



---

**To: ENVIRONMENT POLICY BOARD**

**On: 13<sup>TH</sup> MAY 2015**

---

**Report by: DIRECTOR OF COMMUNITY RESOURCES**

---

**Heading: SCOTTISH GOVERNMENT LOW EMISSION STRATEGY**

---

## **1. Summary**

- 1.1 The Scottish Government has undertaken a consultation exercise to seek views on proposals to introduce a Low Emission Strategy for Scotland, with the aim of drawing together various policies which have the potential to improve air quality. The strategy also seeks to set out the contribution better air quality can make to supporting sustainable economic growth and improving the quality of life for the citizens of Scotland.
- 1.2 Community Resources prepared a draft response to the consultation following discussion with other relevant services within the Council. The Director in consultation with the Convener of Environment Policy Board required to submit the response to meet the Scottish Government's timescales for the consultation, which closed on 10 April, with the caveat that the response had yet to be approved by the Environment Policy Board.
- 

## **2. Recommendations**

- 2.1 It is recommended that the Environment Policy Board approves the consultation response attached at Appendix 1 as its response to the Scottish Government consultation on the Low Emission Strategy for Scotland.
-

### **3. Background**

- 3.1 Whilst it is recognised that local air quality has improved significantly in recent decades, there are still areas, particularly in towns and cities, where limits set for nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM10) are still exceeded. These pollutants are known to have an adverse effect on respiratory and cardiovascular health, particularly in those who have pre-existing conditions.
  - 3.2 The purpose of the Low Emission Strategy is to draw together various policies which have the potential to improve air quality and present these within a coherent framework. The Strategy document can be viewed on the Scottish Government website at: <http://www.gov.scot/Publications/2015/01/3287>
  - 3.3 The Strategy fits well with the Council's ongoing work to monitor air quality and to seek to work with partners to develop measures to further improve air quality in Renfrewshire.
- 

### **Implications of the Report**

1. **Financial** - none
2. **HR & Organisational Development** - none
3. **Community Planning**

**Greener** – Improving air quality is a key objective for the Greener Thematic Board. The low emission strategy should support the Council and its partners as we work towards this objective.

4. **Legal** - none
5. **Property/Assets** - none
6. **Information Technology** - none
7. **Equality & Human Rights** - The recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report because for example it is for homologation only. If required following implementation, the actual impact of

the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.

**8. Health & Safety** - none

**9. Procurement** - none

**10. Risk** - none

**11. Privacy Impact** - none

---

**List of Background Papers** - none

---

**Author** Oliver Reid, Interim Head of Public Protection

**e-mail:** oliver-reid@renfrewshire.gcsx.gov.uk



**CONSULTATION QUESTIONS****Q1 Do you think the Mission, Vision and Objectives for the Low Emission Strategy are appropriate? If not, what changes would you suggest?**

The Mission, Vision and objectives for the strategy are welcomed. (Note, the objective Communication on Pg 4 is referred to as Collaboration on Pg 5).

**Q2 Do you think the proposed actions will deliver the Mission, Vision and Objectives? If not, what changes to the actions would you suggest? Are additional actions required? If so, please suggest what these might be.**

Table 1 – Actions proposed in the Low Emission Strategy is a useful reference as it brings all the actions referred to in the strategy together although the origins of the dates listed in Table 1 are not clear. Some of these dates may not be achievable given the short time scales for implementation, or being dependant on firstly achieving other actions.

It is noted that most of the Actions listed for *Development* are 'required', or the general tone of the text is much stronger than that of the Transport Actions, however road transport sources are the main contributory factor for the majority of air quality exceedences. In Renfrewshire, our current and potential new Air Quality Management Areas are related to volume of traffic and congestion at specific hot spot locations, likely a similar picture throughout Scotland. Action 9a requires Local Authorities to review traffic management procedures and ensure that traffic flow is optimised. In terms of Renfrewshire Council's Air Quality Management Area this may be one of the most significant measures within the strategy, aimed at addressing air pollution levels, but also one requiring significant cost and investment. A commitment from the Scottish Government/Transport Scotland to assist in resourcing this measure would be required for its successful implementation.

Buses are also a contributor to poorer local air quality within our Air Quality Management Area. It is suggested that an action requiring/encouraging partnership working between Transport Scotland /SPT, local bus operators and Local Authorities specifically in terms of air quality issues associated with public transport be included in the strategy.

Action 14k - Is it the intention of this action that Local Authorities are expected to undertake a modelling assessment to determine the impact of a development whereas currently the onus is on the developer to provide an air quality assessment? This could have significant resource implications.

**Q3 Does the Setting the Scene section accurately summarise the current policy situation? Please suggest changes if not.**

The majority of the document is background information rather than a strategy per se. The information and data in this section is useful, however, the finalised Low Emission Strategy should be used as an opportunity to create a focussed, slim line document with focus on the Way Forward section, the actions and their implementation dates.

**Q4 Does the Way Forward section give a reasonable outline of what further action is needed to deliver an effective Low Emission Strategy? Please suggest changes if not.**

Comments made in Q2 above are also relevant to this section but some specific comments are included below.

*Section 6.4 Development Tomorrow (Page 29)*

The Low Emission Strategy refers to the requirements for the preparation of development plans and consideration of 'individual planning applications'. Does the Low Emission Strategy intend that this should apply to all planning applications or just to certain significant applications? Clarification on this matter would be of assistance. Reference is also made to the planning system demonstrating how it can contribute to the **Low Emission Strategy planning objective**. It is not clear from the text exactly what this objective is; therefore further explanation would be helpful.

