Written evidence submitted by Sustrans (IAQ0137)

Sustrans
Sustrans is the charity that makes it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute.

Summary

- Government policies do not adequately take into account the health and environmental impacts of poor air quality and therefore do too little to address it.

- The UK Government plan for tackling nitrogen dioxide does not set out proportionate or effective measures for achieving reductions as quickly as possible:
  
  o The plan is “a plan for more plans”;
  
  o While there are 74 local authorities in England breaching legal limits for NO$_2$, only 29 local authorities are mandated to produce Clean Air Plans which is not a proportionate response;
  
  o The Government is missing the opportunity to fully support charging Clean Air Zones and utilise public support for traffic restraint measures that reprioritise street space towards walking, cycling and public transport.

- There are a number of examples of cities and nations taking more effective action to tackle air pollution that the UK can learn from. These include capital cities around the world banning diesel completely by 2025 such as Paris, Madrid, Mexico City and Athens; restricting cars and reallocating street space from vehicles to walking and cycling such as Oslo and Seville; and gaining funding from the car industry to help cities reduce their pollution such as in Germany.

- Better links should be made with other Government departments outside the Joint Air Quality Unit and there should be wider support of traffic restraint alongside a prioritisation of improvements in cycling, walking and public transport to tackle air quality.

- Local Authorities should be given the resources and funding to deliver their Clean Air Plans as soon as possible with the release of the Clean Air Framework that promotes traffic restraint and cycling and walking infrastructure, and the Clean Air Fund.

Question One: How effectively do Government policies take into account the health and environmental impacts of poor air quality?

1. Government policies do not adequately take into account the health and environmental impacts of poor air quality. Transport policy is broadly increasing motor-traffic, the major source of air pollution where limits are being broken.

2. The most obvious manifestation of the failure of integrated policy is the separation of Nitrogen Dioxide (NO$_2$) from other air pollution types in the Government’s recently
published air quality plan. In transport terms, to attempt to deal with NO\textsubscript{2} without taking into account particulate matter (PM) is counter-intuitive. In addition, the failure to recognise air quality and carbon emissions reduction as being heavily interlinked presents a huge problem. The ‘silo-ised’ policy responses to these challenges lead to incoherent policy positions and contradictory investment priorities.

3. We cite the recent Helm report to illustrate this point. The Cost of Energy Review says, “air quality is directly related to carbon and Green House Gases ... on transport there are mobility objectives, road-building programmes, airport runways, and high-speed trains, all with impacts on carbon. A key reason why our cities have violated the EU air quality requirement is that the government (and the EU) encouraged a switch from petrol to diesel. This is a way of meeting the climate change objective. But it turns out to be a bad way to meet the air quality objective – another example of non-integrated pollution policies. The absence of an environment protection agency to bring consistency to these diverse environmental challenges is a significant obstacle”. \textsuperscript{1}

4. Equally, transport policies either disregard air quality implications, or they are too heavily focussed on long-term technological change which is not quick enough and will not solve all air quality problems. The fact that we have a major £15 billion road building programme underway at a time when recognition of the air quality problem is higher than ever is perhaps the worst example of the failure to integrate policies. The air quality and climate change implications of these programmes will be dramatic and negative, but these impacts are barely acknowledged. When airport plans are taken into the mix, the consequences could be catastrophic.

5. It is our view that too much hope is being placed on a technological fix. This is for three main reasons: first, the slow pace of change; second, the impact of particulate matter pollution; third, it will not solve congestion.

a. Pace of change: there is a major opportunity to reduce air pollution at source by shifting journeys from motor-vehicles to public transport, walking and cycling. Changing travel behaviour through charging Clean Air Zones (CAZ) alongside investment in public transport and walking and cycling could lead to a significant reduction in air pollution much more quickly than through renewal of the entire vehicle fleet.

b. Particulate Matter pollution: the World Health Organisation (WHO) describe Particular Matter (PM) as affecting more people than any other pollutant. 45% of particulate matter is caused by tyre and brake wear. Therefore this source of pollution remains unresolved by a shift to electric vehicles. The separation of the consideration of NO\textsubscript{2} from PM as described above is therefore very unhelpful.

c. In towns and cities where space is limited a switch to electric vehicles will only make congestion worse as populations continue to increase making our cities unattractive places to live and work.
6. Health policies are too heavily focussed on remedial ‘cure’ work, rather than prevention. So much more could be achieved if there was greater funding for prevention work. In this case, moving people from one type of metal box to another does nothing to improve the physical inactivity public health crisis we currently face. The government could realise huge benefits by supporting walking and cycling and putting in place greater traffic restraint measures to improve health and wellbeing and reduce air pollution at source. This would be more economical than treating conditions associated with a lack of physical activity and poor air quality.

