

# Crieff Draft Air Quality Action Plan Consultation

## Results: Jan 2019 – Feb 2019

### Contents

<b>Contents</b>	<b>Page</b>
<b>1.0 Questionnaire Results Summary</b>	<b>2</b>
- 1.1 General	2
- 1.2 Moving Traffic Away from the AQMA	3
- 1.3 Traffic Management – The Optimisation of Traffic	4
- 1.4 Reducing the Emissions from Source	7
- 1.5 Reducing Emissions by Reducing Demand for Traffic	11
- 1.6 Reducing Emissions from Non-Traffic Sources	16
- 1.7 Comments	17
<b>2.0 Formal Responses</b>	<b>24</b>
- Response from SEPA	24
- Response from TACTRAN	26
- Response from Stirling & Tayside Timber Transfer Group	32

## **1.0 – Questionnaire Response Summary**

### **Section 1.1: General**

Q1. What is your postcode?

- 41 postcodes in PH7
- 8 listed as 'PH'
- 4 listed in PH2
- 3 listed in PH6
- 3 listed as in PH1
- 3 listed as 'P'
- 1 listed as 'KY'
- 1 listed in PH5
- 1 listed in DD9

Q2. What are your thoughts regarding air quality in Crieff and the surrounding areas?

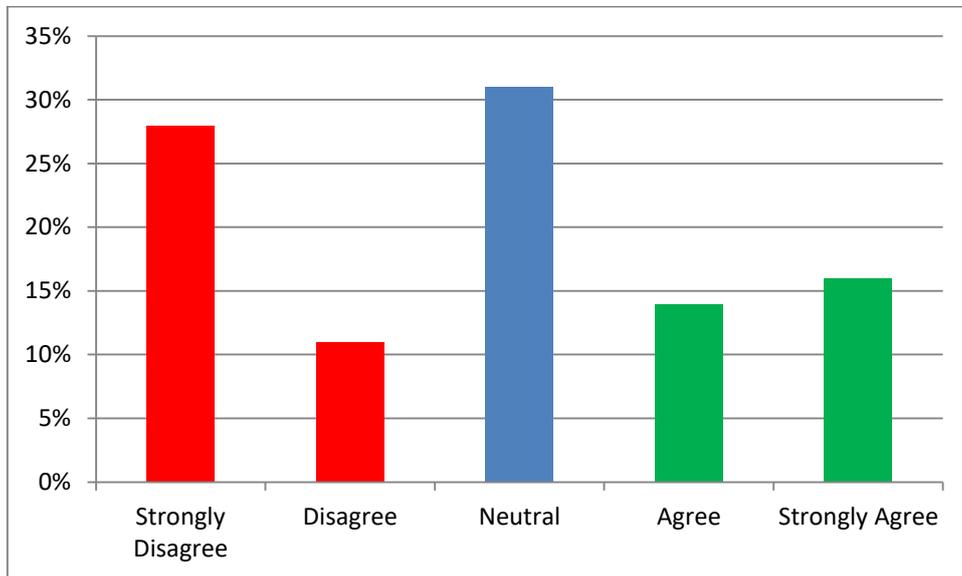
- 75% (46/61) mention that air quality in Crieff is an issue/needs improved.
- 37% (23/61) mention the high street corridor as the area with the worst air quality.
- 3/61 respondents mentioned asthma related symptoms being aggravated by the poor air quality.

Q3. What are your thoughts regarding road traffic congestion along the high street corridor?

- 77% (49/63) mention that road traffic congestion is an issue.
- 51% (32/63) mention that parking/illegal parking is the main source of congestion.
- 14% (9/63) mention that buses are responsible for the congestion.
- 14% (9/63) mention that loading/unloading HGVs are an issue.

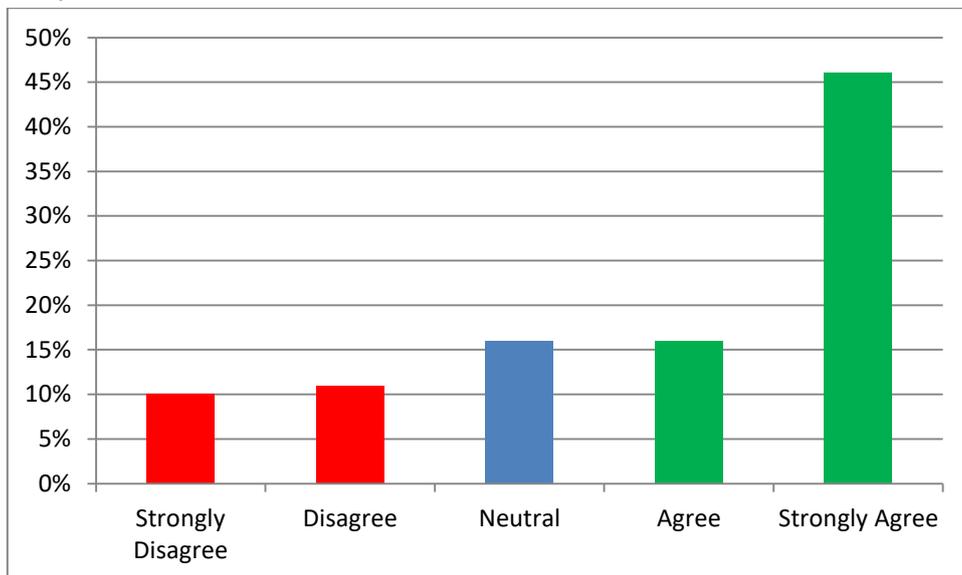
**Section 1.2: Moving Traffic Away from the AQMA**

Q4. Tell us how much you agree with the measure of rerouting some of the traffic that uses the A85 to use only local roads thus moving traffic away from the area?



Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
28%	11%	31%	14%	16%

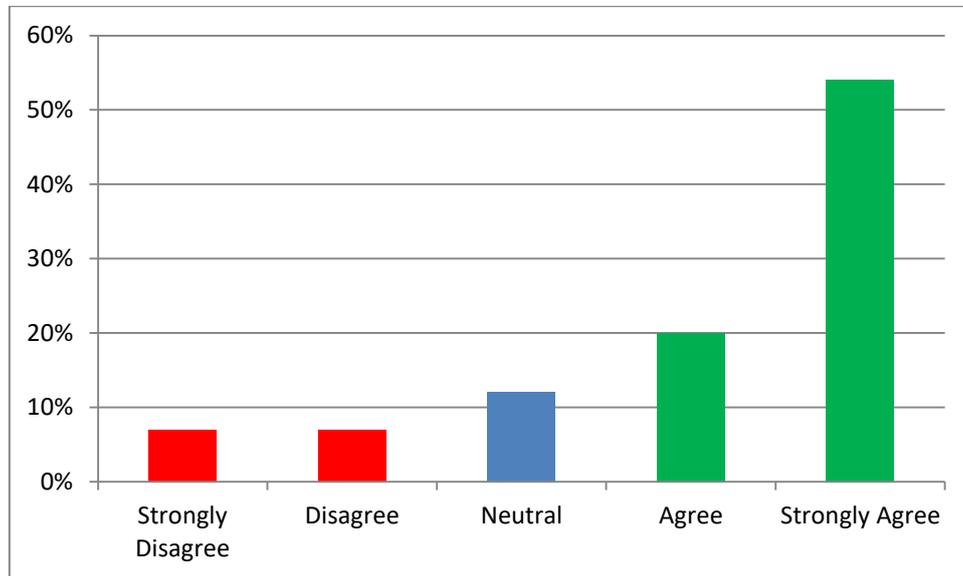
Q5. Tell us how much you agree that the AQAP should consider discouraging parking within, or in close proximity to the AQMA?



Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
11%	13%	16%	11%	50%

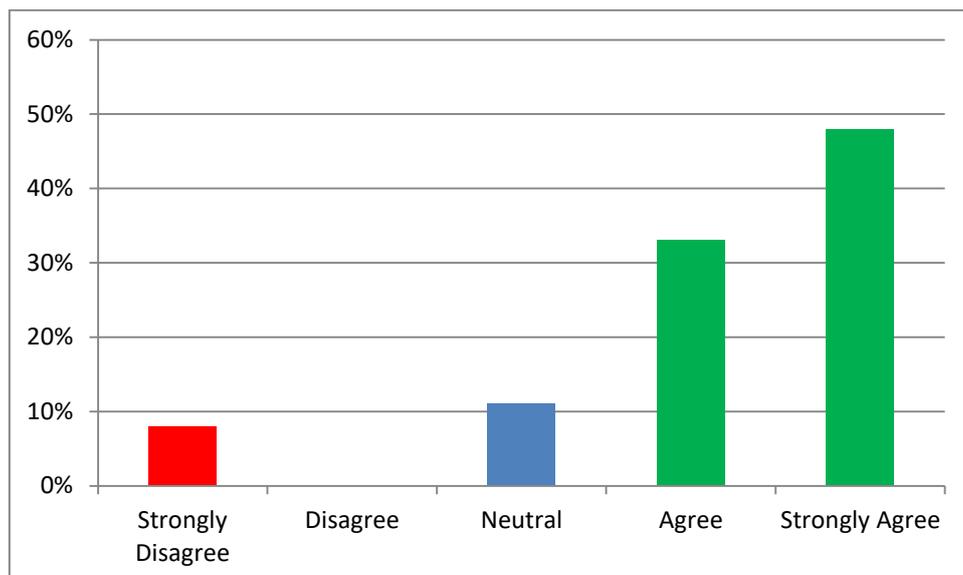
### Section 1.3: Traffic Management – Optimisation of Traffic

Q6. Tell us how much you agree with the possible provision of ‘SMART’ parking technology in Crieff? *(SMART parking technology gives real time information about spaces to enable users to find spaces quickly and easily).*



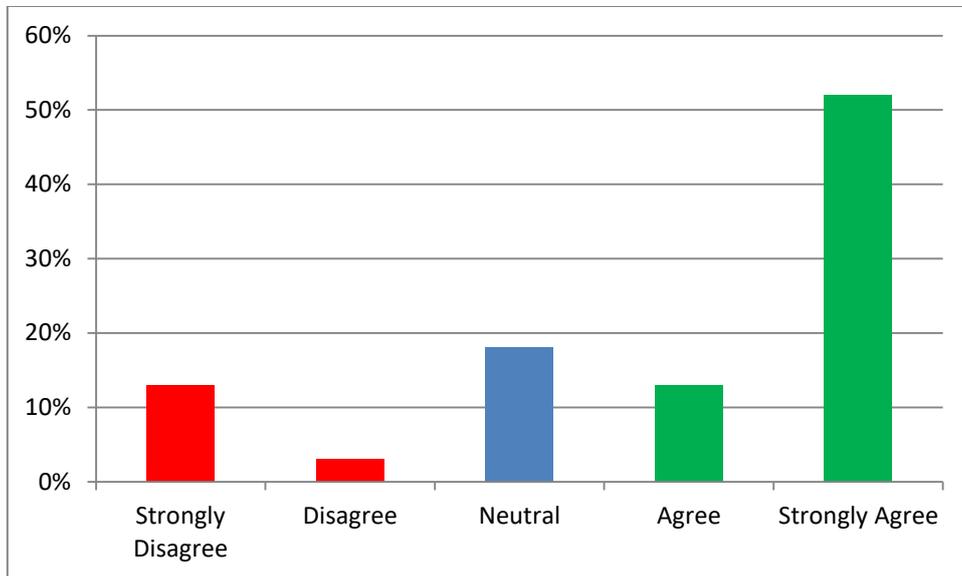
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
15%	5%	35%	13%	32%

