Cleaner Air for Scotland 2 – draft for consultation

Cycling Scotland submission
January 2021

Question 1 – Do you agree with the package of health measures put in place in the health chapter?

Paragraph 21 of the consultation document is welcome and highlights the importance of active travel for addressing air quality issues. Active travel makes a significant positive contribution to improving air quality and improving public health as a result.

We note reference to the wider impacts of improving air quality in the chapter. Specifically, with regards to particulate matter (PM) emissions, it is widely recognised in evidence that such emissions are harmful to health at any concentration[1], which arise almost exclusively from braking and tyre wear from vehicles on the road. This emphasises the need for tough(er) action to promote and encourage active travel and to reduce the number of vehicles on the roads in Scotland, to reduce the significant negative impact of these emissions on population health.

We welcome recognition of the co-benefits of improving air quality and specific reference to active travel as central to achieving this. There are wide ranging positive physical health outcomes from physical activity from active travel for mortality and morbidity, and also significant mental wellbeing gains and overall enhanced health. Further, we note the strategy makes reference to the physical activity benefits of active travel outweighing the harm caused by potentially more exposure to air pollution. This is welcome and important to acknowledge.

Although the actions outlined in this chapter may help to strengthen the evidence base, more specific actions addressing the issues outlined above would be welcome. Actions on understanding the significant negative effects of poor air quality on health outcomes and the role of active travel in addressing this, with a particular focus on short journeys, would be welcome. There should also be actions focused on understanding and addressing inequalities in health outcomes and exposure to air pollution, which is currently missing from the actions listed.

Question 2 – Do you agree with the package of actions put forward in the integrated policy chapter?

Ensuring integrated policy action across government departments and policy areas is fundamentally important for ensuring policy coherence and delivering on overall strategies to improve air quality. Action to improve air quality cannot be achieved by action in one policy area alone, and it is important that an integrated approach is taken to ensure that actions in one area do not undermine or contradict actions in another.

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[1] Lelieveld, J, K. Klingmuller, A. Pozzer, U. Poschl, M. Fnais, A. Daiber, and T. Munzel (2019) 'Cardiovascular disease burden from ambient air pollution in Europe reassessed using novel hazard ratio functions' European Heart Journal 0:1-7 https://academic.oup.com/eurheartj/advance-article/doi/10.1093/eurheartj/ehz135/5372326

We welcome recognition of the co-benefits of climate change mitigation and adaptation, and the proposal to take action to ensure these co-benefits are realised.

It is welcome that there is recognition in the consultation document of the significant contribution of transport to climate emissions in Scotland, as the single largest source of greenhouse gas emissions, and the need for action to address this. It would be beneficial here to outline the important contribution and linkages of cycling and active travel to air quality improvements not just in transport, but across a range of policy areas including planning/placemaking, health, and climate change. This needs to be further recognised and prioritised in decision-making across government.

Question 4 – Do you agree with the package of actions put forward in the placemaking chapter?

We note the actions put forward in the chapter, in particular the focus on utilising the Place Standard Tool to inform decision making, and the focus on green infrastructure. We note reference to the National Planning Framework 4 (NPF4) and Scottish Planning Policy (SPP) providing an opportunity to change planning policies to include the aim of improving air quality outcomes from new developments. This focus on planning policy is welcome, as new developments must not lead to a net increase in carbon emissions, must not worsen air quality and must not exacerbate existing health inequalities. In this chapter, increased reference to the importance of the design of new developments to ensure they better manage vehicles in towns and city centres, reduce traffic and improve environments for walking and cycling is needed. People walking and cycling, and using public transport, should have priority over vehicles in towns and cities. Modal shift to active and sustainable travel modes help to reduce emissions, improve air quality, and can reduce inequality.

We note reference in this chapter that society continuing to be built around roads is inherently unequal. The present transport system, including through continuing to prioritise road development, currently places an unequal burden on those in the most deprived communities, and there is a risk that growth in car ownership further isolates those without access to a car. Re-focusing on providing integrated active travel infrastructure instead of expanding new road capacity is essential. We have previously called for a trajectory to end new trunk road building in Scotland[2], and would like to see this prioritised.

Question 8 – Do you agree with the package of measures put forward in the public engagement and behaviour change chapter?

The chapter acknowledges there is limited research and evidence in this area and outlines an appropriate mechanism to address this deficit.

The chapter identifies evidence gaps with regards to real and perceived barriers about the uptake of low/zero emission vehicles and further modal shift to public transport and active travel, and associated behavioural factors driving these changes.

