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Environmental Protection Scotland

Cleaner Air for Scotland 2
Stakeholder Session
13th January 2021

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Introduction

Environmental Protection Scotland works with policy makers, local authorities, industry, academia and environmental professionals to inform debate, influence policy and promote knowledge and solutions to achieve a cleaner, healthier, sustainable Scotland. We are active and influential in the fields of air quality, land quality and noise, and we work to deliver those topics as a means to protect and improve public health, address sustainable development and tackle climate change.

On 13th January, Environmental Protection Scotland held a stakeholder event on the Cleaner Air for Scotland 2 consultation document. Although 34 delegates registered for the event, only 25 were in attendance on the day, representing individuals, consultancies and local authorities. The event was Chaired by Dr Iain McLellan, University of the West of Scotland and Co-Chair of the EPS Air Quality Expert Advisory Group.

The event was held online using Microsoft Teams and delegates were split into one of five difference breakout groups to discuss their main topic, with time to allow for general feedback. The Air Quality Expert Advisory Group provided the Chairs and Scribes for the breakout sessions; these are detailed in the table below.

All comments were collated and are summarised in this report to the Scottish Government for their consideration and publication. The document reflects the comments and general discussion of the delegates; comments are not assigned to a particular attendee and are not necessarily the views of Environmental Protection Scotland.

Environmental Protection Scotland would like to thank the Chairs and the Scribes for leading the breakout sessions. We would also like to thank Scottish Government for allowing us to contribute to the discussions and we look forward to the outcomes of the Cleaner Air for Scotland 2 consultation.

For further information please contact John Bynorth, Policy and Communications Officer: john.bynorth@ep-scotland.org.uk

Group topic	Chair	Scribe
Transport	Dr David Connolly (SYSTRA Ltd)	Annie Danksin (ITP Energised)
Health and well-being	Andrew Taylor (Scottish Government)	Dr Philippa Ascough (Scottish Universities Research Council)
Planning	Dr Stuart Sneddon (Ricardo Energy & Environment)	Elina Dagdeleni (EPS)
Communications	John Bynorth (EPS)	Clare Carruthers (EPS)
Integrating AQ and climate change policies	Jim Mills (ACOEM Group)	Shauna Clarke (City of Edinburgh Council)

Overall Recommendations

Each topic is detailed in the main text, however these are the high level recommendations:

Transport

- Consideration of vehicle displacement with the strategy.
- Route analysis to determine which part of the fleet must be upgraded immediately.
- Highlight the importance of broadband roll out so that people can work from home and minimise travel.
- Encouragement of active travel hubs.
- Fully integrated transport system and promotion of public transport post pandemic.

Health and wellbeing

- Monitor level of hospital admissions and link to pollution events/levels.
- Give public better information on the impact of different types of air pollution on lung health.
- Provide real-time pollution levels for geographical areas on a more local level for individual decision-making.

Planning

- Replace the word with 'regard' from the recommendation: 'Ensure that NPF4 has regard to CAFS 2 in its preparation.'
- Create a more holistic approach to ensure Environmental Health Officers and other areas of the local authority dealing with air quality work together more effectively with planners.
- Requirement for CPD training for planners to ensure a greater understanding about air quality.
- Air quality and noise need to be embedded in primary and secondary legislation of policy to ensure there is 'buy in' from Planning Officers.

Communication

- Ensure there is a one-stop shop for the public to access for air quality information.
- Tailor communication and messaging for rural and urban communities.
- Better use, and linking, of social media channels to promote air quality messages.
- Learn lessons from COVID communication strategy.

Air Quality and Climate Change policy integration

- Extend monitoring network to include black carbon and carbon dioxide.
- Ensure that new technologies meet both air quality and climate change policies and standards.
- Develop mechanisms for Scottish Government and Local Authorities to share resources centrally, and for better working between different local authorities and industry.
- Integrate air quality into procurement, similar to climate change & Climate Management Plans
- Provide guidance for local authorities.

COVID-19

- An extra section should be considered to incorporate the impact and effects of the pandemic.

