Written evidence submitted by the City of Cardiff Council (IAQ0150)

Executive Summary

- Cardiff is a rapidly growing city, which is not reflected in the UK plans;
- The City of Cardiff Council (CCC) is committed through its Local Development Plan to increase modal share of journeys made by sustainable travel and is delivering schemes to achieve this;
- The UK plan for tackling roadside nitrogen dioxide concentrations, specifically sets out that Cardiff would be benefit from a zonal approach to accelerate the date at which compliance would be achieved;
- CCC has concerns that the UK plan does not take into consideration locally monitored air quality data in the modelling undertaken to identify areas of compliance/ non compliance;
- CCC has limited scope to effect significant change in the composition of the vehicle fleet;
- Additional resources and measures are needed from Central/ Devolved governments in order to achieve NOx reductions in the shortest time possible.

1.0 Introduction

1.1 The City of Cardiff Council (CCC) recognises the need for urgent action to improve air quality and prevent the harmful effects of air pollution. A study undertaken in 2014 published by Public Health England estimated that in Cardiff 143 deaths were attributable to exposure to fine particulate air pollution. More recent work by Public Health Wales estimates that there are 225 and 220 attributed deaths per annum to PM 2.5 and NO₂ in the Cardiff and Vale Health Board area. Cardiff Council recognise that there is no defined “safe level” when describing levels of air quality. Mitigating against current NO₂ levels, Cardiff Council is committed to achieving levels as low as reasonably practicable by demonstrating levels beyond the annual objective set for NO₂ (40µg/m³).

1.2 Our longstanding Transport Vision is for an integrated transport system which provides sustainable travel for all as an attractive alternative to car travel. Our key plans and strategies contain a number of priorities which will help to improve air quality, for example, doubling the number of cycle trips by 2026 and pursuing opportunities for greening the bus fleet. We are also committed to delivering a Clean Air Strategy (CAS) which will set out in detail how we are addressing air quality concerns in Cardiff. Important steps have been made in recent years towards increasing journeys made by active and sustainable modes, for example, there has been an increase in travel to work within Cardiff by sustainable modes, from 43.5% in 2012 to 48.1% in 2016.

1.3 Outlined in the UK plan “UK plan for tackling roadside nitrogen dioxide concentrations, Detailed Plan, July 2017” states; 157. The latest modelling undertaken by Defra identified areas across the UK that may need to implement a Clean Air Zone to achieve compliance in the shortest time. One area identified in Wales, for which, based on current projections, a zonal approach would accelerate compliance, is in Cardiff. The Welsh Government anticipates a Clean Air Zone, with vehicle access restrictions, could be implemented in Cardiff during 2021 or earlier if possible, thereby achieving compliance by 2022 or sooner. Implementation of a Clean Air Zone will be subject to further national and local assessment and ongoing work with the City of Cardiff Council to understand whether alternative local
measures could achieve compliance more quickly. This further assessment will need to be based on local as well as national data modelling relating to both air quality and transport. The modelling will be followed by a thorough options assessment, local consultation, planning and implementation. The actions up to the point of implementation should complete during 2019.

1.4 It is acknowledged that Road Traffic Emissions, in particular particulate matter (PM) and nitrogen dioxide (NO\textsubscript{2}) are the primary contributing factor to poor air quality in Cardiff. Cardiff Council’s Capital Ambition report recognises that Cardiff is one of the UK’s fastest growing cities, and that it is crucial that this growth is well planned and sustainable. Reducing the number of car journeys made in the city, and promoting the use of active and sustainable modes of travel are central to Cardiff Council’s Transport Strategy and in improving air quality in the city. Our Local Development Plan (LDP) provides for 41,000 new homes and up to 40,000 new jobs up to 2026. The LDP sets the target of achieving a 50:50 modal split – this means that 50% of all journeys need to be made by sustainable transport by 2026 in order to accommodate the future development set out in the LDP. It must be highlighted that this increase in growth has not been taken into account for the modelling used to form the UK plans to tackle roadside air quality levels.

