

Cleaner Air for Scotland – a consultation on a draft new air quality strategy for Scotland

Analysis of consultation responses

March 2021



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Riaghaltas na h-Alba
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Background

In November 2018 the Scottish Government commissioned an independently led review of its Cleaner Air for Scotland strategy, which was published in 2015. The aims of the review were to assess progress to date in implementing the strategy and to make recommendations for additional actions required to deliver further air quality improvements.

A report setting out the conclusions and recommendations arising from the review was published in August 2019¹. These recommendations have been used to inform the development of a new air quality strategy, which was the subject of this consultation². The consultation commenced on 30 October 2020 and closed on 22 January 2021.

994 responses were received, 907 of which resulted from a campaign. The remaining 87 responses can be grouped as follows:

Members of the public (individuals and groups) – 27
Business & industry – 19
Non Government Organisations (including charities, public bodies & special interest groups) – 16
Professional bodies & organisations – 15
Local authorities – 10

Two responses were also received on the Environmental Report which accompanied the consultation.

A list of respondents who have agreed for their names to be made public can be found in Annex A. Full consultation responses (where respondents have agreed to publication) can be found at <https://consult.gov.scot>

Other consultation approaches

Three online workshops were held to supplement the written consultation. Two of these, in December 2020, were organised by SEPA and themed around agriculture and domestic fuel burning. The third, in January 2021, was organised and hosted by Environmental Protection Scotland on behalf of the Scottish Government and covered transport, health & wellbeing, planning, communication and integrated policy³.

Key points arising from the consultation

There was broad support for the overarching aims of the strategy, however a wide and diverse range of views was expressed. This analysis is structured around the

¹ [Cleaner Air for Scotland strategy: independent review - gov.scot \(www.gov.scot\)](http://www.gov.scot)

² [Cleaner Air for Scotland 2: consultation - gov.scot \(www.gov.scot\)](http://www.gov.scot)

³ [Cleaner Air for Scotland 2 Stakeholder Session - Environmental Protection Scotland \(EPS\) \(ep-scotland.org.uk\)](http://ep-scotland.org.uk)

30 consultation questions and also includes points covered at the online workshops. As this is a wide ranging strategy covering many different policy areas, the majority of respondents did not answer or comment on all of the questions, but instead focused on those most relevant to their specific interests. Where respondents indicated agreement or disagreement, it should be noted that this was not always supplemented by supporting comments.

Q1 Do you agree with the package of actions put forward in the health chapter?

Of those respondents who expressed a view, 48 agreed and 10 disagreed. Two respondents felt that research on indoor air and in-vehicle air quality would not be best use of limited resources. Other than this, disagreement focused on a lack of detail around outcomes and timelines for the health based actions, rather than objection to the actions themselves.

Amongst those agreeing with the actions, there was a range of comments. Some respondents suggested that issues covered elsewhere in the draft strategy, for example public awareness raising, the benefits of green and blue infrastructure, emissions from domestic fuel burning and ammonia emissions from agriculture should be included in the health section. The final strategy will ensure that the health impacts of these issues are clearly stated in the appropriate sections.

It was also noted by several respondents that there is a reasonably good range of existing health information that could be more effectively deployed for communication purposes, for example resources produced by the National Institute for Health and Care Excellence. Linked to this point was the need for air quality training for health professionals and clearer evidence based communication of air quality impacts to patients with respiratory and other conditions, for example around relative exposure risk in different situations. Also mentioned by one respondent was that the health section should reference collaborative working on health goals. Two respondents suggested that investigating the links between high air pollution episodes and hospital admission rates could be useful.

A number of respondents noted the requirement to focus strongly on the health inequalities and environmental justice aspects of poor air quality, both in research development and guidance. Using the Scottish Index of Multiple Deprivation to explore links between poor air quality and deprivation was also suggested. Three respondents suggested including indoor air quality in the Tolerable Standard – the basic level of repair which a property must meet to make it fit to live in.

Q2 Do you agree with the package of actions put forward in the integrated policy chapter?

Of those respondents who expressed a view, 51 agreed and five disagreed. There was widespread support for integrating policies that impact and are impacted by air quality, and for this to be one of the key underlying principles of the new strategy. One respondent suggested that land use, water quality, biodiversity and ecosystems impacts should be highlighted more strongly in this section. Also mentioned in this context were the Strategic Transport Projects Review 2 and the role of

Regional/Local Transport Strategies and Regional Transport Partnerships, and the Nitrogen Balance Sheet. Four respondents suggested that noise targets could be considered in the new strategy.

