

Item 5

16th April 2024



Glasgow City Council

Net Zero and Climate Progress Monitoring City Policy Committee

Report by George Gillespie, Executive Director of Neighbourhoods, Regeneration & Sustainability

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Air Quality Action Plan Update and Consultation Response

Purpose of Report: To provide Committee with the Glasgow Air Quality Action Plan and information on the statutory consultation undertaken.

Recommendations:

It is recommended that Committee;

- 1) Notes the contents of this report
- 2) Notes the contents of the Air Quality Action Plan and consultation report
- 3) Requests the final AQAP be submitted to the City Administration Committee for approval.

Ward No(s):

Citywide: ✓

Local member(s) advised: Yes ☐ No ☐ consulted: Yes ☐ No ☐

1 Background

- 1.1 The statutory Local Air Quality Management (LAQM) process requires local authorities to regularly review and assess air quality in their areas, and to determine whether the air quality objectives are likely to be achieved. Where an exceedance is considered likely, the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives.
- 1.2 Glasgow City Council has prepared two previous AQAPs. The first, in respect of the City Centre AQMA, was produced in [2004](#). The second, in respect of declarations of the Byres Rd / Dumbarton Rd and Parkhead Cross AQMAs, was produced in [2009](#). Since then, updates on the actions within these plans have been included in the Air Quality Annual Progress Reports (APRs). Actions within the Plans are adapted over time and therefore the APRs have increasingly included progress updates on actions not considered within the original AQAPs.
- 1.3 Air pollution levels have improved in recent years, such that the Parkhead Cross AQMA has been revoked and the Byres Rd / Dumbarton Rd AQMA will be revoked in 2024. However, levels of nitrogen dioxide (NO₂) remain of concern and the City Centre AQMA is still in effect.
- 1.4 In November 2021, Environmental Standards Scotland (ESS)¹ announced that its first investigation would consider air quality, specifically focusing on compliance with the NO₂ limit value set in Directive 2008/50/EC on ambient air quality and cleaner air for Europe, which forms part of retained law following the UK's exit from the European Union.
- 1.5 After taking evidence from the Scottish Government, the Scottish Environment Protection Agency (SEPA) and local authorities, ESS published its conclusions and recommendations in the form of an improvement report in September 2022. The recommendations of relevance to the publication of this AQAP update are:
 - Introduce the requirement for local authorities to review and, where necessary, update AQAPs. The targets for any such review and update must be consistent with the principle of as short a time as possible.
 - Introduce the requirement for local authorities to achieve AQMA and AQAP objectives within a specified target date, which must be within as short a time as possible.
- 1.6 These recommendations were accepted by the Scottish Government and updated [Policy Guidance](#) was produced in March 2023, which set out what a local authority must include in an AQAP. This includes:
 - implementation timescales for measures,

¹ ESS is an independent body set up to ensure the effectiveness of environmental law and prevent enforcement gaps arising from the UK leaving the European Union. It monitors the effectiveness of environmental law in Scotland, and public authorities' compliance with it.

- quantification of expected impacts of measures, and
- assessment of whether measures will be sufficient to meet objectives as well as the statutory consultation requirements.

The policy guidance was also strengthened to require:

- Specified target dates for completing each action plan measure;
- Well defined milestones towards completion; and
- A clearer requirement for assessing (where feasible, given that some measures will be qualitative by nature) the estimated reduction in pollutant concentrations contributed by each AQAP measure.

- 1.7 The revised LAQM policy guidance specifies that current AQAPs should be reviewed and, where necessary, updated within one year of the revised guidance being published, and every five years subsequently. Whilst work on updating the Glasgow AQAP began in 2021, development was paused to focus on delivery of Scotland's first Low Emission Zone and the early draft AQAP has now been adapted to follow and include the requirements of the revised guidance.

2 AQAP Update - Aims

- 2.1 The Glasgow AQAP update outlines the actions that Glasgow City Council will deliver between 2024 – 2029 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 the Glasgow area.
- 2.2 Whilst the focus remains upon the City Centre AQMA, which is currently the last AQMA not scheduled for revocation and where exceedances of the air quality objectives continue to be observed, this AQAP adopts a holistic and city-wide approach to reducing emissions and improving air quality across the Glasgow City Council area.
- 2.3 AQMAs are required to focus primarily on achieving compliance with the statutory air quality objectives, including setting a timescale for the achievement of these and revocation of the AQMA. However, whilst not forming part of the current legislative and policy framework, World Health Organisation (WHO) guidelines are a set of evidence-based recommendations of limit values for specific air pollutants, developed to help countries achieve air quality that protects public health. In respect of levels of nitrogen dioxide and particulates, these guidelines set lower limits on pollution levels than the current statutory objectives or limit values. Glasgow City Council shares the ambition of the Scottish Government to achieve the best air quality possible and the AQAP therefore takes cognisance of these guidelines.
- 2.4 Based on latest monitoring information available within the [2023 APR](#), monitoring of NO₂ showed exceedances of the 40 ug/m³ objective at four locations, with a maximum annual mean measurement of 50ug/m³ at one of these locations in 2022.

