

Scottish Government Low Emissions Strategy Consultation

Response on behalf of Spokes, the Lothians Cycle Campaign

“ [expletive deleted] smokin' - we put a stop to that; why should we put up wi' [expletive deleted] lorrae fumes?” Jane T., 65, housewife, Edinburgh.

We welcome the opportunity to comment on this consultation.

Firstly we wish to endorse the submission from Friends of the Earth Scotland (FoES), whose carefully-argued proposals gain our full support.

The rest of our comments are gathered under the 7 Questions of the Consultation:

Q1 Do you think the Mission, Vision and Objectives for the Low Emission Strategy are appropriate? If not, what changes would you suggest?

Broadly, the Mission, Vision and Objectives are not specific enough; for example the Vision is for air quality that is “among the best in Europe” but not that “*meets Scottish regulatory air quality standards and European air quality legal limits*”, so the Vision needs to be more ambitious and challenging.

Similarly, the transport objective is “A Scotland that reduces transport emissions” but with no ambition as to *how much by, and by when*, ie annual, ambitious targets should be set; again, the Climate objective is “A Scotland that reduces greenhouse gas emissions”, but surely this should be “*in accordance with the Climate Change Act targets*” (which, as we all know, have been missed - making this Strategy *and its implementation* even more urgent).

Vehicle emissions are a major public health issue, causing widespread illness and premature deaths, and at vast expense to the Health Services.

There is also the issue of justice and fairness, in that the health risks are suffered by all, whether they are the cause of the emissions, or not.

Government efforts to date to improve the situation have been half-hearted and piecemeal. As FoES point out, targets for reductions have been set and missed, just as targets for climate-change emissions have been set, and missed.

It is time for the Government to take meaningful action, in concert with Local Authorities. Difficult decisions will have to be faced. Just as in the cases of smoking and alcohol consumption, powerful lobbies will create opposition.

Successive Governments in Scotland have tackled issues like smoking and alcohol with some success, and are to be commended for the outcomes. Public opinion has to be brought inside. *Exposure to vehicle emissions is no more acceptable than passive smoking.*

We suggest therefore that the Strategy could start with raising public awareness and gaining public support. Perhaps a public consultation could offer choices of remedial measures, allowing the public to participate in an open debate, but making it clear that we cannot go on as we are.

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.

and:

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.

The Strategy mentions Government efforts to promote and increase Active Travel, such as the Cycle Action Plan Scotland (CAPS). While these are welcome, they are small in scale, and the outcome, even after 10 years, is that cycling levels nationwide have barely increased at all. The target of 10% of journeys by bike by 2020 has not been supported by a programme of adequate funding, intermediate targets etc.

Similarly, there has been no coordinated effort, backed by funding, to entice motorists to use public transport instead of the private car. On the contrary, successive Government priorities have been to invest in ever-increasing road building programmes, the outcome of which can only be to increase vehicle emissions even further.

The City of Edinburgh has, to its credit, done much in recent years to encourage cycling and walking and use of public transport. Its share of the transport budget for cycling has increased from 5% to 8% over 3 years, and is set to increase to 10%. The outcome has been substantially increased levels of cycling. Its bus company has also been very successful and has increased patronage, even in the face of falling bus use elsewhere.

Edinburgh has now started to tackle the difficult issue of restraining vehicle speeds, by introducing widespread 20mph limits across the whole city. It has been able to do this because public opinion is strongly in favour, despite the fact that the measures will impact on driver behaviour. The expectation that a strong opposition lobby would form was exploded when, at a rally in the city, the police greatly outnumbered the opposition, which attracted no more than 40 participants. We mention this, to show that anticipated opposition does not always translate to reality, that levels of public opinion can be misjudged, and that “anti-car” measures can be acceptable when the benefits are recognised.

Edinburgh's priorities have shown what can be done, if the will is there. Even so, there are excessively high levels of emissions in a number of main streets in the city, which shows, if anything, that 'carrot' measures, like good cycle and public transport provision, are just not enough.

While strategies alone are not sufficient to bring about the needed changes, they are a start. Meaningful change to tackle this major public health issue must be promoted, without delay. *The current libertarian climate, where any vehicle driver is free to create any amount of emissions, anywhere, at any time, can no longer be accepted.* The quote at the top says it all, really.

In particular, the Scottish Government should pursue the following major policy changes...

* *Increase funding for active travel to 10% of the transport budget, as recommended by the Association of Directors of Public Health and many other professional, academic and charitable organisations;*

- * *Reduce the trunk roads budget, in order, firstly, to help fund the above and, secondly, to stop increasing the pressure on towns and cities connected to the trunk roads;*
- * *Allow and encourage local authorities to implement charges on all retail, leisure and workplace destinations based on the number of car parking spaces (staff and public) over a certain minimum level of spaces (Nottingham allows 10 spaces free for its workplace-only levy);*
- * *Make 20mph the default urban speed limit. We note that due to the current 30mph default Edinburgh Council has to pass a TRO listing around 2,500 streets in order that it can implement its city-wide 20mph policy;*
- * *Introduce a national target for transport emission reductions based on fuel use - we suggest previous year minus 1%, to run for the next five years and reviewed at that time.*

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

We strongly support the establishment of a National LEZ Framework, including the Actions specified, viz, the Screening Procedure for assessing LEZ requirements, and the Development of the Framework itself.

The main purpose of these should be to ensure that Local Authorities are encouraged to set up LEZs, and as quickly as possible.

The Low Emission Zone Framework, once finalised, needs to clearly spell out and firm up the following:

- what Euro standards or CO2 standards will be incorporated into the Low Emission Zones;
- how Low Emissions Zones will be enforced & monitored;
- how much money will be required & provided to support local councils to implement Low Emission Zones;
- include a costed range of measures to reduce traffic levels enough so that air quality levels meet Scottish air quality standards by 2020, given that it is highly likely that LEZs alone will not be enough to achieve compliance. For example, measures which boost active travel & public transport usage, and which deter car use (e.g. 20mph zones, parking controls and charges, and congestion charging).

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

We agree that KPIs are important, and we are happy with the list proposed, regular measurement of which should not be too onerous on the LAs involved.

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