Q7. Tell us how much you agree with PKC improving the ease of movement through the AQMA to reduce local emissions and concentrations? *(This would be done by improving traffic management systems).*



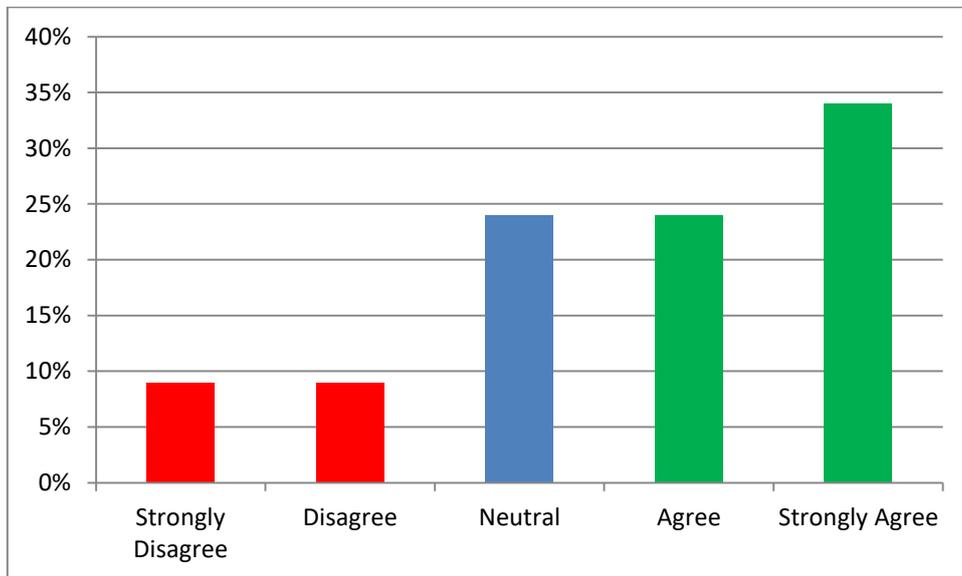
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
8%	0%	11%	33%	48%

Q8. Tell us how much you agree with the possibility of action being introduced to take enforcement action against idling vehicles?



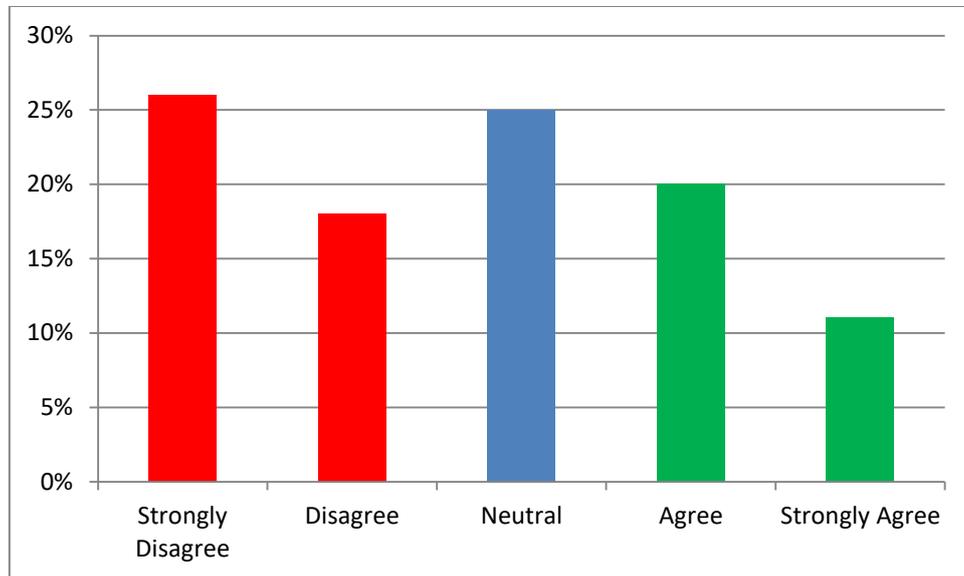
<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
13%	3%	18%	13%	52%

Q9. Tell us how much you agree with a review into the locations and timings of the pedestrian crossings?



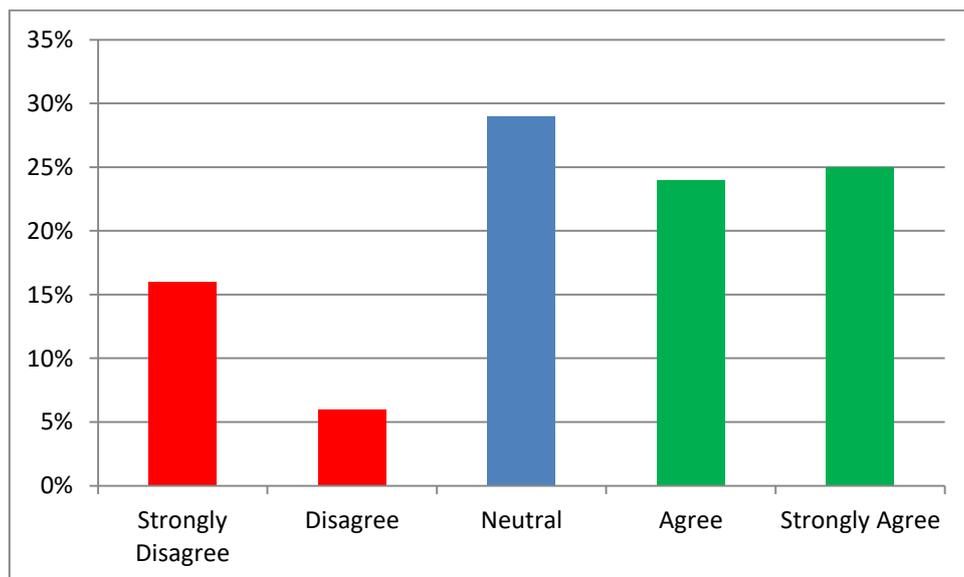
<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
9%	9%	24%	24%	34%

Q10. Tell us how much you agree with the proposed measure of holding/gating traffic as a way of minimising congestion within the AQMA? (*Holding the traffic back to allow a better flow*).



<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
26%	18%	25%	20%	11%

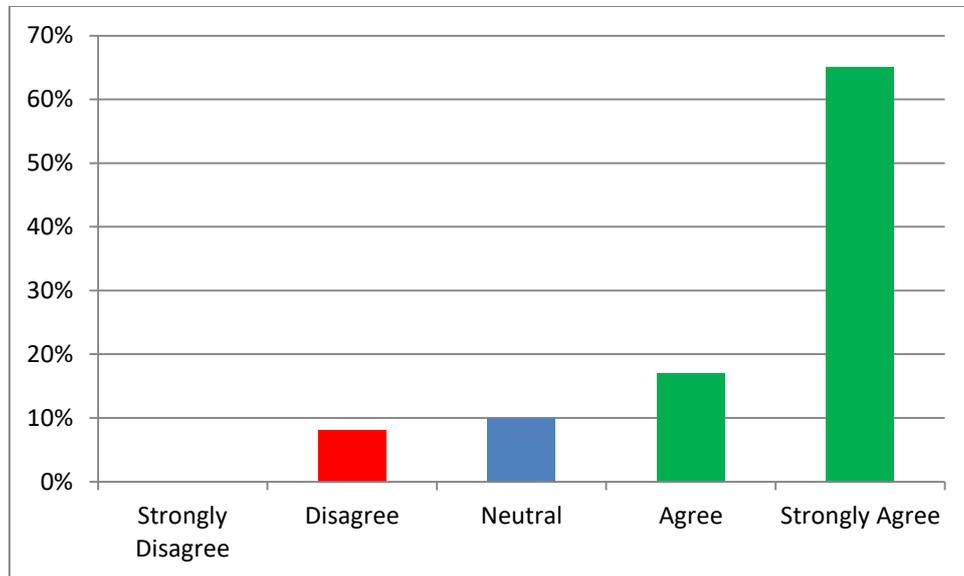
Q11. Tell us how much you agree with the possibility of limiting or prioritising traffic turning right (*onto Comrie Street*) on the high street corridor?



<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
16%	6%	29%	24%	25%

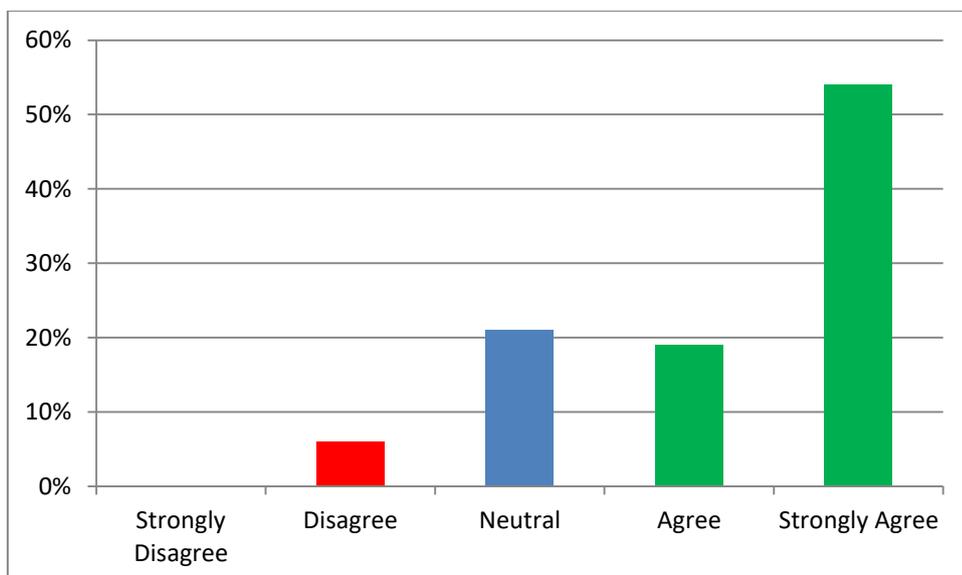
**Section 1.4: Reducing the Emissions from Source**

Q12. Tell us how much you agree with PKC encouraging private and public operators (*such as local bus services and HGVs*) within/serving the Crieff area to pursue cleaner vehicles?



