

PERTH AND KINROSS COUNCIL

Environment & Infrastructure Committee

21 August 2019

Air Quality Action Plan for Crieff

Report by Executive Director (Housing & Environment) (Report No. 19/217)

The Council has a statutory duty to monitor air quality throughout Perth & Kinross and to seek compliance with national air quality objectives. Following exceedances of national air quality objectives within the High Street corridor in Crieff, the Council requires to create an Air Quality Action Plan (AQAP) detailing the short and long term measures to improve air quality. The finalised AQAP is now complete, following public consultation and is submitted for Committee approval (Appendix 1).

1. BACKGROUND / MAIN ISSUES

Draft Air Quality Action Plan for Crieff

- 1.1 On 5 September 2018, the Environment & Infrastructure Committee approved the draft Crieff Air Quality Action Plan (AQAP) for further consultation ([Report No. 18/269](#))
- 1.2 As stated in the draft AQAP, the exceedances of national air quality objectives (nitrogen dioxide and particulates (PM₁₀)) from traffic within the Crieff High Street corridor are marginal (5-10% above objective limits) and have decreased gradually year on year. However, further monitoring is required to establish if this is a continual downward trend, and typical of national reductions in emission levels, due to the emergence of cleaner vehicles. Notwithstanding this reduction in emissions, it is unlikely that compliance with national objectives will occur swiftly enough to enable revocation of the air quality management area (AQMA), which requires a number of years of compliance, without the implementation of the proposed action plan (AQAP).
- 1.3 Where an AQAP is in place, the relevant Local Authority must report annually to both the Scottish Government and Scottish Environmental Protection Agency (SEPA) on the progress in implementing the measures set out in the plan.

Public Consultation

- 1.4 In accordance with Schedule 11 of the Environment Act 1995, the draft action plan required external/public consultation in order to inform the final plan. This resulted in engagement with a number of groups, including members of the public, local businesses, community groups, external agencies and the Scottish Government.

- 1.5 The [consultation exercise](#) on the draft Crieff AQAP was held from 7 January 2019 to 18 February 2019 and consisted of the following activities:
- An online survey was carried out asking the public if they agreed or disagreed with the proposed measures in the draft AQAP along with a number of open questions to encourage additional/personal views to be gathered.
 - Paper versions of the survey were distributed in key public areas throughout Crieff and Comrie.
 - A consultation [leaflet](#) was created and distributed electronically to approximately 200 contacts including PKC Councillors, Crieff and Comrie Community Councillors, the Chamber of Commerce, local schools, freight and haulage associations, community groups (such as Crieff BID), local transport companies, and a large number of Crieff businesses. The leaflet was also provided in hard copy to residents and businesses along the High Street corridor.
 - Social media was used extensively to further advertise the consultation, comprising of PKC Twitter and Facebook posts and articles, published in both the Strathearn Herald and the Courier.
 - Two consultation events were held at Strathearn Community Campus on the evening of Wednesday 7 January 2019 and Strathearn Art Space on the afternoon of Sunday 12 January 2019. These times and locations were chosen to allow a wide range of people the opportunity to attend. At these events members of the public were able to view a presentation given by officers from PKC Regulatory Services and a Ricardo Energy and Environment Air Quality Consultant, followed by time allocated for open questions from attendees.
- 1.6 Key external stakeholders/agencies also involved in the consultation included:
- The Scottish Government
 - SEPA
 - Business groups
 - NHS Tayside
 - Transport Scotland (as the Agency responsible for the A85 trunk road)
 - Tayside and Central Scotland Transport Partnership (TACTRAN)
 - Road Haulage Association

Consultation Findings

- 1.7 The consultation feedback was less than expected given the extensive awareness raising campaign. The online consultation survey was viewed 127 times, however only 66 responses were subsequently submitted, along with a further 6 written responses. Respondents included a number of business owners in addition to Crieff Community Council. Nine respondents lived outside Crieff.

