Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution? Are the policies sufficiently ambitious? Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues? Are there conflicts in policies or barriers to successful delivery of the air quality objectives? How does the Scottish policy fit with the UK and EU policy on air quality? Are the powers and resources of Local Authorities and SEPA to address air pollution adequate? 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? How should the improvement of air quality be prioritised in areas where there have been persistent breaches of NO2 limit values? Is adequate consideration given to air pollution from agriculture?

SPT response:

While the various policies in place may be pointing in the correct direction of travel, it could be argued that there remains an apparent divergence between what policies say and what is carried out in practice.

From a transport emissions perspective, the national ambition “is to largely decarbonise road transport by 2050”, with “significant progress towards this by 2030”\(^1\). Yet car use remains on the rise – motor vehicles licensed in Scotland is at its highest ever level\(^2\), 2.9million - and the uptake of low emission vehicles, while making demonstrable progress and on a positive trajectory, is some way off achieving the vision of “phasing out half of all petrol and diesel fuelled vehicles from our urban environments by 2030”\(^3\) – 4,506 ultra low emission vehicles registered in Scotland as at 2016\(^4\).

At the same time, bus - the main and most flexible public transport mode, accounting for 76% of all PT journeys in Scotland\(^5\) – has this year seen a reduction in the Low Carbon Incentive element of the Bus Service Operators Grant from 14.4p to 10.1p per kilometre; not an action designed, it would seem, to motivate an operator to further invest in low emission buses. Similarly, the level of support provided by the Green Bus Fund (GBF) - £3million in the last round – while welcome, could be argued to be falling short of what is required. While over the 6 years to 2017 the GBF has assisted with the purchase of 315 new low carbon buses, this is obviously a very small proportion of all public service buses in Scotland, currently around 4,300\(^6\).

\(^2\) Scottish Transport Statistics No 35: 2016 Edition
\(^4\) Scottish Transport Statistics No 35: 2016 Edition
\(^5\) Scottish Transport Statistics No 35: 2016 Edition
\(^6\) Scottish Transport Statistics No 35: 2016 Edition
In essence therefore, while the policies are indeed rightly ambitious, it would appear their implementation - the strategy to deliver the change required - remains rife with conflicting actions. It is worth highlighting however that this is not a situation unique to Scotland, but is common across Europe and the rest of the world. A gap remains for a cohesive, co-ordinated approach to tackle the complex and conflicting issues relating to transport and travel that, if successful, would deliver benefits for air quality, carbon targets, land-use development, social inclusion and a range of other issues.

While SPT welcomes the emerging proposal to establish Scotland’s first Low Emission Zone (LEZ), it should be acknowledged this is not a ‘new’ concept - there are already over 200 LEZs in place across Europe – and so there is a range of best practice to learn from. In addition, we have always advocated that such an approach will only be successful if part of a wider package of sustainable, integrated transport and land-use measures. Such measures work well when a commitment to achieve modal shift from (and to actively discourage) car travel is matched by concomitant investment in and promotion of public transport and active travel.

Furthermore, there is currently little to discourage travelling by car to towns and cities across Scotland. Car parking is relatively cheap and capacity is high. Added to this is the significant availability of private non-residential parking available in the heart of our towns and cities – for example, there are 27 multi-storey car parks in Glasgow city centre. This merely serves to encourage unsustainable behaviour with a resultant worsening of emissions levels and air quality.

It remains to be seen whether an LEZ can be delivered by 2018, but SPT believes that a phased approach should be taken to delivery. This means focusing first on the main problem areas identified from robust evidence and analysis, putting the right governance and delivery models in place (along with appropriate funding), and recognising time may be needed to achieve long-term effective change. SPT believes that on current evidence, and subject to further analysis and consultation, Glasgow should have the first LEZ in Scotland; others may follow should the evidence point that way.

Notwithstanding the above, if, from a public health point of view, a problem is recognised as being sufficiently serious to need immediate action, the mechanisms available for councils and public transport authorities to accelerate this action should be flexible enough to cope and deliver. (It is worth noting that if there is a public health issue identified in another field – food or water, for example – action is generally swift). In the transport sector, this may mean enabling relevant councils and public transport authorities to invoke the appropriate measures required in a shorter timescale than currently appears to be available.

