



## Friends of the Earth Scotland Comment on the City of Edinburgh Council's Draft Local Transport Strategy

23 October 2013

### General Comments

Friends of the Earth Scotland has recently launched a campaign on air pollution, and we welcome the chance to comment on this Local Transport Strategy and are keen to engage with the Council on transport and air quality where appropriate.

We are commenting on the Strategy mainly in terms of its capacity to deliver reductions in air pollution.

Traffic is a key cause of pollution in Edinburgh. Edinburgh City Council has a history of being forward thinking and dynamic in its approach to achieving modern, affordable and greener travel, with the highest rates of walking and cycling across Scottish cities, Scotland's first and most prominent car clubs, and a bus fleet which continues to be upgraded to higher Euro standards and hybrid vehicles.

Yet, air pollution remains a challenge for Edinburgh. There are excessively high levels of pollution across the city in several locations: there are five Air Quality Management Areas, including 2 new ones declared this year for the Inverleith Row/Ferry Rd Junction and Glasgow Rd.

What's more, the Council recently indicated that it may have to declare further Air Quality Management Areas in respect of Nicolson Street/South Clerk Street<sup>1</sup>, and Angle Park Terrace/Slateford Rd,<sup>2</sup> due to high annual average levels of NO<sub>2</sub> for 2012.

Edinburgh's dynamic approach towards transport begs the question of why air quality continues to be such a challenge. Clearly part of the answer is that there needs to be much stronger join up between Local Air Quality Management and transport planning.

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<sup>1</sup> City of Edinburgh Council LAQM progress Report 2013, p 66

<sup>2</sup> As above, p 69

The Draft Local Transport Strategy cites the 2008 Air Quality Action Plan, and the Local Air Quality Management Progress Report 2013 cites the Draft Local Transport Strategy. But nowhere between the two documents are the impacts of traffic on pollution levels quantified, or are the effects of the proposed traffic measures on air quality modelled and quantified. Somewhere between the two documents, or if not, then in the forthcoming Air Quality Action Plan, there needs to be a quantification of the contribution of traffic to air pollution, a modelling of how far traffic levels need to be reduced and eased to meet the Scottish air quality standards, a set of proposed actions which achieve the required reductions, and a timeframe for the achievement of the Air Quality Standards.

The Transport Strategy looks forward thinking and ambitious. We welcome many of the proposals on active travel, public transport, travel planning, car parking, and freight. However, we are concerned that without the detailed quantification of how actions will deliver on air quality objectives, it will be impossible to ensure that air quality objectives will be met.

Meanwhile, the health impacts of air pollution remain undisputed: over 29,000 people die each year across the UK from the effects of fine particulates; that is equivalent to over 2000 people each year in Scotland dying from air pollution. Recently, the International Agency for Research on Cancer (IARC) classed the whole cocktail of air pollutants in urban air as carcinogenic for the first time.<sup>3</sup>

### **Comments on Outcomes and Indicators (Chapter 2 and Appendix 1)**

We welcome that improving local air quality forms part of outcome 2, “be healthy”; but we note that this outcome is somewhat vague, and also, the corresponding indicators for outcome 2 are not sufficient to indicate improved air quality if they are met.

We would therefore suggest the introduction of an indicator on air quality that commits to Scottish air quality objectives being met by a designated time.

For the Transport Strategy to succeed in delivering reductions across all air pollutants which are controlled by Scottish Policy, this section needs to be much more quantitative. It needs to:

- quantify how much different levels of different pollutants, especially NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>, need to reduce in order to achieve air quality standards
- model what levels of traffic reduction would need to be achieved in order to meet the air quality objectives by a given date;
- show how proposed actions (including mandatory emissions control measures and/or congestion charging) will achieve the necessary reductions in traffic and in traffic emissions by the specified date.

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<sup>3</sup> IARC Press Release, “Outdoor air pollution a leading environmental cause of cancer deaths”, (17 October 2013). [http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221\\_E.pdf](http://www.iarc.fr/en/media-centre/iarcnews/pdf/pr221_E.pdf)

## Comments on Chapter 5: “Protecting our Environment”:

### a. Comments on Objectives

It is a step in the right direction to see that the Transport Strategy recognises that transport has to play a lead role in reducing noxious emissions in Edinburgh through Objective 2 (“To reduce noxious emissions...”).

However, this air quality objective should go further:

- (1) It should include the need to achieve *Scottish* and UK air quality standards, not just those contained in European legislation, because in some instances the Scottish and UK standards are more stringent.
- (2) It should include the need to meet standards for *all relevant pollutants* rather than just state “noxious emissions” which is potentially vague. For example, whilst the Air Quality Management Areas in Edinburgh are only currently declared for Nitrogen Dioxide, PMs remain cause for concern, and traffic levels remain a dominant source of PMs. For instance, Salamander Street exceeded the Scottish daily mean limit 13 times in 2012<sup>4</sup>. The number of exceedences allowed under the Local Air Quality Management system is 7 and this standard was to be achieved by 31 December 2010.

