



Clean Air Zone for Birmingham Consultation

EU legislation, backed up by a High Court ruling in January 2018, requires the UK government, Welsh government and local authorities to produce plans to reduce air pollution to below legal limits in 'the shortest possible time'.

The UK government's own evidence states that charging clean air zones (CAZs) are the most effective way to achieve this goal. This is where certain pre-defined vehicles are charged to or prohibited from entering a certain area. In contrast, non-charging CAZs contain a package of measures to reduce air pollution but fail to effectively tackle pollution from motor vehicles, which produce most of the harmful pollution we breathe.

Birmingham City Council are currently consulting on the implementation of a CAZ. This document provides responses to the substantive questions in the consultation.

Do you have any comments on the proposed area of the Clean Air Zone?

In order for the CAZ to be most effective it must also include the Birmingham A4540 Middleway, which it currently excludes. Including the Middleway in the CAZ was one of the options that was considered by Birmingham City Council in its feasibility study and has been noted as a potential measure to be implemented post 2020. The health benefits gained from including the A4540 in the current CAZ framework are too important to be delayed.

It should be noted that 5 of the 6 most polluted schools within the CAZ and 5 schools outside the proposed CAZ are within 150m of the A4540. Their levels of exposure are unlikely to be reduced as this 'boundary' road is not included in the CAZ.

Which types of vehicle do you think should be included in the Clean Air Zone restrictions?

All of: Buses and coaches, Lorries (HGVs), Taxis and private hire vehicles, Vans (LGVs) and minibuses, Cars, Motorcycles and mopeds.

Do you have any comments on which vehicles should be charged to drive in the Clean Air Zone and how much those charges should be?

The only way to sustainably reduce traffic and encourage the greatest modal shift towards walking, cycling and public transport is to restrict access by all vehicle categories. We believe that almost all motor vehicles should be charged to drive in the Clean Air Zone, and we therefore support the Council's commitment to introduce a Class D Clean Air Zone by 2020.

Evidence from London shows that excluding certain categories of vehicles from CAZ charges can, in the long run, result in increased traffic congestion as more of those vehicles travel within the zone. In London, private hire vehicles have historically been exempt from the congestion charge, and have caused traffic increases in London in recent years, despite the congestion charge. (<http://content.tfl.gov.uk/travel-in-london-report-10.pdf>)

We commend Birmingham for proposing restrictions on heavily polluting vehicles no matter who owns them. Nevertheless, it should be noted that even ULEVs still release harmful fine particulate matter and switching car journeys to walking and cycling produces far more health benefits than encouraging electric vehicle take up.

As vehicles gradually become more efficient and environmentally friendly, the standards should be raised to continue encouraging more walking, cycling and public transport, and to preserve any revenue for investment in active travel and public transport. This also will help ensure that congestion does not increase as more polluting vehicles are replaced by efficient ones – electric and hybrid vehicles will need to be restricted to tackle congestion and particulate pollution in the long term.

We note that we would support an exception for emergency services vehicles and vehicles used by Blue badge holders.

Please explain the overall impact you think a Clean Air Zone would have for your organisation and for Birmingham and the people who live, work and study here.

Living Streets feel that that a well implemented CAZ in Birmingham will have a number of wide ranging and important benefits for the residents of the area. This would represent a significant step forward in a wider move to decrease the emissions, tackle the poor health outcomes, and reduce the inefficient use of space that result from an over-reliance on motorised vehicles.

The CAZ will help improve air quality in Birmingham. The UK Government's own evidence shows that charging clean air zones are the most effective way to reduce pollution to legal levels in 'the shortest time possible'. Improving air quality means that people who live, work and study in Birmingham will lead healthier lives, which is good not only for them but also for the economy. In the UK, swapping just one urban car journey in four to walking and cycling could save more than £1.1bn in health costs due to pollution, compared to £360mn by swapping journeys to electric vehicles. (<https://www.independent.co.uk/environment/cars-air-pollution-cost-nhs-vans-vehicles-health-bills-lung-disease-a8384806.html>)

To have the best possible impact it is important that surplus revenue is directed towards walking, cycling and public transport. Therefore we feel that the commitment to reinvest revenue from the CAZ in public transport should be extended to also include making the city centre fit for walking and cycling. This requirement will help ensure that the CAZ maximises mode shift, and also guarantees this use of revenues boosts public support for road pricing.

(Polling from Ipsos Mori shows that using road pricing revenues to fund public transport is clearly popular with residents. They recorded a baseline level of support for 'road pricing' (congestion charging, and clean air zones are examples) at around 40%. But, when it was guaranteed that revenues will be invested in public transport, the balance swung to 60% in favour.) (https://www.ipsos.com/sites/default/files/publication/1970-01/sri_transport_road_pricing_at_the_crossroads_102007.pdf)

In order to ensure that the Clean Air Zone is as effective as possible at delivering air pollution reduction, and does not unfairly impact upon people and small businesses, it must be backed up by measures to support people and small businesses to switch to cleaner forms of transport. HGV and taxi upgrade schemes are welcome, but more needs to be done to stop people driving the most polluting cars and vans. For example, the Council can reinvest use the revenue generated from the CAZ to achieve its public transport objectives, and can use the Government's Clean Air Fund to support active travel programmes, such school behaviour change programmes like WOW.

Is there anything else which can be done to improve Birmingham's air quality?

