Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from Corstorphine Community Council

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

No.

Corstorphine Community Council has the unenviable task of dealing with the most polluted street in Scotland. St Johns Road in Edinburgh is a huge air pollution hotspot, evidenced by multiple years of data and an active AQMA declared for NO2 particulates. It regularly receives the annual top spot on the “most polluted streets” list.

Based on current policy, support and delivery, we have seen no meaningful reduction in the persistent air quality issues in our local community. The community must deal with health impacts, shocking congestion, detriment to the local environment and economic impacts as the current mechanisms in place to deal with air quality are woefully inadequate.

The most vulnerable people in our community, including elderly people, young children, people with disabilities and pre-existing medical conditions, and people from deprived areas are even more affected by air quality issues. It is estimated that around 2,000 people in Scotland die prematurely every year due to air pollution – Corstorphine’s locals are part of that toll.

The Clean Air for Scotland Strategy is not robust enough. It needs to go beyond compliance with European law by 2020. More Low Emission Zones should also be funded and introduced as soon as possible. Corstorphine Community Council would be interested in exploring LEZ proposals for St Johns Road.

Scotland is breaking the European Ambient Air Quality Directive. Scotland regularly breaks the limit in four of the six zones. St Johns Road has been one of the areas that regularly breaches the legal limit and we have seen no significant improvement to date.

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

The UK Government’s plans to tackle air pollution have been considered so poor it has been taken to court several times over its lack of action. The UK Gov’s latest plan has been rightly criticised by air pollution campaigning groups, as it is unlikely to address the threat of NO2 pollution “as soon as possible”, instead offering up a solution of phasing out petrol/diesel engines by 2040. This is not deemed sufficiently ambitious or timely, especially when the UK and Scottish Governments both deem it a fundamental right to be able to breathe clean air. It also pushes too much
responsibility onto local authorities and reduces the UK Government’s responsibilities to tackle air pollution.

Scottish plans are also deeply inadequate: they are only aiming for compliance with European law by 2020 which is not the same as reducing all exposure “as soon as possible”. Just because we cannot see air pollution does not mean it isn’t a public health emergency and needs acted on urgently.

EU limits on air pollution will be weakened or non-applicable when the UK leaves the EU, therefore Scottish policy must ensure that robust legal protections are in place so citizens are safeguarded. Corstorphine Community Council believes that stronger Scottish policy, implementation and legislation would not only help to address our local air quality issues, but also make sure that the withdrawal from the EU does not compromise our residents’ rightful protection against harmful levels of air pollution.

Are the policies sufficiently ambitious?

No - Scottish policy needs to be more robust and better resourced with stricter targets.

The most effective measure to cut air pollution has been shown, by UK government research, to be the charging or banning of dirty vehicles. LEZs are 60 times more effective than a scrappage scheme and are the quickest and most cost-effective way to tackle the problem.

The same research looks at different methods of reducing nitrogen oxides (NOx). Reductions, in tonnes of emissions, over 10 years, are calculated (by Defra) as:

- LEZs 24,000
- Retrofitting buses, HGVs and black cabs 10,000
- Ultra-low emission vehicles 2,000
- Vehicle labelling 700
- Scrappage 400
- Influencing driving style 350
- Reducing speed limits 50

The Scottish Government has committed to only one LEZ across the entire nation by 2018. Corstorphine Community Council believes this to be ineffectual. We need direct action on air pollution now – not years or decades down the line.

Scrappage of dirty diesels, and replacement with electrics is an option that the Scottish Government seems reliant on. This is also evidenced by the Scottish Government’s strategy for CO2 reductions in the draft Climate Change Plan, which is heavily reliant on electric vehicles. However, particulate savings are small compared with LEZs.

Retro-fitting of buses, taxis and HGVs will provide some improvement and Corstorphine Community Council would support this option as one method to tackle air pollution.
Corstorphine Community Council would also recommend the following to ensure that air quality is sufficiently tackled in local communities like ours, as well as in other communities across Scotland.

The Scottish Government, its agencies and stakeholders should:

- Co-ordinate action by local authorities and other bodies to tackle air pollution, and support and fund them to create Low Emission Zones in every city.
- Introduce a Bus Act to give local authorities greater powers over bus services. Bus provision in Edinburgh is an exception and we believe the city’s rising passenger numbers – in opposition to Scotland’s bus trend of fewer bus journeys – can be partly attributed to Lothian Buses’ business model which gives City of Edinburgh Council input and influence.
- Make 20mph the default speed limit in cities across Scotland.
- Invest 10% of the national transport budget in walking and cycling infrastructure on a sustained basis.
- Regard walking and cycling as a preferable and better solution to relying on ‘green’ cars, given their wider benefits to public health, placemaking and the environment and the detrimental impacts that vehicles have on public health and placemaking.
- Revise road building plans due to their significant impact on air quality.
- Make it clear in national planning guidance that development should be vetted for the impact it is likely to have on road traffic levels, and ensure that local planning authorities can easily dismiss applications on air pollution grounds.

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

No.

Currently, once an AQMA has been declared, the local authority must develop and implement an Air Quality Action Plan, but they are not obliged to achieve the objectives because they do not have enough control over all the sources of pollution (e.g. from a road for which Transport Scotland is responsible). This arrangement has meant that direct responsibility for achieving air quality objectives is diffuse.

