

Transport and Environment Committee

10:00am, Tuesday, 17 March 2015

Response to the Scottish Government consultation on a Low Emission Strategy for Scotland

Item number	7.12
Report number	
Executive/routine	
Wards	All

Executive summary

The Scottish Government has drafted a Low Emission Strategy for Scotland, with the aim of improving air quality by setting out a range of measures across health, transport, development, climate change, energy and the environment which will be applicable across Scotland.

It is suggested that The City of Edinburgh Council should welcome the general direction of the Low Emission Strategy. However, questions should be raised as to whether additional resources will be made available by Scottish Government to put into practice some of the required actions such as monitoring of Particulate Matter PM_{2.5}. In addition clarity is required on whether the strategy will be for guidance only or have regulatory underpinnings that insist on compliance.

The report notes that the Council has already implemented or taken a leading role in the introduction of a number of proposed actions in the draft consultation. These include setting and achieving significant change in modal shift including cycle to work journeys, pioneering ECOSTARS a freight recognition scheme in Scotland, and working with Lothian Buses on innovative solutions to improve the bus fleet.

Links

Coalition pledges	P51
Council outcomes	CO10 , CO15 , CO18 , CO22 , CO26
Single Outcome Agreement	SO2 , SO4

Response to the Scottish Government consultation on a Low Emission Strategy for Scotland

Recommendations

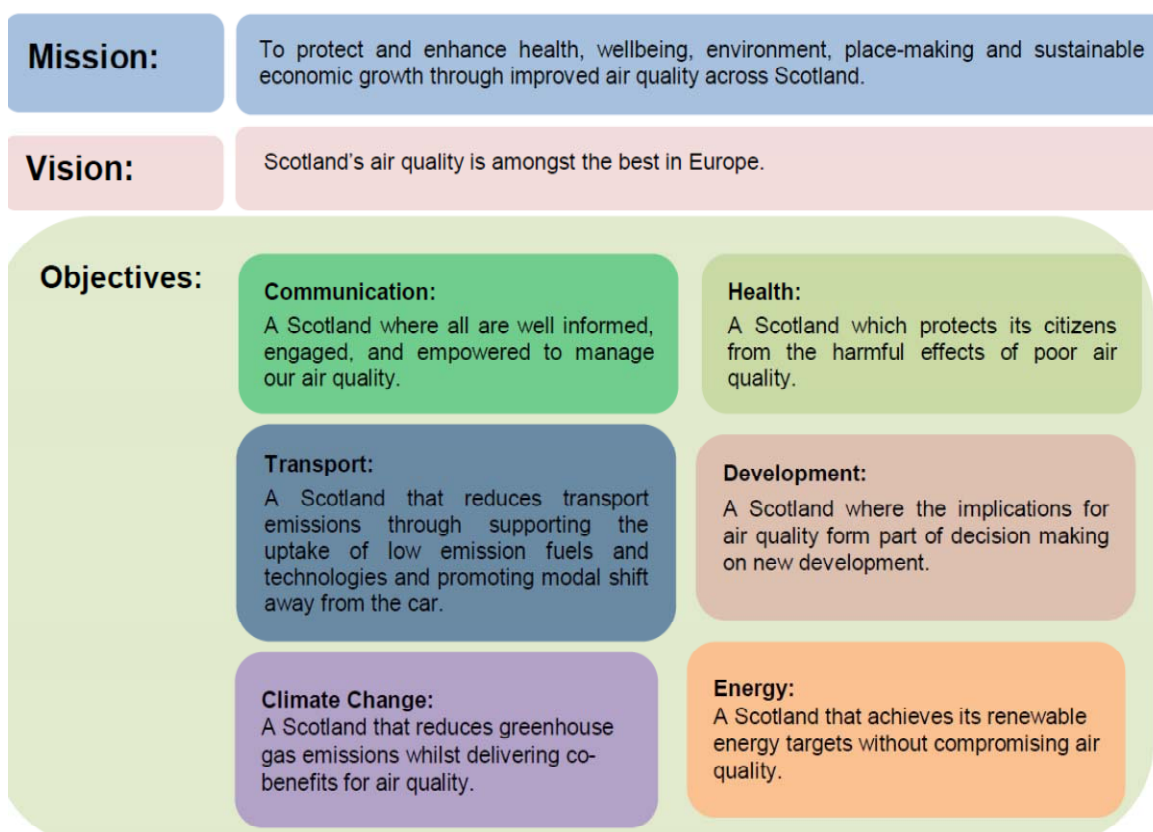
- 1.1 It is recommended that Committee approves the draft response to the Scottish Government's Low Emission Strategy Consultation, attached as an appendix to this report.

