

Air Quality in Scotland

Response from Spokes to the [Scottish Parliament ECCLR Committee Consultation](#)¹

Thank you for the opportunity to comment on this subject. We shall follow the format as set out in the consultation.

1 Does Scotland have the right policies, support and incentives in place to adequately tackle air pollution?

In short, no. As your note says, the EU has introduced a new directive to reduce air pollution since the Scottish 2015 document [Cleaner Air for Scotland](#)², and a High Court judgement has challenged the adequacy of the UK response.

There is a public health emergency. Most urban areas have already suffered illegal levels of air pollution for years. Ministers have called toxic air “the biggest environmental risk to public health in the UK” which causes “unnecessary and avoidable” damage – 40,000 early deaths a year. The annual health costs (UK) are estimated (by the UK Government) at £27.5bn³ at least, and the same will be true, pro rata, for Scotland.

2 Are the policies sufficiently ambitious?

Again, no. Scottish Government has offered one Low Emission Zone (aka CAZ, Clean Air Zone) for one city in Scotland. This is a hopelessly inadequate response to an “emergency”. The Government should offer to fund CAZs for every town and city in Scotland that wants one - or more than one.

Even that is not adequate, because the pollution is everywhere in towns and cities, not just in 'hot spots'. It would be better to give LAs the power to declare the whole town or city a clean air zone, and act accordingly.

The most effective measure to cut air pollution has been shown, by [UK government research](#)⁴, to be the charging or banning of dirty vehicles entering city and town centres. The research shows CAZs are 60 times more effective than a scrappage scheme. They are also acknowledged to be the quickest and most cost-effective way to tackle the problem.

1 <http://www.parliament.scot/gettinginvolved/105527.aspx>

2 <http://www.gov.scot/Resource/0048/00488493.pdf>

3 <https://www.theguardian.com/environment/2017/jul/26/the-governments-air-pollution-plan-is-a-beautiful-smokescreen>

4 https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Technical_Report_Amended_9_May_2017.pdf

The same research looks at different methods of reducing nitrogen oxides (NOx), the most toxic of the harmful emissions. Reductions, in tonnes of emissions, over 10 years, are calculated (by Defra) as:

CAZs	24,000
Retrofitting buses, HGVs and black cabs	10,000
Ultra low emission vehicles	2,000
Vehicle labelling	700
Scrappage	400
Influencing driving style	350
Reducing speed limits	50

Scrappage of dirty diesels, and replacement with electrics, has been mentioned as a solution by the UK government (and motor manufacturers) but, as the table shows, the savings are small compared with CAZs - plus the fact that more than half of the carbon emissions during the lifetime of a vehicle are created in the process of manufacture. This makes scrappage a very wasteful and carbon-costly scheme, which should be an option of last resort.

Retro-fitting of buses, some taxis, and HGVs produces some returns, as shown in the Table above, but again, nothing like what the CAZs could achieve, and the costs would be high.

3 Are the policies and delivery mechanisms ... being effectively implemented and successful in addressing the issues?

We are not aware of any serious attempts to reduce NOx emissions, and even now the Government is only talking about one possible CAZ for the whole of Scotland.

We propose the following policies as a solution:

- 1) For 2018 there should be government funding for a LEZ (CAZ) in each of the 3 Scottish Cities (Edinburgh, Glasgow, Aberdeen) now keen to go ahead;
- (2) Beyond 2018 there should be more CAZs across Scotland - for any town or city that wants one, and the possibility for this to cover the whole town or city;
- (3) Money raised by the CAZs should be invested in active travel and public transport.

We emphasise that this must be a Scottish Government initiative. It is a national crisis, and one which, although it will be implemented by LAs, cannot be left to them to fund, and nor is it fair to leave them to 'take the flak' alone.

4 Are there conflicts in policies or barriers to successful delivery?

Obviously there are, because nothing has been done for so many years. Clean Air for Scotland (CAFS) was published in 2015, but discussion of, and knowledge about, vehicle-created air pollution has been happening for many years before that. European directives have been issued, High Court judgements made, Government inaction has been proved illegal, yet still nothing has been done, and even now we are promised just one CAZ for the whole of Scotland, and not till 2018. Our 2015 submission is [here](#)⁵, and a comprehensive one by FOE Scotland [here](#)⁶. Now, over two years later, we have to make similar points.

5 <http://www.spokes.org.uk/wp-content/uploads/2015/04/1504-Low-Emissions-Strategy-Spokes-response.pdf>

6 <http://www.foe-scotland.org.uk/sites/www.foe-scotland.org.uk/files/FoES%20LES%20consultation%20response.pdf>

Thus a **first major barrier** is the failure by political leaders to take action in the face of what the UK government itself in its Air Quality Plan [consultation document](#)⁷ called “*the largest environmental risk to public health in the UK.*”

It seems that leading politicians would rather hold inquiries, arrange consultations, issue reports about the problem - anything rather than remedial action. Action which might offend motorists is thought to be political suicide.

We can address this by looking at it from the other direction - the victims. Are decision-makers prepared to accept thousands of Scots dying prematurely or becoming seriously ill, and children's lung development stunted, rather than doing anything that might upset motorists?

A **second important barrier** is the absence of adequate public education.

Most motorists think that what they pay in tax covers the costs of road building and maintenance, being unaware that road expenditure comes from the general purse (not their taxes). Even more, motorists are not aware of the so-called *external* costs of motoring - costs which they do not pay for at all, but which run into billions: air pollution; congestion, climate change, and health costs of the sedentary lifestyle, to name but a few. When these enormous costs are taken into account, it is clear that motoring, far from being over-taxed, is in fact being heavily subsidised. These costs should be internalised.

A **third barrier** is the reluctance of decision-makers, and the public, to go ahead with the charging of motorists, which is the only effective way of implementing a CAZ.

However, just as a small charge for plastic bags has led to a big reduction in bag use, so a pollution charge could achieve small but essential changes in travel behaviour. Is your journey really necessary? Could you do it by less harmful means? Could you do it less often? The charge would greatly raise awareness and would counter the present situation where the public use their car without even thinking of the consequences.

Clearly, charges would have to be set at a level high enough to have effect, and could be advertised as being flexible depending on their effectiveness.

Conclusion

Air pollution is killing thousands, even in Scotland. The time for action is now. MSPs must grasp the nettle and not just enable Local Authorities to establish Clean Air Zones in our towns and cities, but also give them the political and financial support to do so.

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⁷ https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Consultation%20Document.pdf