- 2.5 Background levels of NO₂ within the city centre, taken from national datasets, are significantly above the WHO guideline levels. This demonstrates that long term compliance with WHO guidelines cannot be achieved by localised actions alone. Current actions set out in the Glasgow Climate Plan for decarbonisation of heat, transport and power will contribute towards achieving this goal.
- 2.6 Despite Glasgow performing relatively well in respect of particulates², with all applicable objectives being met, this AQAP explores actions which are expected to have co-benefits for particulate emissions as well as the primary focus on reducing levels of NO₂.
- 2.7 The actions within this AQAP, most notably the full implementation of the LEZ, should lead to the revocation of the City Centre AQMA, targeted to be no later than 2029. It should be noted that revocation of an AQMA generally requires a minimum of three years of monitored compliance with the objectives.
- 2.8 Progress has been made on improving the air pollution levels recorded within Glasgow in recent years. However, monitoring will continue in accordance with LAQM requirements, to provide verification of any improvements and inform longer term air quality ambitions. These considerations will guide the comprehensive review of monitoring detailed in the AQAP.

3 AQMA Update - Actions

- 3.1 The full AQAP can be found at this [LINK](#) and includes actions that can be considered under seven broad topics:
- Alternatives to private vehicle use
 - Promoting low emission transport
 - Promoting travel alternatives
 - Public information
 - Transport planning and infrastructure
 - Traffic management
 - Vehicle fleet efficiency
- 3.2 The priorities set out in the plan are to minimise emissions from road traffic, the main emission source leading to current exceedances of the objectives, through the reduction of direct emissions from transport. Reducing short journeys and increasing and promoting low emission public transport and active travel

² Particulates comprise the PM₁₀ and PM_{2.5} fractions with statutory objectives for each.

alternatives also play an important role in the AQAP. Reducing air pollution from heating sources is of considerable importance, particularly in relation to longer-term achievement of the WHO guidelines. Therefore, the following actions have been identified as priority areas:

- Priority 1 – Continue to enforce the Low Emission Zone and Mitigation Measures. The LEZ has been enforced since June 2023. The additional year grace period available to residents of the zone and sector specific time-limited exemptions will expire in June 2024. Therefore, continuous improvements in the annual mean NO₂ levels, due to increased scope of vehicles subject to the LEZ, is expected through to 2025.
- Priority 2 - Support the development and implementation of the Glasgow Transport Strategy (GTS) and associated City Centre Transport Plan (CCTP). These will introduce a range of transport initiatives with the potential to benefit air quality, particularly in relation to the target reduction in peak-hour private car traffic in Glasgow City Centre by 2030.
- Priority 3 – Support the development of an appropriate model to successfully deliver the Local Heat and Energy Efficiency Strategy (LHEES). This is principally relevant to the ambition to accelerate the deployment of heat networks in the city, reducing the contribution to background pollution levels from fossil fuelled heating systems.
- Priority 4 – Improve the emissions of GCC vehicles by implementing the Council's Fleet Strategy. As a major employer with approximately 1200 vehicles servicing the city, reducing emissions from this fleet serves as an example of best practice and can contribute significantly to improving air quality.
- Priority 5 – Undertake a comprehensive review of air quality monitoring in Glasgow with a focus around schools, hospitals, and care homes. This action fulfils one of the additional recommendations from the ESS report. Whilst existing knowledge indicates that all sensitive receptors of this type currently meet the air quality objectives, the provision of this information will help quantify the progress required for longer term ambitions such as meeting the WHO guideline levels.
- Priority 6 – Support the expansion of Glasgow's active travel network and supporting infrastructure through the Active Travel Strategy.
- Priority 7 – Continue to undertake vehicle idling awareness campaigns and enforcement, particularly around sensitive locations, and explore options for improving effectiveness of enforcement.

3.3 A wider range of actions are included within the plan, falling within the broad topics in section 3.1 and complementing the priority actions in section 3.2. Full details of all action plan measures can be found in Table 2 of the AQAP.

- 3.4 Where possible, information relating to timescales, funding, and expected benefits have been detailed for each action. Progress on the delivery of the AQAP will be reported annually within the APR which will be submitted to the Net Zero and Climate Progress Monitoring City Policy Committee and the Scottish Government. Additionally, the APR will also incorporate detailed reporting, as required by legislation and regulations, on the Glasgow LEZ. The AQAP will continue to be an adaptive document, with additional air quality actions identified and incorporated into the annual reporting as required.