To support integration of air quality and climate change, black carbon and carbon dioxide monitoring could be incorporated into the air quality monitoring network.

As in the health section, several respondents noted that the actions are lacking detail on outcomes and timescales.

Q3 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?

34 respondents provided comments on this question, with the vast majority highlighting lack of communication and collaborative working between local authority departments as the most significant barrier. A lack of staff with experience and knowledge of air quality issues in departments other than environmental health, together with a general reduction in staff numbers and budgets, was frequently cited as contributing to this effect, with the proposed solution being more effective awareness raising and training provision. Air quality is still often not seen as a priority, despite positive changes in recent years. It was also noted by several respondents that local authority structures can serve to reinforce silo working and that coordinated leadership at a high level, reinforced by joint targets, is required to address this.

One suggestion was that an enhanced role for Regional Transport Partnerships could also help to overcome these barriers in relation to transport, but other respondents also suggested that more general regional working between local authorities could be effective. At the same time, it was noted that there are examples of local authorities where cross departmental working to improve air quality is effective, and these could be used as examples of best practice.

Q4 Do you agree with the package of actions put forward in the placemaking chapter?

Of those respondents who expressed a view, 45 agreed and nine disagreed. Of those who disagreed, one respondent felt that there should be more emphasis on biodiversity and nature based solutions; however there was widespread support for the focus on nature based solutions in the draft strategy amongst those who agreed. Related to this point, it was suggested that blue infrastructure should be highlighted alongside green. Several respondents also noted that air quality and placemaking is not just an urban issue. Other suggestions included introducing digital Environmental Impact Assessments to streamline the planning process, expediting proposals to make the climate emergency a material consideration.

The 20 minute neighbourhood concept was highlighted by a number of respondents, suggesting that this should receive more attention in the new strategy. Some respondents also suggested a need for enhanced guidance on use of the Place Standard Tool, along with a commitment to working with communities as well as

local authorities but in language that can easily be understood by non specialists. The Place Principle was mentioned by one respondent as needing a sound basis to be effective.

Also on community involvement in placemaking, it was noted that there are existing networks that could be utilised effectively. One respondent suggested that the Scottish Government could consider working with educational institutions and professional bodies to develop postgraduate and vocational courses that have cross departmental relevance, to increase awareness and expertise of land use planners in relation to environmental health issues.

Three respondents felt that NPF4 should go further than simply having regard to Cleaner Air for Scotland.

As with previous questions, there was a feeling amongst some respondents that the placemaking actions need to be more prescriptive.

The campaign responses suggested that actions relating to Air Quality Management Areas need to be included in the placemaking section.

Q5 Do you have any suggestions on the role of place-based approaches in delivering targeted air quality improvements?

Few detailed comments were received to this question, as most respondents focused on question 4, however it was noted that there are a number of existing examples that could be used as illustrations of best practice.

Q6 Do you agree with the package of actions put forward in the data chapter?

Of those respondents who expressed a view, 41 agreed and four disagreed. One respondent was of the view that the potential role of Application Programming Interfaces (a software intermediary which allows multiple applications to interact). Transport Scotland's Land Use and Transport Integrations in Scotland (LATIS) was mentioned in a similar context. Several respondents made the related point that multiple datasets need to be easily accessible by users, ideally in one place, and collection methodologies should be standardised as far as possible. Also more generally, data should be shared more openly and innovatively. One respondent thought it would be beneficial if air quality data could be more easily correlated with pollution sources.

There was a more general view that there is a great deal of currently collected data not being used to maximum effect, for example that gathered by both public and private transport operators. Where there are commercial or other privacy issues, such data can be anonymised and still be useful. Although much air quality data is already available in near real time, it was felt that there is much potential to develop this further.

This section focuses mainly on air quality, transport and environmental data, but one respondent felt that public communication of health data should be covered too.

Additionally, the potential role of satellite data needs to be carefully assessed for added value.

Three respondents also highlighted the need for additional biological monitoring, in the context of pollution impacts on ecosystems and habitats.

Several respondents mentioned the potential for greater use of low cost air quality sensors, but at the same time care is needed when assessing data accuracy and application from such sensors.

Q7 Do you have any suggestions on the approach for annual collection of traffic data for air quality management purposes?