(Note: Although the percentage consultation return rate was low there will be the opportunity for further consultation regarding individual improvement measures as they progress. For example, Section B.2 within the Air Quality Action Plan regarding 'Incentivising Parking out with the AQMA' will be considered as an individual project requiring consultation with relevant parties e.g. local residents, businesses etc.).

- 1.8 Notwithstanding the response rate, the majority of the consultation responses were positive towards the draft AQAP measures, with 75% agreeing that the air quality on the Crieff High Street corridor was poor and needed improving. When asked for their opinion regarding traffic congestion on the High Street corridor, 77% of respondents stated that they felt this was an issue. In addition, a further 51% of responses mentioned illegal parking being the main source of congestion in Crieff, in particular at West High Street. Others mentioned lorries loading/unloading to be another source of congestion.

Further feedback determined:

- 61% of respondents agreed with discouraging parking within/in close proximity of the AQMA (24% disagreed, 16% neutral).
- 49% of respondents agreed with limiting/prioritising traffic turning right onto Comrie Street from West High Street (32% disagreed, 29% neutral).
- 80% of respondents agreed with the introduction of sustainable travel plans for schools to promote sustainable travel (3% disagreed, 17% neutral).
- 74% of respondents agreed with the creation of a PKC Corporate Travel Plan to reduce emissions caused by PKC staff (14% disagreed, 12% neutral).
- 77% of respondents agreed with the introduction of eco schemes for HGV and bus operators to improve fleet environmental performance through, for example, efficient driving and fuel use (3% disagreed, 20% neutral).
- 65% of respondents strongly agreed with the possibility of enforcement action against idling vehicles (16% disagreed, 18% neutral).

- 1.9 A number of responses made reference to the poor air quality in Crieff often aggravating their asthma symptoms, thus reinforcing the importance of improving air quality as a health protection measure.

- 1.10 There were only three measures that received a negative/muted response as follows:

- When asked "Do you agree with the measure of rerouting some of the traffic that uses the A85 to use only local roads thus moving traffic away from the area?" the majority of responses were either negative (39%) or neutral (31%), stating that this would simply move the air quality problem elsewhere, potentially closer to more homes and schools.
- The response to the proposed measure of minimising developments such as biomass installations to reduce pollution was mostly neutral (45%) with 41% agreeing with the measure and 14% disagreeing.

- There were mixed results to the measure proposing the introduction of a *Low Emission Zone* (LEZ), or restricting access to polluting vehicles within the AQMA, 40% were in favour, 40% were against, and 20% were neutral.

(Note: The Scottish Government is likely to request all Local Authorities with AQMA's undertake feasibility studies for potential LEZ's or alternative vehicle access restrictions in 2020)

External Consultation – Other Agencies

- 1.11 As well as responses to the online consultation survey, six written responses were provided by SEPA, TACTRAN, Crieff Community Council and Stirling & Tayside Timber Transport Group (S&TTTG), Strathearn Artspace and one individual. Examples of the aforementioned feedback included:
- 1.12 SEPA verified the Council's findings regarding the source/causes of exceedances and the prioritisation of measures, for example:
 - Measures aimed at reducing emissions from buses were advised to be of a lower priority.
 - Measures to reduce/control emissions from private cars and HGVs, as well as managing and improving traffic flows through the AQMA should be prioritised above other measures
- 1.13 TACTRAN also agreed with many of the measures proposed but stated that in their opinion no one measure would solve the issue and that a package of measures should be implemented. It was also suggested that a public platform should be provided to encourage debate and allow public opinion to be expressed throughout the implementation of the AQAP.
- 1.14 Crieff Community Council recommended a variety of changes including the creation of a 'clearway', whereby a no stopping parking restriction could be applied at certain times and the creation of loading bays to prevent obstruction to traffic flows from deliveries.
- 1.15 Following the completion of the consultation, results have been collated and published on PKC Consultation Hub to provide accessible feedback on the outcomes of the consultation: <https://consult.pkc.gov.uk/change-and-improvement/crieff-draft-air-quality-action-plan-consultation/>. In addition, an [infographic](#) summarising the key findings of the consultation was created and distributed to the original consultees.