1.5 As previously mentioned, CCC are committed to producing a citywide Clean Air Strategy. The strategy coincides with Cardiff’s Capital Ambition report and will help implement and deliver the priorities outlined in the ambition report with an overarching aim to **improve air quality to protect and improve public health in Cardiff**. Cardiff has appointed strategic measures which it feels will have a positive impact to citywide air quality levels, in particular traffic derived NO\textsubscript{2} levels. The key theme of these strategic measures is to increase the uptake of sustainable modes of transport by influencing a behavioural change in Cardiff.

1.6 Coinciding with the development of a Clean Air Strategy, is the Council’s commitment to bring forward a Green Paper on Transport and Clean Air to provide a discussion with citizens and stakeholders about our wider transport system and ways that we can improve our overall wellbeing and the quality of our air.

1.7 CCC would be supportive of measures from Welsh/UK governments to strengthen legislation and provide additional powers which would complement the measures CCC is pursuing through its LDP and Local Transport Plan to encourage modal shift to active, sustainable and less polluting forms of travel. The scope of actions local authorities can take unilaterally to address the composition of the private car fleet is limited. Similarly, additional resources are needed to meet the scale of improvements required.

1.8 Based on the above information, the City of Cardiff Council feels it is of the upmost importance for this authority to directly respond and provide evidence the Select Committee.

2.0 How effectively do Government policies take into account the health and environmental impacts of poor air quality?
2.1 The UK plan targets statutory compliance by achieving levels below the set limit values, it fails to recognise that no level can be defined as a “safe level” and a commitment must be made by all authorities that the long term objective is to achieve levels as low as reasonably practical.

2.2 The UK Action Plan cites the forty-three zones for air quality reporting purposes and the objective to achieve compliance within each zone. This can be regarded as a singular vision approach whereby a cumulative approach is not given consideration. It must be noted that certain measures, although may achieve compliance in an individual zone may give rise to detrimental impacts on air quality in neighbouring zones. For instance any implementation of a clean air zone in one authority could lead to an increase in the use of commercial enterprise’s polluting vehicles in the non-clean air zone areas.

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

3.1 The plans outline some positive measures to address the problem of nitrogen dioxide, such as the commitment to ULEVs and innovative technology. However, it is unclear whether the timescales involved in delivering such measures would enable a reduction of nitrogen dioxide in the shortest time possible. For example, in relation to ULEV and alternative fuels, the timescales for research, development and mass take up of these options by consumers are currently unknown but may be considerable. In relation to road transport, p.16 (para 38) also states: “This means setting new policies and incentives to promote new technology and innovation, speeding up the move to cleaner vehicles and supporting the industrial strategy to deliver cleaner air for UK towns and cities. The solution involves effective and appropriately targeted actions to:

a) reduce emissions of NOx from the current road vehicle fleet in problem locations now; and
b) accelerate road vehicle fleet turnover to cleaner vehicles to ensure that the problem remains addressed and does not move to other locations”.

3.2 Further clarification would be appreciated regarding the timescale for delivery and, regarding point a), how this can be achieved now by central and/or local government through existing mechanisms and with existing resources. The capacity of local authorities to resource the delivery of meaningful measures, particularly in the short term, is likely to be central to the successful implementation of the plan and achieving a reduction in levels of air pollution. Further clarification in this regard would also be appreciated.

3.3 The UK Action Plan details a commitment from Welsh Government to consult on a Clean Air Zone Framework within 12 months from publication of the plan. (it is our understanding that this will be undertaken in April 2018). Given that compliance needs to be achieved in the shortest time possible, and the plan clearly states that Cardiff would benefit from a Clean Air Zone (CAZ), the commitment to only consult on a Welsh Framework in the next 12 months does not provide any kind of guidance of the proportionate measures for Cardiff to adopt. It would beneficial for Welsh Government to adopt the Defra Clean Air Zone framework which would enable Cardiff or other local authorities in Wales to commence work on the necessary feasibility studies to implement a CAZ, as soon as possible.
3.4 It is concerning that the UK Plan does not provide any detail on the implementation of a CAZ in Cardiff and how this would accelerate compliance. It is concerning that the plans do not account for projected future growth in Cardiff City, taking into account the LDP’s strategic sites. It must be noted that the implementation of a CAZ may not necessarily resolve the issue of concerning air quality levels at the defined pieces of road network modelled and highlighted by Welsh Government.

