

CONSULTATION

Response Document



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Cleaner Air for Scotland 2 (Scottish Government)

22 January 2021

Introduction to CIEEM

The Chartered Institute of Ecology and Environmental Management (CIEEM), as the leading membership organisation supporting professional ecologists and environmental managers in the United Kingdom and Ireland, welcomes the opportunity to comment on this consultation.

CIEEM was established in 1991 and has over 6,000 members drawn from local authorities, government agencies, industry, environmental consultancy, teaching/research, and voluntary environmental organisations. The Chartered Institute has led the way in defining and raising the standards of ecological and environmental management practice with regard to biodiversity protection and enhancement. It promotes knowledge sharing through events and publications, skills development through its comprehensive training and development programme and best practice through the dissemination of technical guidance for the profession and related disciplines.

CIEEM is a member of:

- Environmental Policy Forum
- IUCN – The World Conservation Union
- Professional Associations Research Network
- Society for the Environment
- United Nations Decade on Biodiversity 2011-2020 Network
- Greener UK
- Irish Forum on Natural Capital (working group member)
- National Biodiversity Forum (Ireland)
- The Environmental Science Association of Ireland

CIEEM has approximately 600 members in Scotland who are drawn from across the private consultancy sector, NGOs, government and SNCOs, local authorities, academia and industry. They are practising ecologists and environmental managers, many of whom regularly provide input to and advice on land management for the benefit of protected species and biodiversity in general. This response was coordinated by our Scotland Policy Group.

We welcome the opportunity to participate in this consultation and we would be happy to provide further information on this topic. Please contact Jason Reeves (CIEEM Head of Policy and Communications) at JasonReeves@cieem.net with any queries.

General Comments

Consultation Questions

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

Additional comments in support of your answer

Yes, but we would like to see greater emphasis on awareness raising. Air pollution surrounding schools is a serious issue and air pollution is a major contributing factor affecting children's health¹. Differences in air quality can be readily detected between school playing fields and school drop-off zones as indicated by bio-indicators such as lichens. One tool that can be utilised in this is the use of special back-packs with air quality sensors inside². Children can act as citizen scientists and record localised air pollution, highlighting hotspots that can be targeted for improvement and raising awareness among the school community of the issue of high levels of pollution at school pick-up/drop-off zones. This type of action fits well with the principles of the Curriculum for Excellence. It also links to the WHO, UN Environment BreatheLife Campaign³, which aims to engage and mobilise people, cities and regional governments to reduce air pollution to safe levels by 2030 and achieve the Sustainable Development Goals.

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

- **Neither agree nor disagree**

Additional comments in support of your answer

Yes, we broadly support actions taken to address air quality integrating with climate change mitigation and adaptation. Nature-based solutions, such as the integration of green infrastructure in urban areas, are integral to this and should form part of the package of actions⁴. For example, it is estimated that urban trees in London remove between 852 and 2121 tonnes of PM₁₀ annually from the urban boundary layer⁵. Many of the policies on climate change equally apply to air quality. Thinking of the overall picture and policy interlinkages will have multiple benefits, as outlined in the commissioned report - 'Synergies and tensions between climate change and air quality actions'⁶. The pollutants contributing the most to both local and transboundary air pollution problems are SO₂, NO_x, NH₃, volatile organic compounds (VOCs), and fine particulate matter (PM). These mostly originate from the same sources as greenhouse gases – transport, agriculture, combustion and industrial processes. As such, there are strong interactions between strategies designed to improve air quality and those addressing climate change. The economic advantages of an integrated approach to greenhouse gases and air-quality pollutants have been highlighted in different modelled scenarios⁷.

Spatial and temporal factors must be considered as air pollutants have a short atmospheric lifetime compared to persistent CO₂ and other greenhouse gases. Air quality can affect climate and, reciprocally, changes in climate can affect air quality. Predicted climate change impacts must be incorporated into nitrogen deposition models as, for example, changing wind patterns will affect deposition patterns.

