Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from Aberdeen City Council

The Aberdeen City Context

Aberdeen is a unique place in Scotland. Though the City has benefited from the prosperity brought by the oil and gas industry, now that the rest of the UK economy is recovering from recession, Aberdeen is experiencing a decline due to the drop in the price of oil. This is compounded by pressures on infrastructure, connectivity, housing and skills. The effects of this include job losses, falling property prices and loss of custom.

Despite this decline, Aberdeen City continues to make a significant exchequer contribution to Scotland and the UK and this is expected to continue into the future.

Through our Regional Economic Strategy the City / Region is continuing to support the oil & gas industry, but also taking a more sustainable, diversified approach by attracting non-oil business. The City Council is also leading the largest regeneration programme ever seen in Aberdeen to support vastly improved transport, connectivity and investment in the city centre.

The Council is committed to working in partnership, both with other organisations as well as directly with communities themselves, to support the people of Aberdeen to prosper, no matter their social circumstances, and to break a cycle of deprivation that is repeated generation after generation. We want Aberdeen to be a city where there is equality of outcomes and opportunities for all irrespective of their circumstances.

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

Generally yes, particularly as the Strategy links air quality to related influences such as climate change, placemaking and communications. However significant air quality improvement will only achieved if the Scottish Government and partner organisations, including, Local Authorities, Transport Scotland and SEPA work together and take responsibility for the implementation of the relevant actions and if appropriate resources are provided. The Scottish Government must ensure robust mechanisms such as targets and performance indicators are introduced to monitor progress and pursue action where sufficient progress is not achieved.

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

We agree with the Scottish Government’s aim to improve air quality beyond the EU limit values and the UK air quality objectives and that emphasis should be on locations of relevant population exposure. However, the legal status of the standards and objectives within the Scottish regulations and the EU statutory duties can be confusing to the public, businesses such as bus operators and road haulage
companies and other stakeholders. It is essential that guidance and information is presented consistently and clearly in a manner that explains the difference in the regulations and policies, particularly with regards to EU mandatory limit values, and why these differences exists.

**Are the policies sufficiently ambitious?**

Yes provided the Actions within Section 14 are implemented and appropriate targets and performance indicators are introduced to measure progress.

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

Authorities are already under increasing pressure to deliver services and have neither the staffing or financial resources to implement new work streams such as a Low Emission Feasibility Study. Any Low Emission Zones introduced must be fully funded, including the set up costs, infrastructure, enforcement regime and on-going running costs. Additionally, expert personnel support, either through consultants or the provision of additional funding to employ staff, is required to support the development of a Business Case and other associated elements of the National Low Emission Framework process.

Other measures such as placemaking and climate change are already intrinsic local authority functions and therefore limited additional resources are necessary. However, training and guidance may be necessary to support the linking of air quality and sustainability to other associated local authority policies and practices.

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

Progress in the development mechanisms to implement the CAFS actions, for example the development of NLEF guidance, has been slow due to a lack of sufficient staffing resources. Sufficient funding and support must be made available to support Transport Scotland and those local authorities required to undertake a LEZ feasibility study. Furthermore, support must be provided to bus operators, haulage contractors, other business and the public who may be required to upgrade vehicle fleets or otherwise be negatively affected by LEZs. Current bus improvement funding is disjointed and inadequate. There are also limited incentives to encourage fleet improvements or other measures to directly support improved air quality, although it is recognised funding to install electric recharging points, improved cycling and walking etc have a positive effect. Other policies could be introduced to address the issue, for example local authorities have no power to introduce work place parking charges which could support the reduction in cars within city centres, thereby supporting improved air quality, active travel and reduced greenhouse gas emissions.

**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, Scotland is not on target due to the lack of guidance to support Local Authorities undertake the LEZ feasibility process, the complex technical and legislative process that must be explored and the lack of support to Transport Scotland who are primarily responsible for the development of the guidance and progress the elements required to enable the delivery of a LEZ. Furthermore, it takes time to undertake the traffic counts and develop the city air quality models that are necessary to support the feasibility process.

The term ‘pilot’ is inappropriate. LEZs must be consistent in terms of the Vehicle Access Restrictions applied (i.e. Euro vehicle classification, date of compliance) and enforcement regime (e.g. penalty structure) so that a vehicle permitted in one LEZ is not penalised elsewhere. A ‘pilot’ implies scope for change to enable improvements. It is more relevant for LEZs to be introduced when a local authority has completed the feasibility process and the business case demonstrates the evidence to show a LEZ is appropriate. It is essential that funding is not directed to a ‘pilot’ authority leaving insufficient resources to support other local authorities. Additionally, any ‘pilot’ regime should not encourage the redistribution of cleaner vehicles by fleet operators to the LEZ with more polluting vehicles being transferred to other cities or routes.

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

Air quality should be prioritised dependent on the air quality levels i.e. ugm⁻³ above the objective value, size of area, number of people affected and likelihood of any proposed actions achieving the objectives, e.g. significant infrastructure measures. High priority should be given to areas significantly above the objective value where relatively high numbers of people are exposed e.g. >50 and there is limited likelihood of the objective being achieved in the near future without significant mitigation measures.

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

Agriculture is not a significant contributor to the raised pollution levels in Aberdeen, although it is appreciated emissions from agriculture may influence background levels. Additionally complaints of nuisance from dust are not received from local residents. We are unable to comment on the impact from agriculture in other areas. Significant consideration should only be given agriculture if there is evidence to demonstrate emissions are impacting on human health and the environment, although specific activities such as stubble burning may need further review.

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

Barriers to successful delivery include a lack of financial and staffing resources within the partner organisations responsible to implementing the Strategy and local ‘buy in’ to potentially unpopular measures such as LEZs. Resistance from fleet operators, local business, the public and negative local press may also cause conflict.
Conflicts in policies could also arise between actions to reduce greenhouse gas emissions and improve public road safety, for example the promotion of diesel vehicles at the expense of petrol, introduction of speed limits/speed humps to reduce accidents or the use of biofuels that may negatively impact on air quality. However these can be effectively managed through appropriate internal and external consultation within local authorities and partner organisations.