

Response from Clean Air Southampton to the Draft Clean Air Zone Framework, 5.12.2016

Question 1: **In the Draft Clean Air Zone Framework, are the right measures set out in Section 2?**

There is no "one size fits all" clean air zone framework which can be devised. Every city and town in the UK should be required to implement its own arrangements to provide cleaner air, measured from a baseline of now, targetted to be achieved within three years, and tailored to suit local conditions.

As ruled by Judge Garnham recently in the High Court, the emissions measured should reflect real world driving conditions and also monitor the full range of pollutants which can affect human health. As he also recommended, private cars should be included in the new regulations.

All vehicles should be considered as part of the regulated activity within the city or town boundary, and exemptions made only for specific conditions. The primary objective should be to remove diesel engine vehicles from town and city centres. However, public transport systems should be developed, along with improved walking and cycling provision, with the aim of reducing the total volume of four wheeled vehicles in built up areas.

Local authorities require governmental support in the form of regulatory powers and finance in order to bring about substantial change to the levels of air pollution within their boundaries. Without this support, this initiative will fail.

New regulations for clean air should be enacted in all towns and cities simultaneously, or risk suffering from competitive disadvantage and/or non-compliance.

Question 2: **Are there additional measures that should be highlighted under each theme? Please give evidence of impact if possible.**

These comments relate to specific paragraphs in Section 2, and are numbered accordingly.

1. Minimum requirements

Para 22: The target of 2040 of all new cars and vans to be zero emission by 2040 is too long. This should be revised to 2020 or 2025, as has been adopted in many cities worldwide already.

Para 25: Minimum requirements should include baseline monitoring and evaluation, with an annual reporting process, highlighting where further work is needed to maximise the impact of the Clean Air Zone. In particular, where there are discrete areas of the Zone not under the control of the local authority – such as the Port of Southampton – the authority should be mandated with powers to monitor within the bonded area, or the Port authority be mandated with such powers and given the duty to report annually.

2. Supporting local growth and ambition

Para 26: The major philosophical and psychological change introduced by the Clean Air Zone proposals is the “decoupling of growth and pollution”. However, there is insufficient background given (or examples shown) of how to achieve this decoupling. There are many cities in Europe and beyond where prosperity has increased where Clean Air Zones have been introduced. This needs highlighting and an education programme for elected members and businesses should be produced which shows them the benefits which will accrue when there is less traffic, especially fewer diesel engine vehicles in the city. See also <https://www.southampton.gov.uk/planning/planning-policy/supplementary-planning/streets-and-spaces-framework.aspx>

3. Engaging local communities

33. Residents should be encouraged to use citizen science to better understand the effects of air pollution on their community. Existing groups of all kinds could be loaned monitoring equipment, given training in how to use it and how to report and compare results between individual roads and locations.

36. Information and advice on air pollution is not in the curriculum for health professionals, teachers and pupils as yet. This should be incorporated as soon as possible, but will need leadership at national level.

4. Delivering local ambition

40. In the run up to this consultation, our local authority has sold off the two remaining sites which could have been used as park and ride locations. These will be used for logistics warehousing instead. How can the Clean Air Zone receive the status it requires (in order to protect our health) when local authorities are under extreme financial pressure and seeking to maximise financial returns from their assets? This competition between priorities is not acknowledged in this consultation document and is the biggest driver in the choices being made at local level.

41. Local planning policy may already contain the language and vision expressed in this consultation, but on the ground decision-making is often influenced by the power of developers and the exigencies of competing transport infrastructure. There is nothing in this document, or in current planning decisions in this area, to suggest that this situation will change appreciably. Local authorities need stronger powers of enforcement in planning and infrastructure decisions.

43. Clean Air Zones should be implemented in all towns and cities in the UK simultaneously, in order to remove local authorities’ fears of loss of competitive advantage. Without this, local authorities will only implement the minimum mandated requirements and the Clean Air Zone will not be effective enough to protect health.

43. The National Infrastructure Commission should be tasked to examine proposals in the light of the Clean Air Zone requirements, especially in situations where local authorities have no powers to control activities near residential areas, e.g. Port of Southampton, military areas, etc. This would involve estimation of the effects of proposed expansion on air pollution and transport infrastructure, modelled using real world emissions.

5. Optimising traffic management

47. A Clean Air Zone will not function effectively without the listed measures. These should not be “options” but should be “required” actions, especially those concerned with walking and cycling.

