

# **PERTH AND KINROSS COUNCIL**

## **Environment & Infrastructure Committee**

**5 September 2018**

### **Draft Air Quality Action Plan for Crieff**

**Report by Executive Director (Housing & Environment) (Report No. 18/269)**

Perth & Kinross Council's Environmental Health Team has a statutory duty to monitor air quality throughout Perth & Kinross, particularly within areas incorporating busy traffic routes.

Over a number of previous years, exceedances of national air quality objectives have been identified within the high street corridor in Crieff. As a result, this area was declared an Air Quality Management Area in 2014.

In order to seek compliance with air quality objectives, and in accordance with Scottish Government policy guidance, Perth & Kinross Council is required to create an Air Quality Action Plan (AQAP) for Crieff detailing the short and long term improvement measures proposed.

A draft AQAP has now been produced (see Appendix 1) and feedback is sought from members of the Environment & Infrastructure Committee on the content of this document, prior to external consultation.

Following external consultation, the final AQAP will be submitted for Committee approval.

## **1. BACKGROUND / MAIN ISSUES**

### **Health Impacts of Air Pollution**

- 1.1 Air pollution has been associated with a wide range of effects on the wider environment. However, it is the potential negative impacts of ambient air pollution on human health that is the primary focus of local air quality management.
- 1.2 In the long-term, scientific evidence indicates that air pollution can have a significant effect on human health, especially those more vulnerable members of the community. In recent years, emissions from motor vehicles have been shown to have an increasing impact on urban air quality. As a result, a large number of authorities across the UK have declared Air Quality Management Areas in response to identified exceedances of air quality strategy objectives, and are developing plans to improve air quality at the local level.

- 1.3 The 'Cleaner Air for Scotland Strategy' (CAFS) considers the impact of air quality on health, and looks at the estimated costs, as well as the premature deaths associated with poor air quality. It has been estimated that 2,000 premature deaths and around 22,500 lost life-years across the Scottish population are linked to fine particulate air pollution.

### **Monitoring and Managing Air Quality (Crieff)**

(Please see Appendix 2 for a Glossary of Air Quality Terms).

- 1.4 All Councils have a statutory duty to manage local air quality within their designated boundaries in accordance with Part IV of The Environment Act 1995. Under the Strategic Policy Framework for Local Air Quality Management, published by the Scottish Government, Perth & Kinross Council (PKC) has undertaken a programme of air quality assessments. The strategy requires each authority to undertake a series of air quality assessments to determine the current situation regarding local air quality, and to outline the progress of their local air quality management procedures to date.
- 1.5 Air quality objectives are stated within the Air Quality (Scotland) Regulations 2000/2002/2016 (see Appendix 4). Elevated concentrations marginally exceeding Annual Mean objectives for Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>) have been measured within the High Street corridor of Crieff for a number of years. This corridor comprises a narrow street with tall buildings either side of the A85 trunk road. This has resulted in a canyon effect which prevents air pollutants from dispersing. The narrow road often becomes congested, particularly at peak times throughout the day.
- 1.6 Where an authority identifies an exceedance at a location of relevant exposure, it is obligated under The Environment Act 1995 to declare an Air Quality Management Area (AQMA) and undertake a further assessment of existing and predicted future air quality. The Authority must then develop an Air Quality Action Plan (AQAP), setting out the local actions that will be implemented to improve air quality and work towards meeting the NO<sub>2</sub> and PM<sub>10</sub> objectives currently being exceeded. Appendix 3 summarises the AQAP process as a simple flow chart.
- 1.7 A detailed assessment was conducted in 2012 which quantified the likely exceedance area within Crieff. As a result, this area was officially declared an Air Quality Management Area (AQMA) in 2014.
- 1.8 A further assessment in 2015 identified that emission reductions of road NO<sub>x</sub> in the Crieff AQMA were required in order to achieve compliance with the annual mean NO<sub>2</sub> objective, along with a reduction in the traffic contribution of PM<sub>10</sub>.
- 1.9 This assessment also indicated that, in addition to local residents and visitors, up to 70 residential properties within the AQMA were exposed to exceedances of the annual mean NO<sub>2</sub> and PM<sub>10</sub> objectives.

1.10 In order to determine the probable causes of the air quality problems, source apportionment analysis was undertaken and concluded:

- The proportion of emissions from queuing traffic was higher at the western end of West High Street than at other locations. Traffic surveys indicate that traffic appeared to queue regularly throughout the day at this location with longer queues occurring during peak periods.
- The source apportionment also indicated that the highest proportion of NO<sub>x</sub> emissions at all receptors is from HGVs and cars.
- NO<sub>x</sub> and PM<sub>10</sub> emissions from buses are relatively low when compared to other vehicle types.