Steering Group Consultation

- 1.16 Following the findings of the consultation, the steering group (see below) was reconvened to review and reassess all of the measures that were proposed in the original draft AQAP before completing the final AQAP.

- 1.17 The Crieff AQAP steering group is made up of officers with core remits responsible for delivering the agreed action plan measures, namely PKC representatives from:

- Environmental Health
- Sustainable Development
- Roads
- Transport Planning
- Public Transport
- Development Control
- Parking
- Community Greenspace

In addition, representatives from Transport Scotland and TACTRAN were also heavily involved in the collation of the final plan.

- 1.18 The review of the consultation findings by the steering group included a reassessment of the proposed measures based on a consistent methodology regarding cost, economic/social impact, risk factors, potential co-environmental impacts and feasibility/acceptability. The outcome resulted in a small number of measures being reworded and/or amalgamated with others. No new measures were introduced. Appendix 2 provides a summary of the changes to the measures.

2. PROPOSALS

Approval of Final AQAP for Crieff

- 2.1 In accordance with the Environment Act 1995, PKC has created an AQAP for Crieff. Subject to Committee approval, PKC and identified partners will adopt and implement the plan's air quality improvement measures.
- 2.2 All 30 of the improvement measures contained in the action plan will be implemented progressively as projects in their own right, prioritising those measures expected to provide the greatest improvement in air quality and subject to available funding from the Scottish Government Air Quality Grant, Transport Scotland or revenue budgets.
- 2.3 The final Plan is a dynamic document and will be reviewed at least every five years.

3. CONCLUSION AND RECOMMENDATION(S)

- 3.1 A draft AQAP was developed for Crieff, based on work undertaken by the steering group. This document has undergone external consultation (outlined above) in order to inform the final plan.

3.2 It is recommended that the Environment & Infrastructure Committee:

a) Notes and agrees with the content of the final AQAP for Crieff

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Approved

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1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION

Strategic Implications	
Community Plan	Yes
Corporate Plan	Yes
Resource Implications	
Financial	No
Workforce	No
Asset Management (land, property, IST)	No
Assessments	
Equality Impact Assessment	No
Strategic Environmental Assessment	No
Sustainability (community, economic, environmental)	Yes
Legal and Governance	No
Risk	No
Consultation	
Internal	Yes
External	Yes
Communication	
Communications Plan	No

1. Strategic Implications

Community Plan

1.1 The proposals detailed within this report support each of the following priorities:

- (i) Giving every child the best start in life
- (ii) Developing educated, responsible and informed citizens
- (iii) Promoting a prosperous, inclusive and sustainable economy
- (iv) Supporting people to lead independent, healthy and active lives
- (v) Creating a safe and sustainable place for future generations

Corporate Plan

1.2 The proposals detailed within this report support each of the following priorities:

- (i) Giving every child the best start in life
- (ii) Developing educated, responsible and informed citizens
- (iii) Promoting a prosperous, inclusive and sustainable economy
- (iv) Supporting people to lead independent, healthy and active lives
- (v) Creating a safe and sustainable place for future generations

2. Resource Implications

Financial

- 2.1 There are no financial implications associated directly with this report. Each proposed measure will exist as an individual project. Funding will either be sought from available revenue budgets or external Scottish Government Air Quality Grant.

Workforce

- 2.2 The steering group and associated members will be responsible for the implementation of the proposed measures, with each measure existing as an individual project. Where capacity/resource allows project leads will delegate tasks to the existing workforce or a third party.

Asset Management (land, property, IT)

- 2.3 Any projects associated with PKC or Transport Scotland infrastructure will be assessed and managed on a project basis with relevant asset management contacts.

