

**TAYSIDE AND CENTRAL SCOTLAND TRANSPORT PARTNERSHIP****EXECUTIVE COMMITTEE****13 JANUARY 2021****CLEANER AIR FOR SCOTLAND 2 CONSULTATION****REPORT BY STRATEGY OFFICER (STRATEGIC CONNECTIVITY)**

This report seeks approval of a proposed response to the Scottish Government consultation on 'Cleaner Air for Scotland 2 – Draft Air Quality Strategy'

**1 RECOMMENDATIONS**

- 1.1 That the Executive Committee considers and approves the proposed consultation response to the 'Cleaner Air for Scotland 2 – Draft Air Quality Strategy' as detailed in Appendix A.

**2 BACKGROUND**

- 2.1 The Scottish Government issued a consultation on ["Cleaner Air for Scotland 2 - a consultation on a draft new air quality strategy for Scotland"](#) on 30 October 2020 and have requested responses to be submitted by 22 January 2021.
- 2.2 At its meeting of 15 December 2020, the Partnership delegated authority to the Executive Committee to consider and approve a response to the Cleaner Air for Scotland 2 consultation (report RTP/20/44 refers).

**3 DISCUSSION**

- 3.1 In November 2018 the Scottish Government commissioned an independently led review of its Cleaner Air for Scotland strategy, which was published in 2015. The aims of the review were to assess progress to date in implementing the strategy and to make recommendations for additional actions required to deliver further air quality improvements.
- 3.2 A report setting out the conclusions and recommendations arising from the review was published in August 2019. These recommendations have been used to inform the development of a new air quality strategy, which is the subject of this consultation. The draft strategy sets out the Scottish Government's proposals for delivering further air quality improvements over the next five years.

3.3 CAFS 2 is shaped around 10 general themes, which largely reflect the high level recommendations arising from the CAFS review.

- Health - A Precautionary Approach
- Integrated Policy
- Placemaking
- Data
- Public Engagement and Behaviour Change
- Industrial Emissions Regulation
- Tackling Non Transport Emissions Sources
- Transport
- Governance, Accountability and Delivery
- Further Progress Review

3.4 Also issued along with the main consultation document, were a number of supplementary reports that are referenced within the consultation questions.

- [Strategic Environmental Assessment Environmental Report](#)
- [Business & Regulatory Impact Assessment](#)
- [Equalities Impact Assessment](#)

3.1 The consultation asks 30 questions relating to the actions within the topics noted above along with the supplementary assessments. The proposed response from Tactran is limited to the questions related to transport.

3.2 The Executive Committee is asked to consider and approve the proposed Tactran response to these questions, as detailed in Appendix A to allow submission by the deadline of 22 January 2021.

#### **4 CONSULTATIONS**

4.1 The relevant officers from constituent Councils have been consulted on Tactran's 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.

**Niall Moran - Strategy Officer**

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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.

Report RTP/20/44, Director's Report, 15 December 2021

Cleaner Air for Scotland 2 - a consultation on a draft new air quality strategy for Scotland, 30 October 2020

CAF2 - Strategic Environmental Assessment Environmental Report, October 2020

CAF2 - Business & Regulatory Impact Assessment, October 2020

CAF2 - Equalities Impact Assessment, October 2020

## Cleaner Air for Scotland 2 – Draft Air Quality Strategy Consultation

### Question on Health

1. Do you agree with the package of actions put forward in the health chapter?

- A) Yes
- B) No
- C) Neither agree or disagree

Additional comments in support of your answer

*Tactran supports the actions proposed within the health chapter, in particular the proposal to follow an evidence led approach to tackling air quality issues and to aid better understanding of the problems.*

### Questions on integrated policy

2. Do you agree with the package of actions put forward in the integrated policy chapter?

- A) Yes
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran supports the actions proposed to ensure that any proposals to improve air quality also contribute positively to other policy objectives and to enable better understanding of the linkages between air quality, noise and climate change agendas. However, it is important to recognise that the primary objective for tackling air quality issues is public health and there is a risk that by conflating air quality with the other issues identified, focus on this objective could be lost. This could also undermine any public messaging and public support for any air quality interventions.*

3. What in your opinion and/or experience are the barriers to cross departmental working within local authorities or other organisations on air quality and how can these barriers be overcome?

