

General - 6b Publications and Consultations

o Purpose of Report

The purpose of this report is to inform members of recent publications and consultation papers.

o Scottish Government's draft Low Emission Strategy

The Scottish Government has published a consultative draft of a Low Emission Strategy for Scotland and are seeking views on this new national strategy to tackle air pollution. The consultation invites contributions on proposals aimed at making Scotland's air amongst the cleanest in Europe.

The draft national Low Emission Strategy sets out actions already being taken by the Scottish Government and its agencies, health boards and local authorities to tackle air pollution. It also contains proposals for improving air quality across the country by, for example, better co-ordinating policies at national and local level. The draft national Low Emission Strategy can be accessed from the Scottish Government website at: <http://www.scotland.gov.uk/Publications/2015/01/3287>

Although there has been progress towards reducing emissions across Scotland in recent years (emissions data released last year shows that, between 1990 and 2012, nitrogen dioxide has decreased by 65 per cent, particulates by 60 per cent and sulphur dioxide by 79 per cent), the document highlights that more needs to be done particularly in towns and cities where pockets of poor air quality remain. The Government wants to work with local authorities, businesses, the third sector and the general public and therefore the draft strategy provides a framework within which various agencies can work together to achieve the vision of Scotland's air being amongst the cleanest in Europe.

A draft response is attached as Appendix A to this report. Members are asked to endorse this as Nestrans' response or to add any further comments which they would wish to be included.

The consultation closes on 10 April 2015.

o Recommendation

It is recommended that the Board:

- a) note the content of this report and approve the attached Appendix as Nestrans' response to the consultation on a Low Emission Strategy.



Low Emission Strategy 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

Nestrans

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

Surname

Dickson

Forename

Rab

2. Postal Address

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Email info@nestrans.org.uk

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?

Please tick as appropriate

Yes



Low Emission Strategy for Scotland

Draft Consultation Response

February 2015

The Scottish Government published its Consultation Draft of a Low Emission Strategy (LES) for Scotland in January 2015. A report was considered by the Nestrans Board at its meeting on 20 February 2015 and the following comments were approved as the Board's response to the consultation.

Nestrans is the North East Scotland Transport Partnership, a statutory Regional Transport Partnership covering Aberdeen City and Shire. Nestrans' Regional Transport Strategy refresh was approved by Scottish Ministers in January 2104, providing strategic transport policy and guidance for transport in the region.

Nestrans works with local authorities in addressing issues for the region including air quality concerns and supports the Government's aim to reduce Carbon emissions.

The RTS Strategic Objective 3: Environment contains an aim to "... reduce the effects of transport on climate, noise and air quality" and to "reduce the environmental impacts of transport, in line with national targets".

The draft Low Emission Strategy recognises the role of Regional Transport Partnerships and the importance of collaborative working, acknowledging the need for strategic and region-wide policies.

It is noted that the LES is focussed on air quality and that other "co-benefits" are seen as secondary, although recognising that "natural synergies" exist. The Strategy could benefit by being clearer in proposing solutions that contribute to multiple objectives, for example that reducing carbon emissions should be a stated aim through complementary policies, rather than a co-benefit. It should not be assumed that improving air quality will necessarily result in reduced carbon – policies should be developed which contribute widely rather than on a single high level factor in the hope that wider benefits will accrue. One example has been the move to diesel cars, with lower carbon emissions but harmful emissions affecting air quality and human health.

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 “To protect and enhance health, wellbeing, environment, place-making and sustainable economic growth through improved air quality across Scotland” is supported and welcomed.

The Vision “Scotland’s air quality is amongst the best in Europe” should NOT be presented in its currently confusing future/present tense. It should be clear if the Vision is intended to be a future scenario, or if it is a statement of fact. Suggest rewording for clarity to “Scotland’s air quality *will be* amongst the best in Europe”.

The six Objectives are supported, although it is suggested that the Transport Objective should be reordered and widened to recognise that technology and flexibility may also have a role to play in reducing emissions from transport through more flexible working practices, video-conferencing, online retailing, etc. It is suggested that the Objective should be changed to read “A Scotland that reduces transport emissions through enabling fewer trips; promoting modal shift away from the car; and supporting the uptake of technology and cleaner fuels, to lower emission alternatives.”

