Living Street's response to Defra consultation on: Draft plans to improve air quality – tackling nitrogen dioxide in our towns and cities

Living Streets is the UK charity for everyday walking. We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illness and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone.

Our ambition is to get people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking. For more than 85 years we've been a beacon for walking. In our early days our campaigning led to the UK's first zebra crossings and speed limits. Now, our campaigns and local projects deliver real change to overcome barriers to walking and our ground breaking initiatives such as the world's biggest Walk to School campaign encourage millions of people to walk.

Summary

Getting people out of their cars and onto their feet must form a central part of the Government's plans to improve the UK's air quality.

It is unacceptable that a person's health is put at risk simply by walking down their street. Long-term exposure to air pollution is estimated to cause 29,000 premature deaths each year in the UK. Children, older people and people with asthma are especially vulnerable; low-income and ethnic minority groups are also disproportionately affected. The Government knows that there is no safe level of particulate matter and that the UK is breaking the law.

Active travel has to be part of the solution. Currently 39 per cent of journeys fewer than two miles are in a car or van. These are journeys that could be easily walked. Even if new standards in technology were to show big improvements to vehicle emissions, there are still many older diesel cars, taxis and buses in use across the country which will continue to add to the problem. The Government must act now to encourage more people to give up their

cars for short journeys and walk or cycle instead.

National responsibility for air quality should sit across Government departments. This should include a proper resourced Cycling and Walking Investment Strategy to help people leave the car at home. More people walking and cycling will not only improve air quality, but reduce physical inactivity, currently responsible for one in six deaths.

Question 1: Do you consider that the proposed plan set out in the overview document strikes the right balance between national and local roles?

No. The consultation does not strike the right balance between local and national roles. The Government appears to be devolving responsibility to local authorities, with little additional resource or power at a time of budget constraint. This is despite the fact that the failure to meet legal limits for NO2 has mainly been due to national (and European Union) failures to restrict the use of diesel vehicles.

National responsibility for air quality should sit across Government departments. Alongside the Department for the Environment Food and Rural Affairs, the Department for Health, the Department for Health, the Department for Communities and Local Government, the Department for Transport and the Department of Energy and Climate Change (DECC) should be given a share of the responsibility – for example in the form of carbon budgets. Pollution from road traffic is responsible for up to 70 per cent of air pollution[1]. This underlines the need for an improved network of roadside air quality monitoring of the strategic road network and local roads – in particular urban routes where congestion, pollution and health inequalities are greatest. The Government's Road Investment Strategy should be revisited to ensure that it helps to reduce air pollution. We don't believe current road building plans are consistent with ambitions to make our air cleaner.

The Comprehensive Spending Review should support local sustainable transport through national funding for measures to change travel behaviour and improve choice. Initiatives to promote walking and cycling, such as the Local Sustainable Transport Fund, have been proven to be an effective way to increase active travel and reduce vehicle journeys. For example, the Living Streets' Walk to School project (2012-15), resulted in walking rates increasing by an average of 23 per cent and a corresponding drop in car use of 32%.

[1] http://www.parliament.uk/business/publications/research/key-issues-parliament-2015/health/air-quality-in-urban-areas/

A proper resourced Cycling and Walking Investment Strategy will be key to ensuring the air quality benefits of active travel are fully realised. A mode shift to more walking and cycling journeys and longer journeys by public transport would help to reduce pollution, congestion and increase physical activity levels – as well as helping to meet the Government's target of 55 per cent of primary school children walking to school by 2025.

For longer journeys, the planned Buses Bill should support better public transport in cities by allowing local authorities to franchise bus services (as agreed for Greater Manchester and Cornwall) and making low emissions buses a requirement.

It is essential to move away from car dependent development. The National Planning Policy Framework (NPPF) and Planning Practice Guidance notes (PPG) need to be amended to better support sustainable transport. This should include:

- A lower threshold by which negative transport impacts make a proposal unacceptable (currently development is only prevented where transport impacts are "severe.")
- A sequential test in assessing the suitability of sites for development with brownfield land close to the town centre first and greenfield sites only accessible by road considered only when other options are not available, and then taken forward in a way that does not rely on car use.
- Planning Policy guidance needs to be amended to reflect clean air objectives achievable through sustainable transport. This should include appropriate guidance on Sustainability appraisal, Transport evidence bases, and Travel plans, transport assessments and statements.

Question 2: Are you aware of any other action happening in your area which will improve air quality and should be included in the plan? If yes, please identify as far as you are able:
a. What the additional actions are;
b. The zone(s) in which they are being taken; and
c. What the impact of those actions might be (quantified impacts would be particularly useful).

We are concerned that the modelling and data are not comprehensive enough and that the Local Air Quality Plan may not be effective at reducing emissions in compliance with legal limits. The background evidence and technical data have not been released making any assessment difficult.

Question 3: Within the zone plans there are a number of measures where we are unable to quantify the impact. They are included in the tables of measures. Do you have any evidence for the impact of these types of measures?

While the Government's commitment to low emission vehicles is commendable, the production of electricity is itself a polluting activity (e.g. coal fired power stations). Active travel emits zero emissions. Therefore, more should be done to encourage walking (and cycling) for shorter journeys and as part of longer multi-modal journeys. The Department of Transport's own 'conservative estimate' of the collective benefit-cost ratio (BCR) of large projects funded under the Local Sustainable Transport Fund is approximately 5:1 (for every £1 spent on these projects, society derives benefits worth at least £5)[2].