Few specific comments were made in relation to this question. Several respondents mentioned the value of increasing collection of real time traffic data. To make best use of resources however, one respondent suggested priority areas should be identified for the most frequent data collection.

Q8 Do you agree with the package of measures put forward in the public engagement and behaviour change chapter?

Of those respondents who expressed a view, 41 agreed and six disagreed. Points raised included making more effective use of social media, using local case studies to make concepts more relevant to people, involvement of community groups, targeting different messages in urban and rural settings, and learning from the Covid-19 communications approach. Although there is much work to be done on developing communications strategies for air quality, it was pointed out that some effective approaches do already exist and these should be built on rather than duplicated. It was also suggested by one respondent that a question on air quality could be included in the Scottish Household Survey.

Q9 Do you agree with the package of actions put forward in the emissions regulation chapter?

Of those respondents who expressed a view, 31 agreed and eight disagreed. Relatively few substantive comments were offered in response to this question. Two respondents felt that not including the maritime sector is an omission. One respondent had concerns about differing regulatory standards across the UK and another about gold plating. Two respondents felt that transport refrigeration units should be assessed as part of the MoT and one noted that the technology to make such units low emission largely already exists. There was also a view expressed that increased attention should be focused on those not complying with current standards before more stringent ones are considered.

Q10 Should currently unregulated sectors such as non-waste anaerobic digestion and non-road mobile machinery be brought into existing legal frameworks?

Of those respondents who expressed a view, 30 agreed and four disagreed. As with question 9, few substantive comments were made. One respondent considered that any controls on non road mobile machinery should cover industry besides transport.

One respondent made the point that agricultural machinery is usually a long term investment and this needs to be taken into account. Related to this, it was suggested that any changes to fuel specifications for agricultural machinery should not have implications for such investments, and any new regulations for both fuels and machinery should not be applied retrospectively.

Q11 Do you agree with the package of actions put forward to reduce the impact of domestic (household) combustion?

Of those respondents who expressed a view, 30 agreed and 22 disagreed. There were a wide range of views expressed in response to this question, with some considering that the actions do not go far enough, and others conversely that they go too far. One respondent felt that a ban on sale of house coal should come into effect immediately although one also felt that coal should not be banned at all. Most respondents commenting on that point felt that a phased approach would be needed. One respondent suggested that the proposed sulphur limit on manufactured solid fuels should be lower still and that high carbon domestic fuels should be taxed.

It was also suggested by two respondents that manufactured smokeless fuels should have a minimum renewables content specified by law, with no exemptions, and that all domestic fuels, including renewables, should comply with Clean Air Act requirements. Additionally it was felt that a specific test for kiln dried wood is needed.

One respondent noted that off grid rural housing is likely to require significant insulation upgrades if controls on solid fuels are introduced, and this is likely to involve major financial and practical challenges.

Amongst those respondents who disagreed with the proposals, the majority of comments focused on proposed controls on wood burning stoves in urban areas, which are generally installed for amenity or secondary heating use. It was argued that the measures did not go far enough and such stoves should be banned, except in cases of fuel poverty. One respondent felt that manufacturers and suppliers should not be permitted to promote products as green. Other views offered in this context included strengthening and simplifying Smoke Control Area requirements, designating all urban areas as SCAs, requiring planning permission for wood burning stoves, a permit scheme and mandatory register for such stoves, more consideration of the cumulative impact of stoves, introduction of fixed penalties for improperly installed and operated stoves, and different requirements for rural and urban areas.

In relation to Ecodesign, one respondent suggested that accreditation could be retrospectively applied when already installed appliances are subsequently approved. It was noted by one respondent that Ecodesign and similar schemes are essentially self certification, which could be addressed by third party assessment, also reducing the regulatory burden on local authorities.

Ground source heat pumps were mentioned by three respondents who suggested that their use should be restricted unless the associated noise issues can be addressed.

A substantial number of respondents made the point that education of and awareness raising amongst manufacturers, suppliers and users will be key to improving burning practices, both amongst those switching from highly polluting domestic fuels and those already using wood and related products. Related to this was the point that regulation by itself will be insufficient to effect the necessary changes. One respondent suggested that a requirement through household insurance to properly maintain appliances could be a driver for behavioural change. Another respondent suggested that a tax on the worst performing appliances could also help, as could promoting the use of pellet stoves over wood burners, banning outdoor appliances such as chimineas and firepits, and banning peat burning.

