

BCAA statement on the Councils Clean Air Plan

Bristol Clean Air Alliance is an alliance of groups and individuals across Bristol. It is a non-partisan group, united by a desire to see an effective Clean Air Plan in Bristol. We are concerned at the slow progress being made towards proposing a plan.

We are motivated not by political point-scoring, but by a concern for the health of groups that are particularly vulnerable to air pollution, like the young and old, and those with respiratory illnesses.

It is taking too long

Air pollution is now the most serious public health threat facing UK towns and cities.

We welcome the Cabinet paper's announcement of Clean Air Plan proposals. We have been disappointed by the slow progress so far, and it is good to at last see recognition of the serious action that is needed. Even so, it seems clear that Bristol is struggling to meet its own deadline of delivering an Outline Business Case to government in September.

Other cities across the UK have faced the same issues and made better progress. Take Birmingham as an example. The Labour administration will implement a charging Clean Air Zone from January 2020 that includes cars, which is projected to deliver compliance by 2022. They are reducing the impact on the less well-off by delaying the charge for those who earn less than £30,000 a year, and offering financial help to switch to a cleaner car or for using public transport. A similar exemption applies for residents living within the Zone. They are looking beyond compliance with current legal limits, and embedding the clean air plan in wider transport strategy, including behaviour change initiatives.

We are concerned that Bristol's plans will take too long to deliver compliance with air quality limits – 2023/4 or 2025 depending on the option chosen, The council is legally obliged to deliver compliance "as soon as possible", and it does not seem acceptable to propose a plan that will take up to 5 years to deliver compliance.

Serious action is needed

It is instructive that even a Class D (including cars) medium charging Clean Air Zone delivers compliance only by 2027+ (2027 everywhere except 2030 for Upper Maudlin Street). 2027+ is later than other cities that are implementing a charging zone. It implies that Bristol has a worse problem than other cities, possibly because of persistent congestion at places where the pollution gets trapped by buildings in Bristol's narrow streets?

We doubt that Bristol will achieve compliance quickly without reducing the number of polluting cars on city centre roads. Low-emission buses and taxis will help, but cars are more numerous, and they can be just as polluting as larger vehicles, especially when they are stuck in congested traffic. We therefore support the proposed diesel car ban. A car ban zone (Option 2) is more draconian than a charging zone (Option 1), but seems necessary because Bristol seems to have a worse problem than other cities.

Comments on the proposals

Option 1 is provisionally projected to deliver compliance in 2025, and Option 2 in 2023, except Upper Maudlin Street in 2024. If it is confirmed that Option 1 delivers compliance in a later calendar year than Option 2, then there would seem no legal basis for adopting Option 1.

We prefer a Small Area diesel car ban as in Option 2, to a diesel car ban on Upper Maudlin Street only as in Option 1. A city centre zone makes more sense, and a ban on Upper Maudlin Street will displace the pollution on to Park Street and the Centre.

We think it anomalous that LGVs are not included in the diesel ban, and we suspect that by including LGVs the compliance date could be brought forward. As the legal requirement is to deliver compliance “as soon as possible”, and 2023/4 is not very soon, we think the legal requirement is probably to include LGVs.

The proposals could include other mitigation measures apart from a scrappage scheme, eg delaying the CAZ charge for low income families and residents living within the zone. Are these being considered ?

A variation on Option 1 and Option 2 is to pick and mix from the two options. This could be a Small Area diesel car ban, a car scrappage scheme, and the Option 1 location-specific interventions. This would presumably achieve compliance earlier.

The bigger picture

We need to think wider than the narrow aim of delivering compliance with artificial air pollution limits. No level of air pollution is safe. What matters is not compliance in hotspots but the health impact over the whole city. We urge the Council to build on the warm words of the Bristol Transport Strategy and Joint Local Transport Plan by taking enthusiastic ownership of measures to encourage shared transport and active travel, and show a sense of urgency and drive to deliver them.

We acknowledge that the Council has made some steps in the right direction. It is supporting initiatives such as no-idling zones, School Streets temporary road closures, and cleaner buses and taxis. The Mayor’s planned Bus Deal is welcome too, but it will only be effective if the buses have enough dedicated space on the roads to allow them to get through congested traffic (such as extending the bus lane on the M32, as is proposed for Option 1). And it is only one part of the transport plan that Bristol needs.

A charging Clean Air Zone and a zonal older-diesel car ban are sticking-plaster measures. What is needed is a general reduction in single-user vehicles so that our narrow city centre roads can meet the travel demand whilst minimising air and noise pollution. We think the Mayor is tying one hand behind his back by ruling out demand management measures such as a congestion charge that includes all cars, or a Workplace Parking Levy, to reduce the volumes of private motor traffic in the city centre. We recognise that these are politically difficult, but at some stage this nettle will have to be grasped – alongside a programme of improvements for other transport modes. Nottingham did this some years ago, and it seems no coincidence that it is one of the few cities that has not had to introduce a Clean Air Zone in order to comply with legal air pollution limits.

Alan Morris on behalf of Bristol Clean Air Alliance