Background

- 2.1 Air quality has been improving in Edinburgh and more generally across Scotland. But this progress has not been quick enough to meet deadlines set in EU ambient air quality directives for compliance with nitrogen dioxide standards. Progress has been inhibited in the UK due to failure of EURO engine standards to meet their emissions targets in real life and a shift from petrol engines to diesel engines in the car sector.
- 2.2 Approximately 4% of the city area (less if the Council administrative boundary is used) and 3% of the population are currently in an Air Quality Management Area for nitrogen dioxide. Areas of concern are generally related to the central core and arterial road routes, especially those traversing street canyons where pollutant dispersion is difficult or where buses and other traffic is congested.
- 2.3 The Scottish Government in its preamble to the consultation states *“Low Emission Zones (LEZs) are a potentially effective measure that could help to improve local air quality. Although adopted widely in other parts of Europe and in a handful of locations in England (notably London), no Scottish local authority has to date introduced an LEZ. Reasons for this include costs, perceived economic impact and political/public acceptability. Feedback from local authorities and others does suggest however that a national framework could encourage LEZ adoption. Currently, local authorities are able to establish LEZs in their areas and set their own emissions standards and operating procedures. Whilst this gives flexibility to create specific solutions for local issues, it means businesses potentially having to comply with a different set of conditions each time their vehicles enter a different LEZ, which would have both economic and practical negative impacts. A national framework – initial proposals for which are set out in section 8 of the draft Low Emission Strategy - would involve the setting of emissions standards and procedures which would be applicable across Scotland, providing certainty and consistency for all who would be affected.”*

Main report

- 3.1 The Scottish Government has published a draft Low Emission Strategy for Scotland, with a closing date of 10 April 2015.
- 3.2 A response to the Scottish Government consultation has been drafted, and is attached as an appendix, for approval. The strategy has the aim of improving air quality by setting out a range of measures across health, transport, development, climate change, energy and the environment which will be applicable across Scotland.
- 3.3 The mission, vision and objectives of the draft consultation are laid out in the table below copied from the document:



- 3.4 In setting out its consultation the Scottish Government states that “*The Low Emission Strategy draws together the various policies being implemented and developed across a range of central government portfolios which have the potential to improve air quality, and presents these within a coherent overall framework. Although there is currently a great deal of activity involving the Scottish Government, Transport Scotland, SEPA, Health Protection Scotland and others in relation to air quality, it is not always obvious, particularly to those outwith these organisations, how these initiatives relate to each other. Key aims of the LES are to help address this, and also to contribute to more effective and efficient policy delivery.*”
- 3.5 It is suggested that The City of Edinburgh Council should welcome the general direction of the Low Emission Strategy. However, questions should be raised on whether additional resources will be made available by Scottish Government to

put into practice some of the required actions such as monitoring of Particulate Matter PM_{2.5}. In addition, clarity should be provided on whether the strategy will be for guidance only or have regulatory underpinnings that insist on compliance.

- 3.6 The report notes that the Council has already implemented, or taken a leading role in, the introduction of a number of proposed actions in the draft consultation. These include setting targets for, and achieving significant changes in, modal shift including cycle to work journeys, pioneering ECOSTARS a freight recognition scheme in Scotland, and working with Lothian Buses on innovative solution to improve the bus fleet.
- 3.7 The Council notes that more can be done in relation to utilising the planning and development process to mitigate effects on air quality. The planning committee has agreed that the issue of a Low Emission Strategy be added to the list of guidance to be investigated in the coming year. The issue will be considered in relation to both the strategic and local development planning process and how the planning process can contribute to a Low Emission Strategy.

