Response to consultation on new Traffic Clean Air Zone options – November 2020

This is a joint response from:
- Bristol Clean Air Alliance
- Bristol Walking Alliance
- Bristol Civic Society

The response

Our view is as follows:

1 Context

1.1 The consultation

The consultation is part of a project that started in 2016/17 that has been slow to reach a conclusion. This consultation in late 2020 follows a previous consultation in summer 2019, which also consulted on possible Clean Air Zones. In the current consultation, he diesel car ban is no longer proposed, and the Council hopes to demonstrate that recent city centre street space reallocation, and the resulting reduction in motor traffic at pollution hotspots, will achieve compliance with air pollution limits without the need for a charging Traffic Clean Air Zone.

1.2 The air quality problem

- the CAZ proposals are part of a project to achieve legal compliance only, but any level of air pollution is harmful to health. We would prefer that the Council aimed to achieve better than compliance levels of air quality.
- there is a general trend towards a cleaner fleet as vehicles are replaced, and this is gradually bringing down air pollution levels.
- air quality disproportionately affects people in the most deprived communities, especially children. Those communities are often in the most run down parts of the city.

1.3 The transport and wider policy context

The measures being considered are constrained by the legal requirement to comply with the maximum NOx limits as quickly as possible, and some elements are prescribed by government, eg which Euro classes of vehicle are deemed clean or not clean.

The CAZ proposals need to be seen in the context of wider policy for the city, not just transport otherwise avoidable environmental and socio-economic impacts will not be addressed:
- addressing air quality from vehicles is not just about cleaner vehicles, it is about the number and type of vehicles on the road and the impact of the proposals on the built environment, and social and economic inequalities.
- electric vehicles emit particulate pollution from tyres and brakes.
- action on air quality is aligned to goals for addressing climate emergency
- other transport and town planning measures can help air quality and improve environmental quality more generally, eg road space reallocation to buses, bikes and people on foot, Liveable Neighbourhoods, School Streets, road pricing, workplace parking levy, reliability and cost of public transport, the 15 minute neighbourhood.

2 The response

Our view is as follows:

2.1 The no-CAZ proposal

We support in principle the idea of achieving good air quality by road space reallocation and behaviour change. It is a simpler, cheaper, and more permanent solution – if it can be achieved. Reallocating road space is a better way of changing things than expensive and visually intrusive rings of cameras which will be switched off as soon as air quality threshold compliance is achieved, and which will divert Council resources away from doing other things. (It might be argued that the cameras could be used in future for a congestion charge, but it seems likely that in time the implementation of road pricing will be via in-car technology.)

BUT
- it seems likely that there will not be enough time before the government's deadline to demonstrate the effectiveness of the recent street space reallocation measures, and therefore the government will require a CAZ. Bristol is a historic city with difficult hotspots. Leeds has been able to do without a CAZ, but this was based on a change in the fleet, which is easy to demonstrate as a permanent change. Bristol's case seems less easy to prove.
- the current policies discouraging public transport use and car sharing are likely to continue into 2021 with a consequent impact on private car use
- road space reallocation measures need to be applied much more widely on key routes across the city to give protected space for shared and active transport, and to reduce the air pollution from private motor vehicles. The city centre changes are a start, but they need to be extended to other routes.

2.2 Choosing between CAZ options 1 and 2

2.2.1 Context

It is possible that both options - CAZ D alone, or CAZ D and CAZ C together – may be projected to achieve compliance within the same compliance year (the ordained criterion), in which case there is a genuine choice between the options.

The government requires that any solution achieves compliance by 2023 (which means by the end of 2023 as it's based on an annual average), and the scheme is due to be implemented in October 2021, so any CAZ will not be in place for long.

2.2.2 Our view

Decisions need to be taken in a wider context and with broader objectives rather than just technical compliance.
The inner CAZ D -only option will influence vehicle purchase decisions and affect air quality outside the zone. But the medium area CAZ C will presumably affect more vehicle purchase decisions, and so is a stronger solution. Even though both options may achieve compliance in the same year, the medium area CAZ C will bring down air pollution more in areas that are not hitting the compliance limit.

There are cost and fairness pros and cons between the two options. The equalities issues act both ways. Poorer households without cars do not create air pollution but suffer disproportionately from the air pollution and poor quality environments created by other peoples' vehicles. Poorer households reliant on cars/vans will suffer CAZ charges, which hit them harder than higher-income groups.

In principle, we prefer the stronger (CAZ C + CAZ D) option.

2.3 Other aspects

2.3.1 Review after implementation

It needs to be clear that the CAZ will remain until the objective is proven to have been met, even if that is not 2023 as projected.

The model projects what monthly average levels of NO2 it predicts during the lifetime of the CAZ if we are on course to meet the 2023 deadline. The CAZ delivery plan should include review(s) of measured NO2 data against the model and a commitment to strengthen measures if the modelled reductions in NO2 are not achieved – eg in Q1/22, Q1/23 and in Q1/24. The results of these reviews should be made public. If the measured results are worse than the modelled results then there should be a requirement for BCC to explain why, to revise the model to match reality (and so show a revised expected compliance date is based on the latest data) and to deliver new measures to get the compliance date back on target for 2023.

There is also a need for monitoring of the wider impacts that these proposals could have as well as the improvements to air quality.

2.3.2 Visual impact

The implementation of a CAZ has a visual impact on the streetscape. BCC City Design should be consulted on this. The overall impact of the following needs to be considered: the specific location of cameras and choice of technology, the size of informative signage and its location, the extent of road markings, the choice of surface treatment. Sometimes too much signage can outweigh the visual impacts in sensitive locations;

2.3.3 The BRI

The BRI is particularly affected by both the road space reallocation and the CAZ D. The council has been discussing with the BRI how to improve access by shared transport for over a year, and we look forward to seeing proposals soon.

2.3.4 Cabot Circus car park

We suggest that access to Cabot Circus car park free of clean air charge should apply only after 10am each day. This aligns with Cabot Circus opening hours, and will reduce traffic levels in the morning rush hour. Whilst it may make Cabot Circus less attractive as a source of employment for anyone who would drive in from further away, it will give the advantage to potential shop workers living in the surrounding areas of high deprivation.