

TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP**EXECUTIVE COMMITTEE****4 FEBRUARY 2019****CRIEFF AIR QUALITY ACTION PLAN CONSULTATION****REPORT BY SENIOR STRATEGY OFFICER**

This report seeks approval of a proposed response to Perth & Kinross Council's Consultation on a draft Crieff Air Quality Action Plan.

1 RECOMMENDATIONS

- 1.1 That the Executive Committee approves the proposed response to Perth & Kinross Council's consultation on a draft Crieff Air Quality Action Plan, as detailed in Appendix A.

2 BACKGROUND

- 2.1 Perth & Kinross Council issued a consultation on 7 January 2019 on a draft Crieff Air Quality Action Plan (AQAP) requesting responses by 18 February, 2019.
- 2.2 At its meeting on 18 December 2018, the Partnership was advised orally that Perth & Kinross Council intended to undertake consultation on a draft Crieff AQAP and agreed to delegate authority to the Executive Committee to consider and approve Tactran's response.

3 DISCUSSION

- 3.1 Elevated concentrations of Nitrogen Dioxide (NO₂) and Particulate Matter (PM10) have been measured on Crieff High Street for a number of years, presenting a danger to public health. Due to a combination of heavy traffic on the A85 and tall buildings either side of the narrow High Street corridor, a canyon effect prevents air pollutants from dispersing.
- 3.2 Perth & Kinross Council declared an Air Quality Management Area (AQMA) in Crieff in 2014 following exceedances of air quality target levels.
- 3.3 Consequently the Council are required to produce an Air Quality Action Plan (AQAP) to outline the actions it proposes to reduce concentrations of air quality pollutants within the declared AQMA.

- 3.4 A final AQAP will be developed following the current consultation. The Final Plan will be reviewed every five years and progress on measures set out within the Plan will be reported annually within an Annual Progress Report to the Scottish Government.
- 3.5 An officer steering group was formed to inform the development of the AQAP, of which Tactran is a member.
- 3.6 The consultation asks 30 questions, 4 of which ask for written opinion, and 25 of which seek views on a sliding scale of 1-5 (the remaining question asking the respondent's postcode). The proposed Tactran response provides written opinion to all the questions to help explain the 'scoring' against the sliding scale.
- 3.7 The consultation asks questions around a number of themes:
- Moving Traffic Away From the AQMA
 - Traffic Management – Optimisation of Traffic Movement through the AQMA
 - Reducing the Emissions from the Source
 - Reducing Emissions by Reducing Demand for Traffic
 - Reduction from Non-Transport Sources
- 3.8 In summary, the proposed response suggests:
- Given the limited number of route options, it would be difficult to re-route traffic away from Crieff. Indeed, this may increase pollution levels in other settlements
 - Measures to improve flow of traffic along the High Street are most likely to have a positive impact on air quality. This will be clarified via modelling of proposed actions
 - Measures that the Council can take to reduce emissions from sources and by reducing the demand for traffic are to be supported, as they are likely to also support broader health, environmental and access objectives. However, they may not be sufficient alone to address the air quality issue. This will be clarified via modelling of proposed actions.
- 3.9 The proposed response is included as Appendix A.

4 CONSULTATIONS

- 4.1 The relevant officers in Perth & Kinross Council have been informed that Tactran is submitting a response to the consultation.

5 RESOURCE IMPLICATIONS

- 5.1 There are no resource implications arising directly from this report.

6 EQUALITIES IMPLICATIONS

- 6.1 This report has been screened for any policy implications in respect of Equality Impact Assessment and no major issues have been identified.
- 6.2 In considering the equality implications of issuing the Draft Crieff AQAP, Perth and Kinross Council recognise that poor air quality affects the health of those more vulnerable members of the community. However, as there are no relevant actions resulting from noting and agreeing the content of the Draft Crieff AQAP for external consultation, then at this stage an EqlA has not been carried out by Perth and Kinross Council.

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NOTE

The following background papers, as defined by Section 50D of the Local Government (Scotland) Act 1973 (and not containing confidential or exempt information) were relied on to a material extent in preparing the above Report.

Perth & Kinross Council '[Crieff Draft Air Quality Action Plan](#)', July 2018

**Crieff Air Quality Action Plan Consultation Questionnaire
Proposed Response from Tactran**

Section A: General

1) *What is your postcode?*

PH1 5EN

2) *What are your thoughts regarding air quality in Crieff and the surrounding areas?*

Tactran note the air quality issues along a stretch of the High Street in Crieff as identified by air quality monitoring.

3) *What are your thoughts regarding road traffic congestion along the high street corridor?*

Crieff High Street is a relatively narrow town centre sitting on the A85 Trunk Road. Accordingly there is limited space for the street to accommodate a number of functions:

- **Strategic east/west traffic between Perth and Lochearnhead, which inevitably includes freight, timber and tourist traffic, all of which are essential to Scotland's (rural) economy**
- **Parking and loading for the businesses on the High Street**
- **Bus stops and pedestrian crossings**

It is therefore likely that at some periods, such high streets will suffer some degree of traffic congestion. Accordingly, if congestion is to be reduced, the extent of one or more of these functions needs to be reduced (see q4/5).

