

## Response ID ANON-QH6Y-5N7W-S

Submitted to **Cleaner Air for Scotland 2 - a consultation on a draft new air quality strategy for Scotland**

Submitted on **2021-01-22 16:41:20**

### Questions

#### 1 Do you agree with the package of actions put forward in the health chapter?

Not Answered

##### **Additional comments in support of your answer:**

The SPF welcomes the Scottish Government's proposals to tackle air pollution and build on the significant progress that has been made to improve air quality in recent years. We agree that investigating indoor air pollution should be a priority especially in the context of introducing new building standards that may affect the ventilation of a property. We also note the importance of outdoor air quality to the standard of air quality indoors.

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

Not Answered

##### **Additional comments in support of your answer:**

We welcome the Scottish Government's proposal for an integrated policy strategy, recognising the need for stakeholders from across the policy spectrum to be involved in improving air quality. From a property industry perspective, creating great places to live, work and play relies on many different factors, from ensuring that Scotland is welcoming to investment to having a planning system that is responsive and efficient.

Having cognisance of investment and wider economic factors will help to ensure that measures to improve air quality will tie in with the need to create new homes and workspaces. It is important for the public and private sector to work together to ensure that the policy aims of CASF2 enable this vital development.

#### 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?

Please provide any comments here:

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

Not Answered

##### **Additional comments in support of your answer:**

Air quality is an important factor in the creation of great places to live, work and play. We welcome the proposal to undertake a review of how this can be supported by nature-based and green infrastructure interventions.

The SPF's main interest in NPF4 is to see a framework focused on delivering and building sustainable and inclusive growth, to unlock development and deliver the much-needed infrastructure for our growing population and business needs. Our members would like to see NPF4 deliver a framework for investment by the private sector, public sector and other ventures. With a collaborative approach, we can continue to solve the challenge placed on our communities by climate change and air quality issues.

It is important that the rapid electrification of the Scottish economy is reflected in the preparation of NPF4 and its regard to CAFS2. Over the next decade, significant sources of air pollution such as road transport will be reduced by the greater use of electric vehicles and greener public transport. Meanwhile, Scotland's built environment will be increasingly heated by more efficient gas boilers, heat pumps, and district heating.

It is, therefore, vital that every new residential and non-domestic property has access to electricity and, importantly, that the generating capacity is identified and planned for and that the grid can handle the increased load that the changes will entail. Capacity of the grid extends well beyond the planning requirements of a single development and should be a priority at both regional and national levels.

There must also be greater emphasis on the ability to feed into the grid via locally generated renewables such as solar or wind. Our members have reported a conflict between wanting to be able to create renewable energy in their developments but being unable to because the grid does not have the capacity to receive it. Greater consideration must be given to the opportunities and need for the decentralisation of electricity production.

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

Please provide any comments here:

Place based approaches to delivering air quality improvements will become increasingly important in mitigating activities that unavoidably lead to air pollution.

Aviation is an example where current technology, whilst becoming increasingly efficient, still relies on burning fossil fuels, leading to some degree of air pollution. However, the aviation industry is also vital to Scotland's ability to reach out beyond its borders and have global significance. The impact of the coronavirus emergency has thrown into sharp relief the reality that Scotland's economy depends on welcoming people and investors from across the globe to celebrate our world-class hospitality, businesses, universities and cultural experiences.

It is, therefore, important that the strategy allows the flexibility for owners, developers and investors to mitigate the impact of unavoidable impacts on air quality. It

is also vital that Scotland can tap into the wider benefits that industries, like aviation, can bring to supporting the wider agenda of creating sustainable and inclusive economic growth.

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

Not Answered

**Additional comments in support of your answer:**

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

**Please provide any comments here:**

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

Not Answered

**Additional comments in support of your answer:**

Reducing air pollution will require the embrace of new technologies, which people may be unfamiliar with. This could process could be challenging and take time. It is, therefore, vital that there is an understanding of people's current behaviours in order to influence change and help people to adapt to necessary new behaviours and technologies.

The move towards the decarbonisation of heat in the built environment will require new data and an education programme in order to support its roll out. The Scottish Government could combine the need to understand behaviour and educate on air quality with its policy to promote energy efficiency and cut carbon emissions in the built environment.

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

Not Answered

**Additional comments in support of your answer:**

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

Not Answered

**Additional comments in support of your answer:**

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

Not Answered

**Additional comments in support of your answer:**

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

**Please provide any comments here:**

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

Not Answered

**Additional comments in support of your answer:**

**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?**

Not Answered

**Additional comments in support of your answer:**

**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?**

Not Answered

**Additional comments in support of your answer:**

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

Not Answered

**Additional comments in support of your answer:**

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

No

**Additional comments in support of your answer:**

Making our towns and cities more attractive and safer to actively travel in should be a priority for the Scottish Government and local authorities, and we welcome the inclusion of this in CAFS2. Not only will this improve the air quality of our towns and cities, but it will also have beneficial impacts on health and placemaking.

While home-working is an important element of the modern business environment, it remains to be seen whether an increase in people working from their own property will have an impact on air pollution. Indeed, it may be the case that increased home-working could negatively impact on other strategies to improve air quality. We therefore do not believe that the Scottish Government should make increasing the uptake of home-working an action point for CAFS2.

Firstly, more needs to be understood about the efficiency of the home-working environment compared to that of an efficient modern office/workplace. For example, does home-working mean that people are heating their entire homes for longer, and working with less efficient electrical equipment and lighting?

Secondly, the picture is further complicated by many of those who work in our town and city centres who use public transport, which is increasingly low or zero carbon. Such modes of travel will have little impact on air quality, and by stripping demand away from them it could render such services unviable or see capacity reduced. This, in turn, could see a rise in the use of more polluting modes of transport such as the car.

The regeneration and renewal of our town and city centres could also be impacted by a move away from working in a communal setting. A reduction in footfall will make it harder to attract investment to renovate and create new, more efficient buildings, and vibrant and liveable town centres.

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

Not Answered

**Additional comments in support of your answer:**

For investors and developers, guidance and consistency are key to ensuring that developments meet the requirements of any local air quality plan. This consistency is not only important within the local authority, but also between local authorities and other agencies across Scotland.

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

Not Answered

**Additional comments in support of your answer:**

Ministerial oversight may be important to ensure the adoption of CAFS2 will coexist with the policy priorities of the Scottish Government and could help to ensure consistency of adoption across Scotland's local authorities and agencies.

**20 Do you agree with the proposed review timeframe?**

Not Answered

**Additional comments in support of your answer:**

We welcome the planned review as it would provide an opportunity to consider the efficacy of each of the action points and respond to any unintended consequences of the strategy. Technology and regulation are also advancing at a significant pace and it would be useful to take account of the progress made.

## **Impact Assessments**

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

Please provide any comments here:

**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.**

Please provide any comments here:

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

Please provide any comments here:

**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.**

Please provide any comments here:

**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.**

Please provide any comments here:

**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.**

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Please provide any comments here:

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

Please provide any comments here:

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

Please provide any comments here:

**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?**

Please provide any comments here:

## **About you**

**What is your name?**

**Name:**

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**What is your email address?**

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**Are you responding as an individual or an organisation?**

Organisation

**What is your organisation?**

**Organisation:**

Scottish Property Federation

**The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:**

Publish response only (without name)

**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?**

Yes

**I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.**

I consent

## **Evaluation**

**Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)**

**Matrix 1 - How satisfied were you with this consultation?:**

**Please enter comments here.:**

**Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:**

Slightly dissatisfied

**Please enter comments here.:**

It would be useful to be able to review all answers in one place before submitting.