Environment, Climate Change and Land Reform Committee

Inquiry into air quality in Scotland

Written submission from The Royal Environmental Health Institute of Scotland

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

It’s certainly ahead of the rest of the UK and CAFS is a clear statement of objectives. Cleaner Air for Scotland (CAFS) Strategy has a Governance Group and various sub groups have been established to oversee and assist with the delivery. An annual report requires to be submitted to the Scottish Ministers detailing the progress which has been made. Therefore, there is a well-defined structure and system in place to support CAFS.

The aims and objectives of the National Transport Strategy needs to align with CAFS. There should be sufficient importance in this strategy towards public transport and active travel if we are to encourage less car usage in the urban environment.

The National Planning Framework also needs to align with the work of CAFS. Economic growth needs to be delivered in a sustainable, strategic way and that there is sufficient infrastructure to support development. A holistic approach needs to be taken to address air quality and achieve wider outcomes in respect to Placemaking.

There have been examples of high density residential planning applications on agricultural land being refused by local authorities. Local air quality has been raised as a cause of concern amongst other material planning reasons for refusal. However, applicants are appealing these decisions and the government planning reporter has overturned several these refusals.

The national energy policy should also align with Cleaner Air for Scotland. Regulation of policy such as the decentralisation of energy plants into urban environments should be robust.

In terms of direct environmental protection, the Clean Air Act 1994 has been under review for a number of years and needs to be updated as soon as possible.

Are the policies sufficiently ambitious?

In general, yes. They are aligned to EU targets or in advance of those. (Note apart from PM10 – which is more demanding that the rest of the EU and the reasons why this has not been taken back have been explained by the SG)

Climate Change initiatives to reduce carbon emissions by decarbonising the vehicle fleet by 2050 is a very ambitious target. This will also improve air quality. However, an integrated framework covering purchasing infra structure, installation and
subsequent management of sites is not in place to assist local authorities. Electric vehicles are currently prohibitively expensive.

There is a strong economic, social and environmental argument for increasing the amount of plug-in vehicles in Scotland and the amount of publicly accessible EV charging infrastructure for these vehicles. Plug-in vehicles will improve air quality, reduce CO2 emissions and reduce noise and therefore create a better environment for residents and visitors to the region. There is also a growing market in terms of suppliers and local installers of EV charging infrastructure that has a number of benefits to the local economy in terms of jobs and investment.

Progress has been made in for example Dundee, Glasgow and Edinburgh in terms of plug-in vehicle adoption and the installation of EV charging infrastructure. Embedding plug-in vehicles into local policies and strategies will help to both guide and accelerate the widespread adoption of plug-in vehicles across the city.

British roads will be home to more than one million electric cars by 2022 according to leading experts in provider of electric vehicle charging infrastructure, based on recent market developments.

Allowing for a modest increase in adoption, expert projection is based on a growth in electric vehicles of just over 7% of new car registrations.

There has been growth in the uptake of electric cars over the past five years, as they’ve become more competitive in terms of costs, and more practical in terms of range. The number of EVs on UK roads has increased from fewer than 2,000 in July 2012 to more than 100,000 today. It is expected the UK electric vehicle numbers to rise to more than one million by the middle 2022, but it could grow to as much as 1.4 million.

Over the next five years, a significant number of new EV models will have a range of more than 200 miles, with a lower purchase price than their earlier vehicles. Consumers will also be able to choose from larger range of electric vehicles, from manufacturers including Audi, BMW, Ford, Mercedes-Benz, Volkswagen and Volvo, as well as significant new models such as the Jaguar I-PACE and Tesla Model 3 and the new Plug-in Electric London Taxi. The UK’s 100,000th plug-in car was registered in May.

Transport policies require to be strengthened and there should be more emphasis to reduce private car usage. For example implementation of road user charging in urban areas. Money raised could also be used to improve public transport and incentivise park and ride schemes.

There is no requirement in CAFS that stipulates that a Local Authority must implement an LEZ and no mention of road user charger possibilities.

**Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?**
Public transport is regarded as being a solution to congestion and can facilitate air quality improvements. For example, a full double deck bus removes approximately 75 cars off the road network. However, public transport especially rail travel is generally expensive in the UK compared with other European cities, which can deter usage. Additional investment in all public transport, park and ride facilities and subsidised fares to encourage model shift away from private car use are required.

Current transport investment and policy seems to be heavily weighted towards road building and road improvements to support car travel.

It was welcomed news of the city deal for Edinburgh however, it is concerning that the government has prioritised the upgrading of a major road junction (Sheriffhall Roundabout). The upgrading of this junction clearly prioritises car over public transport/cycling/walking. There is even evidence that funding for Borders Rail line was spent on future proofing this junction to the benefit of road but to the detriment of the Borders Rail Line. It is also concerning that the other major transport infrastructure projects such as the Queensferry Crossing prioritise car.