It should however be noted that reducing congestion would not be the only way to improve air quality on the High Street.

Section B: Moving Traffic Away From the AQMA

4) *Tell us how much you agree with the measure of rerouting some of the traffic that uses the A85 to use only local roads thus moving traffic away from the area? 1 Strongly Disagree - 5 Strongly Agree*

Disagree. It is difficult to envisage that much traffic could be re-routed to local roads without a significant impact on the local road network and surrounding streets.

5) Tell us how much you agree that the AQAP should consider discouraging parking within, or in close proximity to the AQMA? 1 Strongly Disagree - 5 Strongly Agree

Agree. Some type of parking restrictions to assist the flow of traffic along the high street would appear to be a deliverable intervention that could assist as part of a package of measures. Any changes to parking would need to be adequately enforced.

Section C: Traffic Management – Optimisation of Traffic Movement through the AQMA

6) Tell us how much you agree with the possible provision of ‘SMART’ parking technology in Crieff? (SMART parking technology gives real time information about spaces to enable users to find spaces quickly and easily). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Investigation of any measure to manage parking on the High Street whilst minimising the number of spaces lost should be an option to consider.

7) Tell us how much you agree with PKC improving the ease of movement through the AQMA to reduce local emissions and concentrations? (This would be done by improving traffic management systems). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Investigation of any measure to improve flow on the High Street should be considered.

8) Tell us how much you agree with the possibility of action being introduced to take enforcement action against idling vehicles? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Investigation of any measure discourage idling vehicles should be considered.

9) Tell us how much you agree with a review into the locations and timings of the pedestrian crossings? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. However, recognising the road user hierarchies that should be considered in a high street, any review of the location of crossings to better reflect pedestrian desire lines (and hence reduce pedestrians crossing at ‘inappropriate’ locations) may not assist the flow of traffic.

10) Tell us how much you agree with the proposed measure of holding/gating traffic as a way of minimising congestion within the AQMA? (Holding the traffic back to allow a better flow). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. This is a well-used technique to improve the smooth flow of traffic (admittedly on longer stretches of road), however the impacts on the overall network would need to be assessed through appropriate modelling.

11) Tell us how much you agree with the possibility of limiting or prioritising traffic turning right (onto Comrie Street) from the high street corridor? 1 Strongly Disagree - 5 Strongly Agree

Neither agree or disagree. Would defer any view until results of traffic modelling are known.

Section D: Reducing the Emissions from the Source

12) Tell us how much you agree with PKC encouraging private and public operators (such as local buses and HGVs) within/serving the Crieff area to pursue cleaner vehicles? 1 Strongly Disagree - 5 Strongly Agree

Agree. Wider legislation is aimed at encouraging the take up of cleaner vehicles. Any initiatives to support local operators who use the High Street frequently can only assist. It is noted that PKC have installed EV charging facilities in one of the off street car parks and expanding this facility should be considered. Local incentives such as free/preferential parking could also increase the uptake in ULEVs.

13) Tell us how much you agree with the development and continuation of a local/voluntary bus quality partnership which focusses on 'best practice' in regards to lowering emissions for bus operators? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiatives to support local operators to use cleaner vehicles who use the High Street frequently can only assist. There may also be more opportunities to explore partnership working with operators with the proposed changes contained within the Transport (Scotland) Bill.

14) Tell us how much you agree with the introduction of travel plans for schools to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. It is likely that a significant proportion of the traffic at peak times on Crieff High Street is as a consequence of the 'school run'. Encouraging children that are able (i.e. within a reasonable distance) to walk or cycle to school should be encouraged, and initiatives to reduce car trips for those that are out with walking or cycling distance (and below the 3 mile school transport) should be explored.

15) Tell us how much you agree with enhancing public transport provided within Crieff to encourage the modal shift away from cars? 1 Strongly Disagree - 5 Strongly Agree

Agree. While a laudable aim, it will likely only have an impact on vehicles travelling to or through the high street, therefore:

- Enhancement of the Crieff town bus may assist;
- The extent to which enhancement of the bus service between Crieff and Perth will help the AQAP is dependent on the proportion of residents that live at the western end of Crieff.

16) Tell us how much you agree with the introduction of a Low Emission Zone or restricting access to polluting vehicles within the AQMA (Crieff High Street Corridor) ? 1 Strongly Disagree - 5 Strongly Agree

Strongly disagree. Given the fact that the A85 is a trunk road, preventing traffic from using the A85 via Crieff is likely to require significant diversions to traffic either via (a) Braco and Comrie (b) Killin, Kenmore and Aberfeldy or (c) Callander and Doune. These longer routes are likely to result in greater overall emissions and increased costs to drivers/operators, and potentially add to air quality issues in the settlements stated.