4 Statutory Consultation

- 4.1 The draft AQAP has been subject to statutory consultation with the public element of the consultation open for a period of 6 weeks, from 13/2/24 to 20/3/24. A summary report on the consultation responses can be found in Appendix A.
- 4.2 The consultation was actively promoted through direct contact with relevant organisations, individuals and business representatives. The consultation was also promoted publicly through GCC social media platforms and website.
- 4.2 All statutory consultees were contacted directly by email and invited to provide comment on the AQAP. A public questionnaire was also hosted on the GCC Consultation Hub for the period. 22 responses were received from statutory or organisational consultees as detailed below:

Scottish Government
Scottish Environment Protection Agency
NatureScot
North Lanarkshire Council
East Dunbartonshire Council
West Dunbartonshire Council
Renfrewshire Council
The Glasgow Centre for Population Health
Strathclyde Partnership for Transport (SPT)
University of Glasgow
Sustrans Scotland
Scottish Ambulance Service
Paths for All
Broomhill Community Council
Downhill, Hyndland and Kelvinside Community Council
Love Thornwood
CoMoUK
Co Wheels Car Club
Road Haulage Association
Stove Industry Association
Parents for Future Scotland
GCC – Transport Planning and Delivery

- 4.3 The online questionnaire resulted in 174 responses, with 160 from individual members of the public and 14 from organisations, including those detailed in section 4.2.

5 Consultation Responses and Actions

- 5.1 The public element of the AQAP consultation suffered from a number of respondents choosing to express their opposition but without providing reasons for this. Where reasons were provided, a significant number used this as an opportunity to express dissatisfaction with established Council policy such as the LEZ, or elements either totally or partially outside of the remit of the AQAP such as general anti-environmental action opinions.
- 5.2 All responses have been collated and analysed as detailed further in this section and in Appendix A, with specific respondent themes addressed. However, due to the above, responses from the public in relation to the AQAP actions are likely to be skewed by those responding to, or passing opinion in relation to, policies and actions outwith the scope of the AQAP consultation.
- 5.3 Responses from statutory and organisational consultees have been generally positive - praising the comprehensive nature of the plan in accordance with Policy Guidance and the latest Scottish Government guidance note; the links with other strategies and plans where statutory consultees have previously provided input; the commitment to undertaking a review of the monitoring network within the city to reflect the recommendations in the ESS report advocating assessing air pollution levels at sensitive receptors such as schools, nurseries and hospitals; the use of source apportionment modelling to highlight emission sources.
- 5.4 Statutory consultees made the following observations and recommendations:
- Graphs showing air pollution trends using concentration levels derived from monitoring data should be included.
 - Various comments / recommendations on wording of specific actions from internal consultees
 - National Planning Framework (NPF4) and the Council's Local Development Plan (LDP) should be more explicitly referenced.
 - An assessment should be made of future development likely to impact on air quality within the AQMA.

The above recommendations have been incorporated into the revised AQAP.

- 5.5 Full details of the online questionnaire and the feedback received can be found in Appendix A. The majority of respondents said they had read the AQAP and majorities agreed with the statements "The AQAP was presented in a clear way" (56.4%) and "The AQAP provided me with adequate information" (50.3%). Those who disagreed or strongly disagreed with these statements number 24.2% and 29.6% respectively.

- 5.6 In respect of points submitted regarding the AQAP format or language, it should be noted that the AQAP is a statutory document and follows the Scottish Government's approved template in both structure and language. Therefore the scope to amend is limited. The template structure was designed to provide a fair balance between detailed technical delivery and non-technical summary.
- 5.7 On the question "Do you agree that the seven key priority actions identified within the AQAP are the main actions in respect of reducing air pollution levels within the City Centre Air Quality Management Area?" a small majority agreed with 47.1% agreeing or strongly agreeing whilst 44.1% disagreed or strongly disagreed.
- 5.8 On the question "To what extent do you agree that the 18 actions set out in the AQAP will contribute to a suitable reduction in air pollution levels?" a small majority disagreed with 44.7% agreeing or strongly agreeing whilst 45.3% disagreed or strongly disagreed.
- 5.9 On the question "Do you believe there are any actions, within the remit of Glasgow City Council to deliver, which should be included within the AQAP?". 159 respondents answered with 56% answering yes and 44% answering no.
- 5.10 For all three of the above questions, respondents were invited to provide more detail for their answer. Of those who chose to do so, several main themes were evident in most of the answers. These themes, and the proposed response, can be found in the table below:

Theme	Action
Expansion of area or scope of LEZ / revocation of the LEZ	<p>Discounted from the consultation due to being adopted policy subject to previous consultation.</p> <p>The process of declaring, expanding or revoking an LEZ is prescribed by the Transport Act 2019 and associated Regulations.</p> <p>Any changes to the Glasgow LEZ would require to meet conditions which do not currently apply.</p>
Actions relating to the Glasgow Transport Strategy	<p>Discounted from the consultation due to being adopted policy subject to previous consultation. Noted that some requests were already features of, and supported by, the GTS.</p> <p>Calls for increased pedestrianisation or restrictions on vehicle access for example, already fall within aspects of the GTS such</p>

