CONSULTATION ON AIR QUALITY PLANS TO MEET EU LIMIT VALUES FOR NITROGEN DIOXIDE (NO_2) IN SCOTLAND

The Scottish Government
Riaghaltas na h-Alba

RESPONDENT INFORMATION FORM

Please Note this form **must** be returned with your response to ensure that we handle your response appropriately

1. Name/Organisation

Organisation Name

Transform Scotland

Title **Mr** ☒ **Ms** ☐ **Mrs** ☐ **Miss** ☐ **Dr** ☐ ***Please tick as appropriate***

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3. Permissions - I am responding as…

Individual ☐ / **Group/Organisation** ☒

Please tick as appropriate

(a) Do you agree to your response being made available to the public (in Scottish Government library and/or on the Scottish Government web site)?

Please tick as appropriate ☐ **Yes** ☐ **No**

(b) Where confidentiality is not requested, we will make your responses available to the public on the following basis

Please tick ONE of the following boxes

Yes, make my response, name and address all available ☐

or

Yes, make my response available, but not my name and address ☐

or

Yes, make my response and name available, but not my address ☐

(c) The name and address of your organisation ***will be*** made available to the public (in the Scottish Government library and/or on the Scottish Government web site).

Are you content for your ***response*** to be made available?

Please tick as appropriate ☒ **Yes** ☐ **No**

(d)	We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

CONSULTATION QUESTIONS

Q1 Do you have any comments on the updated UK plan?

It is hardly surprising that the UK has achieved little in the way of compliance over the past five years given that much of the expenditure at national and local level has been on road-building rather than on developing public transport infrastructure, which would have led to fewer private vehicles on the roads.

We are also rather sceptical at the statement in the document 'Consultation on Air Quality Plans to Meet EU Limit Values for Nitrogen Dioxide in Scotland' that "compliance with the limit values was achieved by 2010 over much of Scotland." This apparent good performance is, of course, due to the coarse nature of the national 'Automatic Urban and Rural Network (AURN)' which only has 145 monitoring stations covering the whole of the UK. Given that much of Scotland beyond the Central Belt is rural and under-populated this is hardly a surprise. In fact, within our major cities of Glasgow, Edinburgh, Aberdeen and Dundee, several locations fail air quality standards and have done so for many years.

We are also rather sceptical of the 'Pollution Climate Mapping (PCM)' modelling as regards its ability to predict air quality over the next decade or more. If the output from the PCM model is to be believed, all failing zones within Scotland will be compliant by 2020 based on measures to be taken at a national and local level. However, it makes use of information on vehicle emissions complied with when sold new. Given what we now know in the light of the VW affair about the use of software to generate emission data far removed from real-life performance, it is likely that the modelling will be shown to be over-optimistic. For example, the DEFRA report 'Assessment of the Plans to Improve Air Quality in the UK' (September 2015), states in Section 6.1 (65) "that should Euro 6 emissions standards not perform as modelled, it could result in up to 22 additional zones being non-compliant" Hence, the need for caution!

This makes the whole UK approach rather worrying as it depends to a great extent on technical fixes such as lower emission vehicles (questionable given what was mentioned earlier) and bland statements about the contribution that could be made by getting more people cycling. However, little expenditure is being offered to facilitate the development of comprehensive cycling networks within our cities while at a national level the Chancellor has announced the most massive road-building programme for generations. All things considered, this is hardly a strategy to aid with the meeting of air quality standards.

We fear that the UK approach is a way of pushing compliance way into the future, whereas many of our Continental neighbours have taken action as long as ten years ago. Why does the UK not introduce LEZs now, as was done in many cities in Germany almost a decade ago, and restrict access for polluting vehicles to areas of poor air quality? We consider the failure to do so to represent a serious absence of leadership on this important public health issue by both Scottish and UK Ministers.

Q2 Do you have any comments on the updated Scottish zonal plans?

Our main criticism of the measures being proposed at a Scottish level is that they will be limited in impact because they are so limited in scope. To take a some examples of a few of the **more significant** measures proposed by various cities such as Glasgow, Aberdeen, Dundee and Edinburgh:

1. *Feasibility study in relation to the potential development and introduction of a Statutory Quality Bus Partnership*
2. *Real-time traffic monitoring with improved control regime to smooth out peak traffic.*
3. *Low Emission Zones for buses*
4. *Introduce measures to reduce emissions from Heavy Goods Vehicles*
5. *Increase bus use*
6. *Travel planning*
7. *Manage Bus Emission*
8. *Controlled City Centre Parking Zones*
9. *Improve walking and cycling provision*
10. *Tram scheme development*
11. *New park and ride facilities*
12. *Rail Improvements*
13. *Car Clubs*

Worthy as these examples and others not mentioned may be, the first eight examples are not going to have a significant effect on the emissions from the queuing lines of cars and HGVs on the approach roads and inner city streets. The P&R schemes, tram network extension, rail improvements and Car Clubs do at least try to address the problem by reducing vehicle numbers entering the city – but more is needed.

In a similar way, all authorities mention the role that increased cycling could play in significantly reducing car commuter numbers but most of our cities lack adequate infrastructure to achieve this modal shift and the capital budgets for cycling investment are miniscule as compared with that for road-building. Yet, if more children were able to cycle to school this could potentially remove 25% of peak hour traffic.

The recently published Cleaner Air for Scotland seems, to us, to be a way of simply **postponing any real action** several years into the future because of its reliance of gathering more data and yet further modelling. This is despite the knowledge we know that road traffic levels is the main cause of the poor air quality. The thrust of policy should instead be in limiting vehicle numbers entering our cities. Reductions in commuter levels would not only improve air quality from a health point of view but would also reduce our GHG emissions, something that seems to be missing from the discussion.

What is absent from national and local proposals are any with a **realistic chance** of achieving significant reductions in traffic volumes and corresponding improvements in air quality. Missing from the national proposals, as far as we can see, is mention of **demand management** as a way of reducing traffic volumes into cities and as a possible way of generating income for significant transport infrastructure enhancements. Most serious of all is the absence at this stage of any signs of significant increased funding from the Scottish Government to cities to allow the necessary scale of active travel infrastructure development and for the future implementation and enforcement of LEZs, should these be adopted.

Transform Scotland therefore proposes the following actions as a way of improving air quality and improving general quality of life:

- *A shift in public expenditure from road-building to public transport and active travel.*
- *The development of efficient public transport systems such as low-emission bus, light rail or metro, which are proven to achieve modal shift in travel habits.*
- *The widespread introduction of demand management in major cities*
- *The mandatory introduction of segregated cycle lanes within city-centre and arterial roads to encourage commuter and school cycling in a safe environment.*

Most importantly, a change in transport funding priorities to allow such developments on the ground to take place.