17) Tell us how much you agree with the introduction of eco schemes for HGV and bus operators to improve their fleet's environmental performance? (This will help reduce harmful emissions from HGV and bus operators' vehicles by improving the efficiency of their operations). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiatives to support local operators to use cleaner vehicles who use the High Street frequently, can only assist.

18) Tell us how much you agree with PKC staff undertaking eco-driver training to save fuel and therefore reduce emissions? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiatives to support local fleet users (including the Council) to reduce emissions, can only assist.

Section E: Reducing Emissions by Reducing Demand for Traffic

19) Tell us how much you agree with the promotion of car sharing and the development of car clubs? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist.

20) Tell us how much you agree with the introduction of travel plans for large institutions and businesses to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage local institutions and businesses to reduce the impact of traffic on the High Street can only assist. However as there are a limited number of 'large' institutions and businesses in the Crieff area that could be targeted, organisations that are out with the immediate area but still contribute to the Air Quality issues in Crieff could also be targeted.

21) Tell us how much you agree with the creation of a corporate travel plan for PKC in order to reduce emissions caused by PKC staff? (This will encourage more sustainable forms of travel). 1 Strongly Disagree - 5 Strongly Agree

Strongly agree. Any initiative to encourage local institutions and businesses to reduce the impact of traffic on the High Street can only assist.

22) *Tell us how much you agree with PKC encouraging the Crieff community to cycle and walk as opposed to using private vehicles? This would be achieved through measures such as improving pedestrian facilities and promoting the cycling/walking networks available. 1 Strongly Disagree - 5 Strongly Agree*

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist. Tactran notes the work that was undertaken by PKC through the 'Crieff on the Go' project and continues through the Tayside-wide 'Get on the Go' promotion and this should be built on and developed along with the area wide active travel strategy.

23) *Tell us how much you agree with the provision of extra buses/increased bus routes both in and serving Crieff? 1 Strongly Disagree - 5 Strongly Agree*

Agree. While a laudable aim, it will likely only have an impact on vehicles travelling to or through the high street, therefore:

- **Enhancement of the Crieff town bus may assist;**
- **The extent to which enhancement of the bus service between Crieff and Perth will help the AQAP is dependent on the proportion of residents that live at the western end of Crieff.**

24) *Tell us how much you agree with PKC undertaking further social marketing campaigns such as 'Crieff on the Go' to promote active travel? 1 Strongly Disagree - 5 Strongly Agree*

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist and as noted under question 22, this should also build on the PKC Active Travel Strategy. Any active travel campaign should also be assessed for effectiveness to determine the impact on outcomes that it has had.

25) *Tell us how much you agree with PKC raising awareness of local air quality and the AQMA through schools and community meetings? 1 Strongly Disagree - 5 Strongly Agree*

Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist. Any such initiatives will only work if there is a broader understanding of why changes in behaviour may benefit not only the town but also the individual.

26) *Tell us how much you agree with an audit on the cycling and walking infrastructure in Crieff being undertaken followed by the creation of a walking and cycling infrastructure action plan? 1 Strongly Disagree - 5 Strongly Agree*

Strongly agree. Tactran, in partnership with Perth & Kinross Council, undertook an Active Travel Audit of Crieff during 2017. This identified a potential strategic walking and cycling network for Crieff and associated action plan. Tactran would welcome further partnership working with Perth & Kinross Council to further develop measures for implementation that are in line with the aims of the AQAP.

27) Tell us how much you agree with the provision of PKC 'Champions' to promote alternatives to car transportation methods by engaging with local walking and cycling groups, encouraging active travel within Crieff? 1 Strongly Disagree - 5 Strongly Agree

Agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist.

Section F: Reduction from Non-Transport Sources

28) Tell us how much you agree with minimising developments such as biomass installations to reduce pollution? (Biomass installations burn organic waste to generate heat and power which releases particulate matter and gases). 1 Strongly Disagree - 5 Strongly Agree

Neither agree or disagree. Where non-transport sources add to the air quality problem within the AQMA, appropriate initiatives should be considered.

Section G: Conclusion

29) Overall, do you feel the AQAP is relevant regarding its proposed actions and purpose?

If the AQAP is to be effective it should prioritise those individual, or packages of, interventions which will have a significant impact on the air quality. Whilst numerous interventions are supported in this questionnaire because they will assist both the objectives of the AQAP and other health and environmental objectives of Perth and Kinross Council, this is not to say that any one of them will solve the problem.

The modelling being undertaken should identify which interventions, or packages of interventions, will be sufficient to address the air quality problem.

The modelling should also identify the extent of the impact of cleaner vehicles (private and commercial) as they continue to be introduced. This will help identify the scale of additional interventions that are required.

30) Do you have any further thoughts or comments to add regarding the AQMA and the AQAP?

If the package of required interventions includes measures which include significant changes to the High Street (e.g. restrictions to on-street parking), it is suggested that a 'platform' which encourages the widest debate in Crieff is found (for example engaging people via a 'The Future of Our High Street' exercise).