Environment, Climate Change and Land Reform Committee
Inquiry into air quality in Scotland
Written submission from McGill’s Bus Service Ltd

Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution?
No comment

How does the Scottish policy fit with the UK and EU policy on air quality?
No comment

Are the policies sufficiently ambitious?
No. If they were, we wouldn’t be sitting here wondering if we were going to go bankrupt as a result of some last-minute knee jerk LEZ scheme. (that is NOT a tongue in cheek comment) Ambition involves planning and a failure to plan, is a failure full stop. This last minute.com attitude to government has to stop.

Are the powers and resources of Local Authorities and SEPA to address air pollution adequate?
No. See answer to the question immediately above. If sufficient powers were available, something would have been done before now and it would have allowed bus operators to plan accordingly. Not only would this have been less stressful, but it would end up being much easier on the public purse, because introducing a true LEZ at this extremely short notice is going to take a significant amount of public subsidy. Subsidy that wouldn’t have been required if bus companies had the time to plan. As an example, in London, where some planning actually took place and the Authority has visibility of the vehicle park, it is still costing the public purse £86.1m to adapt existing vehicles. To put this into context, the same retrofit programme would cost upwards of £9m if Hope Street in Glasgow was declared a LEZ in 2018.

This money will only pay for the adaptation of vehicles to a certain emissions level. It will not meet the uplift in ongoing running costs. There are additional running costs associated with running retrofitted vehicles, which for a scheme like Hope Street in Glasgow, would amount to circa £3.5m. This would result in fares going up to meet these additional costs.

Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?
It is too early to gauge this. There has been no indication of what this might be. This is another source of stress and angst.
Is Scotland on target to have a pilot low emission zone (LEZ) in place by 2018 and should there be more than one LEZ pilot?

No. Planning and communication should have taken place 5 years ago.

How should the improvement of air quality be prioritised in areas where there have been persistent breaches of NO₂ limit values?

This should be a sequential process. The first actions should be the non-technical and those with the lowest cost of implementation. Revised traffic flows and re-phasing or removal of traffic lights. After this, alternative traffic flows to ease congestion which would be tied into a wider traffic flow pattern.

Is adequate consideration given to air pollution from agriculture?

No comment.

Are there conflicts in policies or barriers to successful delivery of the air quality objectives?

Yes. How can it be possible to minimise emissions from a particular group of vehicles when it is the impact of another group that causes the problem. The policy of a free for all in relation to other traffic does not help with the emissions management from public transport. At some point, the free for all policy needs to be drastically changed in order to maintain an acceptable level of public transport in Glasgow.

It seems to me that Glasgow wants what London has but does not want to do what London has had to do to get it. This policy is the very definition of madness. Start in a tight area in the centre of the city by introducing congestion charging, and then a levy on workplace parking. After that, limit the number of car parking spaces, followed by a high minimum charge for parking. Lastly, single occupancy cars and diesel cars should be banned completely. After this, expand the area in a planned and consistent way. To minimise the impact, there should be a levy on out of town retail parks based on the number of parking spaces they have.

All of this needs to be done as part of a 5 to 10 year plan so that it is not tied to a single political term and that people have the ability to plan accordingly.