¹ UNICEF, Clear the air for children: The impact of air pollution on children, 2016.

² Heydon, J., Chakraborty, R. (2020). Can portable air quality monitors protect children from air pollution on the school run? An exploratory study. *Environmental Monitoring and Assessment*, **192**, 195. <https://doi.org/10.1007/s10661-020-8153-1>

³ <https://breathelife2030.org/>

⁴ CIEEM (2020) *Using Nature-Based Solutions to Tackle the Climate Emergency and Biodiversity Crisis*. Available at: <https://cieem.net/wp-content/uploads/2020/07/Nature-Based-Solutions-designed.pdf>

⁵ Calfapietra C. (2020) *Nature-based solutions for microclimate regulation and air quality: Analysis of EU-funded projects*, EU Commission, Available at: <https://op.europa.eu/en/publication-detail/-/publication/001a9517-d530-11ea-adf7-01aa75ed71a1> (page 13)

⁶ Curran, J, Harris, B., Holmes, N., et al (2016). Synergies and Tensions Between Climate Change and Air Quality Actions: a Report by the Cleaner Air for Scotland Climate Change Sub-group.

⁷ ApSimon, H., Amann, M., Astrom, S. & Oxley, T. (2009). Synergies in addressing air quality and climate change. *Climate Policy*, **9**, 669-680. <https://doi.org/10.3763/cpol.2009.0678>

As with the net zero emission targets, clear targets for air pollution would be welcomed. This will help overall awareness and focus across sectors. It also presents an opportunity to influence and link with other countries' air quality plans too.

Consideration of noise pollution alongside air pollution, particularly related to the transport sector, is essential and strategies to address these in conjunction would be welcomed.

There should be further emphasis on collaborative working across government boundaries and the sharing of research and data as impacts occur across boundaries. The actions within the Air Quality Strategy should be consistent with those introduced into other UK countries and vice versa with the equivalent plans supporting the other.

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?

Delivery of noise and air quality action plans will rely on the knowledge, skills and resources of statutory agencies and local planning authorities alike to address these issues. However, such organisations may not have the resources to successfully implement new policies and measures, particularly within a consistent manner. For example, many local authorities no longer employ an ecologist who would be able to advise on biodiversity matters, whilst planning officers are in need of more training and other support in assessing the air pollution impacts of, for example, agricultural and other rural developments. Air quality is increasingly recognised as an impact pathway that requires assessment by ecologists and air quality specialists in conjunction⁸.

We feel that a failure to spend sufficient money on employing and training appropriate Local Authority staff would seriously compromise the achievement of noise and air quality action plans.

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

- No

Additional comments in support of your answer

We would like to see more reference to the benefits to biodiversity in addition to health and wellbeing benefits in this section. The importance and value of biodiversity must be recognised. There needs to be investment in nature-based solutions, including supporting climate- and wildlife-friendly agriculture and restoring carbon-rich habitats such as peatlands and native mixed woodlands⁹. In urban areas, hedgerows, shrubs, trees, rain-gardens, and green spaces in general play an important role in carbon capture and mitigating air pollution. Utilising nature-based solutions for managing issues such as air quality in urban centres should be the norm.

As well as a review of nature based and green infrastructure interventions, we would like to see a compilation of case studies where they are being used and what can be learnt from the implementation. This would give companies and organisations confidence and reassurance that it doesn't need to be difficult or costly to implement nature-based solutions and green infrastructure within development. Following this, an event to share best practice and disseminate information with CIEEM and RTPI members and others would be immensely valuable.

⁸ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK. <https://cieem.net/wp-content/uploads/2020/12/Air-Quality-advice-note.pdf>

⁹ Using Nature-Based Solutions to Tackle the Climate Emergency and Biodiversity Crisis CIEEM Briefing Paper July 2020 <https://cieem.net/resource/using-nature-based-solutions-to-tackle-the-climate-emergency-and-biodiversity-crisis/>

It should also be noted that, while the use of nature-based solutions to help with air pollution is essential, it should not replace action on emissions reductions in the first instance. Offsetting should be a last resort to deal with those emissions that cannot be reduced.

