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

Cleaner Air for Scotland Strategy is the driving force to improve air quality by bringing relevant stakeholders together and providing a mechanism for other benefits e.g. Climate Change and Place-Making. It involves multi-disciplinary working and a governance structure is in place to assist delivery.

However, it is considered that more of an emphasis is required to align Transport and Planning strategies, for example the National Transport Strategy and the National Planning Framework. Care needs to be taken to ensure that economic growth is delivered in the most sustainable, strategic way and that there is sufficient infrastructure to support the level of development. At regional level, there is also a strong requirement for spatial planning decision-making to be undertaken holistically.

The Switched-On Scotland Roadmap is very ambitious. It sets out a vision that by 2050 Scottish towns, cities and communities will be free from the damaging effects of petrol and diesel fuelled vehicles. It builds on the Scottish Government’s existing commitment to the almost complete decarbonisation of road transport by 2050 and establishes the ambition that, from 2040 almost all new vehicles sold will be near zero emission at the tailpipe, and that by 2030 half of all fossil-fuelled vehicles will be phased-out of urban environments across Scotland.

However, the City of Edinburgh Council has had to develop an Electric Vehicle Framework in addition to this policy. The local framework aims to ensure that there is co-ordinated approach to advance a network of rapid and fast electric charging points and guarantee that appropriate mechanisms are in place for procurement, governance, asset ownership, and maintenance.

The Clean Air Act 1994 is outdated and does not deal effectively with emissions from smaller combustion process for example, wood burning stoves, biomass boilers (both domestic and commercial units). A review of this legislation has been under consideration for several years now, little progress has been made in taking it forward.

Decentralisation of energy plants into urban environments requires more robust regulation, as these installations are often smaller and therefore not regulated by SEPA, and can impact on local air quality for example, biomass boilers.

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

Good, efficient public transport is regarded as one of the main solutions to congestion and therefore will improve air quality. Investment in public transport and park and ride facilities to encourage model shift away from private car use is therefore needed.
More funding should be available to bus companies to incentivise the purchase of cleaner vehicles and to develop the charging infrastructure. The Council has had some success in working with Lothian Buses to operate a cleaner fleet of vehicles in the city, and for them to use their cleanest vehicles for the most frequent services in areas of air quality concern.

Scottish Government provides funding for (Local Air Quality Management) Action Planning for those Local Authorities with Air Quality Management Areas (AQMAs). This sum has not increased since the inception of LAQM, although the number of AQMA has increased. Should funding be redirected to national policies, such as LEZs, local Action Plan delivery could suffer.

The freight sector is a more demanding group for local authorities to co-ordinate. Local action through ECOSTARS Edinburgh has been persuading freight operators to voluntary reduce their emissions (currently funded through the above-mentioned scheme). CAfS identifies the need for Freight Quality Partnerships.

A clear and focused message is required on the health impacts of air pollution, which should be the centrepiece of a national co-ordinated communication campaign.

The UK Government should reverse the tax incentives for purchasing diesel vehicles and provide a more robust vehicle testing system.

There are other policies and mechanisms listed below, which assist with addressing the air quality issue;

- Parking policy is important in controlling commuter travel into city, e.g. residential parking zones, Development Management parking standards, Park and Rides and workplace parking levy (legislative changes are needed);
- Active Travel Action Planning - encourages modal shift,
- Traffic management – ensuring efficient flow of vehicles; and;
- Vehicle licensing regimes e.g. taxi licensing or bus route registration.

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

A holistic approach needs to be taken to address air quality and achieve wider outcomes in respect to Placemaking.

There are issues around diesel fuelled cars and biomass (as a fuel) to support climate change policies, as they have a detrimental effect on air quality.

With regards to developing Low Emission Zones (LEZs), lessons should be learned from other cities, for example London, where by law, net revenue from congestion charging must be spent on further improvements to transport across London.

The Council has had success in cooperative working with Lothian Buses with regards to reducing engine emissions and this model would benefit other cities.

More emphasis needs to be made on modal shift away from the private car. E.g. preference for electric vehicles will still result in PM$_{10}$ emissions from brake dust and tyre wear. On-street charging infrastructure for these vehicles needs to be carefully located with respect to public realm and minimising street clutter.
The tighter Scottish Government targets for particles (PM$_{10/2.5}$), (compared with the UK targets and EU Limit Values) are not recognised in the enforcement regimes of other statutory frameworks, e.g.

- Emissions from PPC (Pollution Prevention and Control) permitting processes which are regulated by SEPA, and;
- UK Renewable Heat Incentive (RHI) emission factor standards (for biomass).

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

In respect to the main local air quality pollutants, Scotland has tighter standards for fine particles (PM$_{10}$ and PM$_{2.5}$) in comparison to the UK. The standards are more in keeping with the World Health Organisations and are valued nationally. However different national targets across the UK make for complex management.

The assessment of pollutants is different. The UK Local Air Quality Management framework identifies localised pollution hot-spots where there is population exposure, whereas the EU assessment criteria can result in non-compliance areas, where there is no population exposure.

The impact of British EU exit is difficult to judge as it will depend on how EU environmental law will be dealt with at UK level. The effect on air quality is likely to be detrimental if EU targets are not transferred across.

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

Edinburgh has put itself forward to become an early adopter of a LEZ in Scotland. However, this is dependent on the availability of resources and support. Centralised procurement to deliver LEZ enforcement in Scotland would be welcome.

Workplace parking levies are a valuable tool that makes new public transport projects possible and supports existing services and infrastructure as well as helping to reduce congestion. This has been shown in Nottingham.

**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 time-scale to introduce an LEZ in Scotland by 2018 is very challenging. In Edinburgh, all vehicle types will need to be considered. Work has shown that the NO$_2$ contribution from each vehicle class is different within the AQMAs. For example, cars were shown to contribute the most at Glasgow Road AQMA, buses have the largest impact along some routes in the Central AQMA (London Road, Princes Street, Gorgie Road) and HGVs have a significant impact at Bernard Street.

Funding and resourcing of the LEZ programme needs to be clarified.

Car owners need time to plan alternatives and commercial/bus fleet operators also need time to change and accelerate vehicle replacement strategies.

The process of amending controls over the transport network such as through the use of Traffic Regulation Orders can be time-consuming.

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1 No regrets: Nottingham backs benefits of pioneering workplace parking levy, IN Local Transport Today, No 664 23 Jan-5 Feb 2015, p6
More than one city with a LEZ will enable exploration of different scenarios e.g. problems with displacement of traffic. The benefit of multiple LEZs will be to reduce the possibility of more polluting vehicles (e.g. buses, taxis) being transferred out of controlled areas to ones that have no controls.

It is likely that a phased approach to the LEZ programme will be necessary.

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


Air quality cannot be addressed in isolation. Actions should be imbedded in Locality Improvement Plans, Local Development Plans (e.g. Town Centre plans) etc.

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

More robust agricultural policies to reduce ammonia emissions which lead to secondary PM$_{10}$ formation are required.