

BCAA statement on the Council's 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. Air pollution is the most serious public health threat facing UK towns and cities. We are motivated 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.

General comments

We welcome a Council decision on a strong Clean Air Plan that is shown to deliver compliance within a timeframe acceptable to government. By any measure, it is clear from the multiple documents being presented to Cabinet and the £113m capital cost that this is a major project for the Council to undertake.

We support the proposed diesel car ban element of the preferred option. Whilst it is more radical than the charging zones that other cities are implementing, it seems necessary because Bristol seems to have a worse problem on some of its inner city roads than other cities.

We are unclear whether the preferred option is the best plan that could have been adopted. The proposed plan will deliver only by 2025. This is significantly later than other cities. Whilst it has been shown that a medium zone CAZ D (including cars) would not deliver earlier than 2025, it has not been shown whether a different plan could deliver earlier.

Our concerns

1) Delivering compliance in the shortest time possible

The legal requirement is to deliver compliance "as soon as possible". The proposed plan achieves compliance in 2025. Whilst this meets the 2025 limit set in the government's letter to Bristol Council last August, it is significantly later than other cities, and the obvious challenge is whether the preferred option achieves compliance in the shortest time possible.

The new benchmark against which the proposed plan is tested is Medium CAZ D (incl cars) + diesel car bans in a few city centre problem streets (as in Option 1 in the consultation) + other miscellaneous measures. The preferred 'hybrid' option delivers compliance slightly earlier than this benchmark: the modelling shows that extending the diesel car ban from problem streets across all the small city centre area has more impact than changing from medium CAZ C to medium CAZ D.

Plainly a Medium Zone CAZ D + city centre diesel car ban would deliver more quickly than the proposed plan, but this has not been tested. Nor has:

- a Medium Area diesel car ban
- a Small or Medium Area ban that includes diesel LGVs

How is it possible to say that the plan meets the legal test of achieving compliance as soon as possible ? Even if the government accepts Bristol's plan, it may be challenged in the courts.

Council response: The legal tests include a reasonableness test. At one extreme you could close all roads - which would not be reasonable. The Council has made the judgement that what is proposed strikes the right balance. If they were to go for a stronger option, say a medium zone charging CAZ D (including cars) and a small area diesel car ban, they would have to re-consult and that would delay implementation.

It is only the worst sites, eg Marlborough Street and Church Road, which take till 2025 to get below the pollution limits: other problem sites achieve compliance earlier. The model projections show that emissions start to come down as soon as the scheme is implemented (due March 2021), so it is important not to delay implementation of the scheme. The compliance year projection continues to be refined iteratively: the 2025 compliance date may be brought forward to 2024.

2) Does the proposed plan change behaviour enough ?

One of the most common responses to the consultation was that neither option would create the desired behaviour change. The Economic Case Table 3.2 shows that the preferred 'hybrid' option causes fewer people to change vehicle than the benchmark option. Whilst this saves money for individuals who do not qualify for the scrappage scheme, the consequence is that, as per the Economic Case Figures 3.3 and 3.4, the hybrid option worsens air pollution in more places than the benchmark option.

Council response: behaviour change for the small area diesel car ban affects behaviour in the medium zone as well.

3) Complexity

Combining a Class C (excluding cars) medium charging Clean Air Zone (option 1 in the consultation) with a Small Area diesel car ban (option 2) is a complex solution. Such complexity will be difficult for the motoring public to understand.

Council response: this is accepted. "We will be doing the best we can" to explain it clearly.

4) Cost

The capital cost is £113m – a huge amount. This is no doubt because such a complex scheme will be costly to implement and administer, involving two rings of monitoring cameras and signage, with different enforcement regimes. The Cabinet papers give no indication of what amount of grant the government has committed towards the £113m cost. In November 2018, the government turned down a request from Leeds for a £40m grant. Bristol can argue that it has a worse problem than Leeds, but will government fund a £100m+ grant ?

Council response: Note that part of the £113m is for sustainable transport interventions.

Most of the cost of the Leeds £40m was for mitigation measures (scrappage scheme etc). Bristol Council may get push-back on mitigation costs, but the government will fund the implementation costs as long as they agree to the plan.

5) Consultation

We note that further consultation is planned on “the detail of the implementation of the preferred option”. Whilst there has been consultation on each of the two elements of the preferred option, there has not been consultation on the two elements combined. General public opinion may be against the complexity of the proposed scheme, and we wonder if this might give rise to a legal challenge that could delay implementation.

Council response: there is no time in the government timetable: they have to commit to an option now and submit the Outline Business Case by 6 November. There was more than 50% support for each element in the consultation last July. It is not ideal, but nothing is risk-free.

The bigger picture - benefits

A charging Clean Air Zone and a zonal diesel car ban are sticking-plaster measures, reducing air pollution only marginally and only in hotspots. No level of air pollution is safe.

These measures address nitrogen dioxide pollution. Whilst the measures also address particulate pollution to some extent, transport is not the biggest cause of particulate pollution. We note in the modelling methodology document (section 2.4) that the model estimates particulate pollution as well as nitrogen dioxide pollution. It would make sense to monitor, model and publish data on particulate pollution alongside data on nitrogen dioxide pollution.

We would support better public health monitoring of the effect of air pollution on breathing problems and mortality. Air pollution in Bristol is the cause of 300 deaths per year at present, and affects many thousands of people with non-fatal but life-affecting illnesses like asthma. How much will the Clean Air Plan reduce the health impact of air pollution - where are the figures? The plan may achieve the compliance target of reducing NO₂ below the legal maximum, whilst spreading barely legal levels of air pollution across other areas of the city.

Council response: they plan to do a health impact study for the Full Business Case, which is due by February 2020.

The bigger picture – transport policy

It is remarkable that £100m+ is to be spent, with its associated major diversion of council resources, on such a short-term measure. That is as much as was spent on the biggest recent strategic transport project – Metrobus. That is the consequence of the vehicle emissions scandal in which manufacturers fiddled the tests.

It is ironic that a number of measures were excluded from consideration at an early stage in the Clean Air Plan process because they could not be delivered in time, for instance a large Clean Air Zone and a Workplace Parking Levy. If it had been known earlier that the preferred

option would deliver compliance only in 2025, a more holistic approach could have been taken from the outset.

The climate emergency declaration and the 2030 zero carbon target require a radical change in transport in the city. It would be better to have a joined-up plan to tackle air pollution, congestion and the climate emergency. 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 support measures that the Council has announced - no-idling zones, School Streets, cleaner buses and taxis, the Bus Deal, consideration of a Workplace Parking Levy – but there is no sense of urgency or timeline.

Council response: we will keep asking government for money to do more.

It would make sense to make use of the clean air zones' costly infrastructure of monitoring cameras to implement a congestion zone, and over time this may gain political acceptance.