Measures of success

- 4.1 Submission of the draft consultation response to Scottish Government. Adoption of the Low Emission Strategy and implementation of actions with the outcome that air quality is much improved and complies with EU ambient air quality directive.

Financial impact

- 5.1 The majority of measures in the draft consultation, if implemented, have a financial cost. For example introduction of a low emission zone would likely cost £2M to £5M to set up with annual running costs of £0.5M to £1.0M and transfer of responsibility for monitoring particulate PM_{2.5} from Scottish Government to Local Authority control would likely cost £100k to £200k annually for additional equipment and staff. If the Scottish Government implements this draft consultation as policy they must provide adequate resource for it to be fulfilled.

Risk, policy, compliance and governance impact

- 6.1 If the recommendations are not accepted there is a higher risk that parts of Edinburgh will continue to exceed European Union and UK air quality regulatory standards. The UK government and devolved administrations are currently the subject of EU infraction proceedings for failing to comply with the EU ambient air quality directive as it relates to nitrogen dioxide. It is considered that there are no other known risk, policy, compliance or governance impacts arising from this report.

Equalities impact

- 7.1 This report proposes no change to current policies or procedures and as such a full impact assessment is not required.

Sustainability impact

8.1 The impacts of this report in relation to the three elements of the Climate Change (Scotland) Act 2009 Public Bodies Duties have been considered, and the outcomes are summarised below. Relevant Council sustainable development policies have been taken into account and are noted at Background Reading later in this report:

- The proposals in this report will reduce carbon emissions because they contribute to the development of a Low Emission Strategy for Scotland.
- The proposals in this report will increase the city's resilience to climate change impacts because a Low Emission Strategy for Scotland will encourage the use of low emission vehicles across the country.
- The proposals in this report will help achieve a sustainable Edinburgh because a Low Emission Strategy for Scotland will assist in reducing the health impacts of air pollution generated by road traffic.
- Environmental good stewardship is not considered to impact on the proposals in this Low Emission Strategy for Scotland report because the proposals will help achieve a sustainable Edinburgh by encouraging fuel efficiency in road transport.

Consultation and engagement

9.1 The consultation response has been formulated jointly by Community Safety Planning & Building Standards and Transport services.

Background reading/external references

[Draft Low Emission Strategy for Scotland consultation.](#)

[Climate Change Framework](#)

[Local Transport Strategy 2014 - 2019](#)

[Transport 2030 Vision](#)

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Links

Coalition pledges	P51 - Investigate the possible introduction of low emission zones.
Council outcomes	CO10 - Improved health and reduced inequalities CO15 - The public is protected CO18 - Green - We reduce the local environmental impact of our consumption and production. CO22 - Moving efficiently – Edinburgh has a transport system that improves connectivity and is green, healthy and accessible. CO26 - The Council engages with stakeholders and works in partnership to improve services and deliver on agreed objectives.
Single Outcome Agreement	SO2 - Edinburgh's citizens experience improved health and wellbeing, with reduced inequalities in health. SO4 - Edinburgh's communities are safer and have improved physical and social fabric.
Appendices	Proposed Council response to the Scottish Government consultation on a Low Emission Strategy for Scotland.

APPENDIX A: Proposed Council response to the Scottish Government consultation on a Low Emission Strategy for Scotland.



Low 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

The City of Edinburgh Council

Title Mr Ms Mrs Miss Dr *Please tick as appropriate*

Surname

Mooney

Forename

Susan

2. Postal Address

The City of Edinburgh Council		
Head of Community Safety		
East Market Street		
Edinburgh		
Postcode	Phone	Email

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

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

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

- (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 No

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?

The City of Edinburgh Council supports the Mission and Vision set out in the draft Low Emission Strategy. The Council has already implemented or taken a leading role in the introduction of a number of proposed actions in the draft consultation. These include setting and achieving **significant changes** in modal shift including cycle to work journeys, pioneering ECOSTARS a freight recognition scheme in Scotland and working with Lothian Buses on an innovative solution to improve the bus fleet. The Council has recently revised its Local Transport Strategy 2014-19 and it contains a range of specified actions to encourage modal shift away from car use e.g. Active Travel Action Plan, Work and School Travel Plans and expansion of Park & Ride facilities.

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.