*Tactran is currently involved with the Dundee LEZ working group which has demonstrated good partnership working, both working across the various council teams and departments as well as key external partners and agencies. This multi-disciplinary approach has worked well. It should also be noted that the trunk road network has a significant impact on air quality and should be included within the relevant teams working on AQMA. The key enabler to remove any barriers is to ensure support from both senior officers and elected members.*

*The document also notes that air quality is inextricably linked to climate change agenda. Transport and travel occur across local authority boundaries, particularly considering CO2 emissions and reductions and Regional Transport Partnerships have a role to play in providing a consistent approach to emission reduction.*

## Questions on placemaking

4. Do you agree with the package of actions put forward in the placemaking chapter?

- A) Yes
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran supports the proposed actions to ensure that place making and in particular the place principle is embedded in any interventions that are developed to improve air quality. This principle encourages better collaborative working by recognising the importance that different sectors and organisations have on the overall standard of 'Place'. Regional Transport Partnership should be included in discussions regarding embedding air quality within other plans and strategies.*

5. Do you have any suggestions on the role of place-based approaches in delivering targeted air quality improvements?

*Any place-based approaches to improving air quality must still reflect the objectives of air quality action plans, low emission zones and national policy.*

## Question on data

6. Do you agree with the package of actions put forward in the data chapter?

- A) Yes
- B) No
- C) Neither agree nor disagree

Additional comments to support your answer

*Tactran supports the proposed actions noted within this section, however consideration should be given to going further and better integrating current data sources, data collection, and modelling between transport, land use and air quality.*

*The existing LATIS framework provides a good basis for this integration and could be expanded to include the NMF within its 'suite' of models and data. The LATIS framework also includes processes and procedures for sharing data that is not made available via open data.*

*Better coordination of data collection could allow standardised data to be collected more efficiently and in a more cost-effective manner. It would also ensure a consistency of format that would make it easier for the end user.*

*It is recognised that data collection is resource intensive and requires significant finance to collect. It should therefore be recognised that any data has a monetary value and could be used as an income stream to finance its collection.*

7. Do you have any suggestions on the approach for annual collection of traffic data for air quality management purposes?

See above

### **Question on public engagement and behaviour change**

8. Do you agree with the package of measures put forward in the public engagement and behaviour change chapter?

- A) **Yes**
- B) No
- C) Neither agree nor disagree

Additional comments to support your answer

*A complementary package of behaviour change promotion would ensure that any additional benefits of air quality interventions are maximised and can help build public support for any measures implemented. However, any new package of behaviour change promotion and public engagement should take cognisance of existing programmes and relevant strategies (eg the Tactran Regional EV Strategy) to avoid duplication and reduce the potential for mixed messaging. Consideration should also be given to direct engagement with children via schools.*

*The proposal to undertake a baseline survey of awareness should be expanded to capture public attitudes towards air quality issues and potential interventions.*

*There is a need to be able to outline the specific benefits improved air quality bring to the public. For example, when considered alongside what could be negatively be perceived as restrictions to movement brought about by introduction of LEZs in our cities, there is a need to publicly state the benefits. Although, the difficulty is that the benefits are largely likely to accrue to people within the LEZ, where the restrictions effect those outside the LEZ.*

### **Questions on industrial emissions regulation**

9. Do you agree with the package of actions put forward in the Emissions Regulation chapter?

- A) **Yes**
- B) No
- C) Neither agree nor disagree

Additional comments to support your answer

*Tactran supports the proposed actions in this section where there is a link to transport. In particular, the control of non exhaust emissions from vehicles is strongly linked to an overall reduction in vehicle km which also supports other policy objectives.*

10. Should currently unregulated sectors such as non-waste anaerobic digestion and non-road mobile machinery be brought into existing legal frameworks?

- A) Yes
- B) No
- C) Don't know

Please explain your answer

*Tactran has no comments to make in relation to this topic.*

### **Question on domestic (household) combustion emissions**

11. Do you agree with the package of actions put forward to reduce the impact of domestic (household) combustion?

- A) Yes
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran has no comments to make in relation to this topic.*

12. What potential impacts might the package of actions put forward have on households and businesses?

*Tactran has no comments to make in relation to this topic.*

### **Questions on agricultural emissions**

13. Do you agree with the package of actions put forward in the agricultural section?

- A) Yes
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran has no comments to make in relation to this topic.*

14. We will work together with SEPA and the agricultural industry to develop a voluntary code of good agricultural practice for improving air quality in Scotland. Do you agree with this approach to tackling ammonia emissions from farming?

- A) Yes
- B) No
- C) Neither agree nor disagree

Please explain your answer

*Tactran has no comments to make in relation to this topic.*

15. Any voluntary code of good agricultural practice could be subject to an early review process to assess its effectiveness and compliance. If the review indicates that insufficient progress is being made, the need for direct regulatory intervention will be considered. Do you agree with this approach?