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.

The Actions on pages 5, 6 and 7 do not correspond to the Actions contained throughout the document.

Many of the Actions on pages 22 to 34 lack any target dates for implementation (e.g. a 100% declassification of Local Air Quality management Areas); the Actions appear to be unfunded and aspirational – the actions should be clearer and should be focussed on what Scottish Government can do. For example, rather than “Local authorities should ensure....” Wording should be along the lines “The Scottish Government will provide funding to support local authorities to...”

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

It is noted that between 1990 and 2012, Scotland has seen a 59% reduction in particulates, 65% decrease in oxides of nitrogen and a 79% decrease in sulphur dioxide and that air quality in Scotland compares favourably with the rest of the UK and other EU member states. Transport emissions account for 30% of Carbon Monoxide, 38% of NOx and 20% of particulates.

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.

The LES states that “Central Government cannot deliver improvements to air quality on its own”. However although this is accepted, Government does need to accept its responsibility and take the lead, working collaboratively and consistently with partners to achieve common aims. Trunk roads carry 38.6% of traffic in Scotland, and many Air Quality Management Areas relate to trunk roads.

The Scottish Government needs to ensure that sufficient funding is available to enable implementation of the LES and conduct the actions required of local authorities.

The section on Active Travel should provide an opportunity to better influence active travel policy towards achieving the Government’s key objectives. For example, proposals to develop a national walking and cycling network has missed the opportunity to focus where real difference could be achieved, by linking communities and focussing on urban areas – instead, there seems to be a concentration on leisure and long-distance networks for recreation. Similarly, channelling funding for cycling to Sustrans, with their focus on National Cycling Network will miss the opportunity to provide real change in every day journeys, short trips within urban areas and focussed on communities.

There is also a missed opportunity to declutter the array of bodies involved in delivering active travel – there are at least 20 agencies involved in promoting active travel, including Cycling Scotland, Sustrans, Paths for All, Living Streets, SNH, as well as the Scottish Government’s own agencies such as Transport Scotland and Health Scotland. There is a greater role that Regional Transport Partnerships and local authorities could play in developing locally appropriate initiatives to promote active travel, focussing on the key issues relating to transport and environmental objectives.

The Action to “Consider how statutory Quality Bus Partnerships could be made more effective” seems a very precise action. It is suggested that this should be more outcome focussed, along the lines of “Promoting partnerships between bus operators and local authorities to promote more fuel efficient services and deliver improved services for the benefit of passengers and the environment”.

The section on Low Emission Vehicles references the Aberdeen Hydrogen Bus Project and aims to phase out half of all petrol and diesel fuelled vehicles from urban environments by 2030.

The action for “All local authorities to ensure that they have a corporate travel plan consistent with any local air quality action plan” should be extended to “**All public sector organisations...**”

The section on Behaviour Change needs to recognise the plethora of campaigns and organisations all producing similar-themed campaigns, there is an opportunity to coordinate these and ensure efficiency and effectiveness. The LES states that it "...will support Greener Scotland communication campaigns, encouraging individuals to use the car less to improve their health and their local environment." Again, there may be improvements to be made by decluttering and ensuring consistency by collaboration.

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

Developing a National Modelling Framework provides the opportunity to ensure a standardised approach in a consistent and meaningful manner. Initial focus on Strategic Development Plan areas would seem appropriate and involving SDPAs will gain an insight into likely future development scenarios. However, it is important to include relevant local authorities and Regional Transport Partnerships in developing local models and assessments to ensure that transport interventions are also included.

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

Low Emission Zones will require a level of consistency and Scottish Government should take the lead in providing consistent guidance and overview. However, it is important that decisions are made locally, to be appropriate for local circumstances. It is also important that measures are agreed within regional groupings and are in line with national guidelines.

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

Eight KPIs are proposed, but it is unclear how the data should be collected, who should collect it and whether funding will be available where this entails new information gathering. It is agreed that to be effective, the LES will require meaningful monitoring to take place, but it is necessary to produce data or to offer funding for data to be collected.

RDickson/ 11 February 2015

Nestrans/Board/2015/February/Low Emission Strategy