



Evidence for Net Zero, Energy and Transport Committee

Air Quality Hearing 28th of April 2023

Introduction

Living Streets Scotland welcomes the opportunity to present evidence to Net Zero, Energy and Transport Committee on air quality management.

As a leading UK wide walking charity and advocacy charity for pedestrians, air pollution from vehicles in urban areas is a major concern. Walking offers a convenient, cheap, and healthy alternative to driving in many cities, town centres, small towns, and suburban areas. Fewer car trips reduce emissions. Lower levels of emissions will encourage walking. Achieving shifts in behaviour is a win-win scenario.

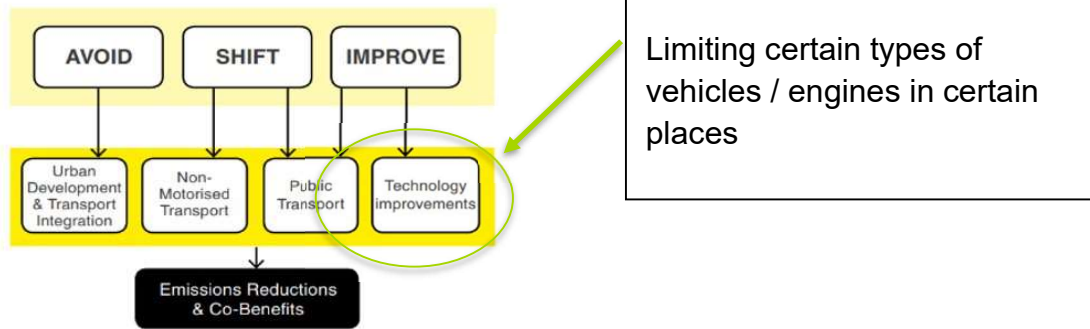
Observations on the approach to air quality in Scotland

We believe the approach to low emissions zones is very top down and technocratic, which focuses on vehicles and engines and less on people and sustainable travel choices.

The focus on specific classes of polluting vehicles whilst scientifically sound has several limitations including:

1. Failure to tackle wider problems with car use in urban areas, including local congestion, and road casualties.
2. Failure to tackle harmful emissions from tyres and brake wear, which may be more prevalent in heavier electric vehicles. The approach is not future proofed.
3. Failure to deliver wider health benefits through tackling Scotland's inactivity crisis, which leads to high levels of conditions such as obesity, heart disease and diabetes.
4. Recognising alternatives to the car are needed, including better walking and cycling infrastructure and public transport services.
5. A heavy focus on clean vehicles discriminates against poorer households who might have no alternative to driving but can't afford the upgrade costs.
6. A focus on material changes to vehicle access, without considering the wider factors that win hearts and minds and deliver behaviour change e.g., individual beliefs and societal norms. See Scottish Government guidance¹. This would include a deeper look at barriers to walking and cycling and beliefs that reinforce car dependence locally.

AVOID-SHIFT-IMPROVE (ASI) APPROACH



(Image: Sustrans)

Policy Change: Towards a more holistic approach

Living Streets believes that improved air quality needs to be delivered in holistic way, which includes:

1. **A focus on overall traffic reduction** through focusing national targets on shorter and more harmful urban journeys where alternatives exist or can be put in place. A national traffic reduction target stated in terms of kilometres is optimised toward longer journeys. This could ignore short local trips which are more harmful per mile and easier to substitute.
2. **Targeting specific types of local journeys** including the school run across Scotland (up to one quarter of morning peak journeys), where substantial reductions can be made. For example, Living Streets' WOW programme only works with 171 schools across Scotland and only schools two in Glasgow. This is despite the potential to remove 5-10% of these journeysⁱⁱ. Independent evaluation shows these changes can be achieved relatively quickly (within an academic year), and this compares favourably against the static national trend.
3. **Reducing emissions at school gates** is an easy win, with strong public support for tackling vehicle idling outside schools, yet few councils have found capacity for enforcement outside schools. Scottish polling by Asthma and Lung UK in 2022 found 77.4% support for action on anti-idling outside schoolsⁱⁱⁱ. The same research found higher levels of concern about air quality outside schools.
4. **More proactive and faster roll-out of 20 mph limits** on all urban streets. Slower speeds not only greatly increase safety, but they also reduce particulates from car tyre and brake wear when stopping. This also complements the uptake in hybrid and electric vehicles, which are better designed for efficiency at low speeds than petrol equivalents^{iv}.
5. **A grown-up debate about parking and how this affects streets and communities**, and how free parking subsidises more affluent households and discourages / competes with alternatives including walking, cycling and public transport and rolling out car clubs. Parking also reduces the options for green barriers such as urban tree planting, and rain gardens.

6. **A more compelling vision for 20-minute neighbourhoods** that demonstrates how quality of life improves via better walking and cycling infrastructure, car sharing, local facilities, and access to frequent, reliable, and direct bus services. Research by Living Streets shows that many neighbourhoods lack basic walking infrastructure (well-maintained accessible pavements and safe crossings) plus basic public bus services.^v
7. **Application of a fuller behaviour change approach** which considers individual beliefs, societal norms as well as material changes to access and infrastructure (ISM). This would start with wider and deeper community engagement.

Summary

A more holistic approach to urban air quality management

The approach to promoting air quality in Scotland needs to be much broader to deliver wider economic, social, and environmental benefits, and go far beyond relying on car manufacturers and consumers using cleaner vehicles within specific cordons. This needs to consider all aspects of an Avoid, Shift Improve approach.

Avoid: Deliver fewer local trips by cars

Overall car use and factors such as parking need to be considered. This includes better planning of 20-minute neighbourhoods with local facilities which can be reached via good walking, cycling and public transport options.

Shift: Achieve easy wins e.g., tackle the school run and idling

There are several relatively low-cost opportunities for targeted behaviour change, such as tackling the school run, which need to be rolled out. A 5-10% switch from car trips to active travel is achievable outside most urban schools, where air quality is likely to be a particular issue. This would be part of shift in strategy focused on behaviour change and social marketing to win hearts and minds.

Improve

Continue to do what we are doing with the right balance of carrots and sticks to change the types of vehicles in LEZs.

For more information please contact:

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References

- ⁱ Scottish Government (2013) Influencing behaviours - moving beyond the individual: ISM user guide.
- ⁱⁱ Derek Haldane Consulting (2022) Review of WOW of Programme for Living Streets
- ⁱⁱⁱ Opinion Matters (2022) Poll for Asthma Lung UK of 1000 Adults
- ^{iv} Energy Saving Trust (2017) [Efficient driving in electric and low emission vehicles.pdf \(energysavingtrust.org.uk\)](#)
- ^v Living Streets (2023) 20 Minute Neighbourhoods a Community Perspective