1 Transport

1.1 Low Emission Zones (LEZs)

It is recommended the strategy should have an action that considers the displacement of non-compliant vehicles that would arise from LEZs. The action should state that no other region should suffer from increased air pollution due to the displacement of non-LEZ compliant vehicles and a mechanism must be found to prevent existing 'cleaner' vehicles in a community (such as buses or private vehicles removed as part of a 'scrappage' scheme) being swapped from LEZ area elsewhere at the expense of another community's air quality. One group commented that there is a need to focus on cleaner technologies combined with cleaner fuels, but the final target should be to reduce the number of vehicles on the roads. The group questioned whether the draft strategy went far enough in this regard.

Another recommendation is 'Route analysis' to determine which parts of the vehicle fleet must upgrade as priority (e.g. those vehicles which travel the most miles in the LEZ and serve areas with high levels of poverty.) The positive from the LEZ emission requirements is that if a bus route starts from outside the zone and is carried on through the zone and out of the LEZ, then neighbouring areas would benefit from improve air quality.

1.2 Avoiding vehicle travel

The strategy could highlight the importance of the continued national roll-out of high-speed broadband to (i) encourage continued home-based working in a post-pandemic Scotland and (ii) discourage vehicle travel for face-to-face meetings and in-store shopping. However, the strategy should note the mental health benefits of people having face to face interaction and the risks to mental health caused by working in isolation at home. This problem could be alleviated through local authorities receiving/providing funding to turn unused local office space into 'remote office hubs'. This would support remote working and reduce the need for commuting by vehicle into urban areas/cities.

The group felt the biggest negative from COVID-19 was the loss of enthusiasm for car-sharing and the impact this would have on car parking space availability as more cars are potentially on the roads with a single occupant due to Scottish Government advice on social distancing.

One group commented that there should be incentives not to travel by car rather than always penalising motorists. It was pointed out that car use can be a practical alternative to other modes of transport.

1.3 Active travel

The strategy could include an action for local authorities to review their active travel provision to ensure it has sufficient capacity to cope with current/aspirational demand. This could include the segregation of cycle lanes into different groups, e.g: 'fast' users of e-bikes, e-scooters and racing cyclists or cycling clubs from slower paced leisure cyclists, such as families, wheelchair users, people of reduced mobility, and young cyclists.

An action should be added to encourage active travel hubs) to be built into park & ride facilities on the perimeters of large towns and cities, allowing for the provision of bicycle and eBike hire. These facilities would allow people who live outside these towns and cities to cycle into the city centre using active travel networks and avoid the need to drive in (so-called 'last mile' travel). These could be built with 'match funding' from other local authorities which would benefit from this 'active travel tourism.' Indeed one group commented that the strategy needs to focus on reducing the first mile and last mile in a private car journey.

Groups acknowledged that there would be difficulties in building up the use of public transport after the COVID-19 pandemic is over and said that walking and cycling needed to be incentivised. A caveat could be added to the action about temporary active travel schemes introduced during COVID-19. This would make it mandatory for only the well-designed, appropriate schemes which are used by the public to be made permanent as there was a feeling that some measures were poorly designed and rushed causing safety issues.

1.4 Public Transport

There is the need for a fully integrated transport system with pay-as-you-go cards (as also suggested in 1.4.1), with the ease of use and convenience when using public transport was identified as key. This included the need to avoid delays when changing train/bus and having bike options at public transport facilities. Lack of regular services creates issue when it comes to changing trains.

It was felt that, the COVID pandemic has resulted in damage being done to the message that public transport is a viable alternative to private vehicles. It is recommended that a post-pandemic campaign should be launched by the Scottish Government to encourage people to start using public transport, and in particular, buses again. This would be in conjunction with upgrades to contactless payment systems and ticketing systems to make it easier for people to use mobile phone technology to store tickets.

A key is to identify barriers to people taking public transport on a local/regional level. Scotland needs to look at other countries which have successfully challenged and changed public transport usage patterns. One group said that infrastructure investment will help drive behaviour change.

It was noted that the promotion of public transport was important, but COVID-19 was not a factor when CAFS, or CAFS2 were originally drafted; it was suggested that the Scottish Government consider the including of an extra section to incorporate the impact and acknowledge the effect of the pandemic.

