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

There are a good range of policies in place which collectively contribute to the ultimate aim of improving air quality in Scotland.

The Cleaner Air for Scotland Policy (CAFS) recognises the need to integrate climate change and air quality, it is therefore unfortunate that some wider polices relating to Carbon Reduction (particularly Renewable Heat Incentives (RHI) encouraging the use of biomass) may be contradictory to this aim and may be considered detrimental to air quality where used to replace existing gas heating systems which are potentially a cleaner source of fuel in relation to particulate emissions. RHI and carbon reduction applied to other heat exchange technologies, such as ground or air source heat pumps, can positively contribute towards cleaner air.

A significant proportion of air pollution is from vehicle use therefore policy should actively encourage use of sustainable vehicles and/or public transport. The complexities of moving the public towards such modes of transport are appreciated. In order to account for this, private vehicles remaining should be as clean as possible and polices, such as scrappage schemes and road-space regulation may need to be considered.

CAFS recognises the links between improved planning policy and improvements in air quality. It is noted that improvements in planning policy guidance are already continuing in this respect. Application of space criteria within planning process has positive contribution to potential pollution (noise and air quality).

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

There are a good range of polices in place which collectively contribute to the ultimate aim of improving air quality in Scotland

Are the policies sufficiently ambitious?

The standards in Scotland exceed those in other UK counties and are considered ambitious, however the population densities and natural environment should allow ambitious polices to be delivered.

Policies effects are limited by the legal duty placed upon regulators. Policies are limited to preparing action plans ‘in pursuit’ of the achievement of air quality standards rather that ‘attaining’ targets. There appears to be a disconnect between polices directed towards local authorities and polices directed towards infrastructure which are the responsibility of Transport Scotland. Local authorities cannot compel
other organisations to take actions. Local authority transport budgets do not routinely include elements reserved for stimulating and supporting sustainable travel.

Steps should be taken to make idling of vehicles, and in particular idling near schools or within air quality management areas, as socially unacceptable as the success witnessed in relation to smoking indoors.

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

Clarification is required in relation to the difference between ‘powers’ available to local authorities to deliver air quality, and the ‘duties’ they have to deliver air quality.

Pressures to fund the wide range of statutory and social services delivered by local authorities within the finite budget settlement will undoubtedly lead to conflict between priorities.

Much of the air pollution recorded at monitoring stations is background pollution over which local authorities have no control. Local pollution sources contribute to this background and can result in local exceedances of targets. Policies should be clear about the roles and accountabilities of various regulators in identifying and controlling background levels.

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

No. The incentives are welcomed and contribute towards policy, however their impact and future planning is limited by the annual application process. Supports and incentives require 3-5yr planning for higher level and infrastructure improvements; annual funding frustrates this process.

Funding for local authorities tends to be related to one-off capital expenditure with no recognition of on-going revenue costs (for example for maintenance of charging units). Due to financial constraints currently placed upon local authorities, there may be a reluctance to engage in activities which has an uncertain on-going revenue cost implication.

As recognised in the recent environmental health publications, it is the application of baskets of measures which will be effective, even where it is not possible to show the effectiveness of individual measures in isolation. The difficulty of demonstrating the effectiveness of individual measures makes it more difficult to make a case for funding or investment.

**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?**

The number of LEZ should be determined by the results of pollution monitoring.

The Friends of the Earth study identifies five major Scottish cities as having the most polluted streets in the UK. The use of LEZs should not be limited by target numbers
and should be open to any LA to consider. The number required will be guided by both local circumstances and the degree of urgency in each case.

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

The Air Quality Action Planning process should identify the principal sources of pollutants in each case and, importantly, the agency responsible for implementation of improvements. Persistent breaches may be due to no local controls being available.

Improvement in air quality should be prioritised by including targets and accountabilities within the Single Outcome Agreement and Joint Health Protection Plans. Transport Scotland’s role in delivering the infrastructure changes required to assist local authorities in delivering cleaner air should be included within this approach.

Improvements plans will have varying degrees of effectiveness, efficiency, and ease of delivery. Improvement plans should consider all opportunities and not be restrictive.

**Is adequate consideration given to air pollution from agriculture?**

The contribution to background and local air pollution by some sectors of agriculture is well documented; poultry rearing being one such area. Air flow in poultry rearing units is important for bird health however the emissions should be able to be controlled by installation of air cleaning/scrubbing systems thereby reducing the local contribution. The installation of such scrubbing systems should be introduced for all new developments. Residential development around existing poultry farms should be limited.

Pollution from other agricultural activities is less well known. Even although particulate matter from arable farming/open crops is unavoidable, it should not be discounted. Where high background levels exist due to agriculture, more focus should be placed upon sources which are within our control.

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

Yes. RHI and Carbon Reduction schemes have promoted the use of Biomass as a renewable source of energy. The installation of biomass to replace gas heating systems increases pollution levels and should only be funded where it replaces dirtier fuels such as coal or oil and where ‘cleaner’ fuels such as gas are unavailable. The use of the best available pollution control technologies should be compulsory and conditional within the grant approval process. This is particularly relevant if biomass is to be used near populations of vulnerable recipients, i.e. schools/hospitals.

Delivery of air quality objectives involves a wide range of partners both within and out with local authority control. In general environmental health services carry out
monitoring and leadership however it is within services such as Planning, or more significantly Transportation (Roads), where the ability to deliver air quality improvements lie. Air quality returns, and grant applications, should require specific detail showing the governance arrangements to ensure all services have a cohesive approach to controlling pollution.