Having analysed all AQMAs and published a map of them (2015), the Institution of Environmental Science highlighted inconsistencies in the approach that local authorities take - e.g. some declare their whole area or a large part of it (making the problem harder to tackle), while others target only a small proportion. For example, Dundee and Perth AQMAs cover the entire city. Local authorities should take a consistent approach to air quality management.

Corstorphine Community Council also recommends that local authorities’ powers and resources include:

- Make the most effective use of local air quality management measures available to them (e.g. Ultra Low Emission Zones and Air Quality Management Areas).
If applicable, all charging LEZs areas’ revenue generated should go towards high quality infrastructure improvements to make non-polluting public transport and active travel more appealing.

Promote car-free days and other events to highlight the need to improve air quality through local action and behaviour change.

Consult with local communities in an accessible way to get their input and feedback on air quality issues and ways to tackle them.

A Bus Act that gives local authorities greater powers over bus services. With the exception of Lothian Buses in Edinburgh, the bus sector in Scotland is in rapid decline, at the expense of people who do not have access to a car or viable walking and cycling options. Local councils should be enabled to regulate fares, plan routes, introduce integrated ticketing systems, and operate entire networks rather than attempting to join up piecemeal services in an incredibly challenging financial climate.

The Scottish Government should legislate to reduce the default speed limit in urban areas from 30mph to 20mph to support clean air, safe streets and help social cohesion so that local authorities can make it easier to reduce speeds and therefore air pollution.

Local authorities should ring-fence 10% of their capital and revenue transport budgets for cycling and improve footway maintenance for people walking.

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

No.

AQMAs have increased from 35 in 2015 to 39 to date (Aug 2017). With worsening air quality contributing towards issues including climate change, public health, inequalities and economic impact, it is imperative that policy and delivery mechanisms for tackling air pollution are improved and their implementation accelerated.

Corstorphine Community Council receives regular complaints from residents on the air quality, parking issues and other detrimental impacts excessive vehicular traffic has on the local community. To date we have seen very little improvement in the quality of air our residents breathe along St Johns Road.

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?

As action on tackling air quality is urgent and considered a national emergency, Corstorphine Community Council would like to see the LEZ pilot implemented by 2018 at the very latest and would like to see the pilot expedited if possible. It is excellent news to hear that LEZs are being piloted, but the timescales are too slow.

Corstorphine Community Council believes there should be multiple LEZ pilots – LEZs have been shown by the UK Government to be the most effective way to tackle air pollution and therefore pilot initiatives should be encouraged in cities with the worst record on air quality: Edinburgh, Aberdeen, Glasgow and Dundee. We would
be interested in exploring a LEZ in Corstorphine to combat air pollution on St Johns Road.

How should the improvement of air quality be prioritised in areas where there have been persistent breaches of NO$_2$ limit values?

Please see our suggestions above.

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

Yes.

Transport policy

While Scottish Government transport policy is supportive of active travel and reducing reliance on vehicles, huge budget spending on road building, slashed investment in public transport and meagre investment in walking and cycling show that money is not backing up policy.

Corstorphine Community Council believes that significant investment needs to be made in alternative transport options – not roads – to tackle air pollution and asks the Scottish Government to allocate an ongoing and sustained 10% investment of the transport budget in safe, dedicated walking and cycling infrastructure to tackle this barrier.

We would also like increased investment in clean public transport – especially buses, rail and light rail – to give people a viable alternative option to the car when it comes to everyday trips. The successes of Transport for Edinburgh and its ever-increasing passenger numbers should be replicated across other Scottish cities with more investment and a bus act that will give local authorities more power over bus provision.

Investing in active travel and public transport, and reducing the need to travel by car in the first place should take much higher precedence than road building. Spending large sums on roads only contributes to air pollution, but the 2017 transport budget increased trunk road spend by 18% to £967m. Whilst a populist option, building roads will do nothing to reduce emissions and vehicular journeys.

Planning and placemaking policy

As all national and local planning policies and local decisions on development make a significant impact on transport, Corstorphine Community Council believes that Scottish planning policy as well as its implementation needs to promote public transport and active travel. They can do this, for example, by locating development where it can be easily reached by active travel and public transport, and providing good active travel access to and within new developments.

The local community is deeply concerned about proposed residential developments to the west of Corstorphine at Turnhouse. With thousands of new houses in the
pipeline, there is significant concern about the ability of local infrastructure to cope with an influx of (potentially) thousands more vehicles. Air quality will only be worsened if these developments progress without the appropriate integrated transport infrastructure in place to ease congestion and burdens on existing amenities.

**Climate Change policy**

The Draft Climate Change Plan’s focus on transport says almost nothing about walking and cycling, instead relying on electric vehicles to combat CO2 emissions.

While technological solutions do contribute to reducing CO2 and improving air quality in urban areas where motor vehicle use is high, shifting people away from driving to walking and cycling, especially for short trips, makes the best sense as it tackles physical inactivity and associated health problems. Over 60% of trips are 5kms or less – distances easily traversed on foot or by bike for most people. Excluding two cheap and highly beneficial modes of transport that can readily combat CO2 emissions is a significant omission.

Also, while electric cars may help clean up urban air, the impact on the wider environment is compromised unless their power comes from a sustainable, pollutant-free source. Approximately 75% of Scotland’s energy consumption still comes from fossil fuels, which are responsible for high levels of pollutants, including NOx, CO, PM, along with the greenhouse gas CO2.