However recent monitoring results indicate a general downward trend in levels of both NO<sub>2</sub> and PM<sub>10</sub> within the Crieff AQMA. This trend, which is being seen on a national basis, is most likely due to the reduction in emissions from newer vehicles.

1.11 Although exceedances are marginal (5-10% above objective limits), further monitoring is required to establish if this is a continual trend that could eventually lead to compliance with the objectives. In the interim, the Council is unlikely to be in a position to revoke the AQMA for some time. As a result, the application of an action plan is still required.

### **Development of a Draft Air Quality Action Plan (AQAP)**

1.12 In creating the action plan, the key requirements as detailed in Department for Environment, Food & Rural Affairs (DEFRA) Technical Guidance TG(16) were followed, principally to:

- develop the AQAP in stages
- undertake appropriate local monitoring and assessment (source apportionment)
- decide what level of actions are required
- establish links to other key policy areas/strategies
- establish a Steering Group with key stakeholder groups at an early stage
- undertake measure selection and impact assessment
- agree monitoring and evaluation of success

1.13 A steering group including key representatives from the Council and other organisations was formed to develop the AQAP. It considered a wide range of potential options for improving air quality within Crieff.

1.14 The steering group was made up of teams that will ultimately be required to work together in order to deliver the agreed action plan measures. The steering group consists of Council officers from the following services:

- Environmental Health
- Sustainable Development

- Roads
- Transport Planning
- Public Transport
- Planning
- Parking

1.15 In addition two other organisations were also represented on the steering group:

- Transport Scotland (as the High Street corridor, the A85, is a trunk road)
- Tayside and Central Scotland Transport Partnership (TACTRAN)

1.16 There is no viable 'quick fix' to improve the air quality issues in Crieff. Therefore, a package of measures are proposed and presented within the Draft AQAP (see Appendix 1). These range from broad strategic measures, to additional traffic management and active travel measures. The potential measures were assessed against the following criteria:

- potential air quality impact
- potential costs
- overall cost-effectiveness
- potential co-environmental benefits, risk factors, social impacts and economic impacts, feasibility and acceptability.

1.17 The draft AQAP outlines the actions the Council will deliver in order to reduce concentrations of air pollutants and exposure to air pollution; thereby positively impacting on the health and quality of life of residents and visitors to Crieff.

## **2. PROPOSALS**

### **Consultation Process**

2.1 A broad external engagement process is proposed to ensure all relevant parties have the opportunity to be consulted on the draft AQAP and to inform the final plan. The consultation process will consist of the following stages/timescales.

### **Piloting of the Air Quality – Place Standard Tool**

- 2.2 As members of the Scottish Government's 'Cleaner Air for Scotland' Governance Group, the Council proposes to pilot, in conjunction with SEPA and Planning Aid Scotland (PAS), the new 'Air Quality Place Standard'. This community engagement tool helps to structure conversations regarding Crieff's air quality on a holistic basis.
- 2.3 Public on-street engagement in August 2018 will contribute to the action planning process, and make the options easier to understand, by acting as a prelude to the official AQAP external consultation in October/November 2018.

## **Multi-Disciplinary Air Quality Place Standard Workshop**

- 2.4 The workshop scheduled for September 2018 will be attended by the existing steering group members and other interested parties, to aid understanding of how a multi-disciplinary approach to air quality improvement is achieved. This approach will also enable the draft AQAP to be further assessed taking into account ongoing changes in relevant strategies and government policy.

## **Wider Consultation**

- 2.5 It is proposed that, following agreement of the Committee, the wider consultation of the draft AQAP be initiated in October/November 2018. This will include the following organisations/agencies:

- Scottish Ministers
- SEPA
- neighbouring local authorities
- other public authorities as appropriate
- bodies representing local business interests, other organisations and communities as appropriate (including representatives of the public e.g. community councils)
- any National Park authority within or adjacent to the local authority area
- NHS Tayside.

- 2.6 Copies of the draft AQAP will be circulated to the above consultees and made available to the public in order to adequately consult interested parties on the content and significance of the plan. In addition, local workshops will be held to further engage with residents and businesses, providing an opportunity for consultees to contribute to the process. It is recommended that the consultation period be no less than 6 weeks, with the actual dates to be determined subject to approval of this report.

## **Approval of final AQAP for Crieff**

- 2.7 Following consultation and necessary amendment, the final Action Plan will be submitted to the Environment & Infrastructure Committee for approval no later than the first Committee of 2019.
- 2.8 The final Plan will be reviewed every five years. Progress on measures set out within this plan will be reported annually within the Council's Annual Air Quality Progress Report to Scottish Government.

## **Further Traffic Modelling & Scenario testing**

- 2.9 Following agreement with Transport Scotland and the Council, an extensive update of the existing Crieff traffic model is to be undertaken. This will involve the gathering of significant traffic data utilising on street observers and various ANPR (Automatic Number Plate Recognition) cameras to create a microsimulation model of Crieff (note: all personally identifiable data will be removed).