1a The City of Edinburgh Council believes that achievement of modal shift targets will require additional incentives and investment to encourage the required degree of expansion of high quality sustainable public transport and active travel alternatives.

1b The City of Edinburgh Council supports use of the Daily Air Quality Index which is currently published on scottishairquality.co.uk website, but would recommend its use is provided with narrative for interpretation eg how close human receptors are to the roadside or kerbside pollution monitor.

2a The City of Edinburgh Council supports the revision of the Local Air Quality Management system which reduces the administrative burden of regulatory reporting to allow greater resource to be devoted to action planning.

2b The City of Edinburgh Council notes this action to adopt WHO limits for Particulate Matter.

2c The City of Edinburgh Council believes it will be difficult for local authorities to achieve the proposed objectives for PM_{2.5} due to non-local transboundary impacts. Much more requires to be done at an EU level to regulate and reduce transnational sources of this pollutant.

2d The City of Edinburgh Council believes that if Scottish local authorities

are to have a responsibility for monitoring and assessment of PM_{2.5}, additional resourcing will be required for establishing monitoring sites, maintaining monitors, training staff and assessing and reporting findings.

3a The City of Edinburgh Council welcomes a proposal for a national air quality modelling methodology. However, clarification is required on the processes that local authorities and others must follow to reduce or mitigate any modelled air quality impacts identified in their areas.

3b The City of Edinburgh Council would like clarity on what benefit a mandatory LEZ screening process would be expected to deliver, if there is no mandatory requirement for a local authority to implement an LEZ. Greater social and health benefits might be derived from the resources required for mandatory screening (and potential feasibility studies) to be applied instead to actions for reducing source emissions.

4a The City of Edinburgh Council notes this action.

5a The aim of removing all local AQMAs by 2020 is welcomed by the City of Edinburgh Council. However, it is unclear if this will be deliverable if current factors such as vehicle emissions influencing existence of current AQMA's are not adequately managed or mitigated within the timescale suggested. Much of the ambition in this action is predicated on other key actions, some of which are considered to lack sufficiently robust policy support.

5b The City of Edinburgh Council supports compliance with the EU ambient air quality directive, but it is not clear if the draft low emission strategy will achieve that ambition.

5c The City of Edinburgh Council supports compliance with the exposure reduction target for PM_{2.5}, but it is not clear if the draft low emission strategy will achieve that ambition.

6a The City of Edinburgh Council notes this action.

6b The City of Edinburgh Council notes this action is assigned to Health Protection Scotland. It is essential that Local Authorities are involved in creation of the communication strategy so that messaging is clear and focussed.

6c The City of Edinburgh Council suggests that this action could be supported by a clear indication from each Health Board setting out the timescales for this to be implemented for their areas since local citizens may not be aware of timescales for revisions of Joint Health Protection Plans.

7a The City of Edinburgh Council notes this action.

8a The City of Edinburgh Council believes from its own trials that low cost sensor technology must be fully proven to provide consistently reliable air monitoring data in real-world environments before it is applied in any formal assessment processes, such as traffic modelling.

9a The City of Edinburgh Council believes that traffic management systems

at local authority level are currently not optimally resourced. Optimisation of local traffic flows will require additional funding to be made available, including for the purchase, installation, maintenance and management of additional infrastructure. It will be essential to ensure that a goal of traffic flow optimisation does not lead to an unintended consequence of increased traffic volumes, especially cars.

9b The City of Edinburgh Council supports this action.

10a The City of Edinburgh Council supports this action.

10b The City of Edinburgh Council already has a 2020 target of 10% of everyday journeys by cycle. It has gone further and placed a target of 15% for travel to work journeys.

10c The City of Edinburgh Council has recently adopted Local Transport Strategy 2014-19 with the stated aim to modal shift away from cars.

11a The City of Edinburgh Council supports this action.

11b The City of Edinburgh Council supports this action

11c The City of Edinburgh Council supports this action.

12a The City of Edinburgh Council supports this action.

12b The City of Edinburgh Council supports this action.

13a The City of Edinburgh Council aspires to continue and evolve the Edinburgh ECOSTars fleet recognition scheme and would welcome policy and financial backing from Scottish Government in support of this initiative. Evolution of a national or regional fleet recognition scheme may be worthy of detailed consideration by Scottish Government.