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

The Scottish Government should not rule out requiring retrospective improvements within existing development to maximise positive air quality benefits. As noted, local monitoring and awareness of air pollution levels can lead to concerted local action and feed into strategic planning. Many of the nature-based solutions related to climate and air quality improvements should be mainstreamed in our future city and town centres (e.g. green spaces and ecological networks, inclusion of rain gardens, urban trees).

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

- **Neither agree nor disagree**

We agree with the comprehensive package of different ways for monitoring air quality and the commitment to commission a review of data gaps. No reference appears to be made to the Air Pollution Information System (APIS)¹⁰ which is a very useful online resource regarding the sensitivity of habitats, species and statutory designated nature conservation sites to air pollution.

We would welcome the further roll out of low-cost sensors as already trialled by SEPA and other organisations. This has real benefits in raising awareness of the issue of air pollution and localised levels leading to positive actions by citizens. It also enables identification of hotspots near sensitive habitats which may require detailed dispersion modelling and conservation action to minimise impacts.

Biological monitoring should supplement chemical monitoring. Recording of NO_x and NH₃/NH₄ levels give a snapshot at that time whereas recording of biological indicators give indications of historical levels¹¹. Recent research highlights that metrics that incorporate long-term nitrogen deposition trajectories explain greater vegetation compositional variance than measures of total N deposition over 1-3 years which is the commonly used metric in the UK¹² and a 30 year moving window of cumulative deposition is optimal to represent impacts on plant communities for application in science, policy and management. In addition, analyses of empirical critical loads which are widely used to quantify and manage the ecological impacts of nitrogen deposition were in many cases deemed to be too high to confidently prevent loss of sensitive species¹³. The most up-to-date list of critical loads is available from APIS at <http://www.apis.ac.uk/src/>.

Modelling should incorporate predicted changes in population as well as any proposed large transport infrastructure projects.

A concerted effort should be made to analyse environmental parameters, such as tree canopy cover, in areas of high air pollution, and promote nature-based solutions where there is a deficit of the above. For example, tree planting should be considered as part of the approach to improving air

¹⁰ Air Pollution Information System <http://www.apis.ac.uk/>

¹¹ N.A. Welden, N.A., Wolseley, P.A. & Ashmore, M.R. (2018). Citizen science identifies the effects of nitrogen deposition, climate and tree species on epiphytic lichens across the UK. *Environmental Pollution*, **232**, 80-89. <https://doi.org/10.1016/j.envpol.2017.09.020>

¹² Payne, R.J., Campbell, C., Britton, A.J. *et al.* (2019). What is the most ecologically-meaningful metric of nitrogen deposition? *Environmental Pollution*. **247**, 319-331. <https://doi.org/10.1016/j.envpol.2019.01.059>

¹³ Payne, R., Campbell, C., Stevens, C. *et al.* (2020). Disparities between plant community responses to nitrogen deposition and critical loads in UK semi-natural habitats. *Atmospheric Environment*, **239**, 117478. <https://doi.org/10.1016/j.atmosenv.2020.117478>

quality on the worst affected roads and urban spaces, providing appropriate Environmental Impact Assessments are carried out on a site-by-site basis. Careful consideration should be given to what tree species are planted.

We welcome the proposed data sharing arrangements between transport agencies, SEPA, LA's, NHS and Public Health Scotland.

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

N/A

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

- Yes

Additional comments in support of your answer

Yes, we welcome the recommendation of the review to ensure public engagement is inclusive. As noted, there are significant barriers to engagement and, importantly, behaviour change, particularly amongst deprived communities and yet it is these communities that are often most heavily impacted by poor air quality, for example, by proximity to major roads and urban pollution sources. This overlaps well with increasing public engagement in NPF4, citizen assemblies and the UN Sustainable Development Goals related to Good Health and Wellbeing.