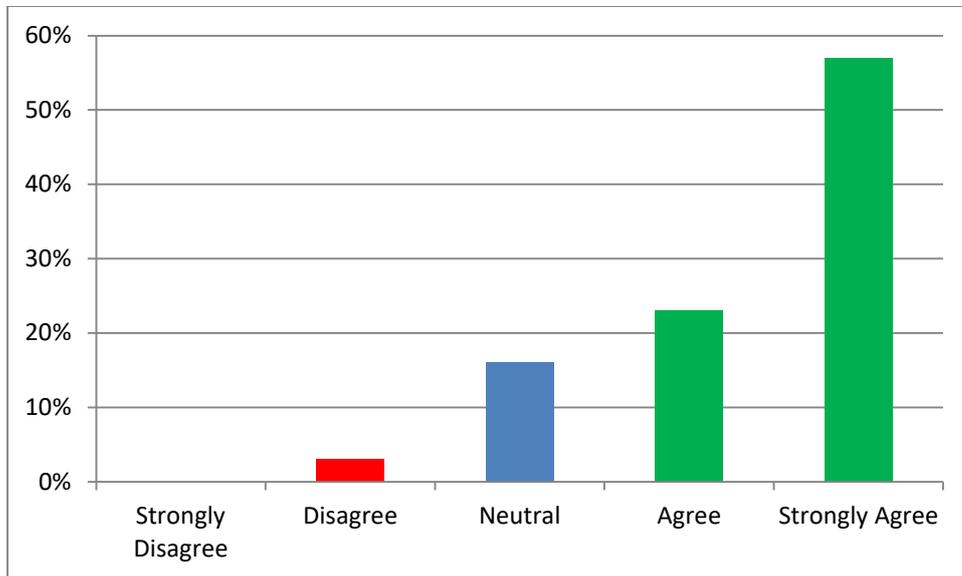
<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
0%	8%	10%	17%	65%

Q13. Tell us how much you agree with the development and continuation of a local/voluntary bus quality partnership which focusses on 'best practice' in regards to lowering emissions for bus operators?



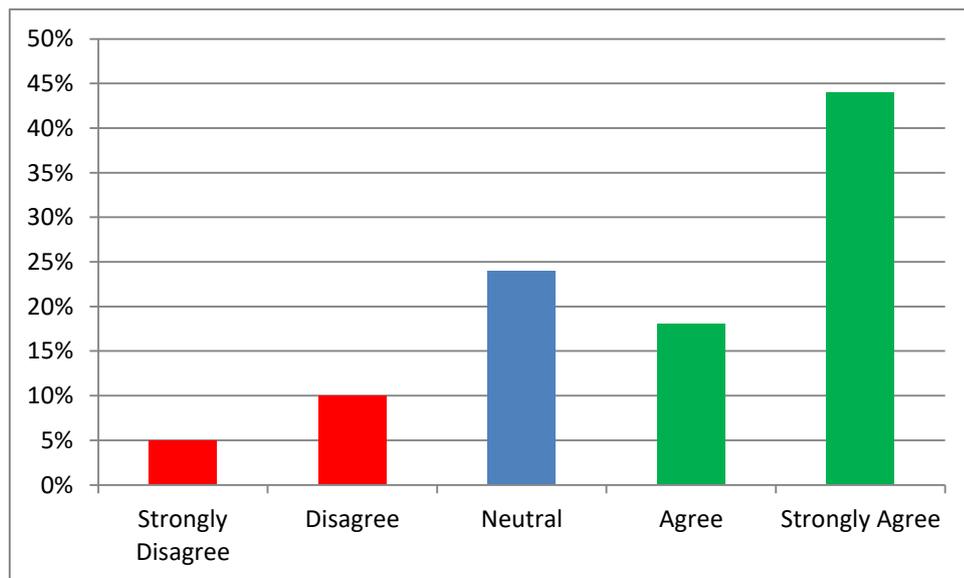
<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
0%	6%	21%	19%	54%

Q14. Tell us how much you agree with the introduction of travel plans for schools to promote sustainable travel?



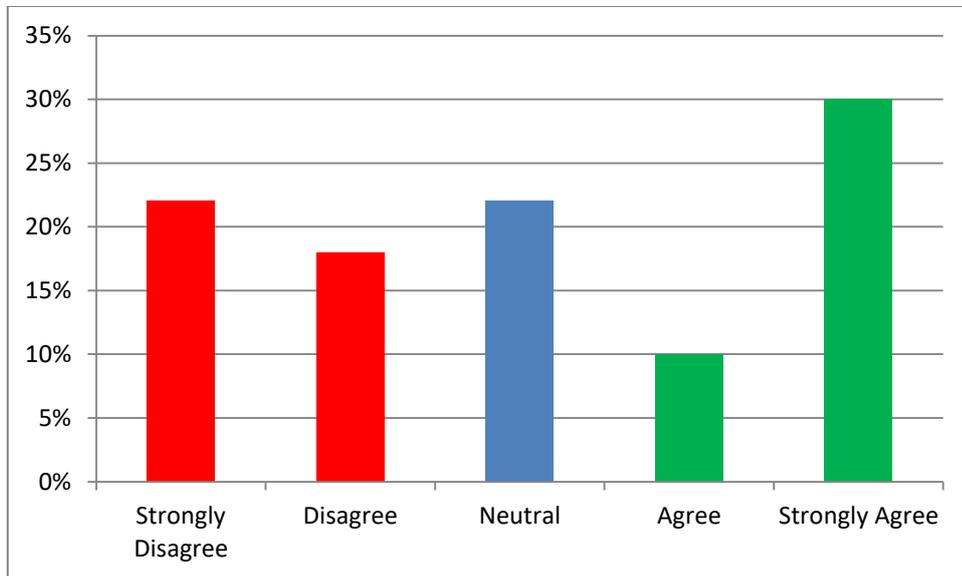
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
0%	3%	16%	23%	57%

Q15. Tell us how much you agree with enhancing public transport provided within Crieff to encourage the modal shift away from cars?



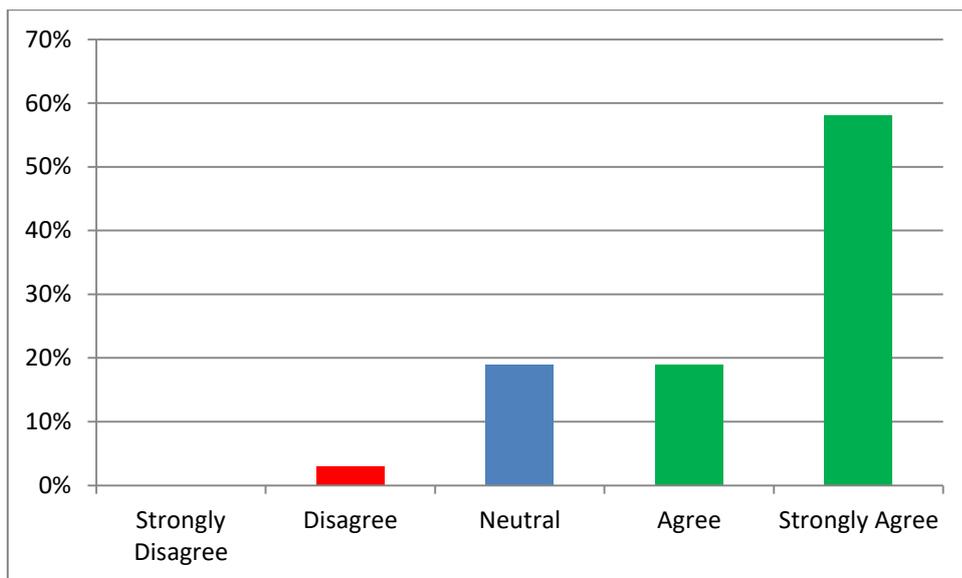
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
5%	10%	24%	18%	44%

Q16. Tell us how much you agree with the introduction of a *Low Emission Zone* or restricting access to polluting vehicles within the AQMA (*Crieff High Street Corridor*)?



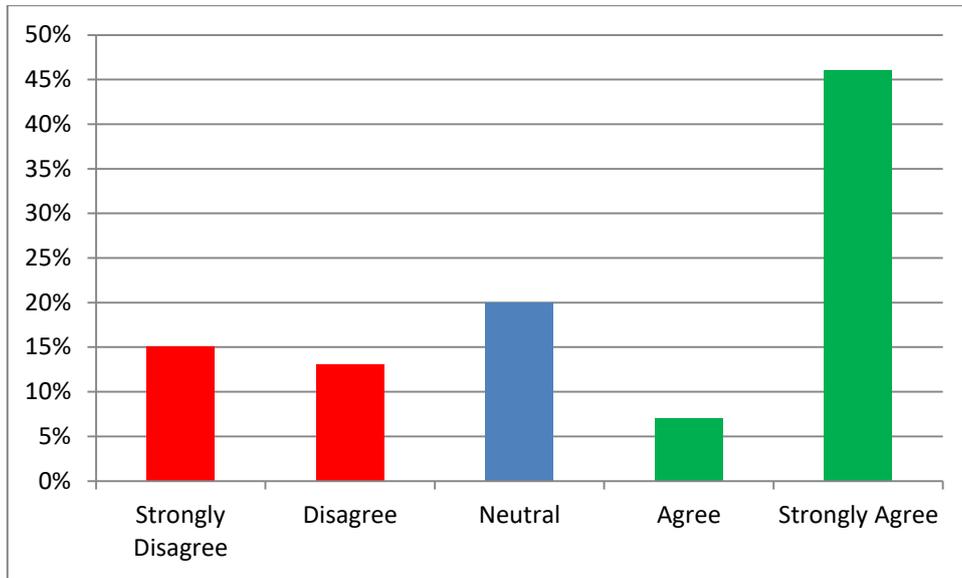
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
22%	18%	22%	10%	30%

Q17. Tell us how much you agree with the introduction of eco schemes for HGV and bus operators to improve their fleet’s environmental performance? (*This will help reduce harmful emissions from HGV and bus operators’ vehicles by improving the efficiency of their operations*).



Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
0%	3%	19%	19%	58%

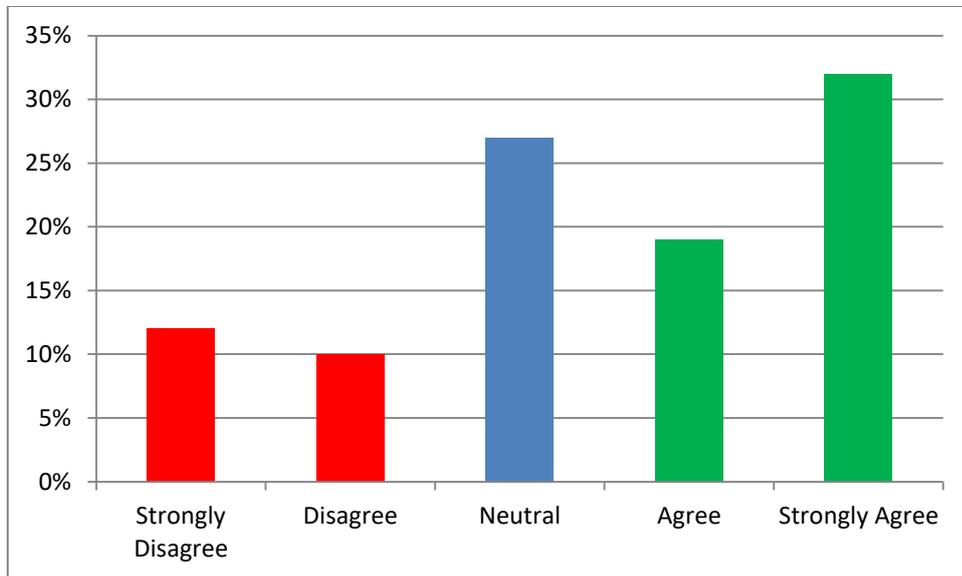
Q18. Tell us how much you agree with PKC staff undertaking eco-driver training to save fuel and therefore reduce emissions?