- A) Yes
- B) No
- C) **Neither agree nor disagree**

Please explain your answer

*Tactran has no comments to make in relation to this topic.*

### **Question on nitrogen deposition and environmental impacts**

16. Do you agree with the package of actions put forward in the nitrogen deposition and environmental impacts section?

- A) Yes
- B) No
- C) **Neither agree nor disagree**

Additional comments in support of your answer

*Tactran has no comments to make in relation to this topic.*

### **Question on Transport**

17. Do you agree with the actions put forward in the transport chapter?

- A) **Yes**
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran supports the actions contained within the Transport chapter and notes that many of the existing actions are those detailed within the NTS2. In particular, it is noted that the commitment to introduce LEZs in to the four largest cities remains and Tactran will continue to support Dundee City Council in the development and implementation of their LEZ proposals.*

*Tactran also supports any actions that will result in a reduction in travel, however reference should be made to existing workplace travel planning programmes and resources such as Travel Know How Scotland.*

*Under the action relating to the Bus Partnership Fund, it should be noted that this fund is closely linked to the formation of BSIPs and a more regional, collaborative approach to improving bus travel.*

*It should also be noted that within the Low Carbon Economy section, significant collaborative work has been undertaken within the Tactran region (and others) on*



*developing a holistic EV strategy which will help deliver and compliment the actions proposed.*

*The action suggested within the “Trunk Road Network and Demand Management” section to explore how road space can reallocated following the Spaces for People programme would be more appropriate within the active travel section of the transport chapter. The further development and potential move to permanence of Spaces for People schemes is better delivered via programmes such as Places for Everyone that are noted within the Active Travel section.*

### **Question on Local Air Quality Management**

18. Do you agree with the package of actions put forward in the Local Air Quality Management chapter?

- A) **Yes**
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran supports the actions within this chapter, however the monitoring and review of LAQM should be done in collaboration with other monitoring frameworks relating to transport and travel such as the active travel monitoring framework and local and regional monitoring programmes. This will allow a better assessment of the effectiveness in delivering improvements and some of the associated/related benefits within the mobility sector.*

### **Question on governance**

19. Do you agree with the proposed Governance of CAFS 2?

- A) **Yes**
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran supports the actions within this chapter, in particular the flexibility that would appear to be suggested with the formation of dedicated specialist groups. This reflects that air quality issues are cross cutting across many sectors and are also not constrained by administrative boundaries with, for example, travel to work areas spanning across multiple local authorities and regional transport partnership boundaries.*

## Question on progress review

20. Do you agree with the proposed review timeframe?

- A) Yes
- B) No
- C) Neither agree nor disagree

Additional comments in support of your answer

*Tactran agrees with the proposed review timeframe, although it should be recognised that this period will contain a significant period of post-covid recovery which will have to be considered, including potential permanent/long term changes in travel demands and travel patterns.*

## Equality Impact Questions

21. Are you aware of any additional equalities impacts of the proposals in this strategy?

No

22. Do you think introducing legislation to control the supply of the most polluting domestic fuels, as described in chapter 7 of this consultation, will have disproportionate impacts on remote/rural or island communities?

Please provide evidence where possible in support of your answer.

*Tactran has no comment to make.*

23. Do you think this strategy will disproportionately impact low income households?

Please provide evidence where possible in support of your answer.

*The potential impact on low income households that would be impacted by LEZ proposals has been mitigated somewhat by the introduction of the LEZ support fund, however further assessment of this impact should be based on SIMD data for LEZ areas.*

## Business and Regulatory Impact Assessment Questions

24. Are you aware of any additional business or regulatory impacts of the proposals in this strategy?

Please provide any supporting evidence that you are aware of.

*Tactran has no comment to make.*

25. Do you anticipate that the proposals in this strategy will have differing impacts for large/small scale businesses?

Please provide any supporting evidence that you are aware of.

*There is the potential for smaller scale transport operators to be more adversely impacted financially as they may be less able to absorb the costs associated with moving to LEVs and alternative fuels in comparison to larger operators. As small operators often provide an important part of the wider public transport network, continued support must be made available to assist with the transition.*

26. Would there be different impacts for those that operate in Scotland only and those that operate across different parts of the UK?

Please provide any supporting evidence that you are aware of.

*Tactran has no comment to make.*

27. Would there be different impacts for those that operate in remote/rural or island communities?

Please provide any supporting evidence that you are aware of.

*Tactran has no comment to make.*

### **Strategic Environmental Assessment Environmental Report Questions**

28. What are your views on the accuracy and scope of information used to describe the environmental baseline set out in the Environmental Report?

*The scope and accuracy of information presented within the environmental report are appropriate.*

29. What are your views on the predicted environmental effects as set out in the Environmental Report?

*Tactran noted that the environmental effects of the strategy are positive and it is noted that the cumulative effect of this strategy with other PPS is positive*

30. What are your views on the findings of the SEA and the proposals for mitigation and monitoring the environmental effects set out in the Environmental Report?

*The proposals for monitoring are appropriate, however consideration should be given to reflecting other monitoring frameworks which will have a direct impact on CAFS2.*