Citizen science, awareness and promoting citizen action are incredibly important as they instill a sense of ownership and pride in doing something in and for your local patch. Highlighting the impacts of atmospheric nitrogen pollution on human health and biodiversity ensures promoted behavioural changes are easier, more convenient, and preferably cheaper than the status quo. There is only so far one can go in encouraging an ethos of 'doing the right thing' without providing alternative means, particularly in terms of cost and accessibility. The review recommendations should be fully considered in the engagement strategy.

We should ensure equitable access to greenspace (both in terms of amount and quality), sustainable transport routes and blue-green infrastructure. Greenspaces should be connected and provide a green 'highway' to all areas of towns and cities. Communities that are more self-contained and resilient and less reliant on travel out of local areas for basic goods and services therefore contribute less to emissions and air pollution. RTPi's Plan the World We Need campaign¹⁴ highlights how the expertise of spatial planners can be used to tackle place-based inequality, prioritise healthy and sustainable modes of transport and coordinate the rapid deployment of zero carbon infrastructure.

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

- Yes

Additional comments in support of your answer

Yes, the inclusion of air pollution from all sectors of the economy is welcomed. The Cleaner Air for Scotland strategy should further promote collaborative working across all relevant industries, including the private sector and encompassing air quality experts and ecologists/environmental managers. Currently the strategy focuses on promoting collaboration with regulatory bodies and communities, but we would also consider that collaboration with the private sectors is of equal importance, since any change also needs to be driven by the potential polluters. There is often a lack

¹⁴ <https://www.rtpi.org.uk/news/plan-the-world-we-need/>;
https://www.rtpi.org.uk/media/5688/plantheworldweneed_june2020.pdf

of understanding of other disciplines and how the data acquired by one translates into something useable by the other.

SEPA's sector plans, if implemented in the right way, will be important in going beyond compliance and moving towards a circular economy. CIEEM has responded to consultations on many of the SEPA sector plans and we look forward to seeing the reported progress. There are many sector plans still in development such as agriculture, food manufacture and processing which have significant air quality and climate change impacts. As with all the SEPA sector plans, we would like to see a clear breakdown of organisational roles so that it is clear who is the lead organisation and who is carrying out monitoring and reporting. This will make the plans much more user-friendly to the various sectors.

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

- Yes
- No
- Don't know

Additional comments in support of your answer

N/A

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

- Yes
- No
- Neither agree nor disagree

Additional comments in support of your answer

N/A

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

N/A

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

- Neither agree nor disagree

Additional comments in support of your answer

We welcome the recognition that, in the Agricultural Sector “the most effective measures to reduce these impacts are those which directly reduce emissions of ammonia to the atmosphere, as opposed to attempting to introduce post emission mitigation.” Nature-based solutions and sustainable land management practices can deliver multiple benefits. Working with farmer-led groups and experts together is also a positive step to achieve a joined-up approach that works on the ground.

Assessments of visible smokes and their impacts from muirburn should also consider the impacts on biodiversity and consider appropriate actions and responses to prevent/mitigate damage. This also ties in with carbon sequestration and protection and restoration of peatlands.

Constraints should be recognised in terms of the planning system where proposals are submitted for agricultural enterprises which present a high pollution risk (particularly ammonia/nitrogen). This is of extreme importance particularly in priority landscapes such as the Atlantic rainforest on the western coast of Scotland, whose internationally scarce and valuable communities of bryophytes and lichens are extremely sensitive to excess nitrogen^{15, 16}.

Farmers who undertake good land management practices which deliver multiple ecosystem services (e.g. biodiversity, flood protection, carbon sequestration, air quality) as well as sustainably growing crops and rearing livestock should be incentivised in the long-term. If we are to achieve dramatic changes in agriculture for the benefit of the environment and human well-being, the process of financial support for farming should undergo a radical overhaul so that public money is used to deliver natural capital improvements.

Many of the reductions that have already occurred have been the 'easy wins' now harder targeted action needs to be taken.

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?