Regarding resources, it is becoming increasingly apparent that an effective LEZ will come at a price; SPT is guided that the cost of replacing much of London’s bus fleet for the forthcoming ULEZ runs into several hundred million pounds. An LEZ in Glasgow will require a substantial level of resource, a level we believe necessitates significant government support. For bus operators, the LEZ unfortunately comes at a time when patronage in the west of Scotland is on an unprecedented and apparently
unending downward spiral – a reduction of 56 million passengers per annum over the last ten years\(^7\). SPT is seeking to address this through our proposal for the Strathclyde Bus Alliance\(^8\) (multi-partner, private and public sector) and we believe with an integrated, cross-sector approach and appropriate funding, growth can be achieved - and emissions reduced too.

Of course, it remains a great irony that much of what an LEZ is seeking to achieve could readily be delivered with some fairly simple interventions.

For example, addressing congestion in the city centre will go a long way to reducing emissions hotspots. A faster-moving bus is a less-polluting bus, but with bus speeds in Glasgow now in many cases significantly slower that 20-30 years ago\(^9\) - and getting worse – until this is addressed the problem will remain. SPT continues to work with Glasgow City Council and operators to deliver interventions which will address issues like these – for example, a recent project on Union Street is already delivering faster journey times for the (up to) 180 services an hour which pass there, and thus less emissions.

There is an opportunity with the introduction of LEZs to think more strategically and SPT would welcome the development of a Business Case approach to LEZs where those applying must demonstrate not only how such a zone would help tackle air pollution in a specific location but also what wider measures are needed to minimise the potentially adverse impacts that introduction might bring. Early research has suggested that while LEZs might indeed tackle poor air quality, the unintended consequences of such an initiative might reduce the sustainability of bus services elsewhere. If buses cannot access the city centre because they do not meet LEZ criteria then this will undermine their viability, place greater pressure on public transport authority budgets to plug gaps and potentially reduce service levels and availability of vital transport services, in particular for those disadvantaged communities and individuals who rely on them most.

Many bus companies across Scotland are facing severe commercial pressures and their capacity to invest in new greener fleets is heavily constrained. Long-term decisions about renewing buses or fleets are not taken lightly and as we move into a new age of vehicle technologies, bus operators must make very difficult decisions about the type of vehicles they buy. Buy the “wrong” type and an operator could be left with a fleet that is costly to maintain, depreciates in value rapidly, does not have supporting infrastructure to make it viable, or ends up contravening new regulations, legislation or government policy. It is not reasonable to expect commercial operators to bear all the costs and risks of delivering a public policy alone. This is particularly true at a time of such uncertainty not only in terms of patronage decline but the wider economy (and it’s changing nature and resultant changing patterns of commuting).

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\(^7\) Scottish Transport Statistics No 35: 2016 Edition
All of this causes uncertainty, and indeed alarm, in the bus industry, when they look at the investment landscape.

For this reason, the industry needs help and so other measures must include significant investment to retrofit or replace existing diesel buses. While commitments to road and rail projects can often reach billions of pounds, a commitment of similar scale for bus appears, for whatever reason, unpalatable. This despite bus being by far the main public transport mode, and its significant contribution to our economy: in UK metropolitan areas, bus networks generate an estimated £2.5bn in economic benefits against public funding of £0.5bn\(^\text{10}\), and more people access High Streets by bus than by any other mode in the UK, bringing a combined retail and leisure spend of £27.2bn\(^\text{11}\).

In conclusion, while there remain significant challenges in addressing air quality, if they are approached in an integrated way, with appropriate resources, the ambitious policies mentioned at the start of our response can be delivered, and the positive outcomes of reduced emissions and improved public health can be achieved.

SPT would be happy to elaborate on our response to the Committee if necessary. Further information on SPT is available at [www.spt.co.uk](http://www.spt.co.uk).

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\(^{10}\) Urban Transport Group / Greener Buses

\(^{11}\) Urban Transport Group / Greener Buses