<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
15%	13%	20%	7%	46%

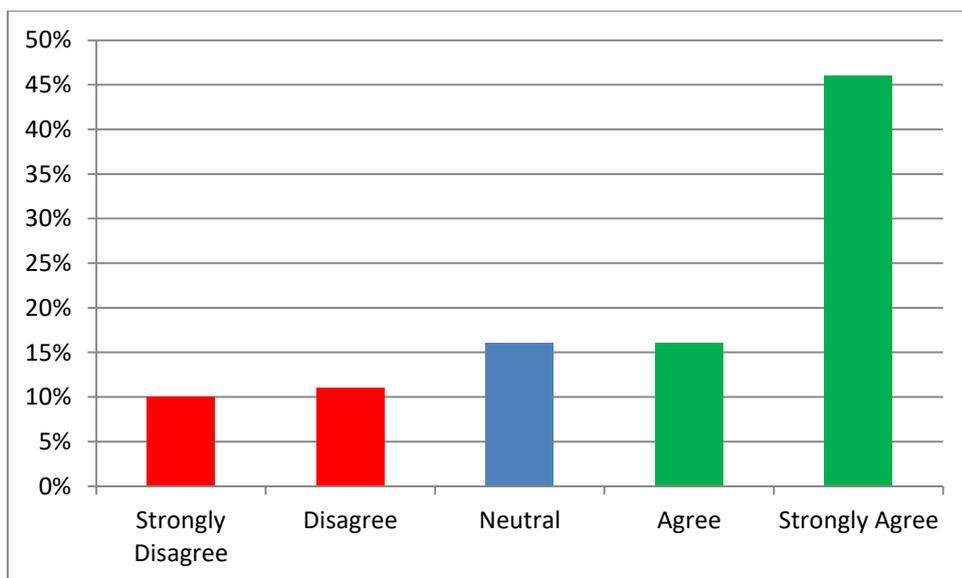
**Section 1.5: Reducing Emissions by Reducing Demand for Traffic**

Q19. Tell us how much you agree with the promotion of car sharing and the development of car clubs?



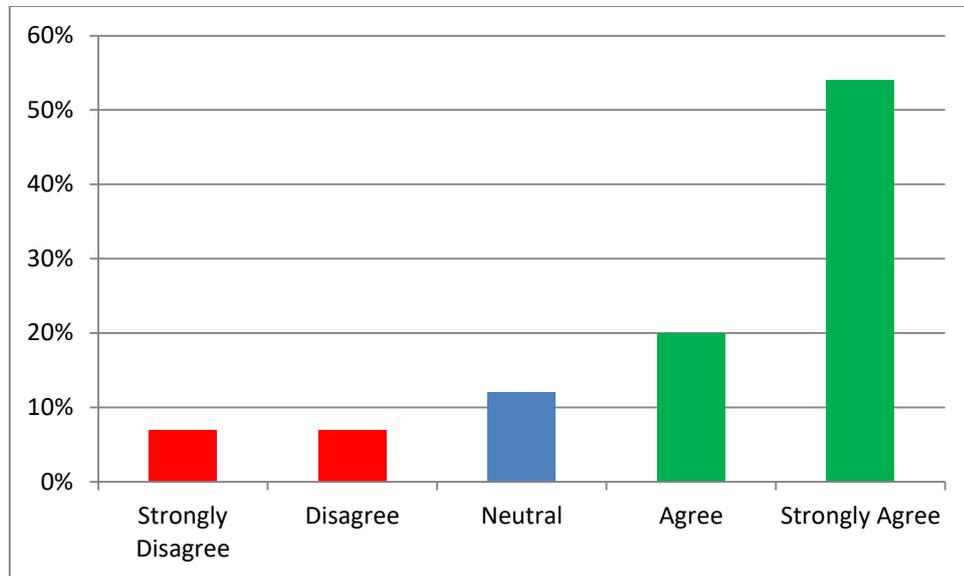
<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
12%	10%	27%	19%	32%

Q20. Tell us how much you agree with the introduction of travel plans for large institutions and businesses to promote sustainable travel?



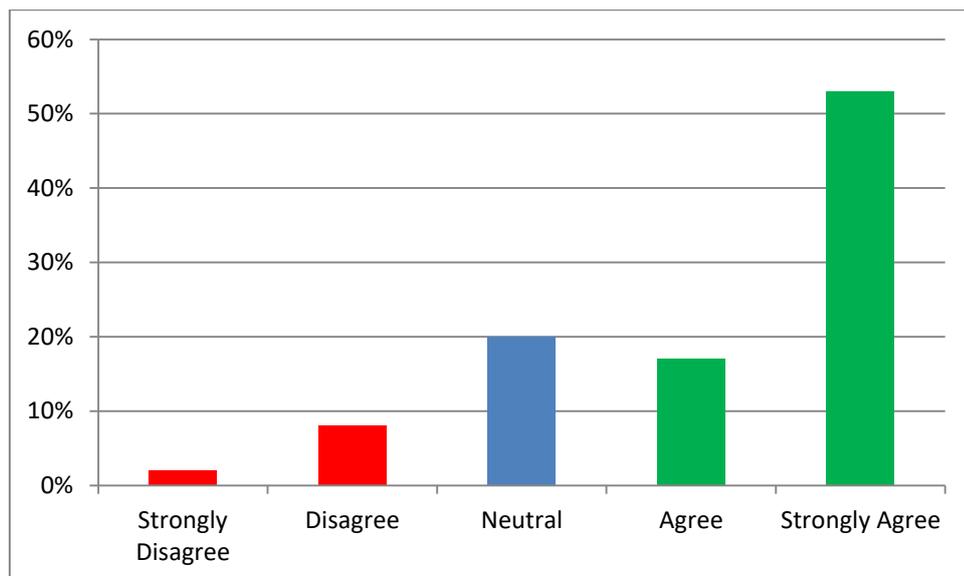
<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
10%	11%	16%	16%	46%

Q21. Tell us how much you agree with the creation of a corporate travel plan for PKC in order to reduce emissions caused by PKC staff? *(This will encourage more sustainable forms of travel).*



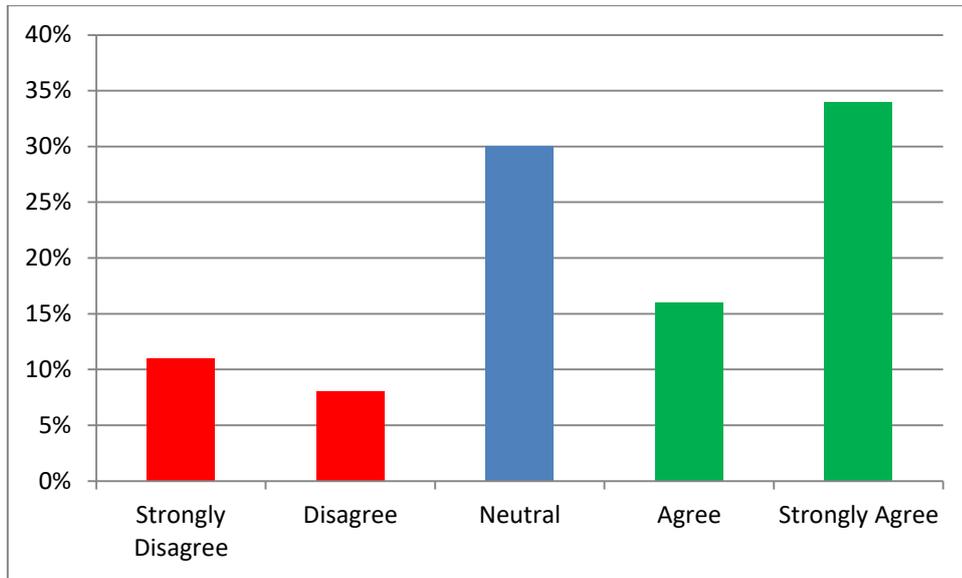
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
7%	7%	12%	20%	54%

Q22. Tell us how much you agree with PKC encouraging the Crieff community to cycle and walk as opposed to using private vehicles? This would be achieved through measures such as improving pedestrian facilities and promoting the cycling/walking networks available?



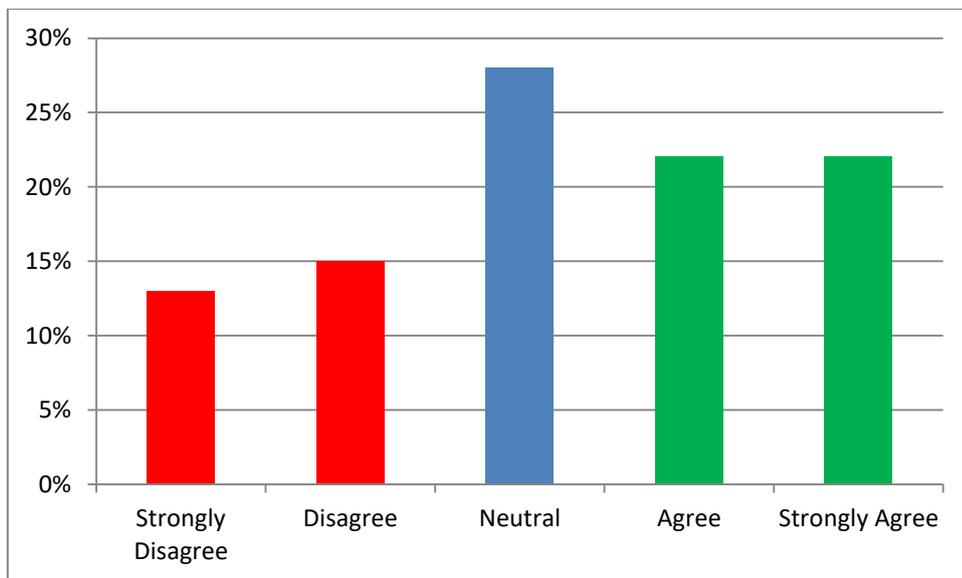
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
2%	8%	20%	17%	53%

Q23. Tell us how much you agree with the provision of extra buses/increased bus routes both in and serving Crieff?



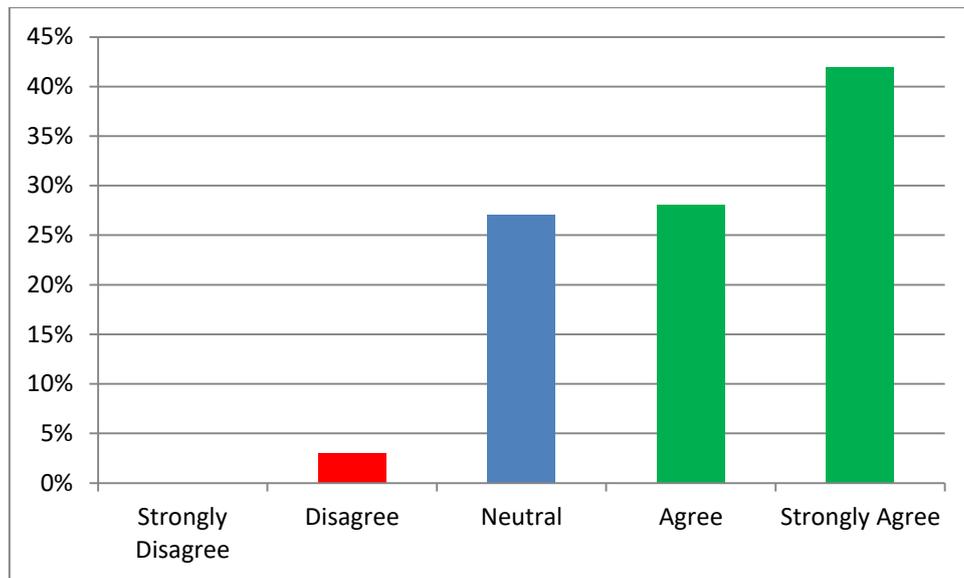
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
11%	8%	30%	16%	34%

Q24. Tell us how much you agree with PKC undertaking further social marketing campaigns such as 'Crieff on the Go' to promote active travel?