	as the City Centre Transport Plan or People First Zone.
Actions relating to the motorway and trunk road network.	<p>Outwith the remit of GCC and the AQAP.</p> <p>Modelling indicates that emissions from the trunk road network are a minor contributor to areas within the City Centre AQMA experiencing the highest pollution levels.</p> <p>As the motorway and trunk road network fall within the remit of Transport Scotland and the Scottish Government, GCC will continue to liaise with these agencies in respect of potential changes / improvements to the network within the Glasgow area.</p> <p>An additional action has been included in the AQAP to reflect this.</p>
Wood burning stoves / low emission plant	<p>Discounted from AQAP due to limited impact within AQMA and focus on national measures for improvement actions.</p> <p>GCC will liaise with and contribute to any review and actions from the Scottish Government in respect of domestic solid fuel sources.</p>
Improve public transport provision.	Supported within various AQAP actions, specifically actions 1,4,5,11,12,13 and 14.
Bring public transport under public ownership	<p>Outwith the remit of the AQAP.</p> <p>GCC continues to address public transport improvements through the organisations such as the Bus Improvement partnership. Recent announcements by SPT in relation to a franchising model for bus services relate to this theme. SPT are currently consulting on this at https://www.spt.co.uk/media/tsnchnh0/spt-srbs-consultation-document-april-2024.pdf</p>
Adopt the WHO guidelines	Local Authorities are required to follow the LAQM process which sets mandatory objectives for pollutants. WHO guidelines are explicitly referenced within the introduction of the AQAP as a longer-term ambition with cognisance of guidelines included in certain actions.

	<p>GCC will liaise with the Scottish Government as it continues to review the statutory requirements in respect of objective levels.</p> <p>An additional action has been included in the AQAP to reflect this.</p>
Help for businesses with costs	The AQAP does not introduce any direct costs on businesses at this stage. Actions arising from associated strategies will be subject to full analysis and potential mitigation measures
Weight based vehicle permit scheme / ban on SUVs	<p>Outwith the remit of GCC and the AQAP.</p> <p>Determination of which vehicles are licensed to use public roads falls within the remit of the UK Government and DVLA.</p> <p>Local restrictions on vehicle types may apply where allowed by legislation (bus lanes / gates, LEZ etc). However, no such legislation applies in respect of these vehicle types.</p> <p>All vehicle types, including SUVs and heavy vehicles, must meet the LEZ emission standards to enter the city centre.</p>
Include emissions from air travel	Previously screened as not significant within existing AQMAs
Specific requests relating to climate change activities	<p>Outwith the remit of the AQAP.</p> <p>Whilst the AQAP is expected to provide co-benefits in respect of climate change emissions, actions specific to climate change fall within the remit of the Glasgow Climate Plan.</p>
Comments regarding indoor air pollution	<p>Outwith the remit of the AQAP.</p> <p>LAQM does not include indoor air pollution and therefore AQAPs are not designed to include actions on the sources of indoor air pollution levels except where these are contributed to by outdoor emissions.</p>
General complaints regarding road network condition, opposition to provision of active travel measures,	<p>Outwith the remit of the AQAP.</p> <p>A significant number of responses which could be considered negative used the AQAP consultation as an opportunity to comment on areas of complaint or</p>

opposition to electric vehicles, opposition to 20mph zones, general opposition to air quality improvement actions or other non-specific complaint.	opposition to factors outwith the scope of the AQAP.
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- 5.11 Of those who made specific requests, responses received focussed on actions already within the AQAP, or outwith the remit of GCC / the AQAP. However, where contributions included relevant additional actions which have been assessed as appropriate, these have been included in the AQAP. Therefore the final version of the AQAP includes 21 actions compared to the 18 within the consultation draft version.

6 Next Steps

- 6.1 The AQAP will be submitted to the City Administration Committee for approval and thereafter formally submitted to the Scottish Government.
- 6.2 Actions within the AQAP will be progressed according to their respective timescales. Progress will be reported within the annual Air Quality Progress Reports and submitted to the relevant Committees.

5 Policy and Resource Implications

Resource Implications:

<i>Financial:</i>	Grant funding for the AQAP and associated actions is provided annually by the Scottish Government. LEZ support funding is designed by Transport Scotland and administered through the Energy Saving Trust. Other actions feature a range of funding sources.
<i>Legal:</i>	LAQM is determined by the Environment Act 1995. This report raises no new legal issues.
<i>Personnel:</i>	LAQM duties undertaken using existing GCC personnel.
<i>Procurement:</i>	No relevant procurement issues from AQAP at this stage. Individual actions may have procurement requirements.

Council Strategic Plan: This work supports the key aims of Grand Challenge 3, Mission 2 of the Council Strategic Plan.

Equality and Socio-Economic Impacts:

Does the proposal support the Council's Equality Outcomes 2021-25? Please specify. Generally supportive of the stated outcomes.

What are the potential equality impacts as a result of this report? No significant impact from this report.
Poor air quality differentially impacts on residents with prior health conditions and improvements in air quality should therefore provide benefits.

Please highlight if the policy/proposal will help address socio-economic disadvantage. No significant impact from this report.

