

About the RCPCH

The Royal College of Paediatrics and Child Health (RCPCH) is responsible for training and examining paediatricians. The College has over 17,000 members in the UK and internationally and sets standards for professional and postgraduate education. We work to transform child health through knowledge, research and expertise, to improve the health and wellbeing of infants, children and young people across the world.

RCPCH response to the Scottish Government: Consultation on Building Scotland's Low Emission Zones

Comments

Question 1

**Do you support the principle of LEZs to help improve Scottish air quality?
Please be as specific as possible in your reasoning.**

Yes. Our joint report with the Royal College of Physicians, [Every breath we take: The lifelong impact of air pollution](#) has shown that some 40,000 deaths a year in the UK are linked in some way to air pollution, and that high exposure to toxic traffic fumes can lead to serious health problems in children with lifelong implications. And as so often is the case, the ideal portion of the population to target improvement and prevention in air pollution are the young – who are especially vulnerable to the effect of inhaled pollutants. At no other point is the body undergoing such rapid changes. Recent work in Aberdeen has demonstrated how pregnant mother's exposure to car fumes is associated with reduced growth of her unborn baby's head. This is what makes environmental toxins such as air pollution so damaging to a young person's life, and intervention is needed to prevent this avoidable harm. Our report showed that air pollution can produce detrimental effects on growth, intelligence and neurological development. That is why we must act now to prevent this issue from getting worse.

Question 2

Do you agree that the primary objective of LEZs should be to support the achievement of Scottish Air Quality Objectives?

If not, why not?

Yes. As a proviso we would look for these upper values to be further reduced in the near future.

Question 3a

Do you agree with the proposed minimum mandatory Euro emission criteria for Scottish LEZs?

Yes. As a proviso we would look for these upper values to be further reduced in the near future.

Question 3b

Do you agree with the proposal to use the NMF modelling in tandem with the NLEF appraisal to identify the vehicle types for inclusion within a LEZ?

Yes.

Question 3c

Should emission sources from construction machinery and/or large or small van refrigerated units be included in the LEZ scope, and if so should their inclusion be immediate or after a period of time?

Yes. We would favour an immediate introduction since the sooner emissions are reduced, the more children will benefit. We accept that there may be logistical reasons for phasing in bans in some contexts such as construction machinery. How will shipping in harbour cities (e.g. Aberdeen) be accommodated in the legislation?

Question 4

What are your views on adopting a national road access restriction scheme for LEZs across difference classes of vehicles?

The consultation document does not provide enough information about this for us to reach an opinion.

Question 5

What are your views on the proposed LEZ hours of operation, in particular whether local authorities should be able to decide on LEZ hours of operation for their own LEZs?

Ideally no petrol or diesel fumes should be emitted in areas where people live at all (and after 2040 this ideal will be achieved). We would support the proposal that LEZ are in operation 24 hours a day 7 days a week. Air pollution is a national (and international) problem and needs a national approach. Companies which use petrol and diesel powered vehicles work in many cities would in particular appreciate consistency across Scotland.

Question 6

What are your views on Automatic Number Plate Recognition enforcement of LEZs?

This is a tried and tested method which is cost effective and mostly reliable

Question 7a

What exemptions should be applied to allow LEZs to operate robustly?

Please be as specific as possible in your reasoning.

None

Question 7b

Should exemptions be consistent across all Scottish local authorities?

Not applicable

Question 8

What are your views on LEZ lead-in times and sunset periods for vehicle types shown in Table 2?

The time scale is optimistic and may need to be pushed back. How might the legislation apply to trains and shipping?

Question 9

What are your views about retrofitting technology and an Engine Retrofitting Centre to upgrade commercial vehicles to cleaner engines, in order to meet the minimum mandatory Euro emission criteria for Scottish LEZs?

This is very reasonable

Question 10

How can the Scottish Government best target any funding to support LEZ implementation?

Question 11

What criteria should the Scottish Government use to measure and assess LEZ effectiveness?

Change in ambient NO₂, SO₂, ozone, PM_{2.5} and PM₁₀ relative to same point in time averaged over three years 2015-2017

Question 12

What information should the Scottish Government provide to vehicle owners before a LEZ is put in place, during a leadin time and once LEZ enforcement starts?

It would be useful to see what other cities (e.g. London, Antwerp) issued. Plenty of notice that the LEZ are coming. The health benefits. The benefits to the economy.

Question 14

How can LEZs help to tackle climate change, by reducing CO₂ emissions in tandem with air pollution emissions?

Climate change is an international/global phenomenon driven mostly by CO₂. LEZ in Scotland is likely to have (at best) minimal impact on climate change. The rationale for LEZ is not climate change.

Question 15

What measures (including LEZs) would make a difference in addressing both road congestion and air pollution emissions at the same time?

Road congestion and air pollution are very closely linked so a measure could affect both outcomes. Legislation and taxation are well-known to change the national behaviour. The built environment has an important part to play e.g. design of new housing estates, creating pedestrianised areas in established urban areas, avoiding the "school rush" by building schools in the centre of communities. The rush hour can be lessened by encouraging flexible working/working from home. Removing heavy goods vehicles from the road to rail system is often suggested but is "clunky", especially delivering goods to city centre stores. "Drive-on drive-off" railway carriages could be one solution.

Question 16

Do you have any other comments that you would like to add on the Scottish Government's proposals for LEZs?

LEZs will likely reduce traffic volume, and possibly speed, and this will reduce child pedestrian injury and death due to traffic collisions.

Question 17

What impacts do you think LEZs may have on particular groups of people?

For the reasons stated in response to question 1, we believe that foetuses, infants and children will benefit from LEZ due to their susceptibility to harm from ambient air exposure and also due to their cumulative/lifetime exposure ambient air pollutants.

Question 18

Do you think the LEZ proposals contained in this consultation are likely to increase or reduce the costs and burdens placed on any sector?

Please be as specific as possible in your reasoning.

We anticipate resistance to this from all parties who are affected by LEZ, and this will include parents. We do not want to speculate or anticipate which sectors may be most affected by increased costs.

Question 19

What impacts do you think LEZs may have on the privacy of individuals?

Please be as specific as possible in your reasoning.

We do not believe that LEZ will impact substantially on the privacy of many individuals.

Question 20

Are there any likely impacts the proposals contained in this consultation may have upon the environment?

Please be as specific as possible in your reasoning.

The proposals are intended to affect the ambient air in the environment. We do not have the expertise to speculate on what the effects of the proposals on other domains within the environment, e.g. water, soil.

For further information about any aspect of this consultation response, please contact Professor Steve Turner, Officer for Scotland at: s.w.turner@abdn.ac.uk