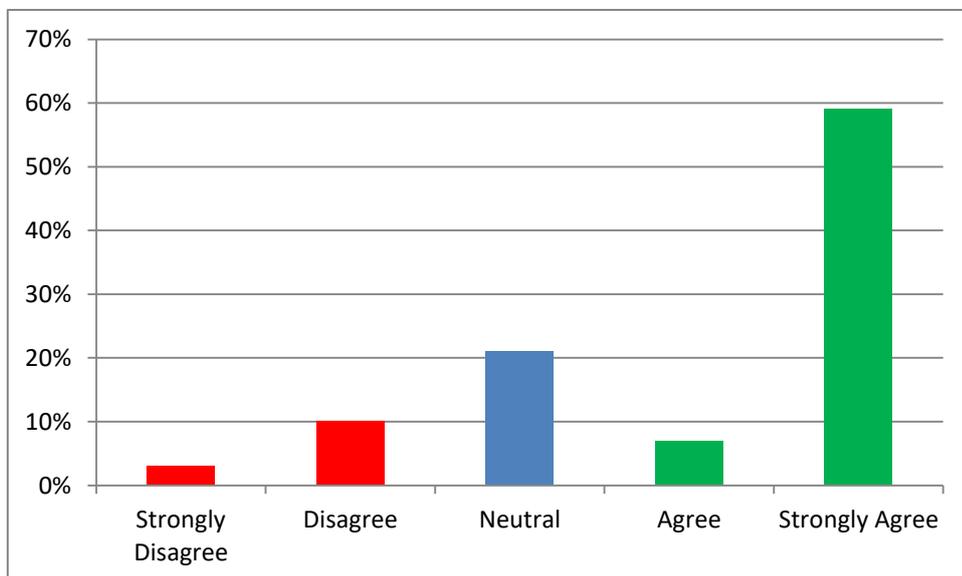
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
13%	15%	28%	22%	22%

Q25. Tell us how much you agree with PKC raising awareness of local air quality and the AQMA through schools and community meetings?



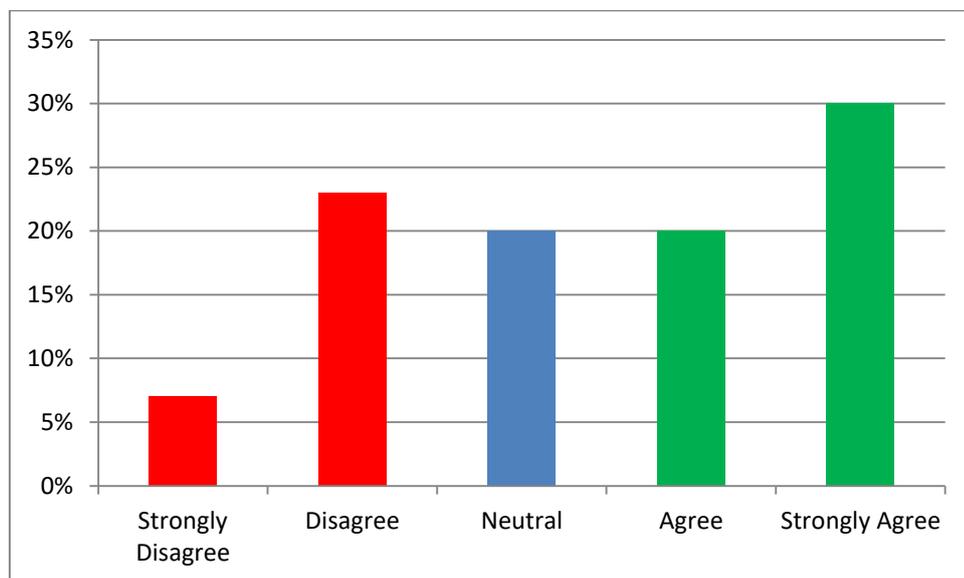
Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
0%	3%	27%	28%	42%

Q26. Tell us how much you agree with an audit on the cycling and walking infrastructure in Crieff being undertaken followed by the creation of a walking and cycling infrastructure action plan?



Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
3%	10%	21%	7%	59%

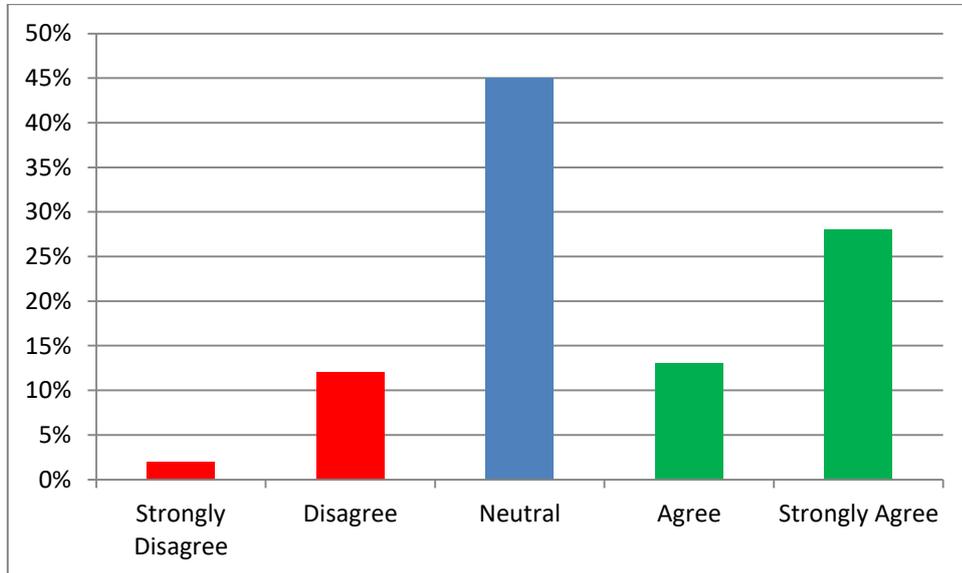
Q27. Tell us how much you agree with the provision of PKC 'Champions' to promote alternatives to car transportation methods by engaging with local walking and cycling groups to promote active travel within Crieff?



<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
7%	23%	20%	20%	30%

**Section 1.6: Reduction from Non-Transport Sources**

Q28. Tell us how much you agree with minimising developments such as biomass installations to reduce pollution? (*Biomass installations burn organic waste to generate heat and power which released particulate matter and gasses*).



<b>Strongly Disagree</b>	<b>Disagree</b>	<b>Neutral</b>	<b>Agree</b>	<b>Strongly Agree</b>
2%	12%	45%	13%	28%

## Section 1.7: Comments

Q29. Overall, do you feel the AQAP is relevant regarding its proposed actions and purpose?

- 70% (39/55) agree that the AQAP is relevant

Q30. Do you have any further thoughts or comments to add regarding the AQMA and the AQAP?

Responses:

- I would like to see Crieff High Street de-trunked, simply so that responsibility for Crieff High Street is transferred back PKC where it belongs as they are publicly accountable at least, Bear Scotland and Transport Scotland are not. This was excluded from the AQAP prior to any public consultation, as was the possibility of relocating bus stops, but not the possibility of moving/removing pedestrian crossings! The heavy traffic on the A85 is not just an issue for Crieff, it's an issue for Methven, Gilmerton, Comrie, St Fillans and Lochearnhead. To the south the heavy traffic is also an issue for Muthill & Braco. As the traffic levels continue to increase the quality of life & health of the residents of those places will continue to suffer. The vast majority of the pollution problem in Crieff is created by traffic moving through the town from east to west and south to north. Let's see a serious amount of money set aside to deal with the complete lack of any investment in the road infrastructure, the sort of money spent on Perth all the time, including the latest £40m announced for Perth's Cross Tay Link Road, designed to alleviate Perth's pollution problem by pumping even larger volumes of traffic through Crieff.
- We already have more buses running around the place. I would like to see Stagecoach operate smaller buses because the large ones are running nearly empty most of the time. The double deckers are full on the school runs but not at other times so fuel is being wasted.
- I think community meetings are poorly attended and perhaps a questionnaire for people to complete delivered to PH7 addresses might work better for those that don't have internet access.
- I am a pensioner unable to walk far or stand about waiting for buses, so I need to use my car.
- It would take a very fit person to cycle all over Crieff due to the hills.
- Air quality on the high st is easily dealt with by managing illegal (quitting) of vehicles and by by-passing the town to reroute heavy vehicles who are simply passing through whilst allowing the high street to benefit from passing trade.

- Eco driving should be promoted to all drivers not just P&K staff
- Driving the High Street regularly the main issue is people stopping on the road causing an obstruction. Perhaps removing on street parking would combat this, particularly on West High Street outside the Clydesdale Bank, High Street opposite the Royal China and the Royal Mail office and opposite Gourlay Butchers on East High Street. Instead of the parking areas could be available for loading/unloading freeing up traffic flows. The pavement outside Subway is very wide. A drop off and loading zone could be created here. At present delivery lorries block the road here on a daily basis.
- Traffic turning right onto Comrie Street should be prevented from doing so. This is a good and sensible measure as it would stop tail backs up West High Street. A bollard or similar physical barrier should be placed outside Tower Bakery to prevent drivers parking on double yellow lines where there is space for a vehicle - a situation which causes a bottle neck at the Town Hall. Removing one parking space opposite Lounge Restaurant would help too - as well as placing physical barriers to stop cars parking on double yellow lines at these spots. There is ample parking available in Crieff off, but near, the High street/East High Street and West High Street. I would not recommend removing/moving any pedestrian crossings, and indeed would recommend introducing more - particularly at the north end eastern end of East High Street, near Handy Shop/Tower Hotel. I would also recommend removing the ability of cars turning right onto the East High Street from Strathearn Terrace as congestion occurs at this spot due to the petrol station (where cars park idling on the road waiting to get fuel, causing tail backs down East High Street). Cars could possibly also be prevented from turning right or left onto High Street from Mitchell Street.
- Get the big lorries out of the town and divert them onto the A9 where they should be crieff high Street is like an M9 corridor at best with speed issues appalling and selfish and dangerous driving procedures mainly due to hap hazard parking and selfish road users get the traffic crossing measures and traffic lights timed properly and police back on the beat to restore some form of discipline if they don't accept this Edinburgh or London or Stirling why is it people in Crieff should be any different double yellows and narrowed the carriageway tow it away fine no excuses unless breakdown or medical emergency otherwise walk or park and ride simple I think people just fall into the lazy routine and forget how there laziness can end up in fatalities or injuries
- Stop parking on double yellow lines as PKC has been urged to do for several years.