1.4.1 Buses

An action could be added which provides guidance to ensure local authorities to give priority for emissions standards over costs when it comes to bus procurement contracts, particularly for school buses and those transporting vulnerable groups. This action could be backed up by additional funding from central government.

1.4.2 Rail

Better provision of secure cycle parking spaces at stations is needed and space freed up for bike storage on commuter trains. It is not specifically a CAFS 2 action however it was suggested that a hydrogen ScotRail train should be put on display at the COP26 summit in November to highlight the Scottish Government's plans for low carbon transport; a train is currently being converted at Bo'ness and perhaps a joint Transport/Environment ministerial visit could be arranged for some of the COP delegates if it was not possible to bring it to Glasgow.

1.5 Taxis and Private Hire Vehicles (PHVs)

It was suggested an action is included to make it clear that the Scottish taxi fleet moves away from diesel as soon as possible unless this is already implicit in the three existing actions.

1.6 Low Carbon economy

The group recommended Scottish Government guidance should be provided to local authorities about the provision of infrastructure, specifically EV charge-points and hydrogen filling stations. This should include details of how best to provide charge-point access for EV owners who do not have access to off-street parking and to assess how many are required to deal with this issue.

1.7 Freight

It is recommended that an action is included that encourages / requires the public sector to take the lead providing the infrastructure needed to support a move away from diesel goods vehicles to both hydrogen and electric powered vehicles. It was suggested that there is a need to target freight fleets with Non-Road Mobile Machinery (NRMM) such as food distribution trucks. Many HGVs have high unregulated emissions which could be a concern due to the rise in home delivered supermarket food during lockdown. One suggestion was for an initiative similar to Transport Scotland's BEAR scheme to be introduced to cut emissions from this area of the goods fleet.

1.8 Workplace Parking Levy (WPL)

No changes were identified. The group felt WPL was a strange 'niche' intervention to include within the draft strategy and it might be better to widen this section out a general consideration of parking policy (including provision for EV charging) and how parking changes can be used to promote a switch to less-polluting travel modes/vehicles.

1.9 Vehicle Scrappage schemes

The interaction between this policy and the LEZ displacement issue was noted. It was suggested that taking one subset of roadworthy vehicles off the roads could see them appear elsewhere, for exampleif they are *not* physically 'scrapped' but sent to other countries for 'disposal' and create air pollution problems in those places. However, it was suggested the strategy should note the need for 'embedded carbon' in the scrapped vehicles, not just the tail-pipe reductions, when considering the emissions impacts of any scrappage schemes.

1.10 Non-Road Mobile Machinery (NRMM)

Although this is not included in the transport section of the strategy, it was suggested that a section could be introduced specifically within 'transport' to deal with NRMM, or alternatively, cross-

reference to a section on it within the strategy. The group suggested an action could be introduced which would seek to quantify the air quality emissions from NRMM and lead to a tightening up of controls over NRMM use.

It was further felt that there needs to be further research into non-mobile machinery and what solutions need to be developed before there can be proper engagement with industry.

1.11 Agricultural vehicles

Some concerns were raised within the group about the increase in size of dual-purpose agricultural vehicles. on trunk roads and local roads, particularly in rural areas. There was a suggestion that these vehicles should be subject to emission standards and banned from town centres.

2 Health and well-being

It was noted that the Scottish Government has commissioned on-going research investigating the co-morbidity with air quality and COVID which was welcomed by the group; further to this another breakout group highlighted that the first national lockdown demonstrated the benefits to air quality, so this should be built into any future research looking at health and well-being.

It was also felt that it would be useful to publish documentation with evidence-based advice to the public on how to avoid pollution in their daily lives., however it is unknown whether the evidence is there and if it is available in an easily digestible form. Some participants thought there was sufficient evidence already to take practical action.

The group suggested that there is a growing awareness of indoor air pollution impacts and a need for public awareness of the actions that individuals could take to reduce their exposure to pollutants in the home, office scenarios. One group noted the imbalance/inequality of impacts/ effects. e.g., COPD patients less likely to have car, but who are more likely to live in an impacted area for air pollution.

