Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from Graeme Cobb

Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution?

There are a number of policies which are correct and a number of incentives which are also correct however there are a number which require some additional consideration and adaptation.

How does the Scottish policy fit with the UK and EU policy on air quality?

I am disappointed that certain areas - dependant on political parties in local power - choose to adopt positions which contradict those of local areas which are SNP majority in what I can only assume is an attempt to undermine Scottish policies.

Are the policies sufficiently ambitious?

I think that the policies in general are sufficiently ambitious

Are the powers and resources of Local Authorities and SEPA to address air pollution adequate?

At this time I believe they are adequate if the powers allocated are used to their fullest extent

Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?

In terms of green car use, and specifically pure battery operated electric vehicles, the continued success of their use in reducing emissions hinges, I believe, on the following information from my submission. (It should be noted that as a private car owner of a fully electric vehicle (BEV – battery electric vehicle) I believe I am well placed to provide an informed opinion on their suitability in terms of impacting positively on reducing air pollution and in turn climate change.) The difference between BEV, PHEV (Plug in hybrid electric vehicle) and additional type hybrid vehicles needs to be correctly recognised by the Scottish Parliament as there are a number of issues which result in a high level of dissatisfaction amongst green vehicle drivers e.g. those which cause conflict around parking and charging and this recognition would resolve most of the issues which affect the green vehicle community.

You may not be aware but there is currently a great deal of tension within the communities which use green, electric, partially electric and hybrid vehicles which cause issues. The incentivised recognition of BEVs as fully electric non petrol/diesel carbon emitting vehicles as being the ideal targeted vehicle of choice for the mass market would solve problems in an instant. I believe that these vehicles should be
encouraged, incentives maintained and parking actually incentives increased in order to encourage full take up. At present BEV use is growing but is minimal due to the massive increase in PHEV and alternative hybrid use. Unfortunately PHEVs and alternative hybrids still produce carbon emissions as do REX (Range extender) vehicles. Most people who buy PHEVs and REX and alternative hybrid vehicles do so because the pure BEVs do not yet have a large enough range to encourage mass use. As such the mass impact of PHEVs creates issues at charge-points when BEV users may be unable to gain a charge due to a PHEV or a hybrid being there which don’t actually need a public charge network but choose to use this either for parking privileges or free charge use within town reducing their fuel bill. BEVs rely on and ultimately require a useable, working, efficient and cheap charging network to remain viable as they need electric charges to maintain and achieve a realistic useable range as opposed to PHEVs and hybrids which only need to be able to reach the next petrol station to gain a charge in terms of fossil fuel.

The next issue facing BEV users is that experienced in accessing electric charging bays. This is often fraught with the issue of ICEing whereby an ICE (Internal combustion engine) vehicle parks within a bay which has a charger and then leaves meaning the intended user cannot make use of the appropriate space and may then not have enough charge to get home and be forced to wait an excessive period on the ICE owner returning or attempting their onward journey with the possibility they may run out of charge. This is not an issue for PHEV or alternative hybrid users or REX vehicles as they just need to get to a nearby petrol station indeed this type of vehicle often pose the biggest risk to pure BEV users as they can often be found parked and not plugged in within charging bays in the assumption that they are an electric vehicle and are entitled. The solution legislation to allow non EV vehicles to be ticketed when inappropriately parked and bays to be allocated in order of need with BEVs being allocated specific BEV only bays or hybrids and PHEVs being restricted to the slow charge system as noted in the following paragraph.

