

PE2123: Update air quality standards in Scotland to align with 2021 World Health Organisation guidelines

Submission from Sustrans, 30 June 2025

Questions

1. Do you support amending the Air Quality Standards (Scotland) Regulations 2010 to align with the 2021 WHO air quality guidelines? Please explain your reasoning.

Sustrans supports improving air quality guidelines and following the WHO recommendations. Although Scotland's air quality has significantly improved over time, it is appropriate to reassess policy when the evidence base has developed.

Improving air quality is an important driver for investment in active travel infrastructure to support walking, wheeling and cycling, connect to public transport and reducing the need to use private cars for short, local journeys. This is highlighted in the WHO Guidance supporting a shift in transport provision to sustainable modes and walking and cycling networks.

UK Government Guidance (Health Matters: Air Pollution; November 2018) is explicit in stating that 'poor air quality is the largest environmental risk to public health in the UK'.

The Scottish Government's strategy Cleaner Air for Scotland 2 (July 2021) states that 'Road transport in urban areas remains the significant contributor to poor air quality'.

It is therefore appropriate to consider the importance air quality standards play in driving investment in transport.

2. What progress has been made in reducing nitrogen dioxide and fine particulate matter in Scotland since 2022/23, when we last sought views on this?

3. To what extent has scientific and public health evidence about air quality evolved since the current standards were adopted? In your answer you could refer, for instance, to impacts on nitrogen dioxide or fine particulate matter on particular groups of people, the effect of Low Emission Zones (or other interventions of a similar nature) on air quality, or any new information or data about the effect of burning particular types of fuel.

Sustrans Research & Monitoring Unit has been modelling impact on levels of air pollution as an outcome indicator for some Places for Everyone (P4E) projects. These projects seek to make walking, wheeling and cycling easier and more

accessible, and often involve a combination of footway improvements, public realm improvements, construction of segregated cycling infrastructure, and road space reallocation in line with the [National Transport Strategy \(NTS\) transport hierarchy](#).

Using the latest vehicle emission factors (2024) five PfE projects were monitored before and after implementation across three types of road vehicle pollutants. On average, vehicle pollutant rates were estimated to have improved by around 10% although findings for individual sites and pollutant types were more mixed.

A range of factors were identified for the improvement including changes in vehicle numbers, speed and the proportion of heavy goods vehicles.

The most significant improvement was estimated for the 'South City Way' in Glasgow – a reduction of pollutants of 53%.

Further details on the monitoring can be provided and the latest Places for Everyone impact report is available at [New research shows active travel infrastructure projects are helping keep Scotland healthy - Sustrans.org.uk](#).

4. The Scottish Government is currently reviewing the CAFS2 strategy with the goal of establishing a long-term policy framework to replace the strategy once it expires. What practical steps can the Scottish Government set out in its new strategy to reduce nitrogen dioxide and fine particulate matter levels?

To support decision making on infrastructure and sustainable travel interventions, it would be of help to have improved technical guidance on 'what works' and what can be expected from road space reallocation and improvements to public realm.

This would have the benefit of making it much clearer what outcomes can be achieved from investment in active travel and public transport.