

G LES ResponseLow 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

Transform Scotland

Title Mr Ms Mrs Miss Dr Please tick as appropriate

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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

(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

Yes, make my response and name available, but not my address

or

(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?

Yes

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.

The proposed actions are very full and very ambitious in their breadth of coverage but will require significant funding to achieve much of them. Yet, we have the impression that the Scottish Government is passing the responsibility for taking action on to the Local Authorities, so we see little likelihood of success. The Scottish Ministers should be financially incentivising Local Authorities to tackle air pollution by rewarding those who pledge to take action with funds for investment in better local transport systems. Under this strategy, Local Authorities would seem to bear the entire financial burden at a time when their budgets are already severely constrained.

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

Yes, this section sets the scene and identifies many of the causes of poor air quality. Sadly, much of this is self-inflicted, resulting from misguided policy over the years, which has led to poor management of the numbers and ages of vehicles. Also, a lack of investment in cleaner modes of public transport, such as trams, that could deliver large numbers of commuters into city centres while causing less congestion.

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 Way Forward states at one point “Full compliance with the EU ambient air quality directive will be achieved” but history casts doubt on the ability to do this unless radical action is taken. For example, the Scottish Government has set very ambitious targets for GHG emission reduction yet has a poor record of achievement. Whether it be their series of missed climate targets, their lobbying for cuts in aviation tax, or their £9 billion road-building programme, the Scottish Ministers themselves have a terrible record that suggests that this target will be little different unless spending priorities are shifted away from roads to public transport and active travel.

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

The approach to modelling seems logical as an information gathering exercise but in itself will achieve little in the absence of strong and co-ordinated action to not only change the fleet efficiency but to also reduce traffic volumes within cities by investment in public transport, introducing traffic-free city centres, investing in cycle infrastructure. The last item can lead to huge reductions in car use as seen from the evidence from Denmark, The Netherlands and other countries and at relatively low cost.

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

The proposals are fine but it remains to be seen whether national and local politicians have the stomach to take on the road lobby to the extent illustrated from Germany, namely, banning unsuitable vehicles from parts of the city, nor the costs of policing the system.

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

The KPIs are fine in themselves but we question what will happen if none of them show any improvement? Will this automatically result in more drastic action being taken or will it be pushed into touch?

In summary we strongly support the promotion of Low Emission Zones because they have worked in hundreds of other towns and cities, and it is time now for Scotland to catch up. We do however fear that much of the effort will go to yet more modelling and consultation exercises and little of addressing the causes of the problem, namely, too many vehicles in our cities.

The problem needs to be addressed by spending less on road developments and more on a mix of proven solutions, such as:

1. Investing in high quality public transport, such as trams and modern buses, to attract commuters away from cars.
2. Investing in safe inner-city cycle networks to encourage commuting by cycle over shorter distances of, say, up to 10 miles.
3. Improving the rail network so that commuters and freight can cover longer distances with journey times equal to or better than by road.
4. Removing traffic from city centres, as has been widely done throughout Europe with no detriment to business but resulting in much improved ambience.