Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.

Does Scotland have the right policies (Clean Air for Scotland Strategy), support and incentives in place to adequately tackle air pollution?

In general, Scotland has strong air quality policies which both recognise the significant problem of air pollution and identify action in several sectors which would help to tackle the problem. However, there are opportunities to better incentivise tackling air pollution and more rapid action is required, in particular regarding the introduction of multiple Low Emissions Zones (LEZs) in Scotland’s cities and large towns.

Cleaner Air for Scotland (CAFS) acknowledges that transport is responsible for the emission of 1/6 of particulate matter (PM) and 1/3 of nitrous oxides (NOx)\(^1\). Whilst low / zero emission vehicles offer a reduction in emissions, their value is overstated. Low / zero emission vehicles still emit harmful PM2.5 from brakes and gears for which there is ‘no evidence of a safe level of exposure’\(^2\), and maintain a range of associated problems (e.g. congestion, collisions, loss of public space).

It is Sustrans Scotland’s belief that there is a drift to wrongly seeing low / zero emission vehicles as a comprehensive solution to mobility. Modal shift to walking and cycling would reduce all types of air pollution whilst bringing a range of other benefits to the economy and public health. Increasing walking and cycling should be the main transport priority within CAFS.

How does the Scottish policy fit with the UK and EU policy on air quality?

EU policy is progressing slowly to protect people from air pollution and the aims to meet EU standards as a minimum are welcome. There is no reason why this should not continue to be a minimum threshold in future, but Scotland also has the opportunity to be more agile, more ambitious and to lead Europe on a policy of clean air. The vision that Scotland’s air quality will be the best in Europe is significant, but will require more funding for local authorities as well as leadership at a national level to achieve the WHO targets cited in CAFS.

UK policy on air quality is comparatively passive. The recently-announced flagship measure to ban the sale of petrol and diesel vehicles by 2040 is unambitious. Whilst air pollution is acknowledged as a national health problem costing £20 billion every year (16% of the NHS budget)\(^3\), this policy suggests that government is content with

---


maintaining current levels until 2040, and only then starting to make a gradual reduction in air pollution. Rather than postponing action for decades, action should be taken now to reduce private car usage and encourage more journeys on foot and by bike.

**Are the policies sufficiently ambitious?**

Many of the targets set within CAFS should be acknowledged as ambitious, such as the target to match WHO guideline targets for PM. Challenging targets such as this may be more difficult to achieve, but Scotland can and should be ambitious to protect its citizens.

However, Sustrans Scotland believe that the ambition of the aims of the strategy are not necessarily matched by the actions and timescales outlined within. For example, the number of Air Quality Management Areas (AQMAs) in Scotland increased from 34 to 38 in 2016. This is attributed to better data collection. However, the variety of different locations of AQMAs in Scottish cities and regions highlights the inadequacy of introducing a single LEZ when the problem of air pollution is widespread.

We question whether enough is being done to disincentivise pollution. The measures outlines in CAFS are orientated to encouraging low pollution behaviours, but the Committee may wish to consider whether sufficient onus is placed on polluters or whether measures which discourage polluting modes of transport are ambitious enough.

**Are the powers and resources of Local Authorities and SEPA to address air pollution adequate?**

Local authorities must be accountable for air quality in their area, but this will require adequate funding in order to deliver solutions. Local authorities are obliged to monitor and report on air pollution, and if necessary draw up a Local Air Quality Management plan, but the legal requirement to protect people in these areas is vague and there is no penalty for failing to reduce harmful air pollution.

SEPA has the power to direct local authorities where it appears they are not meeting, or are unlikely to meet, their local air quality management obligations. To date, these powers have not been exercised, and it remains to be seen whether they are sufficient. Whether this is a question of insufficient powers, resources or accountability, it is apparent that necessary local action on air pollution is not inevitable.

**Are the policies and delivery mechanisms (support and incentives) being effectively implemented and successful in addressing the issues?**

The delivery mechanism of which Sustrans Scotland have the most experience is the vision in the Cycling Action Plan for Scotland (CAPS) that by 2020 10% of everyday journeys will be made by bike. Whilst this would be an effective contribution to

---

5. [http://www.scottishairquality.co.uk/laqm/aqma](http://www.scottishairquality.co.uk/laqm/aqma)
significant reductions in air pollution through a reduction in car use, it is evidently not sufficient for CAFS to simply state support for a policy with complimentary co-benefits.

Scotland’s ambitious policies in numerous areas do not exert sufficient cross-sectorial influence. Sustrans Scotland have seen limited use of air quality policy or the CAPS vision in transport decision-making. For example, the proposed design for Sheriffhall roundabout in Edinburgh ignores the needs of people walking and cycling and acts as a disincentive to walk or cycle from planned new development to Edinburgh, in favour of minor reductions in journey time for people in cars. This type of decision is not uncommon.

Walking and cycling have significant co-benefits, and cost-benefit analyses are often favourable for active travel projects. This is even clearer when air pollution is factored in, but more weight should be given to air quality in transport decision making in order to achieve air quality objectives. It is Sustrans Scotland’s experience that decision-making is not adequately factoring in the co-benefits of increasing walking and cycling, even when identified in related strategies such as CAFS. Implementation of CAFS is undermined by a lack of impact in related sectors.

