



**Low Emission Strategy for Scotland  
Response from Environmental Protection Scotland  
April 2015**

Environmental Protection Scotland brings together individuals and organisation across the public, private and voluntary sectors to discuss and promote ideas, knowledge and solutions to achieve our aims of a cleaner, quieter, healthier, sustainable Scotland. We are a registered charity that informs debate, provides impartial advice and policy updates based on sound science and research in the fields of air quality, land quality and noise.

Governed by a Board of Trustees and supported by Expert Advisory Groups (EAGs) our structure enables us to take a progressive and pragmatic approach to the issues which concern us and, on behalf of our wide and extensive cross-sector membership, to promote integrated and effective policy-making which supports sensible and workable solutions to pressing environmental challenges. Our EAGs represent a wide spectrum of our members and are chaired by experts in their field and seek to build stronger alliances and support better collaboration between government, practitioners, legal experts and researchers.

Our Air Quality work aims to promote integrated policies and practices that reduce the negative effects of air pollution and greenhouse gases on human health and the environment. Our current focus is on particulate matter and the role of Local Air Quality Management in Scotland.

**Comments**

<b>1</b>	<p><b>Do you think the Mission, Vision and Objectives for the Low Emission Strategy are appropriate? If not, what changes would you suggest?</b></p> <p>Yes.</p> <p>Environmental Protection Scotland welcome this draft strategy and are encouraged that the Scottish Government are taking nationwide action to reduce emissions and improve air quality which will ultimately improve health and wellbeing.</p> <p>The draft version is a large document and we would expect that the final version would be a leaner, high level strategic document that brings together the different policy strands and silos. In future, we would like to see policy announcements and guidance e.g. planning, transport, climate change and energy to refer back to the finalised strategy so that all professionals work towards a low emission Scotland.</p> <p>Environmental Protection Scotland believe that this strategy is the start of a journey for Scotland and that through education, awareness raising, collaboration and best practice sharing, professionals and the public alike can come together to improve Scotland's air. At present, Scotland is in a similar position with air quality as it was with recycling 20-30 years ago; funding and advertising was increased and legislative processes were introduced and now recycling is the norm rather than the exception. Encouraging such behaviour change</p>
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	<p>and promoting the use of sustainable traffic and active travel options will take a similar concerted effort.</p> <p>Environmental Protection Scotland would like to see sustainability embedded throughout the strategy so that a sustainable ethos is included in future transport options, energy efficiency measures, noise mitigation and climate change adaptation efforts.</p> <p>Our major concern is funding and staffing resources to achieve a low emission Scotland. At present the funding available to local authorities to improve air quality through the LAQM regime is over-subscribed and with local authority staffing levels decreasing it will be challenging for local authorities to meet the requirements of the strategy. We ask that the Scottish Government give a clear funding commitment which matches the ambition of the strategy.</p>
<p><b>2</b></p>	<p><b>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.</b></p> <p>Yes – with caveats.</p> <p>There are over 40 action points within the strategy none of which has a target date beyond 2020. A number of the actions will rely on collaboration with many different organisations therefore it is imperative that all key stakeholders commit to the low emission strategy at an early stage so that they are aware of the steps they are required to take.</p> <p>Whilst we do not have a particular problem with any of the action points we feel that the timescales for implementation for some of them is unrealistic and these need to be reconsidered, for example:</p> <ul style="list-style-type: none"> <li>• Actions 5a, b and c have a target of 2020 for 100% declassification of AQMA: as only three AQMAs have been revoked since the LAQM regime was introduced these objectives, although ambitious, are going to be extremely challenging for local authorities to meet. Further to this, the Scottish Government have pledged to introduce a PM<sub>2.5</sub> objective into the LAQM regime which will undoubtedly result in declarations of new AQMAs. Whilst we support the introduction we cannot see how the 2020 deadline to remove 100% of AQMAs is feasible.</li> <li>• Development of a national LEZ framework will be developed during 2015. Much more data is needed (car type and model, engine size, age etc.) before a screening procedure is produced therefore we believe that delaying the deadline by a year will allow for greater discussion whilst not detracting from the objectives and ambition of the strategy. A short delay would allow for more time to ensure a political consensus for a Scotland wide framework. The LEZ can be a hugely important tool to improve air quality and should not be rushed.</li> <li>• We feel that action 4a (air quality and noise) could be strengthened to say “considered and implemented”; a large number of Noise Management Areas coincide with AQMAs and tackling one will benefit the other. Doing so would produce a sustainable document so that not only is air quality taken into consideration but other aspects including noise,</li> </ul>