It was noted in several responses that chimney sweeps are well placed to play an important role in the educational process. A register of installers, engineers and sweeps who could report back on installations and advice given may be beneficial. Government recognition for trained and approved sweeps would also support this process.

A number of respondents also highlighted the multiple benefits that can be delivered by promoting locally produced sustainable wood sources. Such benefits can include lower transport costs, closer relations and therefore better educated customers, and a positive impact on the rural economy.

Another common response was that a move away from house coal and other highly polluting domestic fuels is likely to disproportionately affect poorer members of society and has the potential to increase fuel poverty without adequate financial and practical support. At the same time, several respondents expressed the view that controls on house coal and high sulphur fuels are unlikely to have a significant impact, given that use of these is already relatively low and continuing to decline. However additional controls on the supply of wood, for example through restrictions on individuals sourcing and seasoning their own wood supplies (which is not currently part of the proposals) does have the potential for negative impacts.

A number of respondents expressed concern about the financial implications for small and medium sized businesses if they have to invest in kiln drying equipment, and also the energy and emissions costs associated with this, when compared to natural seasoning. This could lead to local suppliers being forced out of business, with trade concentrated on a small number of large suppliers, with associated transport costs. Several respondents suggested that a viable and sustainable air dried domestic wood fuel industry can be established in Scotland, but could take several years to become established and may require subsidy in the meantime.

Q12 What potential impacts might the package of actions put forward have on households and businesses?

The main point raised in response to this question in relation to households was the possibility of increased fuel poverty if adequate support is not provided. For businesses, it was the financial cost of having to invest in kiln drying equipment. A more detailed review of these issues is provided in question 11.

Q13 Do you agree with the package of measures put forward in the agricultural section?

Of those respondents who expressed a view, 29 agreed and seven disagreed. In the latter case, the main point made by all respondents was that a voluntary code of good practice will be insufficient to deliver the required emissions reductions. Those agreeing with the proposals however, were generally of the view that a voluntary code, supplemented by education, awareness raising and financial and practical support, will be more effective in securing the buy in of farmers and the wider agricultural industry. A further view offered by several respondents was that a voluntary approach and further regulation could be used in combination to good effect. The period for which a voluntary code would be in place before being reviewed also needs to be clearly stated from the outset.

Two respondents suggested that current voluntary approaches are ineffective, with these also of the view that any voluntary code should be broader in scope than ammonia emissions, for example highlighting the co benefits from better fertiliser use for reducing other types of nitrogen emissions and odours. A focus on co benefits could also help with prioritising measures through developing a hierarchy matrix. This would also need to include mitigation measures such as agroforestry. One respondent pointed out that potential obstacles to following best practice need to be considered, for example in the planning system. One respondent also suggested that agricultural biomass burning as fuel should be covered by the proposals.

One respondent had concerns about how large scale units will be defined for possible future regulation, stating that this needs to be clearly set out and applied consistently. Several respondents had concerns about cost implications if significant investment in new equipment might be required, with one suggesting that the Sustainable Agricultural Capital Grants scheme could be enhanced for this purpose.

Amongst respondents both agreeing and disagreeing with a voluntary code, there was a widely expressed view that there is a general lack of awareness amongst farmers around the air quality impacts of agriculture, but that with appropriate education and support this situation could be significantly improved. Related to this, there is a need to fully understand how to balance regulation, rural support and the food and drink industry with responding to the climate change and biodiversity emergencies. It was pointed that existing systems and structures will provide a sound basis for further change, for example experience learnt from currently regulated large scale agricultural units and utilising resources such as the Farm Advisory Service, the Feed Adviser Register and Fertiliser and Crop Nutrition Advisers. One respondent suggested following the recommendations of the Suckler Beef Climate Group on best practice. One respondent pointed out that any policies need to encompass contractors as well as farmers, with both practical and financial support being made equally available.

In addressing the environmental impact of agricultural emissions, one respondent suggested that co-ordinating with the SEPA Priority Catchment approach for tackling diffuse pollution could be helpful. One respondent mentioned Regional Land Use Partnerships in the same context. Another respondent observed that the Local Air Quality Management approach for assessing emissions from the poultry sector has proved to be effective and could be a good basis for further policy development.

The campaign responses highlighted the need for the Scottish Government to set appropriate targets in relation to the National Emissions Ceiling Directive requirements.

