

**REPORT TO: ENVIRONMENT COMMITTEE –18<sup>th</sup> MAY 2015**

**REPORT ON: THE SCOTTISH GOVERNMENT’S CONSULTATION ON THE LOW EMISSION STRATEGY FOR SCOTLAND**

**REPORT BY: DIRECTOR OF ENVIRONMENT**

**REPORT NO: 167-2015**

## **1.0 PURPOSE OF REPORT**

1.1 To seek Committee’s approval for the Council’s proposed response to the above Scottish Government’s consultation exercise.

## **2.0 RECOMMENDATIONS**

2.1 It is recommended that Committee approves the attached response and remits the Director of Environment to submit this to the Scottish Government accordingly.

## **3.0 FINANCIAL IMPLICATIONS**

3.1 There are no financial implications arising from this report.

## **4.0 MAIN TEXT**

4.1 The Scottish Government are currently consulting on the draft Low Emission Strategy (LES) for Scotland which aims to draw together the various policies being implemented and developed across a range of central and local government portfolios which have the potential to improve air quality, and present these into a coherent overall framework, setting a new and refocused agenda of actions. The LES is based on an overarching mission statement and vision, supported by key policy objectives.

4.2 The LES sets out the key actions that are required across the policy areas of health, transport, climate change, land use planning and energy with the common thread of communications and collaboration in order achieve compliance with the EU ambient AQ Directive. In addition it contains two significant new policy proposals in the formation of a National Modelling Framework and a National Low Emission Zone Framework and Key Performance Indicators which will be used by local authorities to report on their progress.

4.3 The consultation is seeking views from a wide range of interested stakeholders on:

- the Mission, Vision and objectives of the LES.
- whether the proposed actions will deliver the air quality improvement to meet the objectives of the LES and if not what further actions are required.
- the proposed National Modelling Framework, National Low Emission Zone Framework and Key Performance Indicators.

4.4 The Scottish Government invited responses to the consultation and Appendix 1 sets out the proposed responses to the consultation questions posed.

## **5.0 POLICY IMPLICATIONS**

5.1 This report has been screened for any policy implications in respect of Sustainability, Strategic Environmental Assessment, Anti-poverty, Equality Impact Assessment and Risk Management. There are no major issues.

## **6.0 CONSULTATIONS**

6.1 The Chief Executive, Director of Corporate Services, Head of Democratic and Legal Services and Director of City Development have all been consulted in relation to this report.

## **7.0 BACKGROUND PAPERS**

7.1 None

Ken Laing  
**Director of Environment**

Kenny Kerr  
**Head of Environmental Protection**

27<sup>th</sup> April 2015

## 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

Dundee City Council

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

Surname

Kerr

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*

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

## 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?**

Dundee City Council welcomes the opportunity to comment on the Scottish Government's Low Emission Strategy (LES). We recognise that Scotland is the first area of the UK to publish a national framework for improving air quality and we are supportive of the aims and objectives outlined in the LES.

Dundee City Council is currently progressing a number of the measures detailed within the proposed LES actions within its own Local Air Quality Action Plan and are therefore supportive of the LES actions.

The successful implementation of the aims of the strategy is reliant on a partnership approach involving the Government, its agencies, local authorities, business and industry, non government organisations and the general public. The Mission, Vision and Objectives could be therefore be strengthened by visually interlinking the objectives to show that it requires the co-operation and shared ownership by all parties to achieve the necessary air quality improvements that will enhance the sustainable development of our urban areas.

### **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.**

Comments and changes to proposed actions (as numbered in the consultation document).

Are the actions listed under "Collaboration" intended to address the "communication" objective? For consistency would recommend that objective remains as 'Communication' throughout.

1 - It would be helpful if the Greener Scotland website also provided advice to the public on other air quality issues such as grants offered to promote green home (heating systems etc.) energy.

2 – Clarification is sought on how 2b and 2c will develop fuller engagement. Inclusion of these actions will support delivery of the strategy however these may be better placed under the 'Health' objective.

4a-Revision of the 2001 report is welcomed, and any additional actions that will improve air quality would be welcomed.

5-5a, 5b, 5c are very challenging and in order to assist with their successful implementation, the LES actions shall need to be prescriptive and incorporated

into the appropriate national policy guidance and/or regulations.

6 – The objectives devised under 6c will form a very important part in this area of the strategy.

