sometimes because the capital is too expensive [...] are people who will be quite affected, but who will ultimately benefit less directly than people who live in Brussels from the improvement in the quality of life in Brussels.”  
(sustainable transport association – Brussels)*

## Spatial scales ...

- And what about the broader regional or global context?

*“Everything that we refuse in Brussels will circulate in Wallonia, in the same way as the most polluting vehicles that we refuse in Europe end up, for example, in Africa. This is what is very complicated. It is to address issues that are also global and transnational, and reducing them to limited measures at the scale of a region.”*

*(sustainable transport association – Brussels)*

- Massey (2007): plea for an “**extroverted politics of place**” → in order for a progressive urban politics to emerge in an era of globalisation, relations and responsibilities beyond city boundaries have to become just as significant as those within it

Definition of the spatial scale affects the evaluation of fairness

## ... and temporal scales

- Future environmental gains, but immediate social impacts

*“If we think of the “working poor” [...], the costs might be greater than the health benefits. [...] They are not concerned with long-term things, they are concerned with day-to-day survival. So it is also an ethical question: should the government impose that those people can achieve a possible health gain at some point? While the immediate effect is that they are hindered now in how they go to work.” (public servant – Brussels)*

- The legacy of past policies

*“The thing is, it's not just about car use. It's about this complexity that we've encouraged people to buy these diesel cars, and now, we're having to help them out a little bit because they got a bit trapped from that policy. That would be my argument why they actually need the support.”  
(environmental association – London)*

## Boundaries and politics (Brussels)

The possibilities of finding “the fairest” balance are limited because of ...

- Institutional complexity
- Competency boundaries
- Mechanisms of politics

*“You could say that the state structure is a disadvantage for Brussels, but it is also an advantage. The advantage is that they can decide for themselves for quite a few things on their own territory. The disadvantage is indeed that the Brussels Region is not a socio-economic entity. And therefore, implementing the low-emission zone only for Brussels is a bit counterproductive to the attractiveness of the city and the region and so on. But of course, the region can decide that. It is regional matter.”*  
(business organisation – Brussels)

*“This is the area that Brussels has maximum competence about. They have done the maximum they could do, they couldn’t do more than that.”*  
(environmental association – Brussels)

*“We already have so many transfers from Brussels to the surrounding areas, that it is no problem if it goes in the opposite direction for once. Let's face it, it's also in a way - people will never say that - a fiscal measure.”*  
(local politician – Brussels)

## Boundaries and politics (London)

The possibilities of finding “the fairest” balance are limited because of ...

- Institutional complexity
- Competency boundaries
- Mechanisms of politics

*“That’s really interesting [that people can’t register a new car for one year when using the mobility allowance in Brussels] ... but it falls outside of the powers we have in London ... we can’t tell people not to register a new car or anything like that [...] we can only charge the usage within London.”*  
(local politician – London)

*“Eventually, I can’t see any reason why, in principle, you shouldn’t have something where we cover the entire area that the Mayor, the Greater London Authority actually, has direct responsibility for.”*  
(trade union – London)

*“It’s important to think or realize, in London, the mayor basically has control over all transport, private and public. He can set road user charging schemes [...] whereas the mayor has very little power [...] over house building, for example, and none over taxes [...] In fact, what the mayor is going to do on transport is very much their main area of power.”*  
(environmental association – London)

## Further analysis

- What support should we provide: scrappage schemes vs. mobility allowance
- Cultural differences in interpretations of fairness and individual freedom
- Procedural justice in the consultation process
- ...

# Conclusions

(Social) justice and fairness are relative, cultural, political and place-bound concepts

⇒ *Different valid interpretations should be recognized*

Space and time are used in a flexible way to support argumentation

⇒ *More awareness of different scales of analysis is welcome*

Fairness at population level ⇔ fairness at individual level

⇒ *Unfairness for a minority should be recognized + appropriate support*

Fairness and effectiveness often conflated

⇒ *Ethical problem, democratic debate needed on normative values*

Greater fairness of London's ULEZ?

⇒ *Conflation of acceptance and fairness?*

Thank you for your attention

Thomas Verbeek

# What is just sustainability?

Concept originated from a combination of ...

- Criticism on the narrow environmental focus of environmental justice scholarship and activism.
- Criticism on the a-political environmental notion of the concept and application of sustainability.

Concept stresses the inherent overlap between environmental sustainability and social justice concerns ...

- *“a truly sustainable society is one where wider questions of social needs and welfare, and economic opportunity, are integrally related to environmental limits imposed by supporting ecosystems.”*  
(Agyeman, Bullard & Evans, 2002)

... and calls for more politicisation.

- *“a more just sustainability must encourage the politicisation of the concept and the integration of numerous voices into a community’s vision for the future.”* (Lubitow and Miller, 2013)