Climate Impacts:

Does the proposal support any Climate Plan actions? Please specify: LAQM has many co-benefits and shared actions with the Climate Plan including actions:
22 – development of the LEZ
26 – alternative actions for bus delivery
33 – feasibility study of a Workplace Parking Levy
42 – ban of gas heating in new developments
51 - delivery of a comprehensive active travel network
52 - enable a rapid and strategic shift to electric vehicles through increasing the current rate of deployment of EV charging infrastructure
53 – support transition to cleaner public transport
54 – transition GCC fleet to electric
55 – transition private hire fleet to zero emissions by 2030
56 - reduce the need to own and use a car through measures in the City Development

Plan 2, Glasgow Transport Strategy, and the Liveable Neighbourhoods

What are the potential climate impacts as a result of this proposal?

The AQAP updates action plan measures, many of which have slight beneficial climate impacts.

Will the proposal contribute to Glasgow's net zero carbon target?

Measures proposed within the AQAP have slight beneficial climate impacts, especially in relation to transport, and therefore contribute to the net zero carbon target

Privacy and Data Protection Impacts:

This report has no immediate impacts upon privacy or data protection.

6 Recommendations

6.1 It is recommended that Committee;

- 1) Notes the contents of this report
- 2) Notes the contents of the Air Quality Action Plan and consultation report
- 3) Requests the final AQAP be submitted to the City Administration Committee for approval.

Appendix A

Air Quality Action Plan Consultation – Summary Report

Statutory and Organisational Responses

Eight emailed responses were received from statutory stakeholders including the Scottish Government, SEPA, Nature Scotland and neighbouring local authorities. A further 14 response on behalf of organisations were submitted via the online questionnaire. The full list of statutory / organisational respondents can be found below:

Scottish Government
Scottish Environment Protection Agency
NatureScot
North Lanarkshire Council
East Dunbartonshire Council
West Dunbartonshire Council
Renfrewshire Council
The Glasgow Centre for Population Health
Strathclyde Partnership for Transport (SPT)
University of Glasgow
Sustrans Scotland
Scottish Ambulance Service
Paths for All
Broomhill Community Council
Downhill, Hyndland and Kelvinside Community Council
Love Thornwood
CoMoUK
Co Wheels Car Club
Road Haulage Association
Stove Industry Association
Parents for Future Scotland
GCC – Transport Planning and Delivery

Responses have been generally supportive. Where suggestions have been made, these have included:

- Graphs showing air pollution trends using concentration levels derived from monitoring data should be included.
- Various comments / recommendations on wording of specific actions from internal consultees
- National Planning Framework (NPF4) and the Council's Local Development Plan (LDP) should be more explicitly referenced.
- An assessment should be made of future development likely to impact on air quality within the AQMA.

Actions to address points raised: All of the above suggestions will be addressed and incorporated in the revised plan before submission to relevant committees and plan adoption.

Responses also praised:

- The comprehensive nature of the plan, in accordance with Policy Guidance and the latest Scottish Government guidance note.
- The links with other strategies and plans where statutory consultees have previously provided input.
- The commitment to undertaking a review of the monitoring network within the city to reflect the recommendations in the ESS report advocating assessing air pollution levels at sensitive receptors such as schools, nurseries and hospitals.
- The use of source apportionment modelling to highlight emission sources.

Public Consultation

The consultation ran for a period of 6 weeks, from 13/2/24 to 20/3/24. There have been 174 completed responses registered on the online consultation portal.

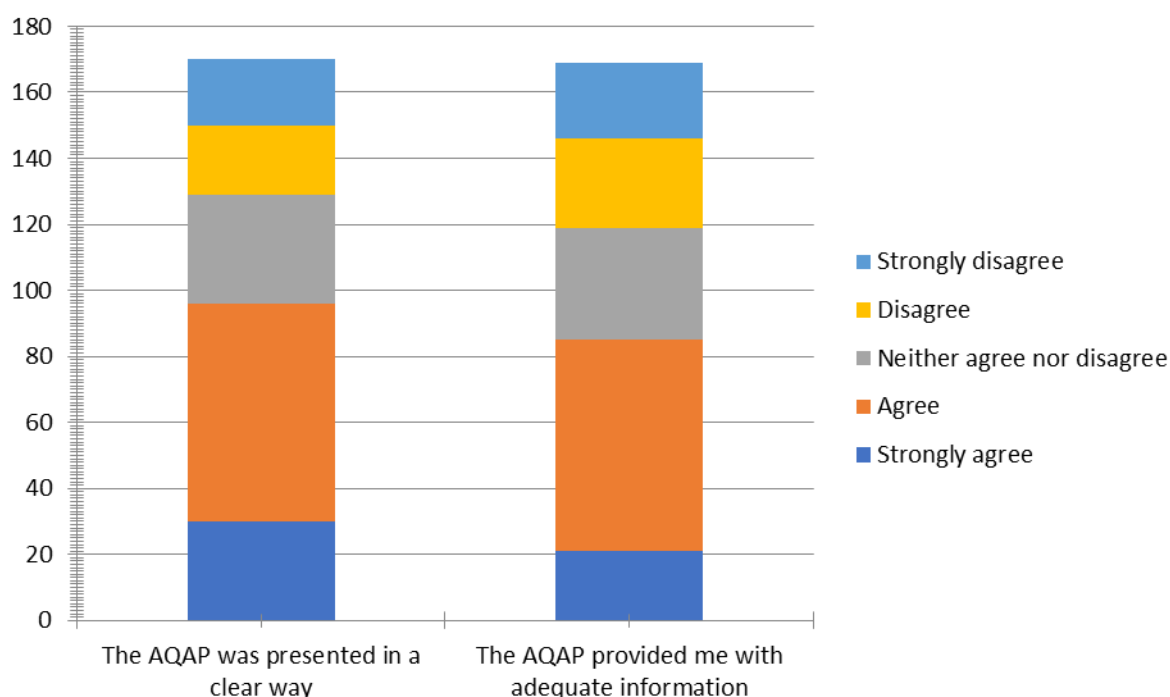
The majority of the responses have been received from individuals, with 14 claiming to respond on behalf of organisations.