- No

Additional comments in support of your answer

Urgent action is needed given the recognition that agriculture accounts for around 90% of total ammonia emissions in Scotland. A code of good agricultural practice would be a step in the right direction, particularly one that is designed through working with farmers and landowners, however voluntary implementation may not go far enough. Measures specifically aimed at reducing ammonia emissions could be integrated into the SEPA PEPFAA Code. Regarding habitats which are rapidly and severely affected by increased ammonia exposure, far stricter constraints are required on agricultural activities in such areas. A presumption against permitting such enterprises within certain distances (ideally based on robust nitrogenous emission and environmental fate modelling) of recognised nitrogen sensitive landscapes should form an integral part of their consideration via the planning system.

The 2019 report 'Cleaner air for Scotland's wildlife: the impact of atmospheric nitrogen deposition on Scotland's wild flora and fungi'¹⁷, commissioned by the Scottish Government, revealed that 80% of land in Special Areas of Conservation, such as within the Cairngorms National Park, already displays 'unacceptable' levels of nitrogen, and many other priority habitats are nearing critical limits. Whilst it is acknowledged that other sources of nitrogen deposition exist, such as industry, it must be recognised that agriculture, which accounts for the vast majority of ammonia emissions in Scotland, has only brought about a decline of 16% from 1970s levels.

¹⁵ Mitchell, R.J., Truscott, A.M., Leith, I.D., Cape., J.N., Van Dijk, N., Tang, Y.S., Fowler, D., Sutton, M.A. (2005). A study of the epiphytic communities of Atlantic oak woods along an atmospheric nitrogen deposition gradient. *Journal of Ecology*, **93**, 482-492. <https://doi.org/10.1111/j.1365-2745.2005.00967.x>

¹⁶ Plantlife (2020). Cleaner Air for Scotland's Wildlife. Report commissioned by the Scottish government. https://www.plantlife.org.uk/application/files/4116/0828/6643/PL_Nitrogen_Scotland_report_Singles.pdf

¹⁷ Plantlife (2020). Cleaner Air for Scotland's Wildlife. Report commissioned by the Scottish government. https://www.plantlife.org.uk/application/files/4116/0828/6643/PL_Nitrogen_Scotland_report_Singles.pdf

It is clear that addressing ammonia emissions is time-critical and a voluntary approach is not likely to control and resolve such issues quickly enough to avoid lasting damage to native biodiversity and ecosystem health. Many of the recommendations to cut airborne nitrogen pollution from agriculture outlined in the Plantlife report¹¹ should be implemented, such as targeted use of fertilisers, matched to specific crop requirements at the right time to have maximum benefit. The role of nature-based solutions should be highlighted here also. Pollutant interception can be an effective means of reducing ammonia emissions from agricultural sources. The use of pollutant interceptors such as scrubbers have been shown to reduce emissions by 70 – 90%¹⁸. Similarly, inclusion of tree shelterbelts has been modelled to show a maximum of 27% ammonia capture from livestock housing¹⁹. The UK Centre for Ecology and Hydrology, in collaboration with Forest Research, have developed an online tool to calculate the efficacy of such shelterbelts for ammonia capture from agricultural installations²⁰.

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?

- Yes

Additional comments in support of your answer

Yes, as a voluntary approach is unlikely to quickly resolve continued impacts on nitrogen-sensitive habitats. Progress against targets will need to be monitored. A potential approach could be modelled on the SEPA Priority Catchment Approach. SEPA created Priority Catchments in response to addressing difficult to deal with diffuse agricultural pollution to the water environment. These catchments were walked and farm visits carried out to raise awareness directly with farmers. A similar approach could help with identifying poor practice but not apportioning blame, providing advice, thus working with farmers to bring about behavioural changes ahead of bringing in regulation. The SEPA Priority Catchment Approach has been very highly thought of across Europe in addressing diffuse agricultural pollution for Scotland's River Basin Management Planning objectives.

Clear governance should be laid out so that statutory agencies have regulatory powers to enforce legislation and air quality targets and, where non-compliance occurs, this is properly scrutinised and legal action taken by Environmental Standards Scotland where necessary.