Page 30 refers to the development of supplementary planning guidance being prepared on a **regional** basis. This could be of assistance as there are likely to be cross boundary issues that individual local authorities need to consider. Exactly what constitutes a 'region' should be clearly outlined in the strategy. Is this referring to Strategic Development Plan (strategic development plan or Clydeplan) area, or other regional agglomerations? Noise mapping is considered on a regional basis and a similar approach may be of assistance. The Low Emission Strategy should consider the timing of the proposed regional guidance. Table 1 (Page 6) puts a deadline of 2016 on the completion of this Action. The strategic development plan is currently at the Main Issues Report stage and a Proposed Plan may be available by 2016 (no deadline is provided in the main body of the Low Emission Strategy text). The Renfrewshire Local Development Plan timetable will follow on in step with the strategic development plan. It would be of assistance if the regional guidance could be developed and introduced in a way that takes cognisance of the development plan cycle.

Page 31 considers the requirements for developing and monitoring of travel plans. Where travel plans are required, the Low Emission Strategy does not indicate who is responsible for monitoring plan implementation and to whom the results of this should be reported. Further information would be useful to make the action more meaningful. Renfrewshire Council is a major employer within the area, therefore, corporate travel planning is appropriate. There are other employers within the area, however, who also have a significant travel footprint and responsibility for creating emissions. It is recommended that the Low Emission Strategy should require other large employers to carry out travel planning. This is particularly relevant where the employee is working on a shift pattern that requires significant numbers of employees to travel at times when public transport is less frequent ie very early or very late starts and finishes.

Reference is made to establishing a potential transport emission fund on page 31 which would be used to consider in more detail the cumulative impact of incremental emissions and the impacts from individual developments. Further details about this proposal would be of assistance, particularly the mechanism for collecting the funds, how it would be administered and what size and type of development might trigger a requirement to contribute. Planning authorities are all aiming to support sustainable economic growth and are unlikely to be willing to enter into obligations or conditions on planning permission that may result in a slowing of potential growth.

Page 32 includes an action for Planning Authorities to use national modelling methodology to assess the potential impact of development on air quality. There are no details about the methodology in this consultation, therefore, it is difficult provide any comments about this action (please see the comments below).

**Q5      What are your views on the proposals for the National Modelling Framework?**

Section 7 confirms that a national modelling and assessment framework has been developed however no further details are provided.

Getting the model right and the accuracy of data feeding into it will be crucial to securing an effective Low Emission Strategy. From section 7 of the Consultation, the development of the National Modelling Framework is at a relatively early stage. A further opportunity to contribute to the development of the framework would be welcomed. Confirmation about the timescale for development, the type of data that will be required and implementation of the framework would also be of assistance. Reference is made to the synchronisation of development planning cycles (for the strategic

development plan in this instance) and air quality modelling. This is supported, as is the synchronisation of developing and implementing the Low Emission Strategy with the Local and Strategic Development Planning process.

We would suggest the National Modelling framework be subject to a further consultation with relevant organisations as soon as available.

Section 7.3 may be better placed in section 8.

**Q6 What are your views on the proposals for the National Low Emission Zone Framework?**

The consultation is proposing setting standard criteria and procedures for the establishment of Low Emission Zones to provide consistency and certainty. It is then proposed, however, that within the framework, individual or regional groupings of local authorities should develop their own approach to LEZ implementation based on their own circumstances. Would this not reintroduce a lack of consistency and certainty? Further information on this proposal would be welcomed.

On page 51 of the document, under the heading of Emission Standards, the Low Emission Strategy suggests that earlier Euro standard diesel vehicles should be retrofitted to bring them to Euro VI standard (or as close as possible to this standard). There is a concern that this could be considered too strict a standard for many vehicle operators to achieve (given that retrofitting is not always possible).

The costs associated with both implementation and management of an LEZ would be significant and clarification on availability of future funding for such schemes should be provided.

Political pressures within any LA may also have an impact on whether LEZs are implemented. There is the possibility that the introduction of such schemes would be unattractive where Local Authorities are encouraging business and people into town centre areas and an LEZ may appear a disincentive to this.

**Q7 What are your views on the proposed Key Performance Indicators? Are any different or additional Indicators required?**

An essential component of a successful strategy is a method for monitoring progress and its effectiveness however the information provided on KPIs at this stage is very limited.



Whilst KPIs are to be welcomed, another measure which is considered appropriate, would be a measure to report on progress with implementation of the action measures.

We would disagree with the statement at 9.2 advising that information required for reporting KPIs will be readily available. Much of this information will be collected by a number of bodies, outwith Local Authorities and further information on the calculation of KPIs is necessary to ensure that Local Authorities will be in a position to report on these.

The KPI for fraction of mortality attributable to particulate air pollution would be better reported by NHS health boards, given their action under 7a – *Regular scientific evaluations of the impact of the Low Emission Strategy on health will be undertaken*. If not, a method for calculating this KPI requires to be provided to Local Authorities in advance of it being implemented.

It is not clear whether the KPIs are to apply across a local authority area or only within Air Quality Management Areas and clarification on this should be provided (in relation to the percentage reductions in pollutants at each monitoring location).

## **General Comments**

The language used within the strategy refers to Local Authorities *must/will/are required* etc but it is also acknowledged that the provisions within the Low Emission Strategy are non-statutory at this time and there appears no intention to alter this status.

Clarification should be sought on requirements for Local Authorities to undertake these actions and potential consequences should timelines not be met or actions not progressed, particularly where funding/resource restrictions limit the implementation of actions.

There is concern that many of the actions will have significant financial and resource implications. Clarification should be provided to confirm whether funding will be made available to assist with implementation of actions.

For ease of reading, it would be helpful if all the figure and table headings throughout the document were before, rather after them.