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BY EMAIL TO:

The Department for Environment, Food and Rural Affairs in England

2017airqualityplan@defra.gsi.gov.uk

and online at <https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide/consultation/intro/>

13 June 2017

Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities

Dear Sir/Madam,

I am responding on this consultation on behalf of Bricycles, the Brighton and Hove Cycling Campaign and as a Cycling UK campaigner.

Cycling is zero emissions transport, so we believe cycling should be at the centre of any air pollution strategy. Motor vehicles are a major source of pollution. This imposes significant human and financial costs on society. More cycling and less motor vehicle use would help the UK comply with legal standards on air quality and improve public health.

Any plan on air pollution needs to include a major emphasis on investment in walking and cycling – we need to move away from over-reliance on motor vehicles and penalise polluting vehicles, in order to reduce air pollution rapidly.

Changes must be made to Vehicle Excise Duty to make diesel less attractive and to encourage use of alternative, cleaner transport options.

Central government and its agencies should:

- Co-ordinate effective action by local authorities and other bodies to tackle air pollution, both in Clean Air Zones (CAZs) and all areas.
- Take full account of the impact of road building on air quality;
- Use the tax system to discourage activities that contribute to traffic-related air pollution through, for example, fuel duty, vehicle tax and emissions-based road user charging;
- Make it clear in national planning guidance that all development projects should be vetted for the impact they are likely to have on road traffic pollution, and ensure that local planning authorities can easily reject applications on the grounds of air pollution
- Work through Public Health England to ensure that local authorities recognise air pollution as an urgent public health problem.

Local authorities should:

- Recognise that tackling air pollution is a key duty;
- Build strong partnerships between those responsible for transport, air quality and public health to address the harm caused by road transport pollution in the locality, and promote cycling as a healthy and sustainable alternative;
- Make the most effective use of local air quality management measures available to them (e.g. Ultra Low Emission Zones, Air Quality Management Areas and CAZs);

There should be an immediate massive increase in investment in cycling and walking infrastructure and public transport.

The recommendations of the All-Party Parliamentary Cycling Group's report **Get Britain Cycling**¹ should be implemented. These include:

- At least £10 rising to £20 per person per year investment in cycling
- Redesigning our roads, streets and communities to prioritise cycling and walking
- Safe driving and safe speed limits
- Training and education
- Political leadership i.e. policy change and championing innovation.

Increasing levels of cycling would ease pressure on the NHS, cut congestion, clean up the UK and make the country a more pleasant place in which to live and work.

There should be more frequent use of sanctions for dangerous and careless driving. Driving licences should be revoked more often for bad/dangerous driving and offences such as using mobile phones or other devices at the wheel.

The national Space for Cycling campaign aims to create the conditions where anyone can cycle anywhere². We strongly support this aim as a means of improving air quality and improving human health.

Funding for road schemes which encourage motor vehicle use should be stopped, and the investment should instead be diverted into improvements for walking, cycling and public transport.

Planning applications which prioritise or depend on motor vehicle transport should be rejected. Access by sustainable transport (walking, cycling, public transport) should be prioritised. More car free developments should be welcomed by local authorities. Poor land-use and transport planning should be acknowledged and improved with clear national guidance.

Introduction of clean air zones will not be enough to address the problem, because polluting vehicles exist everywhere.

Large numbers of fast motor vehicles in our towns and cities create very poor conditions for cycling and walking, also for the timeliness of buses.

Changes to the vehicle tax regime to stop incentivising diesel vehicles and instead encourage a shift to cleaner forms of transport.

Improvement through application of a mechanical adjustment (retrofitting initiatives) should be made available for private, passenger and commercial vehicles

There should be a comprehensive strategy and plan based on a thorough evidence-based analysis of the air quality problem. There should be a review of national policies that contribute to air pollution. The vehicle tax regime should be amended in order to help reduce poor air quality across the UK and not just in the hotspots. Attention should be given to optimising similar opportunities at a regional and local level. Parking charges can be raised to discourage unnecessary car use. Free car parking should not be encouraged by local and regional authorities or politicians.

The UK government should fund an effective national network of charging Clean Air Zones based on a robust national framework to ensure a consistent approach across the country.

