

Air Quality in Scotland- Call for Views

The Net Zero, Energy and Transport Committee has agreed to seek written views on wider air quality issues in advance of the Scottish Government Improvement Plan being laid. The Committee would welcome your views too-

The Scottish Government's, Cleaner Air for Scotland 2 (CAFS2):

- **Priority areas for action;**
 - Effectiveness of the strategy's aims and actions;
And
 - Funding, resources and governance structures for achieving the strategy's aims and actions.

Exposure to air pollution is harmful to people's health in terms of premature mortality and morbidity, mainly related to respiratory and cardiovascular disease. It is also widely accepted that outdoor air pollution causes damage to human health across a wide range of conditions, from pre-birth to old age. Air pollution is also harmful to the environment generally, in particular to sensitive habitats and the wildlife depending on these, across Scotland, from local emission sources and more widely through dispersion and long-range transport of air pollutants. The planning system has an important role to play in improving air quality and reducing exposure to air pollution. Through development planning, land uses can be allocated to make sure existing, sustainable transport links between the home, workplace, educational, retail and leisure facilities are used. It also functions to plan for new sustainable transport links and for identifying appropriate locations for potentially polluting industrial development. Through development management, air quality considerations of individual schemes can be scrutinised both in terms of the direct local implications and wider potential strategic and regional impacts¹. This important link between land use planning and air quality has been recognised in current Scottish Government policy, as set out in the Cleaner Air for Scotland 2 (CAFS2) and the recently adopted National Planning Framework 4 (NPF4). The explicit connection has been made between CAFS2 and the 'Liveable places' national policy section in NPF4 which includes such policy areas as blue-green infrastructure, play, recreation and sport, local living and 20-minute neighbourhoods, design, quality and place and health and safety.

Of particular importance regarding air quality is the new health and safety policy which includes a policy trigger for air quality assessments. The 20-minute neighbourhood policy also has great potential to manage issues around air quality. Research from 20-minute neighbourhood type interventions in Outer London during 2016-19 has shown a modal shift away from private vehicles² and reduction in air pollution³. It should be noted that a number of National Developments set out in the NPF4 will support the implementation of CAFS 2 especially National Developments for Urban Mass/Rapid Transit Networks and the National Walking, Cycling and Wheeling Network.

¹ <https://www.ep-scotland.org.uk/wp-content/uploads/2015/04/DeliveringCleanerAirForScotland-18012017.pdf>

² Aldred, R and Goodman, A (2020) Low Traffic Neighbourhoods, Car Use, and Active Travel: Evidence from the People and Places Survey of Outer London Active Travel Interventions. Transport Findings. September. Available here: <https://bit.ly/38maKTn>

³ Dajnak, D et al. (2018) Air Quality: concentrations, exposure and attitudes in Waltham Forest. July. Available here: <https://bit.ly/3sWUjoo>

RTPI Scotland supports a place-based approach to tackling such issues and engaging with the community. A place-based approach is about considering all aspects of a place when considering an intervention. RTPI Scotland believes that the planning system should be a central, coordinating stakeholder in delivering a place-based approach, set within the context of wider public service reform. This is a particularly important consideration when reflecting on comments made in the Air Quality Investigation Improvement Report from Environmental Standards Scotland (ESS) around governance and oversight arrangements associated with air quality being overly complex and opaque.

It is vital that effective community engagement is integrated within place-based strategies including interventions improving air quality. The Place Standard tool is an existing tool which can help achieve such an approach by providing a simple framework to structure conversations about place. This includes both physical and social elements of place structured around 14 themes. RTPI Scotland are aware that a version of the Place Standard Tool has been developed specifically from an air quality perspective⁴.