There is limited funding available from the UK and Scottish Government to assist bus companies purchase cleaner vehicles and undertake retrofit programmes. The Scottish Government provides funding for (LAQM) Action Planning for Local Authorities with AQMAs. But the total sum has not increased to reflect the significant number of AQMAs declared since inception of LAQM. Therefore, the funding available per local authority has decreased.

Diesel engine cars are known to be more polluting compared with petrol vehicles. Therefore, it would be prudent for the UK Government to reverse the tax incentives for purchasing diesel vehicles to influence behaviour change. The current vehicle testing system is inadequate and has no bearing on real life driving emissions. A more robust UK wide testing system is needed.

Air quality until recently has had little media coverage to reach the general public. 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 mechanisms and frameworks for local authorities to implement LEZs or other vehicle access schemes are still working progress.

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

Resources aside, of note, the use of Biomass Boilers and the financial incentives aligned to encourage their introduction combined with the lack of developmental control over this area is at odds with Air Quality objectives. REHIS has tried to highlight this through SPCCC to Scottish Government policy planners. There was a suggestion that an accreditation Scheme or a Permitted Development Guidance would be prepared but nothing has been forthcoming.

To deliver air quality improvements requires political will and this will be influenced by elected members. Resources are also crucial for delivering projects for example, LEZs. Many local authorities have significantly reduced the number of employees
due to cuts in annual budgets and are faced with difficult decisions. Therefore, air quality may not be a high priority and most local authorities have not specifically identified air quality as one of their single outcome agreements or pledges.

Air quality funding for undertaking LAQM general duties is included in General Capital Grant. It is not ring fenced by the Scottish Government and is likely to be used for other work areas.

As previously mentioned there is insufficient investment to provide affordable clean public transport to promote the degree of modal shift away from private car use. Although funding is available for bus companies to purchase cleaner vehicles there is a vacuum with respect to infra-structure support to enable companies to operate electric or hydrogen fuelled vehicles.

Some Climate Change policies can have a detrimental effect on air quality for example burning of biomass fuel in urban areas or encouraging diesel fuelled cars.

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 for transport across London.

Emissions from PPC (Pollution Prevention and Control) permitting processes which are regulated by SEPA have been set to meet EU Limit Values. However, Scotland has adopted more onerous particle (PM$_{10}$ and PM$_{2.5}$) standards. SEPA are not legally required to regulate PPC emissions to meet Scotland’s tighter particle air quality objectives. Likewise the Renewable Heat Incentive (RHI) emission factor standards for biomass are not stringent enough with respect to Scottish particle standards.

Specifically:

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

The Scottish standards for air pollutants superior to the UK standards and more in keeping with the World Health Organisation recommendations.

The LAQM regime in the UK was put in place to assist local authorities identify pollution ‘hot spots’. The EU assessment criteria to determine compliance of Limit values is different from the UK criteria. The latter method provides better protection as it addresses relevant public exposure more effectively and all roads are considered regardless of their length and category. Some UK EU zones and agglomerations which have been identified as being non-compliant are in areas where there isn’t relevant public exposure.

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

Resources in Local Authorities are stretched as it is. It is hoped that CAFS will bring in new players at a more strategic level, particularly in relation to transport and developmental control.
It is anticipated that given the dramatic cuts that local authorities have endured additional resources and support will be required to adequately address pollution.

To deliver LEZs it may be necessary to have centralised procurement system in place. Additional powers would be welcome to introduce workplace parking levies.

**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 a fully working and operational LEZ in Scotland by 2018 is very challenging due to emerging practical issues. In some local authorities buses as well as cars have been identified as being major contributors to the majority of NO₂. Therefore, if cars are to be included in an LEZ, car owners will need time to plan alternatives and the implementation of a retrofit programme for buses and acquisition of new ones within this time scale might not be possible. The legislative process of enforcement will take time should Transport Regulation Orders be put in place. A commitment from the Scottish Government for funding an accelerated clean-up of the bus fleet will also be required as well as resources for delivery and implementation. It may be necessary to adopt a phased approach.

Having LEZs in a number of cities will reduce the problem of displacement of more polluting vehicles to non-LEZ areas.

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

Targeting of resources already occurs by allocation of moneys to tackle AQMAs via Scottish Government grant allocation, i.e. by declared or possible AQMA sites and on conditions attached to the grants. There is no Statutory Performance Indicator for Air Quality nor Air Quality improvement which may raise it up the agenda for local authorities but could also provide another stick to break the already burdened back of LA officers engaged in this area. There are mechanisms in place for SG through SEPA to impose on local authorities air quality activity and in recent years the threat has been more vocal. However as yet I am not aware that any formal action has been taken against any LA for inactivity or insufficient improvement.

CAFS has identified the need for a National Low Emission Framework and associated National Modelling Framework. It is considered that this is the best approach to ensure a level playing-field and prioritise areas. But consideration could also be given to local authorities where Air Quality Action Plans, Local Development Plans and Health Protections Plans etc have identified the need for action.

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

It is well recognised that farming operations release emissions such as ammonia which lead to secondary PM₁₀ formation in ambient air. Therefore agricultural activity should be robustly evaluated and further consideration given.