Q14 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?

Of those respondents who expressed a view, 29 agreed and 11 disagreed. The range of views expressed is covered under question 13.

Q15 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?

Of those respondents who expressed a view, 31 agreed and nine disagreed. The range of views expressed is covered under question 13.

Q16 Do you agree with the package of actions put forward in the nitrogen deposition and environmental impacts section?

Of those respondents who expressed a view, 33 agreed and four disagreed. There was a broad consensus in support of the actions put forward in this section, with few specific comments made. One respondent who disagreed was of the view that the measures do not go far enough and that nitrogen monitoring is needed at Sites of Special Scientific Interest and Special Areas of Conservation.

Other views offered included adding timeframes to the actions, setting ammonia targets more stringent than those included in the National Emissions Ceiling Directive, introducing a programme of action to reduce nitrogen deposition close to the most sensitive sites, integrating existing sources of nitrogen data into monitoring, assessment and management of such sites, whilst providing guidance and funding for this management. Two respondents also suggested there could be a role for Local Biodiversity Partnerships.

Q17 Do you agree with the actions put forward in the transport chapter?

Of those respondents who expressed a view, 44 agreed and 12 disagreed. Amongst the wide range of comments expressed in response to this question, several broad themes emerged. These can be summarised as follows:

- Increased support for, coordination of and investment in electric vehicle infrastructure;
- More focus on alleviating congestion and emissions in urban areas through reducing use of private cars;
- Adequate recognition of the needs of the haulage industry, in terms of providing more practical and financial support for the transition to low emission vehicles and ensuring that the industry can still function effectively in urban areas as transport policy evolves;
- Greater encouragement of and support for modal shift, including passengers from private cars to public transport and walking/cycling/wheeling, and goods from road to rail and water;
- Increased investment in and support for low emission buses;
- Greater focus on mobility hubs, for both goods and people;
- Reduce government expenditure on roads infrastructure in favour of active travel;
- A commitment to developing a fully integrated public transport system, including better provision in rural areas; and
- A commitment to a full active travel network for Scotland.

Other points were also made by respondents. Workplace parking levies generated comments with no clear consensus, with small numbers being equally in favour and against. One respondent suggested that WPLs should distinguish between single occupancy and both shared vehicles and sustainable mobility e.g. car clubs. There was also no clear consensus on any long term moves towards working from home, with both the advantages and drawbacks being highlighted. On scrappage schemes, one respondent suggested the replacement should be mobility credits rather than a new vehicle (an arrangement which is currently in place via the Low Emission Zone Support Fund), whilst another was of the view that such a scheme should be targeted at the most polluted areas and to individuals on low incomes or in poor health. When encouraging active travel, one respondent highlighted the need to promote the economic and safety benefits, besides health and wellbeing, to further increase take up. Another respondent suggested creating a body similar to Active Travel England. One respondent thought that active travel funding should be provided directly to local authorities rather than by application, to streamline the process. Related to this point, one respondent called for the removal of match funding requirements to provide authorities with more flexibility. Several respondents felt that the increase in the active travel budget is presented in a misleading way and that this commitment should be reworded.

Three respondents noted that the strategy does not cover either aviation or shipping, considering these to be significant omissions. The omission of fleet recognition schemes was also noted by two respondents. Three respondents suggested mandatory 20mph zones in all built up areas. On buses, besides the general request for more investment, two respondents suggested expanding free bus travel to other groups and one for an investigation into the reasons for decreased bus usage in many areas.

The campaign responses stated that traffic reduction measures should be included in the final strategy, in particular a doubling of the active travel budget and an end to trunk road expansion. The recent commitment to a 20% reduction in car kilometres

by 2030 needs to be backed up by actions which support public transport, active travel and electric vehicles.

Q18 Do you agree with the package of measures put forward in the Local Air Quality Management chapter?

Of those respondents who expressed a view, 36 agreed and four disagreed. Few comments were offered in response to this question. Three respondents supported the proposal to extend LAQM assessment to all areas with public access, whilst one noted that it would increase the workload for local authorities. A requirement for more detailed guidance on the use of low cost sensors was also highlighted, as was investigating the possibility of including workplace air quality in LAQM. One respondent noted that it is not always possible to quantify air quality action plan measures and that the merits of qualitative measures should not be disregarded.

Q19 Do you agree with the proposed Governance of CAFS2?

