Environment, Climate Change and Land Reform Committee
Inquiry into air quality in Scotland
Written submission from Lothian Buses Ltd

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

The Cleaner Air for Scotland strategy (CAFS) sets out the key aims of the Scottish Government to meet legal air quality limits and improve air quality with key actions set until 2020. The policy’s overall aim is clear but the support and incentives particularly for public transport, are lacking.

Under the transport heading, key actions include supporting low and zero emission technologies and promoting modal shift from car. For tackling emissions from public transport, the strategy mentions retrofitting existing vehicles and evaluating current funding streams (BSOG, BIF, SGBF) by 2016/17. However with the implementation of an LEZ approaching, funding is required more urgently.

With the deadlines past, the 2016 progress update doesn’t shed light on the reviews of current funding.

Improvements to the bus sector are imperative to tackling air pollution and ensuring compliance with any LEZs, funding for both buses and infrastructure is required to support in air quality improvements.

As outlined in our response to the recent National Transport Strategy Review, it is imperative that wider issues also be addressed. Actions such as traffic management measures, addressing congestion to speed up operations, parking restrictions, engaging operators at the planning stage of new developments, ring fenced (local) public transport budgets and a focus on modal shift are all critical in helping to reduce congestion and promote public transport in our cities.

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

CAFS aligns its policy with that from the EU and UK and seeks to comply with EU air quality legislation by 2020. However the EU has a 2030 timeframe for achieving air quality objectives. Scotland has set itself apart by aiming to meet the WHO guideline limits on PM2.5 by 2020.

Scotland’s CAFS has short to medium term goals rather than longer term. For operators such as ourselves, with vehicle orders planned up until 2021 and investment decisions made over 10-15 years, it would be helpful if Scottish policy developed air quality objectives further and aligned with the EU’s 2030 target so we can plan ahead.
Are the policies sufficiently ambitious?

The policy aims to meet all of its actions by 2020, this in itself is ambitious and addressing actions under each heading is key to delivering the overall objective.

Relevant to ourselves, under the transport/public transport section there is an overall objective to ‘reduce transport emissions by supporting low and zero emission fuels and technologies, promoting a modal shift away from the car, through active travel and reducing the need to travel.’

Supporting actions aren’t as ambitious as expected. Actions mainly contain reviews of existing measures and lack in actions related to modal shift and utilising intelligent traffic systems which are high priority measures as an operator. There needs to be an element of legislative change imposed on local authorities to take ownership and drive forward policies that they are currently not motivated to undertake as they are deemed unpopular either on a political level or with particularly strong lobby groups.

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

The 2016 progress report recently came out to provide an update over the last year.

All key areas under public transport remain under review with no further information.

Lothian welcomes the retention of the core BSOG rate (14.4p/km), however is concerned about the uncertainty regarding the LCV incentive rates given the significant investments in low emission vehicles we have already committed to.

Many of the policies, delivery mechanisms and future policy are under review in the National Transport Strategy which may change guidance.

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 2018 timeframe is fast approaching with no information on the chosen city, implementation plans, timescales or enforcement. Bus operators were only recently engaged by Transport Scotland in May of this year to gather information on thoughts and concerns regarding an LEZ in Scotland. At this stage, it doesn’t seem feasible that the deadline will be met.

As an operator we would look for more information on the proposed delivery timeframe and implementation i.e. design, phased approach delivery, operation and any financial support to comply. This information would help operators to plan ahead. With lead times on vehicle orders often taken a year in advance, Lothian’s vehicle orders are already in for 2018 under our Bus 2020 Environmental Strategy.

Additionally, Euro 6 minimum requirements for the LEZ may not be possible by 2018 for many operators due to costs, timescales and ongoing reviews of funding support.
It is essential that wider transportation methods are also included in any LEZ data including as a minimum car, van, taxi and freight.

Lothian believe that to fully assess the impact of any LEZ pilot more than one would be required as road infrastructure, traffic design, operating circumstances and environments vary considerably in different cities.

Unintended consequences such as moving emissions elsewhere also need to be fully considered and evaluated and the timescales for this are neither short nor medium.

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

Buses and active travel are the solution to helping to improve air pollution. One bus represents 75 vehicles removed from the road. A Euro 6 diesel bus emits ten times less harmful emissions per passenger than a diesel car, however only by addressing congestion and prioritising public transport and active travel, will overall emissions start to reduce.

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

In terms of public transport, the main barrier is the current review of the National Transport Strategy which is ongoing over the next couple of years and will shape a long term vision for transport policy. The objectives in CAFS are an interim measure, however with target dates set as 2020, it is important that there is a clear direction for public transport as the typical capital investment programme will cover 10-15 years.

In order to comply with any LEZ, funding must be confirmed so operators can plan ahead. With a clear fleet strategy in place Lothian is in a fortunate position to support air quality objectives to an extent, but beyond this date there is no clear direction. The LEZ is not a barrier for success but the lack of information regarding the implementation is.

Work surrounding service changes takes place up to a year in advance and so with the 2018 deadline approaching, we have to take steps now to plan ahead in order to comply.