- 2.10 This model will then be utilised to undertake scenario testing and, in conjunction with air quality modellers, assess the subsequent air quality impacts. Such scenarios may include alterations to existing junction priorities, reviewing parking restrictions or changing traffic signalling/crossing controls. The 'Do Nothing' option will also be considered.
- 2.11 The aforementioned work will be funded by the Scottish Government at a cost of approximately £112,000.

### **FUTURE NATIONAL AIR QUALITY CONTROLS**

- 2.12 The Scottish Government's, 'Cleaner Air for Scotland Strategy' 2015 has committed to a National Low Emission Framework for Scotland. This states, in the Government's programme for Scotland 2017-18 that the Scottish Government will work with Local Authorities to introduce Low Emission Zones (LEZs) to all AQMAs by 2023.
- 2.13 Any future feasibility study to determine the need for any LEZ or vehicle access restrictions will be assessed, and influenced, by the subsequent effectiveness of the AQAP.

### **3. CONCLUSION AND RECOMMENDATIONS**

- 3.1 A draft AQAP has now been developed for Crieff, based on work undertaken by the steering group. It is now proposed that this document should be subject to wider consultation, outlined above, in order to create a final AQAP for Crieff
- 3.2 It is recommended that the Environment & Infrastructure Committee:
  - a) Notes and agrees the content of the Draft AQAP for Crieff prior to external consultation.
  - b) Agrees the consultation proposals to engage with all relevant stakeholders in order to create a robust action plan, containing realistic improvement measures.
  - c) Requests the Executive Director (Housing & Environment) to bring the proposed final AQAP for Crieff back to this Committee in due course.

**Author**

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**Approved**

<b>Name</b>	<b>Designation</b>	<b>Date</b>
Barbara Renton	Executive Director (Housing & Environment)	24 August 2018

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## 1. IMPLICATIONS, ASSESSMENTS, CONSULTATION AND COMMUNICATION.

<b>Strategic Implications</b>	<b>Yes / None</b>
Community Plan	<b>Yes</b>
Corporate Plan	<b>Yes</b>
<b>Resource Implications</b>	
Financial	<b>None</b>
Workforce	<b>None</b>
Asset Management (land, property, IST)	<b>None</b>
<b>Assessments</b>	
Equality Impact Assessment	<b>None</b>
Strategic Environmental Assessment	<b>None</b>
Sustainability (community, economic, environmental)	<b>None</b>
Legal and Governance	<b>None</b>
Risk	<b>None</b>
<b>Consultation</b>	
Internal	<b>Yes</b>
External	<b>Yes</b>
<b>Communication</b>	
Communications Plan	<b>None</b>

### 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

### 2. Resource Implications

#### Financial

2.1 There are no financial implications associated directly with this report; however the subsequent and final Crieff AQAP, detailing air quality improvement measures, may require funding and will require approval.



### Workforce

- 2.2 There are no resource implications associated directly with this report with the exception of time commitments from officers in attending the proposed external consultation events; however, the subsequent and final Crieff AQAP may require further resource input and therefore further approval.

### Asset Management (land, property, IT)

- 2.3 There are no asset management implications associated with this report.

## **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. However, as there are no relevant actions resulting from the recommendations in this report then at this stage it has been assessed as 'not relevant' for the purposes of EqIA.

### Strategic Environmental Assessment

- 3.2 The Committee are requested to note the contents of the report and only agree to the proposed external consultation proposals, however the measures associated with the final Crieff Air Quality Action Plan will be fully assessed.

### Sustainability

- 3.3 There are no sustainability issues associated directly with this report; however the final Crieff Air Quality Action Plan detailing improvement measures will require further sustainability assessment.

### Legal and Governance

- 3.4 The monitoring of air quality in Crieff, the subsequent determination of exceedances, the creation of an internal steering group and subsequent draft action plan have been carried out in accordance with current environmental/air quality legislation and policy guidance.
- 3.5 Approval is sought regarding the content of the Draft Air Quality Action Plan and proposed approach to the external consultation.

### Risk

- 3.6 There are no risks associated with the content of the report.

## **4. Consultation**

### Internal

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

### External

- 4.2 Both Transport Scotland and Tayside and Central Scotland Transport Partnership (TACTRAN) have been consulted in conjunction with the aforementioned internal steering group and assisted in the creation of Crieff's Draft Air Quality Action Plan.

## **5. Communication**

- 5.1 The communication strategy has been outlined within the report including the proposed external consultation programme.

## **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](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](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>

### **3. APPENDICES**

Appendix 1 - Draft Air Quality Action Plan for Crieff

Appendix 2 - Glossary of Air Quality Terms

Appendix 3 - AQAP flow chart

Appendix 4 - Air Quality Objectives