As well as COVID and air quality research, one group agreed that more research is required to understand the effects of air pollution in Scotland on public health. This could underpin arguments against planning applications which could adversely impact the health of people in AQMAs. For example, a local authority recently passed an application for a high-density property development in an area which suffers from high levels of PM_{10}. Environmental Health Officers, with concerns about the impact on residents of the new property, believed they could have built a stronger case to block the application had they been in receipt of better Scottish research into the health impacts of air pollution.

Some specific thoughts were provided on air pollution and health actions by the group with recommendations to:

- Monitor level of hospital admissions and link to pollution events/levels.
- Give public better information on the impact of different types of air pollution on lung health.
- Provide real-time pollution levels for geographical areas on a more local level for individual decision-making.

- The group discussed making stronger recommendations on the impact of air quality on health and stronger public messaging that this is a public health crisis which would aim to encourage public compliance.

3 Planning

3.1 National Planning Framework 4

There is a belief that conflicts exist between air quality, noise and planning. Under the current approach, the Scottish Government sets targets and council staff work to implement these with little consideration as to how this is done in practice. A more holistic approach would link them together more effectively.

There needs stronger links made between air quality policy, Environmental Health Officers (EHOs) and Planning Officers. Whilst the draft strategy has many 'good words', concern was expressed that this will not necessarily be implemented on the ground when planning applications are being made and approved.

It was felt that the National Planning Framework 4 (NPF 4) could be far stronger in relation to air quality. Noise, for example, features as more of a priority in planning applications than air quality. Air quality is frequently perceived as an aspiration or 'token gesture' in planning applications and needs to be pushed as a stronger feature or Key Performance Indicator in planning.

NPF 4's spatial plans set out the infrastructure required for the support of long-term growth. However, there are anecdotal claims that planners are still routinely failing to allow requests for EV charge-points for homes. Planning departments should be driving modal transport shifts and active travel infrastructure locally.

The need for good quality training for Planning Officers relating to air quality would bring benefits and improve the links between planners and EHOs, for example, one local authority reported that they had obtained funding as part of an action plan to improve air quality. This money was earmarked to provide CPD training for Planning Officers about the importance of air quality, AQMAs and required by planners to reduce air pollution. However, nobody from the Planning Department attended the training session.

The recommendation that the NPF 4 should "*take regard*" of CAFS 2 in its preparation was considered to weaken this statement of intent. One member said that lawyers for a developer would be likely to ignore the phrase to "*take regard*" of air quality or 'run rings' around the word and exploit it as a legal loophole to avoid building measures to benefit air quality and active travel into planning applications. Further to this, it is suggested that Scottish Government lawyers examine some of the language in the draft strategy to ensure it would not be exploited by lawyers for developers who might be determined to save on costs for home building projects.

3.2 Other Planning Issues

One breakout group said the impacts of COVID-19 and the air quality improvements from reduced vehicle use in their city centre already being used to influence planning application decisions. This was especially the case for applications where developers were seeking consent to build parking spaces. These were increasingly being turned down.

4 Communications

4.1 Scottish Air Quality Database and Air Quality in Scotland website.

All the information the public needs about air quality can be found on the above website, along with pollution readings almost in 'real-time' from sites. Whilst this provides useful information, it is one amongst several different sources of public information about air quality. It was suggested it would be good to have a single place where people can go online to find anything about air quality would raise awareness for information about the health impacts of air pollution, with links for people to click taking them different pages for the projects and topics (e.g: active travel, walking, cycling, education).

One member said Clean Air Day had been successful in their local authority area, as had ECO Stars, which had been instrumental in driving changes to the taxi fleet and had subsequently developed in other areas such as school contracts. One of the breakout sessions questioned whether the Air Quality in Scotland website had achieved the aim of being a 'one stop shop' for information.

It was suggested pushing out air quality information demonstrate how the air quality improved generally during the lockdowns.