In order to deliver community engagement surrounding air quality, support the implementation of 20-minute neighbourhoods, and ensure the appropriate scrutiny of the development proposals and their respective air quality assessment, the planning system needs to be effectively funded. This is especially important to consider given the context of resourcing difficulties experienced in the planning system over recent years, with recently published RTPI research⁵ showing that:

- The planning service is the one of the most severely affected of all local government services in terms of budgets with a reduction of 38% since 2010;
- A quarter of planning department staff have been cut since 2009;
- Planning application fees do not cover the costs of processing planning applications;
- The new Planning Act has introduced 49 unfunded duties to local authorities which could cost between £12.1m and £59.1m over 10 years to implement;
- It is estimated that over the next 10 to 15 years the planning sector will have demand for an additional 680 - 730 entrants into the sector; and
- The planning workforce has both demographic and succession challenges in the short, medium and long term

Notwithstanding the clear case for bringing in more resource into the planning system, RTPI Scotland believes we need to develop new ways of working to ensure the effective running of planning services across Scotland. We note a number of workstreams being undertaken within the Planning, Architecture and Regeneration Division at Scottish Government to streamline procedures which can improve local air quality, such as ongoing work on permitted development rights to enable roll out of EV charging infrastructure and active travel infrastructure. We also note that the Building Standards Division is consulting on legislative requirements for EV chargers in new developments.

Regarding funding more broadly, RTPI Scotland would stress the need to align and coordinate any funding streams with, in particular, the NPF4, the Infrastructure Investment Plan (IIP), the Strategic Transport Projects Review 2 (STPR2) and the National Strategy for Economic Transformation (NSET) but also take consideration of, for example:

- Place Based Investment Programme

⁴ <https://www.ourplace.scot/sites/default/files/2022-01/PST%20Air%20Quality%20lens.pdf>

⁵ <https://www.rtpi.org.uk/research/2022/december/resourcing-the-planning-service-key-trends-and-findings-2022/>

- Vacant and Derelict Land Investment Programme
- Strategic Transport Funding
- Affordable Housing Supply Programme
- City Region Deals and Regional Growth Deals
- Levelling-up funds

Progress towards delivery of Scotland’s low emission zones in Glasgow, Edinburgh, Dundee and Aberdeen, including-

- The scale, ambition and proposed implementation of Scotland’s LEZs;
- Implementation of the bus low emission zone in Glasgow; and
- Monitoring and enforcement of LEZs.

RTPI Scotland do not comment on specific local project, plans or strategies. As set out in the ESS Air Quality Investigation Improvement Report there was a recommendation for Scottish Government to critically analyse the protocols surrounding the siting of monitoring stations and data provision. Implementing this recommendation will allow stakeholders to better comment on the effectiveness of LEZ’s introduced. It should be noted that in the NPF4, only the Glasgow City Centre LEZ is mentioned in regard the Spatial Planning Priorities - a section containing information intended to guide the preparation of Regional Spatial Strategies and Local Development Plans to help deliver Scotland’s national spatial strategy.

- **Scotland’s compliance with international standards on air quality-**
 - Scotland’s performance in meeting international guidelines regarding limit values for air pollutants.
 - Scotland’s performance compared to other European countries.
 - International examples of best practice and how this could be applied in Scotland.

RTPI Scotland is aware that according to provisional analysis from Friends of the Earth, Scotland did not breach legal air pollution limits in 2022 for the first time⁶, which is an improvement -notably in Glasgow likely through the implementation of the LEZ. However, as set out in the Air Quality Investigation Improvement Report from ESS, concerns have been raised that there is *“uncertainty as to whether air quality limit values will be met in the future, especially given the longer term European Union programme of reducing limit values further and the Scottish Government’s commitment to ‘keeping pace’ with developments emanating from Europe.”*⁷ It should also be recognised that numerous locations in Scotland are continually found to breach both the Scottish, UK and EU’s shared annual average target limit on air pollution⁸, with air pollution estimated to contributing towards 2,500-3,500 premature deaths annually⁹.

You do not need to respond to all the points above and the Committee would welcome any further views on other issues not covered that are relevant to this inquiry.

⁶ <https://foe.scot/press-release/scotland-meets-air-pollution-limits-thanks-to-clean-air-zones/>

⁷ <https://www.environmentalstandards.scot/wp-content/uploads/2022/09/20220929-ESS-AIR-QUALITY-INVESTIGATION-REPORT-IESS.21.013.pdf>

⁸ <https://www.igair.com/world-most-polluted-cities/world-air-quality-report-2019-en.pdf>

⁹ <https://foe.scot/press-release/new-research-means-2500-deaths-a-year-in-scotland-are-from-air-pollution/>