13b The City of Edinburgh Council supports this action.

14a The City of Edinburgh Council takes account of relevant policies in the preparation of Development Plans and when undertaking Development Management.

14b The City of Edinburgh Council supports this action.

14c The City of Edinburgh Council does not currently have supplementary guidance on air quality. It is not clear if the strategy is introducing a requirement to prepare such guidance.

14d The City of Edinburgh Council measures the impact of development plans on the transport network through appraisal of its Local Development Plan. The Council has a requirement for transport assessments for proposals generating a significant amount of travel or in particularly traffic sensitive locations.

14e The SDP for the SESplan region does not have a specific policy on air quality which would allow regional supplementary guidance to be adopted. It is unclear from the strategy how regional guidance adapted by individual local authorities to suit their specific circumstances differs from the action

for local authorities to review supplementary guidance.

14f Air quality is identified as a significant issue in Edinburgh. As required the City of Edinburgh Council considers the issue of air quality in the preparation of its Local Development Plan.

14g The City of Edinburgh Council is currently revising its air quality action plan and will take this action into consideration during its preparation.

14h The City of Edinburgh Council requires travel plans to be submitted for significant or major travel generating development. The assessment of such developments includes assessment against the objectives of the local transport strategy which identifies a range of actions and policies to reduce emissions and improve air quality standards across the city.

14i The City of Edinburgh Council supports this action and is actively formulating a corporate travel plan.

14j The City of Edinburgh Council agrees with the principle of creating a central low emission fund if appropriate. There is a need to ensure that this can be created within the current regulatory framework.

14k The City of Edinburgh Council welcomes the use of national modelling methodology as a first step in assessing the potential impact of development.

14l The City of Edinburgh Council currently applies mitigation measures through conditions on planning permissions and planning obligations if appropriate.

15a The City of Edinburgh Council welcomes the direction of this action. However, the current wording at '*endeavour to ensure*' is weak and the action lacks a clearly defined mechanism to effect its delivery.

16a The City of Edinburgh Council agrees that policy on air quality should be taken into account when considering bioenergy applications.

17a The City of Edinburgh Council supports this action.

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

The City of Edinburgh Council agrees that the current policy situation is accurately summarised in this section. However, in 5.4 Development Today it is important to note that the emphasis a local planning authority might apply to the impacts of development on local air quality are usually weighed against a range of other local priorities. In this context air quality may be one of several factors considered in arriving at a balanced decision.

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 must ensure that all local air quality impact factors, including existing policy drivers and conflicts, are fully accounted for and understood. If current predictions of population growth in Edinburgh are realised the additional level of transport demand requires to be carefully managed if it is to be sustainable. Rapid growth of residential development outwith the city, but reliant on it for employment and other facilities, is another major influence on transport demand into the city. Consequently, a much more robust and integrated regional approach, involving the Scottish Government, SEStran, SESPlan, the constituent local authorities and a range of transport providers will be necessary if the projected growth in transport demand is to be managed in a manner consistent with the LES vision.

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

Proposals for a National Modelling Framework are welcomed by the City of Edinburgh Council. It will be important to ensure that such a model is employed accurately and consistently by all who wish to obtain a clear and repeatable understanding of the likely impacts on air quality of specific proposals. However, of crucial importance will be the need for the Scottish Government to put adequately robust mechanisms in place to ensure these are then addressed.

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

The City of Edinburgh Council has a commitment in its Local Transport Strategy 2014-19 to consider the possibility of introducing an LEZ to assist in the management of emissions from road vehicles, where these are not improving sufficiently.

The Council's current focus of LEZ considerations is on the emissions of bus and HGV fleets. However, the Council is very keen to work with operators of these fleets to achieve improvements in air quality through voluntary processes eg SCRT exhaust retrofit, Green Bus Fund to introduce increasing numbers of electric hybrid buses, bus engine management systems remapping, the ECOstars fleet recognition scheme, routing of the cleanest vehicles through AQMAs and the Council fleet improvement

programme.