7a-Further details on how the impacts of the Low Emission Strategy on health can be evaluated would be welcomed. If measureable health impacts can be attributed to the LES then a longer term target date (than 2017) may be beneficial.

9a 9b - The actions relating to intelligent Traffic system management at current locations in Dundee have been in operation for a number of years and this has provided some improvements. However, AQ problems still exist in Dundee in main bus routes that are within street canyons and it is considered that best way of solving Air Quality is to encourage fleet change towards cleaner buses.

Dundee City Council has been proactive in encouraging the uptake of low emission vehicles by providing electric charging points in the city. Further incentives for encouraging the uptake of electric / low emission vehicles would be very beneficial along with bus operators to upgrade their fleets to low emission vehicles.

10a- Suggest that SNH, as Scottish Government advisors on green infrastructure, be involved the delivery of this Action?

10a – This would be best delivered by ensuring close working between the CAPS and local authorities.

10b – Additional capital infrastructure would greatly assist the 'shared vision' target of 10% of all journeys by bike by 2020.

10c – It is noted that the Local Transport Strategy is no longer a statutory document. It may be more appropriate to reference Regional Transport Strategies. Policies will be best supported by appropriate funding in order to maximise modal shift away from private vehicle use.

11a - The Green Bus Fund would benefit from being made much more attractive to bus operators. The value of grants would require to be significantly increased to achieve any speeding up of vehicle replacement programmes.

11b - The majority of BIF bids will have little direct impact on Air Quality. Trying to link AQ improvements to wider public transport improvements is relatively tenuous. This action could be removed.

11c – Examples of how partnerships might best work on a statutory basis) could include smart routing, deploying best technology in AQMA's etc. Access to further funding (e.g. for improved emissions technology) would greatly assist.

13a - Continued support of the ECO Stars programme in Scotland is welcomed as this has been demonstrated to be a well received method of engaging with fleet operators.

13b - Dundee City Council is already part of a Freight Quality Partnership through

TACTRAN the Regional Transport Partnership and would be pleased to assist with any review that would improve this service. The adopted Sustainable Urban Logistics Plan (SULP) developed through Dundee's involvement in the ENCLOSE project sets out our roadmap of short, medium and longer term strategy for logistics efficiency in Dundee.

14 - The recognition that Land Use Planning has an important role to play in improving air quality is welcomed.

14a - Dundee City Council has very recently completed production of a Local Development Plan for the City. The next plan will be produced after the 2016 deadline stated for this objective.

14f – The SEA currently appraises the impact of development plans on air quality. This includes the likely impact of transport.

14h - More specific guidance is required on the type of developments that should provide travel plans and how these can be applied in practice and monitored. It should be recognised that the Planning capability to monitor the use of Travel Plans in development is limited and enforcement may not be possible as development will have taken place prior to Travel Plans coming into use.

15a - Existing policies need to be reviewed to ensure that Climate Change and Air quality Policies are consistent with each other and maximise co-benefits, and this is recognised as a measure in Dundee City Council's Air Quality Action Plan.

16a - As per comment regarding Action 5 the guidance on bioenergy applications needs to be more prescriptive to enable local authorities to achieve the Scottish Government's desired outcome in respect of improvements to air quality..

#### Suggested additional actions

- Public bodies to lead by example eg require a certain % of fleet to be LE or electric by a given date?
- Statutory obligation on public bodies to minimise their operations emissions to air of LAQM pollutants as well as CO<sub>2</sub>?
- The Strategy should contain more actions to tackle commercial, domestic and agricultural combustion as Table 2 shows that these are the main sources of PM<sub>10</sub> emissions;
- Scottish Government/Transport Scotland to work with UK Govt to consider adopting car scrappage schemes, review of fiscal instruments associated with vehicles to take account of emissions other than CO<sub>2</sub>, and
- Investigation into the merits of a scrappage scheme for the oldest, dirtiest vehicles;
- A review of fiscal instruments such as fuel duty, vehicle excise duty and vehicle tax disc to calculate the true cost to society, to avoid an unnecessary distortion of the market towards a particular technology or behaviour and to take account of emissions other than CO<sub>2</sub>;
- Investigation of the merit of changing the test procedure for vehicles, by utilising the Worldwide Harmonized Light Vehicles Test Procedure (WLTP) as a replacement for the New European Driving Cycle (NEDC), with an adaption to the latest Euro and CO<sub>2</sub> standards.