Most said they had read the AQAP, with 2 respondents stating they had not read the plan.

Question 1

The majority of respondents agreed or strongly agreed with the statements “**The AQAP was presented in a clear way**” (56.4%) and “**The AQAP provided me with adequate information**” (50.3%). Those who disagreed or strongly disagreed with these statements number 24.2% and 29.6% respectively.

Please state the extent to which you agree or disagree with the following statements.



40 respondents took the opportunity to provide further comment on the reasons for their response to the above questions. Responses were varied, with some responses giving more detail on why they gave a positive answer to this question. Of those who expressed a negative opinion, some cited the technical language used within the report as being difficult to understand. Other criticisms included the report format, the use of tables, the requirement for more data or that the report was too long. Others used the opportunity to express non-specific negative views or that the AQAP was targeting motorists.

Some respondents used this opportunity to comment on specific aspects of the plan.

Actions to address points raised: The actions in respect of the statutory and organisational responses previously noted will serve to address some of the points also raised in the online responses.

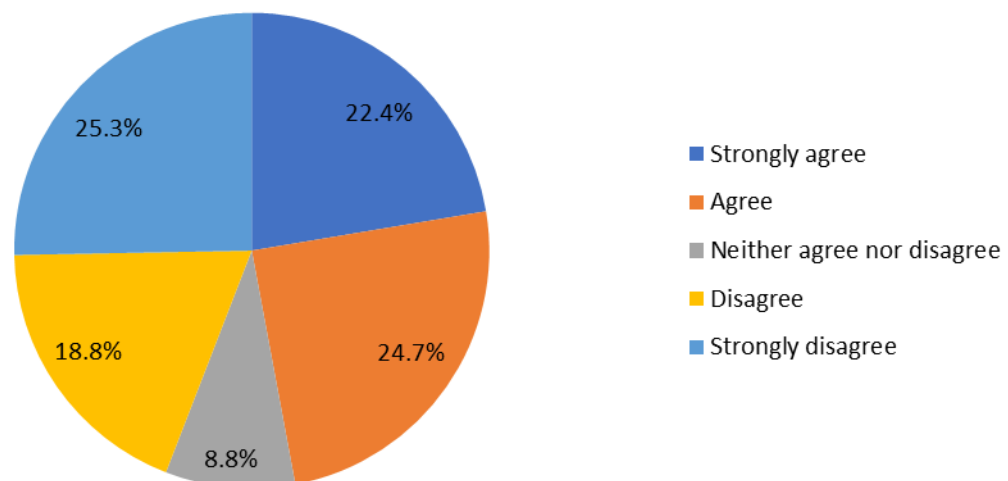
In respect of points regarding the AQAP format or language, it should be noted that the AQAP is a statutory document and follows the Scottish Government's approved template in both structure and language. Therefore the scope to amend is limited. The template structure provides a fair balance between detailed technical delivery and non-technical summary.

Question 2

On the question **“Do you agree that the seven key priority actions identified within the AQAP are the main actions in respect of reducing air pollution levels**

within the City Centre Air Quality Management Area?” 47.1% agreed or strongly agreed whilst 44.1% disagreed or strongly disagreed.

Do you agree that the seven key priority actions identified within the AQAP are the main actions in respect of reducing air pollution levels within the City Centre Air Quality Management Area?



61 respondents chose to provide reasons for their choice. Again, these were varied with some response providing general praise for the actions. Others indicated support but suggested stronger actions in respect of public and sustainable transport, tackling motorway emissions, expansion of the LEZ, completely removing vehicles from the city centre, banning SUVs, providing more public information and adopting the WHO guidelines for air pollution. Some indicated support for actions excluded from the plan such as action on domestic wood burning.

Of those who expressed a negative view, the main themes were the AQAP was an attack on motorists, there is no air quality problem requiring an action plan, opposition to the LEZ, opposition to active travel policies, opposition to electric vehicle adoption, opposition to 20mph limits, air quality issues are due to buses only, the AQAP will affect businesses, disbelief in air quality statistics and climate change and conspiracy theories relating to the purpose of air quality or environmental actions.