It is hoped that the acknowledgement of the Consultation on the Future of the Scottish Planning System in CAFS will lead to strong influence in future policy. Sustrans Scotland hope to see future planning policy incorporate strong measures to counter air pollution, including walking and cycling infrastructure in all new developments.

Is Scotland on target to have a pilot low emission zone (LEZ) in place by 2018 and should there be more than one LEZ pilot?

Progress on LEZs (or Clean Air Zones) has been slow. The city councils of Aberdeen (in 2010), Edinburgh (in 2013) and Glasgow (in 2010) have all conducted feasibility studies, yet action to introduce a LEZ has stalled for several years, and the intervening period will have been detrimental to public health and costly for the NHS. Cities which have conducted feasibility studies are yet to consult on the proposed terms and regulation of a LEZ. In addition, multiple cities are keen to introduce a LEZ, and if this requires a competitive process it is less likely that implementation by 2018 will be achieved.

The current commitment to one LEZ by 2018 is not sufficiently ambitious. Sustrans Scotland do not believe that it is necessary for only one city to first trial a LEZ. LEZs should be introduced in the seven cities as soon as possible, and their use considered in other urban areas of high air pollution.

Defra analysis of European LEZs indicates that national LEZ frameworks or very active government encouragement highly increases the establishment of LEZs at city level8. We would encourage the Committee to recommend national implementation of LEZs rather than a conservative attempt at one LEZ in Scotland. This is the

8 https://uk-air.defra.gov.uk/assets/documents/reports/cat05/1605120947_AQ0959_appendix_1- evidence_review_on_air_quality_effects_of_transport_measures.pdf
quickest way to ensure that the maximum number of people in Scotland are protected by efficient, safe clean air zones within a reasonable timeframe.

**How should the improvement of air quality be prioritised in areas where there have been persistent breaches of NO₂ limit values?**

Sustrans Scotland would like to see a more people-orientated approach to tackling air pollution. Justifying air quality interventions should be simple on the basis that people living, working or moving through an area of high pollution are not protected from a preventable health risk. There is also a need for greater public awareness of air quality conditions. Introduction of publically visible air quality information, in a similar manner that water quality at beaches is advertised, would increase awareness and contribute to behaviour change.

Sustrans Scotland believe that the onus for improving air quality should be placed on polluters, as per Royal College of Physicians recommendations⁹. Polluters must be required to take responsibility for harming our health, and where that comes from vehicles (as it often does) councils must prioritise interventions which reduce pollution. If the cause of high pollution is volume of traffic, councils must to act to reduce the source of pollution.

Given that transport is identified as the source of 1/3 of NOx emissions, this should be the priority for tackling persistent breaches. A reduction in the number of polluting vehicles in urban areas can be achieved through LEZs, but more incentive should be given to people to switch journeys from a car to walking and cycling.

The simplest incentive for more walking and cycling is to provide more space for people on foot or a bike. Seville built 110km of urban cycle routes and reduced vehicle access to the city centre. The share of journeys undertaken by bike increased by 6.5%, and there was a drastic concurrent reduction in PM and NOx¹⁰. More cycle routes, segregated where necessary, and priority at junctions make a significant contribution to people feeling safer when cycling¹¹. By reducing the space for vehicles and re-balancing streets towards people walking and cycling we can reduce polluting transport whilst creating more liveable spaces for people. The evidence from Seville suggests that taking space from polluting vehicles and reapportioning it to active travel does not cause an increase in congestion, and overall provides significant reductions in air pollution.

**Is adequate consideration given to air pollution from agriculture?**

Sustrans Scotland is not in a position to comment on this question.

**Are there conflicts in policies or barriers to successful delivery of the air quality objectives?**

Our answer to the question above on the success of policy and delivery mechanisms applies equally to our response to this question. While CAFS does not exert

---

⁹ https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution  
sufficient cross-sectorial pressure, there are national policies which are, to an extent, contradictory. Projections of vehicle KM growth in the Climate Change Plan\textsuperscript{12} are a tacit adoption of increases in vehicle traffic in policy, where only a reduction in overall vehicle KMs would bring about improvements to air quality.

Some of the suggestions contained within this response are part of a wider cultural shift to favour walking and cycling. This carries cost implications at a time when local authority budgets are stretched. There is, for example, already demand for walking and cycling infrastructure that outstrips the funding available. Sustrans Scotland’s Community Links grant programme\textsuperscript{13} and Community Links PLUS design competition\textsuperscript{14} funding are already over-subscribed, and still more local authorities report an inability to match-fund projects.

Sustrans Scotland advocate increasing funding for active travel to realise the 10% modal share envisaged in CAPS. Funding for walking and cycling should rise incrementally to 10% of the transport budget. Funding at this level would catalyse a step-change in active travel in Scotland, and make a major contribution to achieving the goals of CAFS.

\textsuperscript{12} http://www.gov.scot/Publications/2017/01/2768/11
\textsuperscript{13} https://www.sustrans.org.uk/communitylinks
\textsuperscript{14} https://www.sustrans.org.uk/community-links-plus