	<p>climate change and active transport are also considered resulting in sustainable and robust actions.</p> <ul style="list-style-type: none"> <li>• In that light we would suggest that actions 15, 16 and 17 are incorporated into the strategy, not as separate actions, but as the ethos for the whole document and are stated in the introduction.</li> <li>• It may be an oversight but the actions on page 34 are not listed within the actions' table at the beginning of the document:             <ul style="list-style-type: none"> <li>○ the LES will support the ongoing Greener Scotland campaigns</li> <li>○ the Daily Air Quality Index is to be adopted as the key air quality indicator</li> </ul> </li> </ul> <p>Through Breathe Scotland, our clean air initiative, we will work with the Scottish Government to raise awareness and encourage behaviour change through the website, Twitter and Facebook feeds.</p>
<p><b>3</b></p>	<p><b>Does the Setting the Scene section accurately summarise the current policy situation? Please suggest changes if not</b></p> <p>Yes.</p> <p>Environmental Protection Scotland agree that there are no easy solutions, tackling air pollution is more than just targeting diesel vehicles or the most polluting buses and taxis. Whilst this will be hugely beneficial other aspects such as biomass burning in city centres and encouraging behaviour change to more sustainable active travel options is paramount.</p> <p>The document should better promote the health benefits and ultimately cost savings of improving air quality.</p> <p>We would ask that under Section 5.6 Energy Today that a caveat is added to the bullet point that discusses using less polluting fuels such as biomass and biofuels. This is only advantageous in areas off the gas grid and should not be encouraged in towns and cities especially those with AQMAs, Smoke Control Areas or where current air quality levels are near the AQMA objective value.</p> <p>It is encouraging that the Scottish Government is looking at air pollution in rural areas as well, poor air quality does not stop at the city boundary and transboundary pollution is a concern.</p> <p>As previously mentioned, all future relevant policy areas (e.g. planning, climate change, transport, energy etc.) should refer to this document – the LES must be an overarching and high level policy commitment from the Scottish Government.</p>
<p><b>4</b></p>	<p><b>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.</b></p> <p>Yes with caveats.</p> <p>Please see previous comments regarding the actions.</p>

<p><b>5</b></p>	<p><b>What are your views on the proposals for the National Modelling Framework?</b></p> <p>Environmental Protection Scotland support the development of a National Modelling Framework as this will provide a consistent approach across the country.</p> <p>More information on the development of the network is needed before we can fully comment on the framework but we would expect that any future framework to be based on existing models and best practice rather than starting from scratch.</p> <p>We would also expect that any modelling framework is peer reviewed to ensure that it is fit for purpose i.e. it is validated. Following this Environmental Protection Scotland would encourage the Scottish Government to do a full public consultation when the proposals have been developed.</p>
<p><b>6</b></p>	<p><b>What are your views on the proposals for the National Low Emission Zone Framework?</b></p> <p>We support the development of a national Low Emission Zone Framework as it provides consistency for fleet operators, haulage companies, bus companies and the private motorist throughout the country however the timescale given in the document is not feasible.</p> <p>Further comment is not appropriate at this time until more information is available and we would encourage the Scottish Government to continue with its multi-stakeholder sub-group that has been established to discuss the way forward. Further to this, ensuring the political support from Elected Members will be key in ensuring the success of any future LEZ framework.</p> <p>As with a National Modelling Framework, Environmental Protection Scotland expect a LEZ framework to be developed based on existing best practice from across Europe.</p> <p>As well as proposals for a LEZ framework we would like the Scottish Government to consider what other options are available if a local authority’s feasibility study does not recommend the implementation of a LEZ, e.g. active transport options, greener areas etc.</p>
<p><b>7</b></p>	<p><b>What are your views on the proposed Key Performance Indicators? Are any different or additional Indicators required?</b></p> <p>No comment.</p>



## 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

Environmental Protection Scotland

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

Surname

McLellan

Forename

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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*

(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

Yes, make my response, name and address all available

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

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

**(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       No