- Introduce a Congestion charge, reopen old train routes as cycling/ walking paths, loading only parking on high street, remove parking on James square and better promote king street car park. Car park should be free or cheap (£1 all day) no overnight parking. Employee full time parking attendants
- To encourage more electric vehicle use there needs to be more than one rapid charger in once car park - there should be a good mix of rapid and fast chargers in EVERY parking area - and installation of future more powerful charging technology as it becomes available. To encourage more cycling there needs to be more safe places bikes can be securely parked. There should be safe pedestrian crossings on ALL junctions leading to the local schools, safe pavements on all these routes and clearly identified cycling routes through the town. A safe, off-road cycle route to Perth would encourage more cycling too - it's not too far, but the road is quite scary for cyclists at times!
- My firm belief is that the current structure of James Square contributes to the issues of this survey. I firmly believe that a double entry/exit to the Square could alleviate many of the issues by easing the traffic. Bearing in mind this was how Crieff used to be and the re-develoment is nothing but a failure commercially and possibly a factor in the AQMA issues.  
By doing this various options could be considered.
  - A) Traffic heading West from Perth 'could' be directed through the Square with bus stop at lower end of Square - with further options of closing King St or as a one-way route for traffic heading South (Glasgow/Stirling)
  - B) Square could be utilised for underground parking as seen in many European towns and cities with most parked traffic being sheltered and not visible. The Square is on a natural and severe slope so this lends itself to that proposal.
  - C) By just keeping it as a double entry and exit it may move congestion to the Square rather than the canyon of West High St.
  - D) The suggestion of right turning traffic being moved to Burrell St rather than Comrie St would have a major improvement on the West High St congestion.
  - E) The bus stop at RS McColls (Perth > Crieff) is a major cause of congestion - moving this to the Square would be the only obvious and practical solution without a major inconvenience to passengers and bus companies.
- Move people away from on street parking to car parks. Make car parks free at for an hour. Encourage out of hours deliveries to local businesses through reduced rates. All of this will reduce stationary idling cars where they are stuck at bottle necks.

- Regarding PKC's initiative to try and minimize the amount of travel and emissions caused by council vehicles and travel then they should be monitoring all there departments to ensure they follow there own advice before trying to tell others what to do . I know of at least one department that routes there jobs and travel to fill out the day and make them look busier than they are, instead of keeping travel to a minimum and efficient.
- plant trees
- Why is the testing equipment within 20metres of the main bus stop where buses idle fo the longest possible period therefore slanting the results towards poor air quality
- Yes I would like to see more visits from the traffic wardens particularly after 17:00 to the High Street / King Street to witness the irresponsible parking and engine's left running at Takeaways and convenience stores
- I think that specific off the A85 Loading and Unloading Bays should be created by removing some of the pedestrian area around James Square and if possible re locating the Bus stops to this area too. The pedestrian area is underused and given the high level of pollutants in the air in this area it makes little sense to use it for concentrating pedestrians or using it as a seating area. Much of the pedestrian area is in poor condition and money will need to be spent on it in the near future. Many years ago the buses started and ended their journeys at the Bus Station in Church Street. I realise that Bus Stations as such are no longer sustainable but the lower Leadenflower Car Park could easily become a Bus Terminus and keep the current long waiting periods buses are 'parked' on the High Street. This could be achieved without much cost. It is very important for the Crieff town centre that the current on street parking is maintained to encourage Crieff residents to continue to shop within the town. There is already a large number of empty shops and we need to do all possible to maintain the health of the High Street.
- Main focus and challenge is HGV and bold measures will likely be required to address this to reduce damage to air quality they are causing
- Yes. Let's remember that one of Crieff's tourism offerings is its natural beauty. Let's tackle the air pollution before we see more of our birds, insects etc suffering from it. Reducing High Street traffic would also make the town more pleasant for strolling visitors. When King Street was closed to traffic recently because the road was being dug

up, I know some businesses were concerned about the effect on their trade, but personally I much preferred strolling up and down the street when there were no cars to watch out for.

- Most of the people I know who live in Crieff are either old or disabled. They rely on their cars & no amount of encouragement is going to get them cycling.

My wife works for a large employer out of town. Sometimes she works at the Stirling site, sometimes in Edinburgh. The hours are irregular. Any journey from or to Crieff using public transport can involve two or three buses or trains & take in excess of two hours each way. Going by car takes no more than 45 minutes.

There are quite a few people who need their cars, this is still a rural community, away from the urban centres.

I walk everywhere within a two mile radius but the idea of cycling these rural roads fills me with horror

Talking to people who park on the High St it is because it's too far to walk up to Leadenflower, the pavements are too narrow to get there & the carparks are badly signed so people don't know they are there.

People are lazy

- Build a bypass!
- Yes. Definitely, the need to improve traffic flow in the High Street. Think the A85 junction with Comrie Street is crucial, and giving the A85 right of way. As is parking, although is it more a question of reducing rather than removing all spaces? Two areas where my view has grown as a result of the consultation exercise is 1. the provision of loading bays. At the very least this has to be looked at. Secondly, the provision of spaces for bicycles, including battery powered cycles, on the High Street. Given its topography Crieff may not be the easiest town to cycle in, but the more I think about it if those coming into the High Street, could be sure that they could park their cycle safely, that one measure alone would cut the number of short car journeys. Think it would have far more impact than cycling champions or car sharing clubs. I would also urge the need for more electric vehicle charge points, such as at Leadenflower.
- I don't think that you would be able to get enough people to use bicycles to make a substantial difference.
- I'm in favour of a congestion charge within areas where air quality is particularly poor. Walking and cycling routes in the area are poor and need improvement desper

- It would be great to have cycle paths so people can safely cycle around Crieff. At the moment it is too dangerous. More transport links would be beneficial but needs to be in diesel free buses.
- You need to correctly identify why there are local spikes in pollution levels and determine the reasons for these.
- I think you will find that most spikes can be traced back to driver error hence more active policing would make a big difference at very little added cost
- unlike parking controls which are expensive and polluting themselves, most parking wardens have to travel to Crieff to carry out their duties which incurs a cost to the Council plus the pollution from the vehicle used.
- The easiest way to reduce pollution on the high street is to address the bus stop area outside of RS Mcolls. Whenever there is a bus parked it makes the high street a one way system because only one car at a time can drive by. If there is traffic coming from Comrie, cars on their way to Comrie waiting to get past the bus need to wait for the pedestrian crossing lights to be used in order to stop the oncoming traffic and get past the buses. It is important to note that it isn't just buses that use this area but many delivery drivers and at all times of day. So then why not widen the road JUST A LITTLE BIT. A whole car width would be great, but even if you remove half a car width from the pavement it will allow buses to pull in while still allowing traffic to flow both ways. Once traffic is flowing better it will improve the air quality. It seems pointless that you are considering gating the high street, making it one way, or so many other ideas when you can't see that by narrowing the pavement just a little bit you would be able to then allow 2 cars to go through.
- Public transport has to be realistic as is expensive at the moment. should reward people that do use sustainable transport
- The acronyms should be explained as I don't know what they mean.
- Walking and cycling will not be so popular as Crieff is so hilly. In addition, a lot of local people drive into Crieff to shop locally / visit bank / visit vet etc. and make short journeys in and out. A local bus service would be of no use to us because we still have to

drive into Crieff and would need to park locally to Crieff in order to board the local bus and the times may not be relevant. Apart from food shopping, the majority of time I spend in Crieff is barely 30 mins twice a week.

- Improve off road parking and signage, with long term free parking. Improve pedestrian and cycle routes to the schools. Introduce traffic management to improve flow through the town, with dedicated loading areas for businesses.
- Everything possible should be done to make Crieff look welcoming. If Crieff looks pleasant more people would walk rather than using their cars. Action on idling cars and action on illegal parking needs to be taken. Less parking on the high street and encourage people to use the car parks.
- In general the buses on the high street switch off their engines rather than idling and this is a good thing especially in the centre of Crieff as they can be there for upto 20 minutes at a time.

## **2.0 – Formal Responses**

### **Response from SEPA**

SEPA welcome the opportunity to comment on the draft Air Quality Action Plan (AQAP) for Crieff and do so as a statutory consultee under Schedule 11 of the Environment Act 1995.

There appears to be a single site of exceedance of the nitrogen dioxide (NO<sub>2</sub>) annual mean objective in Crieff, with a recorded pollution level above 40µg/m<sup>3</sup>. Monitoring data indicates a significant decrease in NO<sub>2</sub> concentrations at this location from 2012, such that the objective is now only marginally exceeded. It is likely that new vehicle technology has led to the decrease in NO<sub>2</sub> concentrations, which can be seen on a national basis.

The objectives for PM<sub>10</sub> are being met at the automatic monitoring station. At the time of writing PM<sub>2.5</sub> is not monitored in Crieff, therefore it is not possible to comment on compliance with the national air quality objectives in respect to this pollutant. The draft AQAP includes a measure to introduce PM<sub>2.5</sub> monitoring to the AQMA. SEPA support this measure.

Although further improvements in vehicle technologies will likely deliver objectives at the location of current NO<sub>2</sub> exceedance in Crieff (7 West High St), we support the Council in developing an Action Plan to bring the area in to compliance in the shortest possible timeframe to protect the health of residents and visitors to Crieff.

Source apportionment work and traffic surveys have provided the Council with the evidence needed to develop and implement measures which are effective, feasible, proportionate and quantifiable as required under Policy Guidance LAQM.PG (S) (16).

For the Crieff AQMA, it is clear that the canyon effect and volume of traffic are contributing significantly to elevated levels of NO<sub>2</sub>. Concentrations are also higher at the western end of West High Street than at other locations, which has been attributed to queuing traffic. Source apportionment indicates that emissions from HGVs and cars contribute the highest proportion of NO<sub>x</sub> at receptors. Measures to reduce/control emissions from private cars and HGVs, as well as managing and improving traffic flows through the AQMA should be prioritised above other measures ( those listed under section C – traffic management and D – reduce emission from source)

SEPA supports measures in the draft AQAP to help mitigate the impact of future development on the Crieff AQMA, given Crieff is identified as an area of growth for both housing and commercial development in the Local Development Plan. Measure A.5 aligns the draft AQAP with the Scottish Government's Cleaner Air for Scotland Strategy's (CAFS) Placemaking aims "A Scotland where air quality is not compromised by new or existing development and where places are designed to minimise air pollution and its effects".

Those measures aimed at reducing emissions from buses should be less of a priority. Providing additional buses (measure E.5) should be carefully considered so as not to increase emissions from this source. We also advise that Measure E.3 PKC Corporate

Travel Plan, is required under CAFS so this should also be a priority measure to be delivered in the short term.

Additionally, it will be important to monitor future traffic levels in Crieff within the context of the action plan, therefore a measure to introduce/increase automatic traffic counts alongside the air quality monitoring network in the AQMA may be appropriate depending on the existing traffic monitoring system.

In relation to low emission zones (LEZs), as identified in the draft AQAP, the Council will be required to assess the suitability of an LEZ as a measure to reach objective compliance within the Crieff AQMA. This will be done through the National Low Emission Framework which was published by Transport Scotland and can be found here <https://www.gov.scot/publications/national-low-emission-framework/>

I hope you find these comments useful in developing the final AQAP for Crieff. If you have any queries please get in touch.