In this regard, it should be recognised that we cannot simply rely on the quick fix of technology to improve air quality. While technology innovation is important and should be recognised, it should not be relied upon too heavily to achieve desired policy outcomes, as the pace of change and rate of uptake cannot be guaranteed. Such vehicles still represent vehicular traffic on the roads and issues of congestion and emissions, from very harmful

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[2] https://www.cycling.scot/mediaLibrary/other/english/7079.pdf

particulate matter emissions from braking and tyre wear[3], remain. The biggest barrier to cycling is concern about traffic on the road, and so a large number of these vehicles, in place of conventional petrol or diesel vehicles, on the road may discourage people from cycling, which could undermine the achievement of emission reduction targets and broader climate change objectives. Further, there are additional safety concerns for vulnerable road users, like people cycling, as these vehicles are often silent/much quieter at low speeds and so are more challenging for people cycling to hear on the road. The focus should be on promoting delivery of the sustainable transport hierarchy, implementing it into budget decisions and prioritising active travel (and other sustainable modes).

We consider that greater emphasis needs to be placed on achieving the required scale of behaviour change and it should be acknowledged that this will not happen overnight. It is imperative that work is redoubled to influence behaviour as we emerge from the pandemic and that a trajectory of targets is set out to demonstrate progress. Only by adopting this approach will it be possible to influence people's travel choices effectively and make a significant contribution to improving air quality.

Question 17 - Do you agree with the actions put forward in the transport chapter?

Transport is the single largest emitting sector in Scotland, accounting for 35.6% of greenhouse gas emissions in 2018, and therefore has a significant negative impact on air quality in Scotland. Of these, 40% are from cars[4], with vans (Light Goods Vehicles, LGVs) increasing to account for 13% of emissions[5]. The 93% increase in LGV emissions between 1990 and 2018, the largest percentage increase of all transport modes, is of great concern. We would like to see stronger action in relation to addressing this and the key linkages to poor air quality more strongly identified in the transport chapter and across CAFS2 in general.

We welcome that the strategy document recognises that the greenest mile is the mile not travelled.

We note the actions for active travel which include recognising and acknowledging the importance of the sustainable transport and investment hierarchies as the basis for policy decision making and funding decisions. A focus on modal shift for everyday journeys to be by bike should remain, with a related clear aspiration for reduction in car use, especially for short journeys, by both national and local government.

Alongside measures to encourage modal shift to active and sustainable modes, measures to reduce demand for cars and decisions on the allocation of investment in the transport system need to be taken. As previously outlined, we have highlighted there should be a trajectory to end new trunk road building as expanding road capacity will inevitably increase traffic levels, resulting in increased emissions and poorer air quality as a result[6]. Such a commitment is currently missing from the strategy. If emissions from traffic are not tackled in

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[3] Lelieveld, J, K. Klingmuller, A. Pozzer, U. Poschl, M. Fnais, A. Daiber, and T. Munzel (2019) 'Cardiovascular disease burden from ambient air pollution in Europe reassessed using novel hazard ratio functions' European Heart Journal 0:1-7 https://academic.oup.com/eurheartj/advance-article/doi/10.1093/eurheartj/ehz135/5372326

[4] Scottish Government (2020) Update to the Climate Change Plan 2018 – 2032 Securing a Green Recovery on a Path to Net Zero

[5] Scottish Government; Carbon Account for Transport No. 12: 2020 Edition

[6] https://www.cycling.scot/mediaLibrary/other/english/7079.pdf

the next 5 years, it will continue to undermine progress made in other sectors in action to improve air quality.

We note one of the actions in this chapter is to consider the impact of match funding criteria on the uptake of active travel funding for infrastructure and behavioural change programmes. This is welcome, as the current system of match-funding is unsustainable for many local authorities and can further alienate them from the agenda, limiting actions they can deliver to improve active and sustainable travel options and outcomes in their area. Government at all levels should build and maintain staff capacity to manage cycling infrastructure and the local road network in the present financial climate.

The current Covid-19 pandemic has led to fundamental changes in travel patterns and behaviours. The importance of sustainable travel and the possibilities around reducing travel have been highlighted. There has been a significant increase in the number of people cycling across Scotland, and this is welcome. A key facilitator of this has been the significant reduction of cars and vehicles on the roads. This has helped to improve air quality and reduce emissions and has significantly increased feelings of safety for people cycling.

We welcome the support given to local authorities to introduce temporary cycling and walking infrastructure to support people to travel actively for essential journeys during the initial lockdown, and it is welcome this is acknowledged in the strategy. Evidence from a recent survey we carried out highlights the importance of dedicated separated infrastructure to encourage cycling, with more than a quarter of survey respondents stating that dedicated cycle paths would be the most likely factor to encourage them to cycle after the (initial) lockdown[7]. In this regard, in response to the current pandemic, there is a need to ensure that transport infrastructure decision-making and spending takes into account the need to deliver space separated for different users, especially in busier urban areas with cycle lanes physically separated from footways and the carriageway. Space allocation decisions and ensuring sufficient footway and cycle path width will help physical distancing for active travel and public transport, both now and in response to future pandemics. As outlined, this needs to be supported by a commitment to end new trunk road building, to further mitigate the negative impact of transport emissions in air quality.