Question Two: Do these plans set out effective and proportionate measures to achieve necessary emissions reductions as quickly as possible?

7. Sustrans does not believe the UK Government plans for tackling nitrogen dioxide set out proportionate or effective measures for achieving reductions as quickly as possible. To achieve the necessary emission reductions far more local authorities must be mandated to take action and there needs to be greater support for charging Clean Air Zones.

8. The main problem is the ‘UK Government Plan for tackling Nitrogen Dioxide’ is a plan for many other plans and does not set out clear actions. The plan states that 29 local authorities across England must produce draft Clean Air Plans by March 2017 but does not provide them with guidance or funding to deliver these plans – stating that a Clean Air Fund and Clean Air Framework will be made available later in the year. It is unfair to expect local authorities to adequately push ahead with these plans when they do not know how much funding or what frameworks are available for support. Finally, on this point – the Government announced that a Clean Air Strategy would be published in 2018 which would tackle all forms of air pollution including particulate matter. Whilst this is welcome, and should help the creation of more integrated policies if implemented well; it illustrates the Governments lack of current integrated policy in that it is coming after a separate plan for tackling only NO\text{\textsubscript{2}}. It is an inefficient way of tackling emissions reductions as quickly as possible.

9. Secondly, the latest plans published in July 2017 no longer mandate five local authorities to have Clean Air Zones. This is a backwards step, particularly when the Government’s own evidence in their supporting technical report finds that a network of charging Clean Air Zones is the fastest way to tackle air pollution. This does not reflect action to tackle emissions reductions as quickly as possible. The plan also only mandates 29 local authorities in England to produce Clean Air Plans. Only these local authorities will be eligible for the Clean Air Fund when it is released. This is despite the fact that at least 45 other local authorities in England have illegal levels of air pollution. Yet these authorities are not mandated to do anything and have no access to new central funding to help them reduce their air pollution.

10. We would like to see a network of charging Clean Air Zones across towns and cities in England and their equivalent across the whole of the UK. Traffic restrictions and a
shift away from motorised private transport is the only way to tackle air pollution from transport.

11. Sustrans own Bike Life reports which assess cycling across seven major cities in the UK has found that traffic restraint measures are far more palatable to the public than many think. Residents in our seven cities think investing in more street space for cycling and walking or buses is the best way to keep their city moving, improve health and reduce air pollution. Furthermore 78% of residents support building more protected roadside cycle lanes even when this can mean less space for other road traffic. If the Government helped local authorities more effectively invest in public transport, cycling and walking in addition to traffic restraint to reduce the numbers of cars on the road we could see real improvement in the air we breathe.

Question Three: Are other nations or cities taking more effective action that the UK can learn from?

12. There are a number of examples of cities and nations taking more effective action to tackle air pollution that the UK can learn from. These include capital cities around the world banning diesel completely by 2025 such as Paris, Madrid, Mexico City and Athens; restricting cars and reallocating street space from vehicles to walking and cycling such as Oslo and Seville; and gaining funding from the car industry to help cities reduce their pollution such as in Germany.

13. In 2016 it was announced by the Mayors of Paris, Madrid, Mexico City and Athens that all diesel vehicles would be banned from their cities by 2025. This is a target which should be adopted across the UK in addition to reducing car use overall. The UK Government has had a target since 2011 to ban the sale of all diesel and petrol cars by 2040. Evidence suggests the car industry should reach this target by 2040 regardless of the Government making it. It would be better for cities in the UK to focus more on traffic restraint measures to encourage people to travel in different cleaner ways.