Yours sincerely,

Tanith Allinson

Local Air Quality Management Specialist

National Air Quality and Energy Unit

## Response from TACTRAN

### **Section A: General**

1) *What is your postcode*

**PH1 5EN**

2) *What are your thoughts regarding air quality in Crieff and the surrounding areas?*

**Tactran note the air quality issues along a stretch of the High Street in Crieff as identified by air quality monitoring.**

3) *What are your thoughts regarding road traffic congestion along the high street corridor?*

**Crieff High Street is a relatively narrow town centre sitting on the A85 Trunk Road. Accordingly there is limited space for the street to accommodate a number of functions:**

- **Strategic east/west traffic between Perth and Lochearnhead, which inevitably includes freight, timber and tourist traffic, all of which are essential to Scotland's (rural) economy**
- **Parking and loading for the businesses on the High Street**
- **Bus stops and pedestrian crossings**

**It is therefore likely that at some periods, such high streets will suffer some degree of traffic congestion. Accordingly, if congestion is to be reduced, the extent of one or more of these functions needs to be reduced (see q4/5)**

**It should however be noted that reducing congestion would not be the only way to improve air quality on the High Street.**

### **Section B: Moving Traffic Away From the AQMA**

4) *Tell us how much you agree with the measure of rerouting some of the traffic that uses the A85 to use only local roads thus moving traffic away from the area? 1 Strongly Disagree - 5 Strongly Agree*

**Disagree. It is difficult to envisage that much traffic could be re-routed to local roads without a significant impact on the local road network and surrounding streets.**

5) *Tell us how much you agree that the AQAP should consider discouraging parking within, or in close proximity to the AQMA? 1 Strongly Disagree - 5 Strongly Agree*

**Agree. Some type of parking restrictions to assist the flow of traffic along the high street would appear to be a deliverable intervention that could assist as part of a package of measures. Any changes to parking would need to be adequately enforced.**

### **Section C: Traffic Management – Optimisation of Traffic Movement through the AQMA**

6) Tell us how much you agree with the possible provision of 'SMART' parking technology in Crieff? (SMART parking technology gives real time information about spaces to enable users to find spaces quickly and easily). 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Investigation of any measure to manage parking on the High Street whilst minimising the number of spaces lost should be an option to consider.**

7) Tell us how much you agree with PKC improving the ease of movement through the AQMA to reduce local emissions and concentrations? (This would be done by improving traffic management systems). 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Investigation of any measure to improve flow on the High Street should be considered.**

8) Tell us how much you agree with the possibility of action being introduced to take enforcement action against idling vehicles? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Investigation of any measure discourage idling vehicles should be considered.**

9) Tell us how much you agree with a review into the locations and timings of the pedestrian crossings? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. However, recognising the road user hierarchies that should be considered in a high street, any review of the location of crossings to better reflect pedestrian desire lines (and hence reduce pedestrians crossing at 'inappropriate' locations) may not assist the flow of traffic.**

10) Tell us how much you agree with the proposed measure of holding/gating traffic as a way of minimising congestion within the AQMA? (Holding the traffic back to allow a better flow). 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. This is a well-used technique to improve the smooth flow of traffic (admittedly on longer stretches of road), however the impacts on the overall network would need to be assessed through appropriate modelling.**

11) Tell us how much you agree with the possibility of limiting or prioritising traffic turning right (onto Comrie Street) from the high street corridor? 1 Strongly Disagree - 5 Strongly Agree

**Neither agree or disagree. Would defer any view until results of traffic modelling are known.**

#### **Section D: Reducing the Emissions from the Source**

12) Tell us how much you agree with PKC encouraging private and public operators (such as local buses and HGVs) within/serving the Crieff area to pursue cleaner vehicles? 1 Strongly Disagree - 5 Strongly Agree

**Agree. Wider legislation is aimed at encouraging the take up of cleaner vehicles. Any initiatives to support local operators who use the High Street frequently can only assist. It is noted that PKC have installed EV charging facilities in one of the off street car parks and expanding this facility should be considered. Local incentives such as free/preferential parking could also increase the uptake in ULEVs.**

13) Tell us how much you agree with the development and continuation of a local/voluntary bus quality partnership which focusses on 'best practice' in regards to lowering emissions for bus operators? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiatives to support local operators to use cleaner vehicles who use the High Street frequently can only assist. There may also be more opportunities to explore partnership working with operators with the proposed changes contained within the Transport (Scotland) Bill.**

14) Tell us how much you agree with the introduction of travel plans for schools to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. It is likely that a significant proportion of the traffic at peak times on Crieff High Street is as a consequence of the 'school run'. Encouraging children that are able (i.e. within a reasonable distance) to walk or cycle to school should be encouraged, and initiatives to reduce car trips for those that are out with walking or cycling distance (and below the 3 mile school transport) should be explored.**

15) Tell us how much you agree with enhancing public transport provided within Crieff to encourage the modal shift away from cars? 1 Strongly Disagree - 5 Strongly Agree

**Agree. While a laudable aim, it will likely only have an impact on vehicles travelling to or through the high street, therefore:**

- **Enhancement of the Crieff town bus may assist;**
- **The extent to which enhancement of the bus service between Crieff and Perth will help the AQAP is dependent on the proportion of residents that live at the western end of Crieff.**

16) Tell us how much you agree with the introduction of a Low Emission Zone or restricting access to polluting vehicles within the AQMA (Crieff High Street Corridor) ? 1 Strongly Disagree - 5 Strongly Agree

**Strongly disagree. Given the fact that the A85 is a trunk road, preventing traffic from using the A85 via Crieff is likely to require significant diversions to traffic either via (a) Braco and Comrie (b) Killin, Kenmore and Aberfeldy or (c) Callander and Doune. These longer routes are likely to result in greater overall emissions and increased costs to drivers/operators, and potentially add to air quality issues in the settlements stated.**

17) Tell us how much you agree with the introduction of eco schemes for HGV and bus operators to improve their fleet's environmental performance? (This will help reduce harmful emissions from HGV and bus operators' vehicles by improving the efficiency of their operations). 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiatives to support local operators to use cleaner vehicles who use the High Street frequently, can only assist.**

18) Tell us how much you agree with PKC staff undertaking eco-driver training to save fuel and therefore reduce emissions? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiatives to support local fleet users (including the Council) to reduce emissions, can only assist.**

**Section E: Reducing Emissions by Reducing Demand for Traffic**

19) Tell us how much you agree with the promotion of car sharing and the development of car clubs? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist.**

20) Tell us how much you agree with the introduction of travel plans for large institutions and businesses to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiative to encourage local institutions and businesses to reduce the impact of traffic on the High Street can only assist. However as there are a limited number of 'large' institutions and businesses in the Crieff area that could be targeted, organisations that are out with the immediate area but still contribute to the Air Quality issues in Crieff could also be targeted.**

21) Tell us how much you agree with the creation of a corporate travel plan for PKC in order to reduce emissions caused by PKC staff? (This will encourage more sustainable forms of travel). 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiative to encourage local institutions and businesses to reduce the impact of traffic on the High Street can only assist.**

22) Tell us how much you agree with PKC encouraging the Crieff community to cycle and walk as opposed to using private vehicles? This would be achieved through measures such as improving pedestrian facilities and promoting the cycling/walking networks available. 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist. Tactran notes the work that was undertaken by PKC through the 'Crieff on the Go' project and continues through the Tayside-wide 'Get on the Go' promotion and this should be built on and developed along with the area wide active travel strategy.**

23) Tell us how much you agree with the provision of extra buses/increased bus routes both in and serving Crieff? 1 Strongly Disagree - 5 Strongly Agree

**Agree. While a laudable aim, it will likely only have an impact on vehicles travelling to or through the high street, therefore:**

- **Enhancement of the Crieff town bus may assist;**
- **The extent to which enhancement of the bus service between Crieff and Perth will help the AQAP is dependent on the proportion of residents that live at the western end of Crieff.**

24) Tell us how much you agree with PKC undertaking further social marketing campaigns such as 'Crieff on the Go' to promote active travel? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist and as noted under question 22, this should also build on the PKC Active Travel Strategy. Any active travel campaign should also be assessed for effectiveness to determine the impact on outcomes that it has had.**

25) Tell us how much you agree with PKC raising awareness of local air quality and the AQMA through schools and community meetings? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist. Any such initiatives will only work if there is a broader understanding of why changes in behaviour may benefit not only the town but also the individual.**

26) Tell us how much you agree with an audit on the cycling and walking infrastructure in Crieff being undertaken followed by the creation of a walking and cycling infrastructure action plan? 1 Strongly Disagree - 5 Strongly Agree

**Strongly agree. Tactran, in partnership with Perth & Kinross Council, undertook an Active Travel Audit of Crieff during 2017. This identified a potential strategic walking and cycling network for Crieff and associated action plan. Tactran would welcome further partnership working with Perth & Kinross Council to further develop measures that are in line with the aims of the AQAP for implementation.**

27) Tell us how much you agree with the provision of PKC 'Champions' to promote alternatives to car transportation methods by engaging with local walking and cycling groups, encouraging active travel within Crieff? 1 Strongly Disagree - 5 Strongly Agree

**Agree. Any initiative to encourage locals to reduce the impact of traffic on the High Street can only assist.**

#### **Section F: Reduction from Non-Transport Sources**

28) Tell us how much you agree with minimising developments such as biomass installations to reduce pollution ? (Biomass installations burn organic waste to generate heat and power which releases particulate matter and gases). 1 Strongly Disagree - 5 Strongly Agree

**Neither agree or disagree. Where non-transport sources add to the air quality problem within the AQMA, appropriate initiatives should be considered.**

#### **Section G: Conclusion**

29) Overall, do you feel the AQAP is relevant regarding its proposed actions and purpose?

**If the AQAP is to be effective it should prioritise those individual, or packages of, interventions which will have a significant impact on the air quality. Whilst numerous interventions are supported in this questionnaire because they will assist both the objectives of the AQAP and other**

health and environmental objectives of Perth and Kinross Council, this is not to say that any one of them will solve the problem.

The modelling being undertaken should identify which interventions, or packages of interventions, will be sufficient to address the air quality problem.

The modelling should also identify the extent of the impact of cleaner vehicles (private and commercial) as they continue to be introduced. This will help identify the scale of additional interventions that are required.

*30) Do you have any further thoughts or comments to add regarding the AQMA and the AQAP?*

If the package of required interventions includes measures which include significant changes to the High Street (e.g. restrictions to on-street parking), then it is suggested that there is likely to be significant public objection. To enable a truly representative opinion from the people of Crieff to be heard to inform Council decisions on the detail and extent of potential changes to the High Street, it is suggested that a 'platform' which encourages the widest debate in Crieff is found (for example engaging people via a 'The Future of Our High Street' exercise). This could also incorporate a programme of wider urban realm improvements to maximise the benefits of any changes to Crieff High Street.

## **Response from Stirling & Tayside Timber Transfer Group**

### **Section A: General**

#### **1) What is your postcode?**

C/O Stirling & Tayside Timber Transport Project Officer - DD9 7RN

#### **2) What are your thoughts regarding air quality in Crieff and the surrounding areas?**

The Stirling & Tayside Timber Transport Group [S&TTTG] note the air quality issues along a stretch of the High Street in Crieff as identified by air quality monitoring and welcome the development of an AQAP.