Local authorities should be given additional 'greening' funding so that when they are procuring for bus services, they are able to demand that the vehicles are of a certain standard. If funded, it could become a mandatory requirement placed on transport commissioners to only support green buses in designated AQMAs.

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

This section is well structured in 'themes'; and recognises the importance of the need for stronger linkages between policies that have natural synergies.

In section 5.6, whilst reference is made to PM<sub>10</sub>/PM<sub>2.5</sub> emissions from biomass, it should also be noted that biomass will contribute to NO<sub>2</sub> flue emissions and further development of abatement technology in this area is required.

**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.**

Dundee City Council currently employs a number of the Action Plan measures in its own AQAP and therefore agree with the LES action measures. Some possible additional actions have been detailed in the response to Question 2.

The Way Forward section may benefit from the points listed below to ensure that the LES will be more effective in improving air quality.

- There is clearer direction from the National Outcome Framework to local authorities and other partner agencies
- Where an LEZ is feasible it should be strongly considered for introduction
- All public bodies are required to increase the percentage of their vehicle fleet that is low emission (e.g. electric/hybrid-electric/(Euro VI))
- Businesses need more incentives or legislative drivers to move to lower emission choices
- Given that the Regional Transport Strategy is a statutory document the role of Regional Transport Partnerships should be strengthened in the LES. Information from the Strategic Transport Projects Review should be examined to identify actions that could bring air quality benefits
- There was an appraisal of the proposed actions to identify any quick wins, priorities and if they will be sufficient to deliver the necessary improvements to air quality.

The financial implications should be quantified and funding sources identified.

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

Welcome the introduction of the National Modelling Framework and offer the following specific comments:

- More detail on the type and extent of high quality traffic data would be beneficial;
- Clarification sought on how recent the estimates of fleet composition will

need to be for the low emission framework model:

- The modelling methodology will need to be able to take into account specific road characteristics such as street canyons and gradients.
- Will there be scope for local verification of the modelling methodology?

Clarification is sought on why the National Modelling Framework seems to solely consider vehicle emissions when the “Setting the Scene section 5.1” highlights how significant combustion emissions are from commercial and domestic sources

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

The LES would be a useful framework in which to introduce local LEZs.. Perhaps focussing on a feasibility study for the seven cities that would include common design /management/restriction practices would be beneficial.

Where an LEZ is not appropriate other methods to encourage fleet change should be developed and considered within the LES.

Local authorities have chosen different approaches to the AQAP process with some like Dundee declaring their whole local authority area while others have declared a number of smaller more focussed AQMAs. These different approaches should be recognised in the development of the NLEZ Framework.

As stated in our response to Q4 the financial implications should be quantified and funding sources identified or provided.

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

Clarification is sought on why the KPIs are placed solely on local authorities and none on the Scottish Government and other partner agencies that can have role to play in delivering an effective national low emission strategy.

Suggestion – that the first two KPIs are ‘headline’ indicators and the remainder are ‘supporting’ indicators.

It is unclear why Action 1b is not included as a KPI.

Consideration could be given to including another KPI that requires all public bodies to report on what proportion of their fleet is low emission/electric vehicles

If planning is to play a key role should there not be a KPI related to LDP/SEA process? For example-

- Monitor mitigation measures put in place through plan making process. The type of mitigation measures that may be included relate to (1) demolition and construction phase impact management, (2) operational phase impact management eg transport related/building design and (3) planning agreements and conditions for the provision of infrastructure, air quality monitoring, financial contributions.
- Monitor green infrastructure included in new development. Show case a good example.



- Monitor/Require where appropriate AQA assessment reports prepared by applicants through pre application process and mitigation identified (Dundee SG).

The Transport related Key Performance Indicators in the consultation draft are not ones that Dundee City Council record as the level of monitoring would be very onerous and costly. The council use the Scottish Household Survey for mode share information which is supplemented with Traffic counts. The council is investing in journey time (JT) monitoring equipment and have undertaken a significant number of JT surveys over the years. Interpretation of the KPI's is important as for example an increase in travel time to work could mean that there is more traffic congestion however it could also mean that more people are using Public Transport. The council considers that the transport related KPI's suggested in the LES are revised and any additional data collection should not place an unnecessary burden on local authorities.

### **General Comments.**

No links in document to place making and green infrastructure guidance issued by Scottish Government.

Opportunity to strengthen the importance of the SEA process using AQA model as a tool

Would there be an opportunity to include a pilot LEZ as part of this strategy to help raise awareness?