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

- No

Additional comments in support of your answer

The package of actions is not very committal or ambitious and this should be addressed. The national nitrogen balance sheet will be a welcome tool and should highlight relative contributions from different sectors. As highlighted in question 6, many of the critical loads are too high to prevent impacts and loss of sensitive species in Scotland. Research is needed on potential mitigation

¹⁸ Guthrie, S., Giles, S., Dunkerley, F., Tabaqchali, H., Harshfield, A., Ioppolo, B. and Manville, C. (2018). The impact of ammonia emissions from agriculture on biodiversity: An evidence synthesis. The Royal Society, London. https://www.rand.org/pubs/research_reports/RR2695.html

¹⁹ Bealey, W.J., Loubet, B., Braban, C.F., Famulari, D., Theobald, M.R., Reis, S., Reay, D.S. and Sutton, M.A. (2014). Modelling agroforestry scenarios for ammonia abatement in the landscape. *Environmental Research Letters*, 9, 125001. <https://doi.org/10.1088/1748-9326/9/12/125001>

²⁰ See <https://www.farmtreestoair.ceh.ac.uk>

strategies²¹ and the role of nature-based solutions. For example, how effective hedgerows and tree shelterbelts²² are at minimising the impacts from point sources of ammonia e.g. pig and poultry farms on surrounding semi-natural habitats.

Monitoring and assessment of levels of atmospheric nitrogen at Sites of Special Scientific Interest (SSSIs) and Special Areas of Conservation (SACs) should be implemented and efforts made to determine how these could be reduced. This is especially important with increased usage of nature reserves as a result of the Covid-19 pandemic. It has been recognised for a long time that vehicular emissions of NO_x and NH₃ result in elevated concentrations of nitrogen at roadside verges with impacts on vegetation composition²³, with NO_x and NH₃ concentrations showing a decreasing gradient with increasing distance from the road. Where roads run alongside sensitive habitats efforts should be made to reduce impacts by mitigation and overall reduction of levels. Concentrations of ammonia in the atmosphere can also have a significant effect on designated nature conservation sites.

Principles that should be applied when undertaking assessments of the air quality impacts on designated sites are laid out in the Institute of Air Quality Management publication on “A guide to the assessment of air quality impacts on designated nature conservation sites²⁴. A newly published CIEEM advisory document²⁵ outlines the issues that ecologists and air quality specialists should consider to make an informed judgement as to the ecological effects of changes in pollution concentrations and deposition rates. Six steps are outlined to assist ecologists in making informed judgements regarding matters such as the level of risk, the sensitivity of particular sites and habitats, and the magnitude of ecological effects:

Step 1. Identifying the Baseline Ecological Features and Air Quality

Step 2. Assessing Confounding Factors, Background Pollution Trends and the Sensitivity of the Receptor

Step 3. Is the Critical Load or Level Exceeded?

Step 4. Apply Critical Loads and Critical Levels with Expert Judgement

Step 5. Project Duration and Seasonal Effects

Step 6. Relative Importance of Pollutant Concentration vs Deposition

²¹ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK. <https://cieem.net/wp-content/uploads/2020/12/Air-Quality-advice-note.pdf>

²² Bealy, W.J., Dore, A.J., Dragosits, U., Reis, S., Reay, D.S. and Sutton, M.A. (2016). The potential for tree planting strategies to reduce local and regional ecosystem impacts of agricultural ammonia emissions. *Journal of Environmental Management*, **165**, 106- 116. <https://doi.org/10.1016/j.jenvman.2015.09.012>

²³ Truscott, A-M., Palmer, S. C. F., McGowan, G. M., Cape, J. N., & Smart, S. (2005). Vegetation composition of roadside verges in Scotland: The effects of nitrogen deposition, disturbance and management. *Environmental Pollution*, **136**, 109-118. <https://doi.org/10.1016/j.envpol.2004.12.009>