3. Assessments

Equality Impact Assessment

- 3.1 This report recognises that poor air quality affects the health of those more vulnerable members of the community. The Crieff AQAP was assessed as not relevant for the purposes of EqIA, due to the measures having no identified negative impact on members of the public.

Strategic Environmental Assessment

- 3.2 The Environmental Assessment (Scotland) Act 2005 places a duty on the Council to identify and assess the environmental consequences of its proposals.
- 3.3 Screening has determined that there is unlikely to be significant environmental effects as the existing exceedances are marginal. The AQAP is therefore exempt and the Consultation Authorities have been notified. The cumulative effects of the action measures within the AQAP are expected to have a positive impact on local air quality, which is the primary aim of the plan. PKC will continue to monitor air quality in and around the AQMA with the purpose of quantifying improvement and informing the direction of future review of the AQAP.

Sustainability

- 3.4 The proposed measures within the Crieff AQAP have been assessed against the Council's Principles for Sustainable Development, and have been found to

give a positive contribution towards Sustainable Development under the following Principles:

- Mitigation and adaptation to manage the impact of climate change & reduce the production of greenhouse gases.
- Living in a way that minimises the negative environmental impact and enhances the positive impact (e.g. recycling, walking, and cycling).
- Protecting and improving natural resources and biodiversity (e.g. air quality, water quality, and contaminated land).
- Accessible and appropriate transport services and communication linking people to jobs, schools, healthcare and other services (e.g. public transport facilities, telecommunications).
- Continuous improvement through effective delivery, monitoring and feedback at all levels.

Legal and Governance

- 3.5 The monitoring of air quality in Crieff, the subsequent determination of exceedances, the creation of an internal steering group, the subsequent draft action plan, and the external consultation have been carried out in accordance with current environmental/air quality legislation and/or policy guidance.

Risk

- 3.6 There are no risks associated with the content of the report. Risks associated with the implementation of each improvement measure will be assessed as measures are progressed.

4. Consultation

Internal

- 4.1 All relevant internal stakeholders, in particular representatives of Crieff Air Quality Steering Group have been consulted on the content of the Air Quality Action Plan for Crieff. These stakeholders support the measures contained within the report.

External

- 4.2 A broad range of external stakeholders have been consulted on the content of the Air Quality Action Plan for Crieff.

5. Communication

- 5.1 Each proposal will exist as an individual project with its own communication plan (if one is required).

2. BACKGROUND PAPERS

2.1 The background papers are:

- Further Assessment of Air Quality in Crieff
http://www.scottishairquality.co.uk/assets/documents//ED45590_Crieff_FA_Final_report_final_March2015.pdf
- Cleaner Air For Scotland Strategy: The Road to a Healthier Future
<http://www.gov.scot/Resource/0048/00488493.pdf>
- The Air Quality (Scotland) Regulations 2000/2002/2016
<http://www.legislation.gov.uk/ssi/2000/97/made>
<http://www.legislation.gov.uk/ssi/2002/297/made>
<https://www.legislation.gov.uk/sdsi/2016/9780111030837>
- The Environment Act 1995
<https://www.legislation.gov.uk/ukpga/1990/43/contents>
- The Air Quality Strategy for England, Scotland, Wales and Northern Ireland
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf
- Local Air Quality Management: Policy Guidance (PG(S)16)
<http://www.gov.scot/Resource/0053/00534614.pdf>
- Local Air Quality Management: Technical Guidance (TG16)
<https://laqm.defra.gov.uk/documents/LAQM-TG16-February-18-v1.pdf>
- Draft Crieff AQAP 5/9/18 Committee Report
<https://perth-and-kinross.cmis.uk.com/perth-and-kinross/Meetings/tabid/70/ctl/ViewMeetingPublic/mid/397/Meeting/1885/Committee/111/Default.aspx>

3. APPENDICES

- 3.1 Appendix 1 - Air Quality Action Plan for Crieff
- 3.2 Appendix 2 - Post Consultation Changes to AQAP Measures