Actions to address points raised: The consultation advised respondents that “the Glasgow Low Emission Zone, the Glasgow Transport Strategy and the Local Heat and Energy Efficiency Strategy are adopted Glasgow City Council policies and have been subject to their own consultation processes. Therefore, this consultation will not impact upon these specific actions.” As detailed above, some respondents chose to provide comment in support or opposition to these actions.

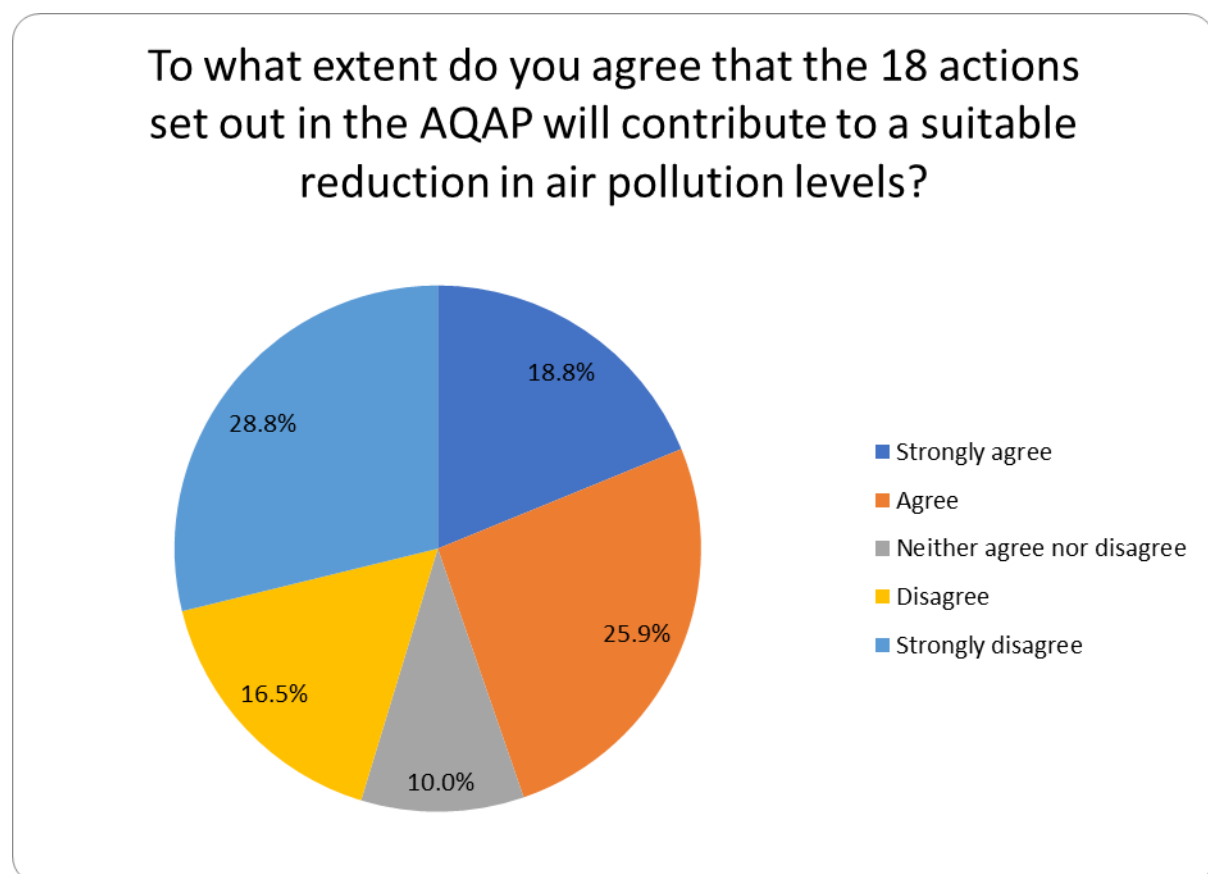
Other comments requested actions either outwith the scope of a local authority, such as in respect of the motorway or trunk road network or banning SUVs, or in respect of actions not taken forward within the AQAP, such as domestic solid fuel burning. The reasons for such actions not being taken forward were clearly stated within the plan.

The AQAP also stated that the World Health Organisation Guidelines were recognised as longer term ambition. However, the AQAP is a statutory document in respect of the Scottish air quality objectives.

It is therefore not proposed to make changes to the 7 key priority actions based on consultation responses.

Question 3

On the question “**To what extent do you agree that the 18 actions set out in the AQAP will contribute to a suitable reduction in air pollution levels?**” 44.7% agreed or strongly agreed whilst 45.3% disagreed or strongly disagreed.



62 respondents chose to provide reasons for their choice. These closely mirrored or re-iterated the reasons as discussed in the previous question. However, new comments in general favourable of the AQAP expressed support for more monitoring, reduction in parking availability, a weight-based permit scheme or more pedestrianisation.

Of those who expressed a negative view, new comments cited congestion as the cause of pollution and requested measures to improve traffic flow, blamed air travel for pollution, cited incorrect air quality statistics or that the priorities were wrong in some way.