²⁴ Holman *et al* (2019). A guide to the assessment of air quality impacts on designated nature conservation sites – version 1.0, Institute of Air Quality Management, London. www.iaqm.co.uk/text/guidance/airquality-impacts-on-nature-sites-2019.pdf

²⁵ CIEEM (2021) Advice on Ecological Assessment of Air Quality Impacts. Chartered Institute of Ecology and Environmental Management. Winchester, UK. <https://cieem.net/wp-content/uploads/2020/12/Air-Quality-advice-note.pdf>

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

- **Yes**

Additional comments in support of your answer

The increased investment in active travel that has arisen from the Covid-19 pandemic should be sustained. A largescale shift away from private car transport in our towns and cities is required, instead encouraging use of bicycles, buses, trams etc. The use of the private vehicle should be disincentivised, for example through the widespread introduction of driving charges in towns and cities, as currently proposed in the four major cities.

New housing developments which are being built on former 'green belt' land should be required to include the creation of safe active travel routes into city / town centres. The Covid-19 pandemic has highlighted the importance of local places for people's health and wellbeing. Spatial planning policy shapes local neighbourhoods, with significant impacts on the health and wellbeing of both current and future residents. The 20-minute neighbourhood approach underlies Scottish National Outcomes. There must be a fundamental shift towards local walking and cycle networks within communities, in high quality greenspaces to improve air quality and health.

It is important that Covid-19 does not prevent a return to the use of public transport. There may be a reluctance to use public transport in the future as a result. When it is safe to do so, the public will need to be encouraged to begin using public transport again. Increased investment in carbon neutral public transport, with sufficient service to allow for social distancing whilst providing good service to link communities and business, should be the way forward. Reducing the cost of using public transport and providing more frequent reliable services is key.

We would like to highlight that in some Local Authorities there was a rush to deliver temporary solutions under the Places for Everyone programme without consideration of how measures could become permanent. For example, Aberdeen City Council who installed cycle lanes at the beach esplanade and yet removed them in less than two months. This was at some considerable cost, lack of access while work was undertaken and undermined public opinion in active travel. A similar case has arisen with a hastily installed cycle lane along the A77 in East Renfrewshire. Therefore, it is essential to work with Local Authorities and delivery partners to consider opportunities for making the temporary infrastructure permanent through the Places for Everyone programme.

There should be increased funding in initiatives that result in freight traffic being diverted from road to rail, thereby reducing NOx levels. Our international gateways post-Brexit should avoid locations and options which are sensitive to the climate and ecological crises. Ferry routes for freight and people to the rest of Europe should be promoted and/or reinstated. Rail links to our international ferry ports should be a priority.

The cultural change that has occurred as part of the Covid-19 pandemic has to continue. For example, working from home has become widespread and can play a continued pivotal role in reducing carbon emissions and air pollution associated with commuting. This will require the development and expansion of digital infrastructure and boosting broadband provision to support home working especially in rural areas. Flexible working practices should continue to be encouraged.

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

- **Yes**
- **No**
- **Neither agree nor disagree**

Additional comments in support of your answer

N/A

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

- **Neither agree nor disagree**

Additional comments in support of your answer

Yes, although we would like to see how collaborative working across all relevant industries, including the private sector will be facilitated. A plan of how the delivery group and working groups will work with climate change groups to maximise benefits of considering the overall picture and policy interlinkages. Local Authority planners have an important role in contributing to these working groups.

20. Do you agree with the proposed review timeframe?

- **Yes**

Additional comments in support of your answer

We agree with the 5 year timescale for CAFS 2. As in CAFS, we presume annual reporting to assess progress towards targets will be undertaken. In the key areas outlined where immediate progress is needed, a short review of progress and assessment of the effectiveness of strategies will be required. Otherwise, opportunities to re-address strategies could potentially be missed.

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

N/A

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.

N/A

23. Do you think this strategy will disproportionately impact low income households? Please provide evidence where possible in support of your answer.

N/A

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.

N/A

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.

N/A

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.

N/A

27. 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.

N/A

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

N/A

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

N/A

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?

N/A