If an LEZ framework of the LES compels the Council to screen for an LEZ, it is unclear what benefit this will deliver in air quality terms if ultimately there is no mandatory requirement on local authorities to implement an LEZ. It is the Council's view that increasingly scarce financial resources could be more effectively applied through programmes to reduce emissions at source – which could be made mandatory within specified timescales.

Additional resource would be required from central government in support of such programmes, but they would probably encounter much greater industry and public acceptance than more prescriptive tools, like an LEZ.

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

The City of Edinburgh Council is of the view that it would be beneficial to include a KPI to show year-on-year decrease in numbers of people exposed to air quality in breach of the relevant air quality standards for Nitrogen Dioxide and Particles (PM₁₀ and PM_{2.5}). This will require good baseline and ongoing data, but is likely to offer a very good indication of the effectiveness or otherwise of the Low Emission Strategy in achieving its mission and vision.

Appendix B List of Proposed Actions in Scottish Government Low Emission Strategy Document.

Obj	#	Actions	Lead	Date
Collaboration	1 Provide peer reviewed and consistent evidence on air quality issues			
	1a	The LES will support the ongoing Greener Scotland communication campaigns, encouraging individuals to use the car less to improve their health and their local environment.	SG/TS	2017
	1b	The Daily Air Quality Index will be adopted as the key air quality indicator.	SG	2015
	2 Develop fuller public, private, business, and academic engagement on air quality management			
	2a	A revised Local Air Quality Management system will be introduced.	SG	2015
	2b	Assess case for adopting World Health Organisation guideline values for PM₁₀ and PM_{2.5} as Scottish objectives.	SG	2015
	2c	PM_{2.5} will be included in regulations for Local Air Quality Management.	SG	2015
	2d	A PM_{2.5} monitoring network will be established.	SG	2017
	3 Establish a national Low Emission Zone Framework			
	3a	A national air quality modelling methodology will be developed.	SEPA	2015
	3b	A screening procedure for assessing LEZ requirements will be produced.	SG/SEPA	2015
	3c	A national LEZ Framework will be developed.	SG/SEPA	2015
	4 Air quality and noise			
	4a	Options for updating information on conflicts and synergies between air quality and noise will be considered.	SG	2015
Health	5 Compliance with air quality legislation			
	5a	On a prioritised basis, a 100% declassification of Local Air Quality Management Areas will be targeted.	SG	2020
	5b	Full compliance with the EU ambient air quality Directive will be achieved.	SG	2020
	5c	Compliance with the UK exposure reduction targets for PM_{2.5} will be achieved.	SG	2020
	6 Provide consistent national air quality health messages			
	6a	A DPSEEA analysis of air quality and health will be conducted.	HPS	2015
	6b	A communications strategy will be developed to convey health impacts of poor air quality.	HPS	2015
	6c	Health Board areas with AQMAs should ensure that the next revision of the Joint Health Protection Plan includes objectives relating to air quality and associated air quality action plans.	HBs	2017
	7 Provide further evidence of the impact of air quality on health			
	7a	Regular scientific evaluations of the impact of the Low Emission Strategy on health will be undertaken.	HPS	2017
Transport	8 Measurement and modelling of roadside transport emissions			
	8a	Trialling of low-cost sensor technology that would enable roadside monitoring of air quality, in order to underpin urban traffic modelling, will take place.	TS/SG	2018
	9 Intelligent traffic system management			
	9a	Local authorities will review traffic management procedures and ensure that traffic flow is optimised.	LAs/TS	2017
	9b	Options for local authorities to use resident and visitor policies to encourage low emission vehicles will be explored.	SG/LAs	2017
	10 Active travel			
	10a	Paths for All will establish a new delivery forum for the National Walking Strategy, and will work in partnership with the Cycling Action Plan for Scotland Delivery Forum.	SG	2017
10b	Work collaboratively with our delivery partners towards our shared vision that by 2020 10% of everyday journeys will be made by bike.	SG/LAs	2020	