Actions to address points raised: Responses received closely mirrored those of the previous question. Where new comments were received, these generally related to comment on actions already incorporated in the plan or outwith the remit of GCC or the AQAP to deliver

It is therefore not proposed to make changes to the 18 actions based on consultation responses beyond those identified within the responses from statutory consultees.

Question 4

Respondents were asked “**Do you believe there are any actions, within the remit of Glasgow City Council to deliver, which should be included within the AQAP?**”. 159 respondents answered with 56% answering yes and 44% answering no.

85 respondents took the opportunity to provide further information on their response. These tended to follow the same themes or re-iterate previous answers. The main themes of responses received and actions to address these, where relevant, are shown in the table below.

Theme	Action
Expansion of area or scope of LEZ / revocation of the LEZ	<p>Discounted from the consultation due to being adopted policy subject to previous consultation.</p> <p>The process of declaring, expanding or revoking an LEZ is prescribed by the Transport Act 2019 and associated Regulations.</p> <p>Any changes to the Glasgow LEZ would require to meet conditions which do not currently apply.</p>
Actions relating to the Glasgow Transport Strategy	<p>Discounted from the consultation due to being adopted policy subject to previous consultation. Noted that some requests were already features of, and supported by, the GTS.</p> <p>Calls for increased pedestrianisation or restrictions on vehicle access for example, already fall within aspects of the GTS such as the City Centre Transport Plan or People First Zone.</p>

<p>Actions relating to the motorway and trunk road network.</p>	<p>Outwith the remit of GCC and the AQAP.</p> <p>Modelling indicates that emissions from the trunk road network are a minor contributor to areas within the City Centre AQMA experiencing the highest pollution levels.</p> <p>As the motorway and trunk road network fall within the remit of Transport Scotland and the Scottish Government, GCC will continue to liaise with these agencies in respect of potential changes / improvements to the network within the Glasgow area.</p> <p>An additional action has been included in the AQAP to reflect this.</p>
<p>Wood burning stoves / low emission plant</p>	<p>Discounted from AQAP due to limited impact within AQMA and focus on national measures for improvement actions.</p> <p>GCC will liaise with and contribute to any review and actions from the Scottish Government in respect of domestic solid fuel sources.</p>
<p>Improve public transport provision.</p>	<p>Supported within various AQAP actions, specifically actions 1,4,5,11,12,13 and 14.</p>
<p>Bring public transport under public ownership</p>	<p>Outwith the remit of the AQAP.</p> <p>GCC continues to address public transport improvements through the organisations such as the Bus Improvement partnership. Recent announcements by SPT in relation to a franchising model for bus services relate to this theme. SPT are currently consulting on this at https://www.spt.co.uk/media/tsnchnh0/spt-srbs-consultation-document-april-2024.pdf</p>
<p>Adopt the WHO guidelines</p>	<p>Local Authorities are required to follow the LAQM process which sets mandatory objectives for pollutants. WHO guidelines are explicitly referenced within the introduction of the AQAP as a longer-term ambition with cognisance of guidelines included in certain actions.</p>

	<p>GCC will liaise with the Scottish Government as it continues to review the statutory requirements in respect of objective levels.</p> <p>An additional action has been included in the AQAP to reflect this.</p>
Help for businesses with costs	The AQAP does not introduce any direct costs on businesses at this stage. Actions arising from associated strategies will be subject to full analysis and potential mitigation measures
Weight based vehicle permit scheme / ban on SUVs	<p>Outwith the remit of GCC and the AQAP.</p> <p>Determination of which vehicles are licensed to use public roads falls within the remit of the UK Government and DVLA.</p> <p>Local restrictions on vehicle types may apply where allowed by legislation (bus lanes / gates, LEZ etc). However, no such legislation applies in respect of these vehicle types.</p> <p>All vehicle types, including SUVs and heavy vehicles, must meet the LEZ emission standards to enter the city centre.</p>
Include emissions from air travel	Previously screened as not significant within existing AQMAs
Specific requests relating to climate change activities	<p>Outwith the remit of the AQAP.</p> <p>Whilst the AQAP is expected to provide co-benefits in respect of climate change emissions, actions specific to climate change fall within the remit of the Glasgow Climate Plan.</p>
Comments regarding indoor air pollution	<p>Outwith the remit of the AQAP.</p> <p>LAQM does not include indoor air pollution and therefore AQAPs are not designed to include actions on the sources of indoor air pollution levels except where these are contributed to by outdoor emissions.</p>
General complaints regarding road network condition, opposition to provision of active	Outwith the remit of the AQAP.

travel measures, opposition to electric vehicles, opposition to 20mph zones, general opposition to air quality improvement actions or other non-specific complaint.	A significant number of responses which could be considered negative used the AQAP consultation as an opportunity to comment on areas of complaint or opposition to factors outwith the scope of the AQAP.
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Actions to address points raised: As with previous questions, responses received focussed on actions already within the AQAP, or outwith the remit of GCC / the AQAP.

However, where contributions included relevant additional actions which have been assessed as appropriate, these have been included in the AQAP. Therefore the final version of the AQAP includes 21 actions compared to the 18 within the consultation draft version.