Living Streets' Walk to School campaign supports over one million children in 4,000 schools to walk more through national schemes and events including Walk once a Week (WoW) and Walk to School Week, making it one of the UK's leading behaviour change campaigns for young people. Across the three years of the project (2012-15), walking rates increased by an average of 23 per cent after five weeks. They remained 22 per cent higher after one year and 19 per cent higher after two years. Meanwhile there was a corresponding drop in car use of 32%. The project delivered a Benefit to Cost Ratio (BCR) of 4.17:1, meaning £4.17 of benefits for every £1 spent.

We also need to see support for changes to land-use planning policy to better support sustainable transport and move away from car dependency. Planning decisions tend to focus on individual buildings and their immediate vicinity. However, the layout of a street can help to trap air pollution (the canyon effect) and should be considered in planning decisions. Similarly, design considerations such as filter permeability not only allow air pollution to disperse, but also creates a better pedestrian environment which encourages more people to walk. Temporary road closures like Play Streets and Open Streets held on a regular basis do the same. Local plans and neighbourhood plans (e.g. informed by community street audits[3]) should set out how sustainable transport will be actively supported through future

[2] Department of Transport (2014). 'Value for Money Assessment for the Local Sustainable Transport Fund'. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/347894/vfm-assessment-of-lstf.pdf

[3] For example the London Boroughs of Peckham and Tooting have invested £5million in a partnership approach to improve pedestrian safety. The project is community led and includes the use of Community Street Audits – a method for evaluating the quality of public spaces (streets, housing estates, parks and squares) from the point of view of the people who use them rather than those who manage them.

networks for walking, cycling and public transport. These should be linked to the Infrastructure Delivery Plan and the Community Infrastructure Levy.

Local Enterprise Partnerships (LEPs) play a central role in local transport infrastructure. They should have a formal link with the planning system to ensure their transport priorities support sustainable transport (e.g. Walk to Work initiatives) and include a clear evidence base on public health and air pollution.

Promoting active transport is good for public health and for the economy. In some of the worst affected areas of London, for example Oxford Street, improving the walking environment through pedestrianisation would reduce air pollution and benefit the local economy. Road user charging initiatives, such as London's Ultra Low Emission Zones, must include behaviour change as an objective. The Nottingham Parking Levy includes a package of support measures for businesses (including travel planning) and to date there has been no recorded impact on business (start ups, closures and relocations are about the same) – and there is 100% compliance.

Question 4: Do you agree that a consistent framework for Clean Air Zones, outlined in section 4.3.6 of the UK overview document, is necessary? If so, do you think the criteria set out are appropriate?

As part of the Healthy Air Campaign, Living Streets is been calling for a national network of Low Emission Zones to keep the most polluting diesel vehicles out of towns and cities. While we welcome the Government's proposal to develop a national framework for Clean Air Zones (CAZs), this has not been sufficiently outlined or evidenced to evaluate its impact. This is an important part of efforts to reduce air pollution and it should be a requirement for all zones currently in breach of legal limits. Currently, Zones are proposed for only the seven areas predicted to have worst air quality by 2020. This is based on a number of assumptions including cleaner engines about which recent VW revelations raise serious questions.

The Government's proposed voluntary approach relies on local authorities to have the resources and political leadership to implement Clean Air Zones. This is a recipe for inconsistent implementation across the UK and could simply displace air pollution problems elsewhere. Central Government should take the lead in establishing a much tougher framework. Recent scientific evidence has shown that merely complying with EU standards is wholly inadequate to protect human health – as air quality causes illness and death at

levels well below current EU standards[4][5]. Current EU limits for PM2.5 are inadequate (250 per cent higher than WHO guidelines). UK policy therefore needs to set out a clear path towards compliance with WHO guidelines.

Previously it was estimated that Government plans would not meet nitrogen dioxide limits until after 2030 in London, Birmingham and Leeds[6]. This underlines the need for action to restrict or discourage the use of motor vehicles and should be supported by improvements in public transport, walking and cycling infrastructure. In London where almost 9,500 early deaths are caused each year from exposure to air pollution[7], practical measures such as 20 mph speed limits are helping to make walking safer and easier. We want to see 20 mph rolled out across London – indeed it should be the default speed limit in all urban areas.

Question 5: What do you consider to be the barriers that need to be overcome for local authorities to take up the measures set out in section 4 of the UK overview document? How might these be overcome? Are there alternative measures which avoid these barriers?

Many local authorities are working hard to make their areas greener and healthier. However, land-use planning must do more to help improve air quality. Instead of consistently relaxing planning requirements and undermining the planning process, national Government should not allow economic growth to trump all other planning concerns.

Local authorities should not be allowed to support developments which rely on most people driving to their destinations. Instead, they should encourage new building only on sites which are suitable for walking and cycling, and can be easily served by good public transport. This is likely to mean brownfield land close to the town centres being prioritised before greenfield sites which need new roads.

Local authorities should make sure their plans and decisions contribute to reaching air pollution reduction targets. There should be clear policies and plans for walking, cycling and public transport. New housing should focus on walking distance transport links town and city centres. Street layout and design should encourage attractive routes for cycling and walking.

[4] Cesaroni et al, BMJ 2014;348:f7412 http://www.bmj.com/content/348/bmj.f7412
[5] WHO REVIHAAP study press release: http://europa.eu/rapid/press-release_IP-13-72_en.htm
[6] http://www.clientearth.org/news/latest-news/uk-will-miss-air-pollution-deadline-by-over-20-years-fails-to-suppress-information-in-eu-court-2598
[7] http://healthyair.org.uk/twice-as-many-deaths-caused-by-air-pollution-in-london/

Residential developments should have good travel planning which encourages the use of greener transport. Awareness raising initiatives, such as the City of London's 'no [engine] idling day' are an effective way to remind individuals of actions that they can take to reduce air pollution.

Question 6: Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plans?

N/A

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