Obj	#	Actions	Lead	Date	
	10c	<u>All local transport strategies will include policies to deliver a modal shift away from private vehicle use.</u>	LAs	2018	
	11 Public transport				
	11a	<u>Work with operators and local authorities to review and improve the Green Bus Fund scheme, taking account of technological and market developments.</u>	TS/SG	2018	
	11b	<u>Evaluate Bus Investment Fund supported projects and generate good practice examples to inform future national, regional and local initiatives.</u>	TS/SG	2018	
	11c	<u>Consider how statutory quality partnerships could be made more effective.</u>	TS	2017	
	12 Low Emission Vehicles				
	12a	<u>The Low Emission Strategy will support delivery of the actions contained in Switched On Scotland: A Roadmap to Widespread Adoption of Plug-In Vehicles.</u>	TS	2015	
	12b	<u>Work with key partners to investigate the use of hydrogen as a transport fuel, as well as exploring wider environmental and economic opportunities of using hydrogen for energy applications – especially in promoting renewables, energy balancing and storage.</u>	TS / SG	2015	
	13 Freight				
	13a	<u>Continue to support and develop the ECO Stars programme in Scotland.</u>	SG	2018	
	13b	<u>Guidance on establishing Freight Quality Partnerships will be reviewed and revised where necessary.</u>	TS	2015	
	14 Contribution of development and plans to air quality improvements				
	*Development	14a	<u>Local authorities are required to take account of the objectives and policies in the Low Emission Strategy in preparation of Development Plans and when undertaking Development Management.</u>	LAs	2016
		14b	<u>The objectives and policies in the Low Emission Strategy should be considered as part of the Community Partnership Planning process.</u>	LAs	2016
14c		<u>Local authorities with air quality issues to review supplementary guidance and revise at the next scheduled update (i) to take account of action to improve air quality whilst (ii) aligning with Low Emission Strategy objectives.</u>	LAs	2016	
14d		<u>Scottish Planning Policy expects planning authorities to appraise the impact of development plans on the transport network.</u>	LAs	2015	
14e		<u>RTPI to collaborate with the Strategic Development Planning Authorities and the Scottish Government in the development of regional supplementary guidance on air pollution mitigation.</u>	RTPI/ SG/ SDPAs	2016	
14f		<u>Planning authorities should ensure that where potential air quality effects are identified as significant during the SEA process, the issues are considered in the preparation of development plans.</u>	LAs	2016	
14g		<u>All local authorities with AQMAs should ensure that their air quality action plans provide clear advice on air quality assessment and mitigation.</u>	LAs	2016	
14h		<u>In developments where travel plans are required, developers should ensure that potential air quality impacts are addressed. A procedure for monitoring plan implementation should also be put in place and reported upon.</u>	LAs	2016	
14i		<u>All local authorities should ensure that they have a corporate travel plan which is consistent with any local air quality action plan.</u>	LAs	2016	
14j		<u>Strategic Development Planning authorities and local authorities to consider whether a central low emission fund would be appropriate for their circumstances; if so, a feasibility study should be commissioned to inform development of such a fund.</u>	LAs	2016	

Obj	#	Actions	Lead	Date
	14k	Planning authorities should use the national modelling methodology as a first step in assessing the potential impact of a development, building in local and development specific monitoring and modelling data as appropriate.	LAs	2016
	14l	Where mitigation measures are required for a development in order to manage air quality effects of development, in accordance with current Scottish Government guidance on planning and air quality, these could be applied through conditions on a planning permission. The use of planning obligations may be appropriate in some circumstances.	LAs	2016
Climate Change	15 Effective co-ordination of climate change and air quality policies to deliver co-benefits			
	15a	The Scottish Government and local authorities will endeavour to ensure that policies designed to control greenhouse gas and/or air pollutant emissions are not in conflict with each other (for national plans and local air quality action plans respectively), and are integrated to maximise co-benefits.	SG/LAs	2018
Energy	16 Delivery of renewable energy targets without compromising air quality			
	16a	Local authorities are expected to ensure that the national policy position on air quality is taken into account when considering bioenergy applications in their areas and when developing local policies.	LAs	2015
Environment	17 Protection of the natural environment from the effects of poor air quality			
	17a	To continually promote the reduction of total emissions to ensure protection of the natural environment.	SEPA/SG	2015

Table 1 – Actions proposed in the Low Emission Strategy

* Actions that related to specific policy areas are grouped together. Under Planning, this grouping is not intended to suggest that all the actions are the responsibility of planning authorities.