If any scrappage scheme for polluting vehicles is developed, this should be funded by the car companies who produced the vehicles, and not from general taxation. Scrappage schemes reward historical poor choices and this one looks set to be abused. What it does not do is reward those who made the right choices.



¹ www.cyclinguk.org/campaign/get-britain-cycling

² www.cyclinguk.org/campaign/space-for-cycling

Financial subsidies should be prioritised for public transport, walking and cycling, not for private purchases of yet another motor vehicle which though adjudged as cleaner, still contributes to poor air quality, climate change, congestion, road traffic collisions, public health issues like obesity, diabetes, cardiovascular disease etc.

Where pollution is high, introducing “no drive” days based on registration numbers is a useful option. This has been used in several cities across the world.

10. How best can governments work with local communities to monitor local interventions and evaluate their impact?

The Government and the devolved administrations are committed to an evidence-based approach to policy delivery and will closely monitor the implementation of the plan and evaluate the progress on delivering its objective

There should be a far-reaching government-backed education programme providing information on social media and on TV.

An easily accessible website should record the progress of each local authority area on levels of emissions, including Nitrogen Dioxide and related gases, particulates and other gases.

There should also be a measure for the level of traffic and the level of cycling/walking in each area.

The list of authorities given in the technical report combines areas (e.g. Brighton/Worthing/Littlehampton) which are various and have many separate areas with air quality problems. Monitoring must include a break down to comprehensible discrete areas.

The presentation of information should be user-friendly and comprehensible to ordinary members of the public.

The Government must ensure that it is crystal clear to local authorities (and to the public) what is being monitored, and the way it is to be measured. Otherwise there will be a lot of incomplete data in different units.

The UK government should also ensure that the general public are alerted about high pollution levels when forecasted and as they happen. This will help people protect their health and consider how they can reduce their contribution to the problem e.g. not driving their car. The current system is based on thresholds that are too high and do not cover all pollutants. It is also a passive system that relies on individuals looking for the information online. An air pollution alert system could use the similar systems in place for heat waves and cold weather warnings.

11. Which vehicles should be prioritised for government-funded retrofit schemes?

We welcome views from stakeholders as to how a future scheme could support new technologies and innovative solutions for other vehicle types, and would welcome evidence from stakeholders on emerging technologies. We currently anticipate that this funding could support modifications to buses, coaches, HGVs, vans and black cabs

Vehicles prioritised for retrofit schemes could include the most polluting buses and coaches used for public transport in poor air quality areas, and any vehicles in use by the emergency services, the armed forces and any government-funded organisations.

12. What type of environmental and other information should be made available to help consumers choose which cars to buy?

Figures on real world emissions i.e. nitrogen dioxide, particulates, carbon dioxide and all gases with potential for harm to human health or significance for climate change. There should be a colour coding system to assist comprehension. The information should enable comparison to other vehicles and demonstrate compliance with air

pollution measures, such as Clean Air Zones and the vehicle tax regime which must be adjusted to favour the very least polluting vehicles.

13. How could the Government further support innovative technological solutions and localised measures to improve air quality?

Add a display to emission monitoring stations so that the public can see when emissions are high and make the connection with the causes. Provide schools with a similar display.

Provide a comprehensive, long-term, strategic and funded plan to improve air quality beyond the current legal limits. Nationally coordinated measures, such as a national network of charging Clean Air Zones and changes to the vehicle tax regime, will help send a clear signal to businesses, local authorities and the general public of what investments they should be making. The government should reward and acknowledge effective technologies and innovation.

14. Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?

I have made some additional comments at the beginning of this letter. Please include these.

The draft UK Air Quality Plan is weak and illogical. Firstly the government's plans and consultation do not match what its own evidence says needs to happen. If the evidence shows that taking certain measures will be necessary to tackle the public health crisis of polluted air, then the plan needs to make that clear. Secondly, this is a plan to make more plans later when we need action now. I want to see a national network of clean air zones to protect people's health alongside measures to encourage people to switch to cleaner forms of transport such as changes to vehicle taxation and far greater investment in cycling, walking and public transport which will reduce overall motor vehicle use.

Yours sincerely,



Becky Reynolds

Campaigns Officer & News Editor, Bricycles, the Brighton and Hove Cycling Campaign

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