4.2 Clear messaging about the impacts of air pollution

It was felt the communications recommendations should include a simple sentence that 'all air quality communications must be presented in a clear and easy to understand way.' The group felt this might seem an obvious statement, but that it would ensure discussions about air quality and the health impacts are kept simple and straightforward. One member suggested publicity campaigns should utilise the emerging evidence that links COVID-19 and respiratory illness and apply this to air quality and health campaigns.

4.3 Better co-ordination of social media messages

Local authorities use their own social media platforms, but many young people do not follow their social media accounts which means the messages about air quality are missed by a key group of society. The role of influencers, well known figures who are popular with young people, cannot be underestimated. It was suggested that public transport organisations, such as bus companies, need to be more on board with the air quality agenda to maximise communications strategies.

The group heard that Local Authorities sometimes have difficulty sourcing good quality air quality information for press releases. For this reason, they find the Clean Air Day toolkits, resources and graphics especially useful and something similar could be deployed by the Scottish Government.

In that light, education offered plenty of opportunities for getting the modal shift message across, particularly as young people are far more receptive to environmental issues than the older generations. However, there are difficulties in developing a coordinated approach to air quality in schools.

4.4 Regional Communication

People living in rural areas have different concerns about air quality to residents of urban areas. One of the difficulties in the Highlands was trying to convince the public not to bring their vehicles into Inverness for shopping trips. Likewise, the local authority still had to be convinced not to build more parking spaces to encourage shoppers. Education of both the public and Elected Members must take place.

A lot of work needs to be done to encourage people to use EVs in the Highlands, with many people remaining unconvinced about the availability of charge-points and the cost of purchasing a new vehicle. The group felt there was a need for perceptions to be changed generally and that EV motorists almost never pay the full retail price for a vehicle. A more joined up comms strategy would inform people of the grants available for EV ownership/home charging installation.

There were also contradictions noted in some areas of the Highlands between air quality and climate change objectives. Some people had put in biomass installations in the belief it would be beneficial for climate change, but they did not realise these installations caused air quality problems. One member of the group called for more comms engagement to make people and organisations link together to explain the connections between low carbon innovations and air quality. Although it was important to link Air quality to climate change, it was a difficult balancing act, and more awareness raising of the need to reduce carbon was required.

People must also be made aware of the trans-boundary nature of air pollution, with ozone an issue in parts of the Highlands, and that Scotland has little control over pollution from the EU, eastern Europe and further afield. Whatever actions we take there will still be air pollution 'episodes' as a result of these factors.

The group agreed that communications should be tailored to urban and rural areas to account for all of the differences around the country.

4.5 Learning from COVID-19 communications strategies

It was felt that a lot can be learned from the processes developed during the pandemic by central and local government and Public Health Scotland. Key questions raised during COVID-19 included how people understood messages to encourage behaviour change; how did messages influence the 'stubborn minority' who ignored COVID-19 restrictions. There is an overlap between air quality and COVID-19 and lessons could be learned from the pandemic.

Given that we know a lot about the causes of air pollution and the actions we can take to improve it that further studies could add to the delays in getting the message out to the public. In this regard, government lockdown announcements provided extreme example about the importance of creating clear, concise messaging that the public had to respond to.

Failure to comply with air quality regulations could lead to stronger enforcement and fines should be issued if people are carrying out an action which causes air pollution and damages public health. Some in the group felt there will come a point when communications can only achieve so much and local enforcement officers needed the 'teeth' (by the way of fines) to deal with persistent rule-breakers. (e.g.: domestic burning.)

An action could be added to the strategy regarding financial incentives and campaigns to win the 'hearts and minds' of motorists to encourage people away from ownership of larger, diesel vehicles to low emission models, EVs and car clubs.

A clear guide could be published to encourage widespread people to switch to EVs. It would provide a one stop shop for funding/grants/loans for purchase, grants for the installation of home charging and a tool to allow motorists to compare the running costs to a comparable petrol/diesel model. A network-wide map app of EV charge-points (not just in Scotland) could also be included.