Of those respondents who expressed a view, 40 agreed and four disagreed. One respondent suggested there should be a legally binding duty on the Scottish Government to report annually to the Scottish Parliament on progress with the new strategy, together with legally binding air quality targets for 2030 and beyond. One respondent felt that the governance proposals should be expanded to cover a wider range of organisations and one suggested the Ministerial group should meet quarterly.

Q20 Do you agree with the proposed review timeframe?

Of those respondents who expressed a view, 47 agreed and six disagreed. One respondent felt reviews should be more frequent, without suggesting a timescale, and one suggested that there should be a mid term update.

Q21 Are you aware of any additional equalities impacts of the proposals in this strategy?

Respondents did not highlight any significant issues in addition to those already covered in the Equalities Impact Assessment.

Q22 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.

Respondents who provided comments on this question focused on the issues of fuel poverty for users and potential economic impacts for small business. Both of these points are assessed under question 11. Two respondents noted that the positive impacts of better air quality could help to balance these negative impacts.

Q23 Do you think this strategy will disproportionately impact low income households? Please provide evidence where possible in support of your answer.

As with question 22, the main point raised here by those who commented was potential fuel poverty.

Q24 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.

Respondents did not highlight any significant issues in addition to those already covered in the Business and Regulatory Impact Assessment.

Q25 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.

The main point raised here was the potential impact of controlling the sale of the most polluting fuels.

Q26 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.

Few comments were offered in response to this question. The main point raised was the potential impact of different regulatory requirements in different parts of the UK for UK wide businesses.

Q27 Would there be different impacts for those that operate in remote/rural or island communities? Please provide any supporting evidence that you are aware of.

No comments were provided on this question which differ from those already covered previously in relation to controls on the sale of the most polluting domestic fuels.

Q28 What are your views on the accuracy and scope of information used to describe the environmental baseline set out in the Environmental Report?

Q29 What are your views on the predicted environmental effects as set out in the Environmental Report?

Q30 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?

Substantive comments on the Environmental Report were provided by one respondent. Questions 28, 29 and 30 are covered jointly here in relation to that response. The issues covered by the Report were however addressed indirectly by a number of respondents in responses to other questions. The respondent considers that the potential impacts have been broadly recognised, and the inclusion of soil, water and biodiversity is welcomed. It was felt that the positive impacts of

reduced emissions on biodiversity could have been highlighted more strongly, but that this may be partly due to a lack of data. Requirements for additional environmental assessment on any new plans or programmes arising from the strategy should be set out in more detail. It was also considered that more detail is required on how progress with actions will be assessed.

Scottish Government response

The points raised in response to the consultation will be considered during finalisation of the strategy. In particular the Scottish Government acknowledges that many of the proposed actions require additional detail, including timelines and outcomes. This will be addressed in the delivery plan which will accompany the strategy.

The Scottish Government also recognises the need to cover in the final strategy developments related to various plans and policies which have taken place since the consultation was launched, including but not restricted to the Climate Change Plan update, NPF4, National Transport Strategy 2, the Land Use Strategy, the Nitrogen Balance Sheet and the wider Covid-19 recovery plans.

Annex A – respondents

The following organisations gave permission for their responses to be published. Responses from the 27 individuals have also been published anonymously.

Aberdeenshire Council
Agriculture Industries Confederation Scotland
Asthma UK & British Lung Foundation Partnership
BL Fuels Ltd T/A Bruce Lindsay Coal
British Heart Foundation Scotland
Chartered Institute of Ecology & Environmental Management
Chartered Institute of Waste Management Scotland Centre
Clean Stove Consultants
Cycling Scotland
Cycling UK in Scotland
EVA Scotland
Falkirk Council
Fife Council
Friends of the Earth Scotland
Glasgow Centre for Population Health
Glasgow City Council
Highnam Assist
Hultsteins UK Ltd
Keep Scotland Beautiful
Logistics UK
National Association of Agricultural Contractors
National Association of Chimney Sweeps
NatureScot
Nestrans
NFU Scotland
North Ayrshire Council
North Lanarkshire Council
OFTEC
Paths for All
Road Haulage Association
Royal Environmental Health Institute of Scotland
Royal Town Planning Institute Scotland
Scottish Power
Scottish Property Federation
Stirling Council
Strathclyde Partnership for Transport
Sustrans Scotland
Tactran
UK & Ireland Fuel Distributors Association
UK Noise Association



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