To deliver fair access to transport, reduce health inequalities and improve air quality, everyone should be able to walk or cycle for most of their regular, local journeys. Safer streets with cleaner air require taking space from private vehicles to make more room for walking and separated cycling. A long-term approach with increased and multi-year funding is required to support local authorities to deliver this urgently.

We note the action to explore sustainable first and last mile delivery options and welcome that cargo and e-cargo bikes have been recognised as having a role to play in this. E-cargo bikes, where utilised for first and last mile deliveries, have an important role to play in improving air quality, as they can help to reduce the number of freight and delivery vehicles on the road, which as outlined earlier, are the transport mode which has seen the largest increase in emissions.

With regards to workplace parking, we welcome the proposed action outlined. The Transport (Scotland) Act 2019 gives local authorities the power to introduce a Workplace Parking Levy (WPL). Such powers are significant as a WPL is an equitable policy across the whole population and can help to reduce transport inequalities as well as encourage modal shift to

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[7] https://www.cycling.scot/news-article/new-lockdown-cycling-survey

active and sustainable travel. Specifically, in Scotland, around 30% of households do not have access to a car[8], meaning they are often negatively impacted by prioritisation of cars at workplaces and in other public spaces. A WPL would help to remove this disparity and have a positive impact on improving air quality.

To deliver on the actions put forward, there should be action to build and maintain dedicated cycling infrastructure, enabling anyone to cycle safely on coherent cycle networks across and between towns and cities. This entails cohesive, seamless networks of on-road separated routes in cities and links to existing off road networks. It also entails roll out of 20mph speed limits and there should be some provision of routes where demand will be greatest alongside trunk roads and busier local roads in rural areas. The primary focus of investment should be on enabling cycling through changes to the physical environment for short journeys to enable anyone to cycle. A key overarching focus in this area needs to be on addressing inequality and ensuring that any decisions do not further exacerbate existing inequalities or create new ones. Commitment to such action could be strengthened and further expanded within CAFS2.

Question 18 - Do you agree with the package of actions put forward in the Local Air Quality Management chapter?

The chapter acknowledges there is inconsistency in air quality management across the country. Further, the chapter outlines there is no systematic approach for reporting on measures and that local authorities are not legally required to achieve the air quality objectives but simply demonstrate they are doing all that is reasonably possible to work towards them, mainly because some sources of air pollution are out with direct local control such as SEPA controlled processes and trunk roads managed by Transport Scotland. To ensure consistency in air quality management across the country, this needs to change.

In our response to a previous Cleaner Air for Scotland steering group report consultation, held in December 2019, we highlighted that, with regards to guidance for Local Air Quality Management Areas (LAQMs), the review document outlined a criteria for the inclusion of non-specific measures on transport where it is a significant contributor to non-compliance and a requirement for a justification for the uptake or exclusion of a particular mode. Although reliant on high-quality traffic data to identify which vehicles are causing pollution problems, such an approach is welcome and can help mitigate against decisions always being made in favour of cars or motorised vehicles. This approach should be taken forward in CAFS2.

Question 20 - Do you agree with the proposed review timeframe?

Yes

The proposed timeframe outlined is appropriate and is sufficiently forward looking, aligning with longer-term climate change targets, as well as short-to-medium term deliverables.

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[8] Scottish Household Survey (2018) Travel and Transport in Scotland Local authority analysis, table 4 https://www.transport.gov.scot/publication/transport-and-travel-in-scotland-results-from-the-scottish-household-survey-1/

Question 29 – What are your views on the predicted environmental effects as set out in the environmental report?

The focus on policy integration in the environmental report is welcome. Key linkages between different policy areas, and their corresponding impacts, should be recognised.

Paragraph 3.4.13 outlines the impact of the ongoing Covid-19 pandemic on air quality and what Scotland can learn from the pandemic experience to create safer, attractive urban spaces which put people first and make walking and cycling the norms for everyday journeys. It is welcome this has been acknowledged in the document. One of the positive outcomes of the pandemic has been an increase in rates of cycling (and walking) across the country. Compared to 2019, rates of cycling from March to December 2020 were much higher and increased by more than 100% in some areas[9]. Going forward, action is needed to embed this (behaviour) change long-term to achieve a sustained modal shift to active travel and the resultant reduction in transport emissions, from increased rates of cycling and walking.

Recognition of the significant positive effects of actions on air quality, population and human health, and climate factors in the document is welcome. Promoting and encouraging cycling and active travel are essential for achieving these positive effects, helping to deliver the sustainable travel hierarchy and to prioritise walking, cycling, and wheeling in investment and other decision making,

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[9] https://www.cycling.scot/news-article/six-month-stats-see-cycling-up-43-in-scotland