4.6 Engagement

One breakout group highlighted the importance of engaging with people and understanding public views, both individually and at a group level and to find out what motivates them. Some people may be broadly supportive of environmental/ public health goals, but who are unwilling to give up own car or make personal changes that impact their own lifestyles. Increase awareness among public that personal actions have an impact and what they should be doing.

The need was highlighted to avoid counter-productive negative/hopeless messages that leave people wondering why they should change their habits. Message of co-benefits of actions to reduce pollution need to be conveyed by joined up comms strategies (e.g. fitness, better outdoor spaces, etc). Emphasise intuitive theory of that cars are not necessarily safe place from an in-car air pollution exposure standpoint.

Homeworking provides opportunities to reinforce messages (once the pandemic is over) over travel patterns. People could be encouraged to work from home and not just go into the office by car for the sake of maintaining the status-quo, with emphasis on the health and well-being improvements of active travel. (e.g.: 'Travel when you need to travel/Don't travel for the sake of it').

5 Air Quality and Climate Change policy integration

5.1 Extend the air quality monitoring network to monitor for Black Cardon and CO_2

The group suggested it might be beneficial to extend the air quality monitoring network to monitor black carbon and carbon dioxide (CO_2). There are potential co-benefits in both air quality and climate change if there is a wider focus on these pollutants; Black Carbon forms part of total PM and both are greenhouse pollutants; they could also provide additional information regarding sources. Should Scotland be the first country to have a 'Black Carbon Standard?' This may help integrate the Climate Change and LAQM fields of work.

Other lines of discussion included:

- Focus should be on continuous improvement on air quality, even when the standards are met (Actions).
- New technologies in energy provision (especially buildings, decentralisation of national energy sector) – are they in keeping with climate change and air pollution and have they been fully addressed. The group said the new strategy should be clear on this point.
- The draft strategy lacks detail regarding how to integrate policies, but it was understood that the document cannot be too prescriptive.
- COVID-19 provided the opportunity to see what a reduction in emissions and clean air looks like within Scotland's cities. Many changes were made by local authorities and private companies to adapt and so a precedent has been set in what can be achieved.
- Could there be a mechanism developed for Scottish Government and Local authorities to share resources centrally.
- Minimum requirements are defined in terms of climate impacts for local authority procurement within the Climate Management Plans, but not necessarily with a mention of air quality. The group asked whether air quality could be integrated into this to ensure that even if the impacts on climate change are positive with the procurement of "equipment." The equipment should not be procured if there is an adversely negative impact to air quality.
- Mechanisms for better working between different local authorities and between councils and industry, e.g. regional groups, partnerships.
- Provide guidance for local authorities.

The strategy could note that bio-fuels are not always cleaner (and are sometimes 'dirtier') than fossil fuels and that the trade-off between AQ and greenhouse gases needs to be considered carefully when considering increased use of bio-fuels. Air pollution policy feeds into other policies, notably environmental (e.g. N-balance sheet)

One group felt the large number of projects across Scotland, from reductions in carbon emissions to renewables, air quality and noise should all be brought together and provided a positive which linked to communications relating to climate change. However, local authorities should be given enforcement powers at the planning stage for new build properties to ensure they are heated by low carbon non-fossil fuel and are automatically fitted with EV charge-points.

6 Comments outwith our main topic sessions

6.1 Indoor air quality

It was felt that this was an area that needed more coverage. In particular, the example of office was cited: office workers spent long hours in buildings which are often near busy roads with poor air quality. However, said it was reported that planners do not take account of this in applications and it was suggested that office accommodation should be a sensitive receptor. There was a suggestion that we needed to define what is indoor air quality and more research was required that would require adequate funding.

6.2 Data

Some data, specifically relating to transport, is not always easy to obtain and this could be looked at to improve transparency and knowledge of air quality studies.

6.3 Agriculture

Local authorities have little control over influencing and changing behaviours and communicating with farmers. Local authorities are unsure how to progress issues around ammonia with agricultural groups, to make them aware of practices and how this can impact on local air quality. They are currently seeking organisations to engage with on this issue. Another suggestion was to develop an ECO Stars-style scheme to drive 'fleet' change in terms of pesticides and other sprays for farming methods to reduce ammonia levels.