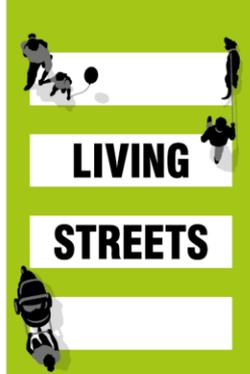


YOUR HOW TO GUIDE

ON RESPONDING TO

LOCAL AIR QUALITY

CONSULTATIONS



Responding to Local Air Quality Consultations: How to guide for Living Streets Groups and Supporters

A number of areas across the country are, or soon will be, asking local people to give feedback on their plans to tackle air pollution. This is a key opportunity for Living Streets groups and supporters to push your local authority to do more to effectively tackle air pollution, and to promote the importance of walking as the natural choice for short journeys.

This guide aims to empower you, as a Living Streets supporter or local group member to respond with confidence and rigour to air quality consultations in your area. It outlines Living Streets' position on the main issues and provides text that you can use in your own responses.

Air pollution in the UK has serious detrimental impacts on our health. The Royal College of Physicians estimates that 40,000 deaths a year are attributable to exposure to outdoor air pollution.¹ A recently published study also found that exposure to air pollution also results in reduced intelligence.² People who walk or cycle do not contribute to air pollution, but are unfairly exposed to it.

Two air pollutants are the main issue: nitrogen dioxide (NO₂) and particulate matter. Road transport is responsible for 80% of roadside NO₂ concentrations, and NO₂ is emitted as part of a car's exhaust fumes. Particulate matter is made up of partially-burned fuel, as well as engine oils, and tiny specks from tyres, brake discs and road dust. There is no safe level of particulate matter.

The UK Government is breaking the law with current levels of air pollution. The environmental campaigning group, ClientEarth has repeatedly taken successful legal action against the Government. This has led the Department for the Environment, Food and Rural Affairs (Defra) to require a number of local authorities to take action, and to the launch of a Clean Air Fund.

Local action is important to tackle air quality. The most effective way local authorities can take quick and decisive action is by charging the most polluting vehicles to travel in the most polluted areas, for example London's congestion charge. In order to reduce air pollution it is crucial to reduce the volume of traffic by incentivising a shift towards more active travel (walking and cycling) and more efficient longer journeys by public transport.

¹ Reducing air pollution in the UK: Progress report 2018, RCP, 2018, <https://www.rcplondon.ac.uk/news/reducing-air-pollution-uk-progress-report-2018>

² <https://www.theguardian.com/environment/2018/aug/27/air-pollution-causes-huge-reduction-in-intelligence-study-reveals>

Air Quality Consultations

EU legislation, backed up by a High Court ruling in February 2018³, requires the UK Government, Welsh Government and local authorities (LAs) to produce plans to reduce air pollution to below legal limits in ‘the shortest possible time’. In the High Court case, the Judge declared that the Government’s failure to require action from 45 local authorities in England with illegal levels of air pollution in their area (of which just 12 had adequate measures in place to improve sufficiently by 2019) was unlawful.

As part of their attempts to reduce air pollution, the UK Government has mandated five cities to introduce a Clean Air Zone: Birmingham, Leeds, Nottingham, Derby and Southampton. The Government has also named an additional 23 local authorities where it expects pollution levels to reach illegal levels by 2021. These 23 local authorities have been directed to carry out feasibility studies on measures that would reduce roadside NO2 concentrations as quickly as possible. They were required to submit draft clean air plans to Government for appraisal by March 2018, to be followed by final plans by December 2018. A further 33 local authorities, which were highlighted in the High Court case, have also been directed to produce plans to tackle air pollution.

As well as providing technical support from Defra’s Joint Air Quality Unit, a “Clean Air Fund” has been created to enable LAs to help individuals and businesses impacted by local air quality plans. This fund can be used, for example, to improve cycling and walking infrastructure, to subsidise concessionary public transport schemes, and to promote behaviour change such as walking to school (e.g. Living Streets’ WOW – the year-round walk to school challenge).

This means that this is a key moment for tackling air pollution through local action. LAs will be opening public consultations, looking for feedback on their proposals. There will be variation in what they propose and you will have the opportunity to call for the strongest possible action (i.e. road user charging) in your area.

Consultation responses from local people, which provide detail and evidence, are going to have the most impact. You can push your council to go further and do more to tackle air pollution.

The website “FleetNews” has created a useful list of the status of some CAZ plans and consultations, which allows you to see if your LA is one that the Government is targeting, and the status of their plans. This can be seen at: <https://www.fleetnews.co.uk/fleet-faq/what-are-the-proposed-uk-clean-air-zones-caz>

³ <https://www.theguardian.com/environment/2018/feb/21/high-court-rules-uk-air-pollution-plans-unlawful>

Clean Air Zones

This section explains what a Clean Air Zone is, how they function, and outlines what Living Streets thinks about them.

What is a Clean Air Zone?

A Clean Air Zone defines an area where targeted action is taken to improve air quality. There are two kinds – non-charging and charging. Both kinds can involve a package of measures, for example programmes to encourage active travel and public transport fleet upgrades.

A **charging** CAZ 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.

More information can be found in a guidance document published by the UK Government: the Clean Air Zone Framework.⁴

Why should local authorities implement a charging Clean Air Zone?