The Council must reduce air pollution in Birmingham to within legal limits in the shortest possible time. The current plans do not go far enough towards this. Whilst the Clean Air Zone proposals set out in the draft plan will lead to a welcome reduction in air pollution, they are not predicted to achieve legal compliance by 2020. The Council needs to show what further measures it will adopt in order to clean up Birmingham's air as soon as possible.

A legacy of designing our towns and cities around cars, rather than people, has left us less healthy, our roads more congested and our cities less well-off. Living Streets have a different vision for our cities. We want to create walking cities across the UK – safe and inviting to people of all ages, where every child can walk safely to school, and communities have quality spaces to thrive. Walking cities mean better cities for everyone, and would significantly improve air quality for all.

The implementation of a CAZ is a good step towards creating a Walking City but more work must be done to ensure a modal shift by enabling alternatives to car travel such as cycling and walking programmes. To achieve this and build on the groundwork laid for the Clean Air Zone, Birmingham City Council and the West Midlands Combined Authority must act ambitiously and decisively to rethink how people move around, both in Birmingham and in the other towns and city centres in the region. Living Streets has a number of ideas to help do this, all of which will contribute to cleaner air. We also have comments on proposed actions that are currently being assessed by Birmingham City Council.

Encouraging mode shift to reduce traffic volume

Fundamentally, to reduce air pollution it is crucial to reduce the volume of traffic by encouraging active travel and more efficient longer journeys by public transport. The implementation of a CAZ is a good step towards creating a Walking City but more work must be done to ensure modal shift. The Council must work to enable alternatives to car travel such as cycling and walking programmes. Living Streets has a number of ideas on how to do this, all of which will contribute to cleaner air.

Walk to School

A key area where there is an opportunity to encourage mode shift and improve public health is the walk to school. How children travel to school is a key element of reducing air pollution in urban areas, and Living Streets strongly supports moves to enable more children to walk to school. Our recent report, 'Swap the School Run for a School Walk' (https://www.livingstreets.org.uk/media/3618/livingstreets_school_run_report_web.pdf), contains recommendations for how schools and local authorities can work together to transform the school walk for every child.

Local authorities can also support schools to incentivise active travel to school through initiatives such as WOW – the year-round walk to school challenge – which leads to a 23% mode shift towards walking to school and a corresponding drop in cars at the school gates (<https://www.livingstreets.org.uk/what-we-do/projects/wow>). Local Authorities can apply to the Clean Air Fund to support school travel behaviour change programmes such as WOW.

We would also encourage the Council to look at additional measures to improve air quality, such as timed school route closures.

Workplace Parking Levy

We would recommend that Birmingham City Council look at introducing a Workplace Parking Levy (WPL). Nottingham City Council has introduced a WPL, which during the next period will mean employers will pay £402 per place per year if they have 11 or more employee parking spaces. The WPL generates around £9m per year from more than 24,800 registered parking spaces, with only 5% of that going towards the cost of running the scheme. The rest is ring-fenced for investment in public transport, including the highly successful tram scheme, extending the bus and rail network, and investing in electric buses. This has been successful at reducing air pollution, encouraging mode-shift, and funding public transport improvements.

Our comments on Birmingham City Council's ideas

ULEVS

We note that you are looking into building more low and zero emission refuelling stations, including charging points for electric vehicles. Living Streets would expect to see incentives for travelling actively and by public transport prioritised above incentives to switch to ULEVs. For example, a targeted diesel scrappage scheme particularly to lower income drivers and small businesses could offer a vehicle exchange in return for free public transport season tickets or e- bike purchase loan. Furthermore, any incentives encouraging ULEV uptake should never come at the expense of people walking:

- Charging infrastructure should never be placed on the footway, as this restricts clearance and is dangerous particularly for wheelchair users or families with pushchairs, who may be forced into the road.
- Restricted parking and loading bays should be provided using space from the road, not the footway, to preserve pedestrian comfort space.
- Restricted traffic lanes for ULEVs should not take space from the footway or from bus lanes, as this will reduce bus reliability, which in turn could affect bus ridership. Furthermore, adding traffic to lanes directly next to the footway will make the walking environment less safe and more hostile, increasing chances of a collision and discouraging walking.
- We strongly oppose any suggestion of opening up pedestrianised roads to ULEVs. This would send the message that walking is not a priority in Birmingham. Furthermore, as ULEVs become more widespread, these streets will become more congested and hostile for people walking and cycling, as well as result in the creation of more fine particulate pollution, released by wear and tear of brakes and tyres.

- There must be a default ban on all vehicles parking on the footway, as this deters people walking and is a safety hazard for wheelchair users, blind people and families with pushchairs in particular. Minimum recommended footway clearance is 2m, according to Pedestrian Comfort Guidance, but note this is a minimum.

Making changes to roads and Traffic Management

We note that you are looking at making changes to roads, such as building more bus lanes, changing junctions or roads to encourage people to take a different route and also reviewing traffic management such as looking at how road space is used, sequencing of traffic lights, and direction signs. This should be taken as a major opportunity to be bold, and to create spaces welcoming to pedestrians.

By tackling motor vehicle dominance and encouraging a move towards active and sustainable travel, Birmingham can be transformed into a place where people enjoy living healthy and active lives. Living Streets' Walking Cities campaign includes a Blueprint for Change with further recommendations.