### b. Comments on Policies

#### General:

Env 1 and 2 are steps in the right direction. However:

- (1) Achieving sufficient reductions in air pollution cannot be delivered simply by tighter emissions controls. Experience has already shown that Euro standards cannot be relied upon as the silver bullet to enable Edinburgh to meet its air quality targets, and whilst there may be promise in the Euro 6 standard, this will not in and of itself fix the problem.

Policy on pollution needs to include measures to promote of active travel, use public transport, discourage unnecessary vehicle use through parking restrictions and possible congestion charging, as well as emissions control measures.

We appreciate that measures for improvements in Active Travel, Public Transport and Parking issues are dealt with elsewhere in the Local Transport Strategy and that in many areas the measures contained are forward looking

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<sup>4</sup> City of Edinburgh Council, Air Quality Progress Report 2013, Table 2.14

and ambitious; but the Council's policies in Chapter 5 need to explicitly refer to them as necessary measures for the achievement of Scottish air quality standards.

- (2) There should be an additional Policy statement in which the Council commits itself to implementing transport-related measures contained in the Air Quality Action Plan and state how the forthcoming revised Air Quality Action Plan will be taken account of and implemented – we note there was such a reference in the 2007-2012 Transport Strategy so the omission is regrettable.

**Env 1:** We welcome the Council's support of emissions control measures; but we would like to see the Council go further and express support for *mandatory* emissions control measures including Low Emissions Zones. We note that in the Issues for Review document, the Council stated, "There is an Air Quality Action Plan which, to date, has relied on voluntary measures, for example retrofitting of lower-emission engines into buses. However progress towards reducing emissions has been slow and there is a risk of EU fines from 2015." In 2007 Transport and Travel Research conducted a Low Emission Strategy Feasibility which showed that the greatest reductions in NO<sub>2</sub> emissions and PMs could be achieved by mandatory emissions control measures. The groundwork has therefore already been done which shows that mandatory measures are required; Low Emissions Zones were mentioned in the Issues for Review document and we are concerned that these stronger Low Emissions Zones options are not included in the Local Transport Strategy.

As above, the scope of Env1 should refer to the more stringent Scottish Standards as well as European Legislation.

**Env 2:** We welcome the Council's support of increased use of low emissions vehicles but think that this should form part of a suite of policies which first and foremost encourage cycling and walking, using public transport, and discourage unnecessary vehicle use.

### **c. Comments on Proposed actions**

The Council's proposed actions surround emissions control measures. These are all positive steps in the right directions. We applaud the Council's efforts with the ECOSTARS project; we look forward to being part of the discussions surrounding emissions control measures going forward to 2014; and we applaud the Council for leading by example on acquiring electric and/or hybrid cars for its fleet.

However, we would suggest the following additions:

- (1) The Policy objective of Env 2 has not really been translated into a proposed action beyond the Council acquiring electric and/or hybrid vehicles for itself. We be keen to see additional actions which address how electric charging points will be rolled out and how the pricing scheme for parking permits will encourage the purchase of low emissions vehicles.

- (2) We would suggest that the Council looks again at Road User Charging. After congestion charging was introduced in London in 2003 there was an initial 30% reduction in cars and lorries in the central charging zone.<sup>5</sup> Although levels have since crept up, this could be because the charge itself has not risen as much as public transport fares. Stockholm estimates a 19% reduction in traffic in its inner city as a result of its congestion charge.<sup>6</sup>

If the Council is not going to propose a re-examination of congestion charging, it needs to demonstrate that its package of alternative measures is as effective in reducing pollution and congestion.

- (3) We would like to see the Council run a public campaign to raise awareness about the fact that pollution levels in many parts of the city centre are excessively high, and around the health and environmental impacts of air pollution and traffic congestion.

We see that the Council is undertaking such work in relation to Road Safety (Chapter 6), through exploring opportunities to work with schools and local communities. This is laudable.

We point out that at least 10 times more people are killed from pollution than from road traffic accidents in Scotland: in 2012, there were 170 road traffic accidents,<sup>7</sup> and over 2000 people die annually from the effects of air pollution.

Therefore, it would seem logical for the Council to extend the scope of its outreach work on Road Safety to include communicating the causes and effects of air pollution.

Launching a public campaign on air pollution would have a positive impact on encouraging people to support measures which might otherwise be unpopular, including mandatory emissions control measures and road user charging. It would also encourage people to cycle, walk, and take public transport.

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<sup>5</sup> Sustainable Glasgow Report (2010), p 81

<sup>6</sup> Sustainable Glasgow Report (2010), p 81

<sup>7</sup> Transport Scotland Statistical Bulletin, "Key Reported Road Casualties Scotland 2012" (25 June 2013)