In addition to this issue is the fact that the network of rapid chargers is not strong enough (Rapids can give a BEV a viable charge to get to their destination in a short time period such as 30 minutes from empty to almost full.) and there are a number of areas which have no rapid charge availability therefore a full BEV might not be of much use as their battery levels outwith the very expensive ‘Tesla’ type range (Which remains outwith the purchase range of the majority of the population at this time.) remain poor if used in the same manner an ICE vehicle would be. I understand that the rapid chargers are far more expensive than a 7kw charger or even a 22kw charger (potentially as much as 10 times) however the time taken to add miles onto a BEV from anything but a rapid charger necessitates a lengthy wait time and is not suitable for day to day usage unless leaving such a vehicle parked for the day, (On 7kw it takes as much as 6 – 12hrs to fully charge a BEV) therefore, as you can see such a network of 7kw chargers is not of much use to the true electric car network. (Especially if using the chargers within places such as Glasgow at 20p for 12 minutes parking – resulting in a parking charge which does little to encourage the end user of a BEV as opposed to Dundee or Kilmarnock where such parking is currently free)

Next is the fact that it is often the case that public use chargers are in a state of disrepair or failing to connect to the network and the maintenance of same by the
provider is often poor its almost akin to providers such as local authority having the
facility installed using grants to show they are eco-friendly and then not bothering
with them. For example, in relation to this the only public charger in Saltcoats and
the three towns area has been in disrepair for over 6 months as has a set within the
Kilmarnock town centre Queen street car park I could name many others which I
have visited which have been broken at time of attempted use from Abington village
to Falkirk train station etc. The public chargers within Irvine town centre are
invariably used by council vehicles (who are the provider) which are often plugged in
over the entire weekend meaning it is often not possible for visitors to charge and
this discourages use, indeed the spaces are often occupied by council vehicles
which are not even plugged in. (The view of the council is that these are for the use
of the council in the first instance – albeit grant money has been used during the
initial install.)

A further example of the types of problem faced by pure BEVs which need a
charging network to be viable is where there is no rapid charger provision between
Kilwinning and Largs which is a fair distance if coming up to the end of your charge
and in need of a boost between the two locations again resulting in issues for pure
BEVs. Often areas only have a single rapid charger which means having to wait until
a vehicle before has finished resulting in dissatisfaction and doesn’t encourage
uptake. I realise that there has to be a charge at some stage for charge-point use
however to implement such a charge in the near future will only drive away true BEV
users and the only uptake which will flourish will be the PHEV and hybrid market
which still produce carbon emissions! The system needs improved and to be able to
run correctly before implementing charges otherwise uptake has the potential to be
killed.

The parking and charging network needs a national approach not just a national
management company i.e. charge place Scotland. There needs to be consistency of
approach or the situation which exists in England and Wales will come here with
multiple charge suppliers preying on the environmentally driven market which will
result in the uptake of true BEVs remaining low. I appreciate the incentives received
in my BEV use and purchase although I wonder where these will go to i.e. do the
manufacturers just inflate their prices to get extra money by way of purchase
incentives?

Unless the issue of clearly defined categories of use focused on the BEV market as
a priority with the introduction of a national strategy of parking and charging for this
strand being free and perhaps a sliding scale of reduced charges for PHEVs and
hybrids the best option in terms of true zero carbon emission (BEVs) simply won’t
have a great enough incentive to the public. My experience to date has been
extremely varied as can be seen from my statement and indeed there are many
times when I consider if the experiment has been worth the hassle and lack of
encouragement locally and in some cases nationally and if I should return to an ICE
vehicle after my BEV pcp expires. If I am of this opinion then it is a safe bet to
assume many other pure BEV users are the same.
Are there conflicts in policies or barriers to successful delivery of the air quality objectives?

As noted earlier there appears to be an issue in local authority areas which are non SNP majority controlled areas in what I believe is an attempt to undermine national policy. For example Glasgow introduced a charge for electric vehicles to park and thus by default have a cost for charging this is also true of Moray council and so on. I understand why this has happened and it is in direct response to the number of PHEVs and hybrids using the electric vehicle only spots and creating issues between different sub section drivers. This is easily addressed by simply defining charge points as rapids for BEV use only, 22kw as PHEV and BEV use and adding spaces which can be used by all green vehicle users; i.e. change over a good number of public spaces to green vehicles. This would encourage uptake and reduce numbers of ICE cars in centres.