3.5 A number of the strategic measures being assessed as part of the DRAFT Clean Air Strategy for Cardiff are not quantifiable in terms of demonstrating the impact they will have on improving air quality levels, both on the already established four AQMAs in Cardiff and on the identified road networks which are shown to be non-compliant beyond 2020. It therefore seems impossible that such measures will comply with the legal ruling that compliance needs to be achieved in the shortest possible time and that compliance will be likely. Therefore this really only leaves the option of the implementation of a charging CAZ to demonstrate that compliance will be achieved in the shortest time possible. However, as it stands the UK plan does not provide the full evidence to demonstrate that even a charging CAZ will achieve citywide compliance.

3.6 The UK Plan sets out a clear understanding for the next steps those highlighted LAs in England must take. The plan draws upon available funding to help aid those LAs to improve air quality; “The government will set up a £255m Implementation Fund to support local authorities to prepare their plans and deliver targeted action to improve air quality. This funding will support the immediate work to conduct feasibility studies and develop and deliver local plans. Further details will be announced later in the year. However, £40 million will be made available immediately to support local authorities to take action to improve air quality as quickly as possible.” The plan does not details whether this funding is being made available to Welsh LAs and clarification has been sought on this from Welsh Government.

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

4.1 Examining European cities, in particular France, French Government has mandated the ‘Clean Air’ sticker requirement. The system is adopted in Paris, Grenoble and Lyon.

4.2 Paris Crit’Air Zones

The sticker scheme became mandatory from Monday, January 16, 2017, requiring all motorists entering the city should display a sticker defining how polluting their car is.

Cars registered prior to 1996 are not permitted to have stickers, meaning these vehicles cannot be driven in the city’s Crit’Air zones between 8am – 8pm Monday to Friday. Additionally, from July 1, 2017, Euro 2 diesel car registered before January 1, 2001, are also be banned from the city’s streets 8am – 8pm Monday to Friday. The infographic below provides further details.
4.3 The UK and Devolved governments may wish to consider whether this approach and a similar national approach which has been adopted by Germany, has been effective in reducing air pollution, and whether the UK framework should be adopted likewise.

5.0 Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?

5.1 Transport functions are a complex mix of socio-economic, demographic and behavioural influences that cannot be separated from addressing air quality. This requires effective collaboration between a wide range of stakeholders. It is not clear currently to what extent collaboration is underway.

5.2 Although air pollution is a public health priority in Wales, its management needs to be a collaborative approach between public bodies, private companies, third sector partners and the public, all whom have important roles to play in addressing this pressing issue. Further fiscal and policy incentives to improve and increase a fully collaborative approach needs serious consideration.

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

6.1 CCC fully supports the need for urgent action to improve air quality and prevent the harmful effects of air pollution. We would support the principle of using all available levers to reduce population exposure to air pollution. The scope of actions local authorities can take unilaterally to address the composition of the private car fleet is limited and this is a matter which needs to be addressed by the UK Government.

6.2 This underlines and reinforces the need for a robust transport policy from the UK/Welsh governments which promotes modal shift as well as making effective use of all available tools to ensure the transport sustainability of new developments. Policies and initiatives to support and promote the use of newer, greener vehicles and technology would also be welcomed.
6.3 Measures designed to promote modal shift from road transport would provide one effective means of providing support at the local level. This would also help to mitigate the impact of measures on local business, residents and visitors by ensuring that a range of options are available for journeys. Whilst these measures may be best identified and developed at a local level, measures to address the composition of the existing vehicle fleets are dependent upon actions and funding by central government, such as targeted scrappage schemes, fiscal incentives for the purchase of hybrid and electric cars as well as investment in vehicle re-charging infrastructure. Particularly in view of the need for reductions in levels of nitrogen dioxide as quickly as possible, interventions which rely on local communities and behaviour change by individuals as consumers and businesses will not be sufficient to deliver the large scale change which is needed.

6.4 Securing modal shift on a significant scale will be central in addressing air quality issues and ensuring alternatives to the private car are attractive and realistic options are vital in enabling local authorities to deliver air quality improvements.

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