14. Secondly the Government must prioritise helping cities achieve modal shift away from motorised transport:

a. In Oslo they have the ambition to be car free by 2019 and for cycling to make up 25% of modal share by 2025. The city’s population is expanding rapidly with 1.4 million people living in the metropolitan area and the negative effects on air quality that this will bring if they all decide to drive. There is a plan in place to transform it into a cycling city with a budget of €140 million euros a year to invest in cycling. To see rapid change they have reduced car lane space at junctions; removed car parking to form bike lanes and are developing wide pedestrian streets. So far evidence shows cycling in Oslo has increased by 65% between January 2016 and January 2017.

b. Seville built 110km of urban cycle routes and reduced vehicle access to the city centre. The share of journeys undertaken by bike increased by 6.5%, and there was a drastic concurrent reduction in PM and Nitrogen Oxide. More cycle routes, segregated where necessary, and priority at junctions make a
significant contribution to people feeling safer when cycling. By reducing the space for vehicles and re-balancing streets towards people walking and cycling we can reduce polluting transport whilst creating more liveable spaces for people. The evidence from Seville suggests that taking space from polluting vehicles and reapportioning it to active travel does not cause an increase in congestion, and overall provides significant reductions in air pollution.

c. On a smaller scale, in Edinburgh, the award-winning ‘School Streets’ initiative has brought traffic-free streets to nine Edinburgh primary schools at school opening and closing times. As a result, two thirds of parents and residents agree that the streets with vehicle restrictions felt safer during operating times. The project identified air quality improvements with associated reductions in Nitrogen Oxides on all tested closed streets and most surrounding streets.

15. In Germany, the Government recently secured €250 million from the car industry towards a Clean Air Fund to help German cities meet air quality targets. The car industry helped contribute to the air quality crisis we currently face, and should help our country get out of it. They should contribute to the Clean Air Fund as they have in Germany and the fund should be available to all local authorities breaking legal limits not just the 29 mandated to produce Clean Air Plans.

**Question Four: Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?**

16. There is not enough cross-government collaboration to set in place the right fiscal and policy incentives to reduce emissions in the quickest time possible. The Joint Air Quality Unit is well intentioned and it is good to have the Department for Environment, Farming and Rural Affairs and the Department for Transport working together through it. However, it is still disconnected from other policy initiatives within the same department which would benefit air quality such as the Cycling and Walking Investment Strategy. Furthermore the Treasury, the Department of Health, the Department for Business, Energy and Industrial Strategy and arguably both the Department for Education and the Department for Communities and Local Government should be part of the cross departmental group as they all have a stake in reducing air pollution.

17. Sustrans has found that if the targets in the Cycling and Walking Investment Strategy were achieved to double cycling and increase walking by 300 stages per person per year by 2025 then the positive benefits to air quality would be greater than from Clean Air Zones over a ten year period. This does not diminish the need for Clean Air Zones. The success of walking and cycling programmes in improving air quality is in modal shift away from motorised vehicles. This necessarily involves traffic restraint measures such as charging Clean Air Zones but people need to be offered alternatives to travel by private vehicle including safe cycling routes, public transport and good walking infrastructure. We encourage the Government to properly invest in the Cycling and Walking Investment Strategy and to join the strategy up to air quality
policy. For example, the Local Cycling and Walking Infrastructure Plans should be linked to local Clean Air Plans for a joined up approach to delivery. Government should provide proportionate funding to enable the delivery of these plans and ensure that priority is given to the issue at a local authority level, starting with the extension of the Cycle City Ambition Grant beyond April 2018.

18. The Government should also join its planning policies up with transport policies to tackle air pollution. The planned review of the National Planning Policy Framework and Planning Practice Guidance should include changes that promote Transport Orientated Development, an approach to development planning that reduces car-dependency and promotes active and sustainable travel by prioritising development of new homes and businesses near existing public transport hubs.

19. Vehicle Excise Duty should be reviewed to discourage the purchase of new diesel vehicles by having a higher first year levy on new diesel purchases.

Question Five: How can those charged with delivering national plans at local level be best supported and challenged?

20. Local Authorities should be fully supported to deliver their Clean Air Plans as soon as possible with the release of the Clean Air Framework and the Clean Air Fund. The Clean Air Framework should support local authorities in developing cycling and walking infrastructure to give people viable alternatives to travelling by private motor-vehicle. Local Cycling and Walking Infrastructure Plans should also be given more support and funding should be put in place for the delivery of the plans themselves.

21. Government should set clear air quality targets for local authorities. The need for local authorities to monitor and report on progress on their plans should be included in the Clean Air Framework.

22. As the most effective tool to tackle urban air pollution, the UK Government should support Charging Clean Air Zones as a core priority. They have been shown to be very effective in tackling air pollution and local authorities need national support to be given the confidence to take these forward.

23. A Clean Air Act should be put in place by UK Government to ensure everyone’s right to breathe clean air is enshrined in law, especially after leaving the EU.

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References

4 https://www.clientearth.org/clientearth-launches-new-air-pollution-legal-action/