#### **3) What are your thoughts regarding road traffic congestion along the high street corridor?**

Members of the S&TTTG recognise the current congestion along the high street corridor and have noted that it can become a bottleneck, particularly in the summer. The A85 is however a strategic route for the timber transport sector and, as a Trunk Road, is classified under the industry's Agreed Routes Map system as an Agreed Route – a route which can be used for timber haulage without restriction as regulated by the Road Traffic Act 1988.

Notwithstanding its Agreed Route classification, the timber haulage sector sometimes take steps to minimise its impact on congestion through the High Street by seeking to avoid travelling through the town during school drop off/pick up hours or by using the B827 as an alternative route down to the A9. The B827 road is not constructed to the same standard as an Agreed Route however so the B827 is currently a Consultation Route under the ARM system which highlights the need for consultation with the Local Authority to discuss any limitations to timber haulage operations (e.g. maximum tonnages to be carried, use during winter months etc.).

### **Section B: Moving Traffic Away From the AQMA**

#### **4) Tell us how much you agree with the measure of rerouting some of the traffic that uses the A85 to use only local roads thus moving traffic away from the area? 1 Strongly Disagree - 5 Strongly Agree**

1. The S&TTTG do not consider that the use of local roads by 44 tonne timber lorries would be a feasible option. Exceptions could be where local "Consultation Routes" are improved to a standard of geometry and structure that would allow them to be upgraded to "Agreed Routes" for timber transport.

#### **5) Tell us how much you agree that the AQAP should consider discouraging parking within, or in close proximity to the AQMA? 1 Strongly Disagree - 5 Strongly Agree**

4. The S&TTTG would welcome some type of parking restrictions within, or in close proximity to the AQMA as part of a package of measures as this should reduce congestion. Any changes to parking would need to be adequately enforced to be effective.

### **Section C: Traffic Management – Optimisation of Traffic Movement through the AQMA**

**6) Tell us how much you agree with the possible provision of 'SMART' parking technology in Crieff? (SMART parking technology gives real time information about spaces to enable users to find spaces quickly and easily). 1 Strongly Disagree - 5 Strongly Agree**

3. As it is unlikely that timber lorries would have cause to find parking spaces on the High Street, the possible provision of SMART parking technology would be of limited direct benefit. Were it to reduce the number of cars parking on the High Street however, it would help to improve traffic flow and reduce bottlenecks.

**7) Tell us how much you agree with PKC improving the ease of movement through the AQMA to reduce local emissions and concentrations? (This would be done by improving traffic management systems). 1 Strongly Disagree - 5 Strongly Agree**

The S&TTTG note that High Street, Crieff is not part of the PKC roads network. It is part of the A85 trunk road and is managed by Transport Scotland and their Operating Company BEAR Scotland.

5. The S&TTTG would support an improvement in the ease of movement through the AQMA, providing any measures used to do so were deliverable, cost effective and improved efficiency.

**8) Tell us how much you agree with the possibility of action being introduced to take enforcement action against idling vehicles? 1 Strongly Disagree - 5 Strongly Agree**

3. Providing ease of movement had been improved such that vehicle idling was not necessary, the S&TTTG would welcome the introduction of enforcement action against those drivers who chose to do so.

**9) Tell us how much you agree with a review into the locations and timings of the pedestrian crossings? 1 Strongly Disagree - 5 Strongly Agree**

5. The S&TTTG have no comments to make regarding the location of pedestrian crossings other than, and in connection with question 8 above, the timings of pedestrian crossings would need to be set such that vehicle idling was minimised.

**10) Tell us how much you agree with the proposed measure of holding/gating traffic as a way of minimising congestion within the AQMA? (Holding the traffic back to allow a better flow). 1 Strongly Disagree - 5 Strongly Agree**

1. The S&TTTG would be very concerned were measures introduced to hold/gate traffic along the A85. As mentioned above, this road is a strategic route for timber haulage and any measures which delayed timber flow would impact on drivers/operators, management of logistics and delivery schedules to end users.

**11) Tell us how much you agree with the possibility of limiting or prioritising traffic turning right (onto Comrie Street) from the high street corridor? 1 Strongly Disagree - 5 Strongly Agree**

3. The S&TTTG would wish to defer any view until results of traffic modelling are known.

**Section D: Reducing the Emissions from the Source**

**12) Tell us how much you agree with PKC encouraging private and public operators (such as local buses and HGVs) within/serving the Crieff area to pursue cleaner vehicles? 1 Strongly Disagree - 5 Strongly Agree**

4. Wider legislation is aimed at encouraging the take up of cleaner vehicles and the timber transport sector already actively seeks to improve its efficiency through technological and other advances. It should also be noted that timber lorries driving through Crieff are likely to be travelling long distances and only using the A85 as a through-route and hence will not be serving the local town directly.

**13) Tell us how much you agree with the development and continuation of a local/voluntary bus quality partnership which focusses on 'best practice' in regards to lowering emissions for bus operators? 1 Strongly Disagree - 5 Strongly Agree**

3. The S&TTTG has no specific comment to make on this proposal.

**14) Tell us how much you agree with the introduction of travel plans for schools to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree**

3. The S&TTTG has no specific comment to make on this proposal.

**15) Tell us how much you agree with enhancing public transport provided within Crieff to encourage the modal shift away from cars? 1 Strongly Disagree - 5 Strongly Agree**

3. The S&TTTG has no specific comment to make on this proposal.

**16) Tell us how much you agree with the introduction of a Low Emission Zone or restricting access to polluting vehicles within the AQMA (Crieff High Street Corridor)? 1 Strongly Disagree - 5 Strongly Agree**

1. As mentioned above, the A85 is a strategic route for the timber transport sector and, in recognition of this, together with its capacity to sustain timber haulage, has been classified as an Agreed Route under the industry's Agreed Routes Map system. Were access to be restricted on the A85, significant diversions, where available/feasible, would be required and these longer routes would be likely to result in greater overall emissions and increased costs to drivers/operators, and potentially add to air quality issues in other areas.

**17) Tell us how much you agree with the introduction of eco schemes for HGV and bus operators to improve their fleet's environmental performance? (This will help reduce harmful emissions from HGV and bus operators' vehicles by improving the efficiency of their operations). 1 Strongly Disagree - 5 Strongly Agree**

4. The S&TTTG would welcome the opportunity to learn more about any schemes which could further improve the environmental performance of the timber haulage sector's fleet.

**18) Tell us how much you agree with PKC staff undertaking eco-driver training to save fuel and therefore reduce emissions? 1 Strongly Disagree - 5 Strongly Agree**

5. The S&TTTG would welcome any initiatives to support local fleet users (including the Council) to reduce emission.

***Section E: Reducing Emissions by Reducing Demand for Traffic***

***19) Tell us how much you agree with the promotion of car sharing and the development of car clubs? 1 Strongly Disagree - 5 Strongly Agree***

3. The S&TTTG has no specific comment to make on this proposal.

***20) Tell us how much you agree with the introduction of travel plans for large institutions and businesses to promote sustainable travel? 1 Strongly Disagree - 5 Strongly Agree***

3. The S&TTTG has no specific comment to make on this proposal.

***21) Tell us how much you agree with the creation of a corporate travel plan for PKC in order to reduce emissions caused by PKC staff? (This will encourage more sustainable forms of travel). 1 Strongly Disagree - 5 Strongly Agree***

5. The S&TTTG consider that any initiative to encourage local institutions and businesses to reduce their demand for traffic on the High Street would only assist in the reduction of bottlenecks and congestion.

***22) Tell us how much you agree with PKC encouraging the Crieff community to cycle and walk as opposed to using private vehicles? This would be achieved through measures such as improving pedestrian facilities and promoting the cycling/walking networks available. 1 Strongly Disagree - 5 Strongly Agree***

3. The S&TTTG has no specific comment to make on this proposal.

***23) Tell us how much you agree with the provision of extra buses/increased bus routes both in and serving Crieff? 1 Strongly Disagree - 5 Strongly Agree***

3. The S&TTTG has no specific comment to make on this proposal.

***24) Tell us how much you agree with PKC undertaking further social marketing campaigns such as 'Crieff on the Go' to promote active travel? 1 Strongly Disagree - 5 Strongly Agree***

3. The S&TTTG has no specific comment to make on this proposal.

***25) Tell us how much you agree with PKC raising awareness of local air quality and the AQMA through schools and community meetings? 1 Strongly Disagree - 5 Strongly Agree***

5. The S&TTTG considers that any initiative aimed at encouraging locals to reduce/understand the impact of traffic on the High Street would only benefit the situation. Furthermore, the S&TTTG would welcome any initiative to improve local understanding of the reliance on the public road network by rural industries and would be happy to work with Perth & Kinross Council to identify potential opportunities by which to do so.

**26) Tell us how much you agree with an audit on the cycling and walking infrastructure in Crieff being undertaken followed by the creation of a walking and cycling infrastructure action plan? 1 Strongly Disagree - 5 Strongly Agree**

3. The S&TTTG has no specific comment to make on this proposal.

**27) Tell us how much you agree with the provision of PKC 'Champions' to promote alternatives to car transportation methods by engaging with local walking and cycling groups, encouraging active travel within Crieff? 1 Strongly Disagree - 5 Strongly Agree**

3. The S&TTTG has no specific comment to make on this proposal.

#### **Section F: Reduction from Non-Transport Sources**

**28) Tell us how much you agree with minimising developments such as biomass installations to reduce pollution? (Biomass installations burn organic waste to generate heat and power which releases particulate matter and gases). 1 Strongly Disagree - 5 Strongly Agree**

2. As part of the wider forest and timber technologies industry, the Stirling & Tayside Timber Transport Group operates within a sustainable, low carbon sector and one which produces and uses renewable, recyclable, low energy products. We see wood—based biomass as an increasingly important part of Scotland's low carbon energy mix, with this increase being driven by a need to do more to combat climate change. We would therefore promote an increased use of biomass as a source of heat and power but recognise that any such installations need to be located in areas where the significant benefits of using wood-fuel outweigh any negative impacts.

#### **Section G: Conclusion**

**29) Overall, do you feel the AQAP is relevant regarding its proposed actions and purpose?**

If the AQAP is to be effective it should prioritise those individual, or packages of, interventions which will have a significant impact on the air quality and are deliverable. Whilst numerous interventions are supported in this questionnaire because they will assist both the objectives of the AQAP and other health and environmental objectives of Perth & Kinross Council, this is not to say that any one of them will solve the problem.

The S&TTTG would expect that the modelling being undertaken will identify which interventions, or packages of interventions, will be sufficient to address the air quality problem and which would deliver the greatest environmental and economic benefit.

The modelling should also identify the extent of the impact of cleaner vehicles and other technological solutions (private and commercial) as they continue to be introduced. This will help identify the scale of additional interventions that are required.

**30) Do you have any further thoughts or comments to add regarding the AQMA and the AQAP?**

The S&TTTG appreciates the opportunity to contribute to this consultation. As the AQAP is further developed however – and in connection with the comments below - we would welcome further

engagement with Perth & Kinross Council so that the impacts of any proposed actions can be identified and discussed.

When considering the various interventions proposed in the AQAP, the S&TTG would wish that the economic impacts of each of these on the targeted group/s be fully assessed and costed so that suitable support mechanisms can be developed to assist both during and following implementation.

As a specific example, were the B827 to be considered as an alternative route for the majority of timber traffic, improvement works - such as embankment stabilisation, edge strengthening, carriageway widening and the construction of passing places – would be required and the necessary funding provided.