The UK Government's own evidence states that **charging** clean air zones are the most effective way to quickly tackle air pollution.⁵ LAs may opt to not implement a charging CAZ and make the case that other measures such as bus and taxi fleet upgrades will be sufficient to improve air quality in their area. **However, the evidence shows that this means that they are not taking the most effective step to quickly tackle air pollution.**

Some local authorities may be nervous about local backlash to a charging CAZ. However, 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**.⁶

⁴ 2017 Clean Air Zone Framework, a set of principles for setting up a CAZ in England.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/612592/clean-air-zone-framework.pdf

⁵ https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/supporting_documents/Technical%20Report%20%20Amended%209%20May%202017.pdf

⁶ https://www.ipsos.com/sites/default/files/publication/1970-01/sri_transport_road_pricing_at_the_crossroads_102007.pdf

What should a Clean Air Zone look like?

If your local authority is looking at a charging CAZ, they will be thinking about where the geographic boundary of the zone might be, at what times it would operate, which vehicles should be charged, and how much it should cost to enter the zone.

Which vehicles should be included?

The Government's guidance outlines four different classes of charging-CAZ:

1. Class A - Buses, coaches, taxis and private hire vehicles
2. Class B - Buses, coaches, taxis, PHVs and heavy goods vehicles (HGVs)
3. Class C - Buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs)
4. Class D - Buses, coaches, taxis, PHVs, HGVs LGVs and cars

Living Streets believes that all CAZs should be introduced at the highest level: class D. 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.

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.⁷

The Clean Air Zone Framework states that Ultra Low Emissions Vehicles (ULEVs) should not be charged to enter. **However, Living Streets notes that ULEVs still release harmful particulate matter and contribute to congestion.**

As vehicles gradually become more efficient and environmentally friendly, 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.

Living Streets supports limited exemptions to CAZs. Local authorities should consider exemptions for “Blue Badge” holders, and should work closely with the emergency services to work to tackle the pollution caused by emergency vehicles, whilst being aware of the importance of their work.

Living Streets does not have an opinion on how much each type of vehicle should be charged to enter the CAZ. There is evidence which suggests that the existence of a charge is enough to create behaviour change.

⁷ <http://content.tfl.gov.uk/travel-in-london-report-10.pdf>

What area should a CAZ cover?

The area a CAZ needs to cover to be effective is specific to an area's local geography, so as someone who knows an area well you are well placed to consider this issue. When setting the boundaries for a CAZ, **it is important that areas with high pollution are included, and that the CAZ is big enough to ensure it doesn't just shift the issue to the other side of a town.** LAs should not shy away from including certain key roads such as ring roads for geographic convenience, if they are a key problem area for air pollution.

What times should a CAZ function, and how much should it cost?

Living Streets does not have an opinion on what times a charging-CAZ should function, or how much it should cost for each category of vehicle. Local knowledge should inform your view on these questions.

Should local authorities support people and small businesses to switch to cleaner forms of transport?

Yes. In order to ensure that a 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 LA can reinvest 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 as school behaviour change programmes like WOW.

What more can LAs do to tackle air pollution?

Consultations will tend to have a section at the end where they ask for any more ideas to help tackle air pollution. Living Streets has plenty of these, and this is a key area to push for the LA to implement policy changes and programmes that support walking as an everyday choice.

Encouraging modal 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 by local authorities to ensure modal shift. The LA 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.

A key area where there is an opportunity to encourage mode shift and improve public health is the walk to school. Living Streets' recent report, 'Swap the School Run for a School Walk'⁸, contains recommendations for how schools and local authorities can work together to transform the school walk for every child.

Local authorities can 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.⁹ Local Authorities can apply to the Clean Air Fund to support school travel behaviour change programmes such as WOW.

Why not encourage your local authority to look at additional measures to improve air quality, such as **school route closures** at the beginning and end of the school day.

You could also ask your local authority to introduce a **Workplace Parking Levy (WPL)** like Nottingham City Council did in 2012. It currently costs employers £402 per place per year if they have 11 or more employee parking spaces. For this, employers receive a business support package of travel planning and parking management.

The WPL generates around £9m per year from more than 24,800 registered parking spaces, with surpluses ring-fenced for investment in public transport, including the new tram lines, extending the bus and rail network, and investing in electric buses. The scheme has been very successful at reducing air pollution, encouraging mode-shift, and funding public transport improvements.

⁸ https://www.livingstreets.org.uk/media/3618/livingstreets_school_run_report_web.pdf

⁹ (<https://www.livingstreets.org.uk/what-we-do/projects/wow>)

Moving towards greener vehicles

Living Streets supports the move to greener vehicles, but it should not be at the expense of pedestrian comfort or active travel. We are developing advice on the location of vehicle charging points. The main points are that:

- 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. Furthermore, as ULEVs become more widespread, these streets will become more congested and hostile for people walking and cycling, as well as result in 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. The minimum recommended footway clearance is 2m, according to Pedestrian Comfort Guidance, but note this is a minimum.

By tackling motor vehicle dominance and encouraging a move towards active and sustainable travel, your area can be transformed into a place where people enjoy living healthy and active lives. Living Streets' Walking Cities campaign (<https://www.livingstreets.org.uk/what-you-can-do/campaigns/walking-cities>) includes a Blueprint for Change with further recommendations.

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