6. Local authority leadership in fleet procurement and operations

49. Decisions about location and re-location of staff must demonstrate to all other employers in the zone that proper consideration has been given to reduction, not increase, in miles/hours travelled to and from and during work. Recent decisions by our local authority have impacted negatively on air quality because staff offices have been re-located further away from their homes and without public transport or cycling links that would reduce car use. In addition, local authorities should work with local employers to influence fleet purchasing and leasing decisions in favour of ULEVs. They should also work with local vehicle sales showrooms to encourage displays of vehicles which will meet the Clean Air Zone requirements for low emissions.

50. Special consideration should be given to alternative methods of waste collection and disposal, as bin lorries are highly polluting and are operating in the city every day. An interim measure of fortnightly bin collections would help somewhat, with provision for food waste in hot weather, but smaller, zero emission vehicles for waste collection should be adopted. This would provide less obstruction in roads, permit collection at any time of day because quieter, and slower collection would not impact on the efficiency of the process. The present high emission bin lorries are parked up for at least 12 hours per day.

6. Improving collaboration and joining up approaches

55. 2016/17 is a highly significant year for consideration of transport infrastructure, development proposals and air quality in the Southampton area. There are major consultations ongoing:

- * ABP Masterplan for the Port – predicting major growth with impacts on surrounding land and roads and air quality
- * Highways England proposal for changes to Redbridge roundabout – an attempt to keep freight and commuter traffic moving, but which is unlikely to improve air quality
- * A proposal for a 40MW diesel power generating plant at Marchwood
- * A new cycling strategy for Southampton is presently out for consultation
- * The Local Plan will be put out for consultation early in 2017
- * The Local Transport Plan may be out for consultation in early 2017

- * Devolution proposals in the Solent area will bring the potential for much larger infrastructure projects
- * Large housing developments on the northern and eastern fringes of Southampton, where planning has been approved and detailed plans are out for consultation

Taking all this into account, this is the moment when all relevant authorities should be talking to each other, commissioning planning advice, and preparing a vision for how all these proposals can form part of an ambitious vision for the whole area, which solves the tremendous problems experienced with traffic volumes, road accidents and air pollution now and for the next generation, within the city and beyond. This plan for a Clean Air Zone cannot on its own address the scale of what is required. Nor is there any guarantee that any proposed devolution within Hampshire will attract sufficient funds to match this ambition.

7. Improving the business environment

59. Our local authority has claimed in its “Streets and spaces framework” document² that trade may increase by up to 40% if shopping areas are created with pedestrians and cyclists in mind, and with fewer vehicles. The creation of traffic-free town/city centres (except for residents and authorised low emission vehicles) should be part of a Clean Air Zone.

8. Improving services and infrastructure

73. Consideration should be given to reduction of parking spaces in the city centre, except for ULEVs. We understand that our city is oversupplied with parking spaces which are presently far cheaper to use than public transport. To balance this, bus companies should be helped to offer family tickets which cost less than parking a car. An “Oyster card” system should be introduced to make using public transport a cheaper and more integrated experience than it is now. In addition, car parks on the periphery of the city could be designated as “park and ride” and existing local bus routes badged as “park and ride” with stops at convenient locations. This could be introduced immediately without the considerable expense of a specially constructed park and ride scheme.

74. Our city already has a distribution centre, operated by a large logistics company. It is under-used. As a consequence we have articulated HGVs delivering food to small local supermarkets and other goods to large stores right across the city, causing obstruction to traffic movements and air pollution. The language of this paragraph (use of “may include” instead of “will include”) will not change this situation. Local authorities should have powers to require the use of e-cargo bikes and ULEV vans for deliveries within the Clean Air Zone.

76. There should be Government support to local authorities and bus companies to move to electric and hydrogen powered buses.

9. Supporting innovation

78. Local authorities should collaborate with Universities in their vicinity to develop scientific monitoring of the Clean Air Zone, from baseline, in order to achieve an understanding of how the Zone affects air quality, and where improvements can be made. This could be modelled on the work already undertaken at Kings College London.

10. Immediate action to improve air quality and health

87. Where is the evidence for the claims made in this statement? Has anyone evaluated a Clean Air Zone of the restricted kind being suggested in this document and shown a clear reduction in air pollution and improvements in health? Local authorities were required to measure air quality until 2015 at which point funding was removed, and most monitoring ceased. This should be reinstated as a basic requirement for Public Health monitoring in local authorities along with the associated funding and reporting structure.

93. Our local authority has no power over the operations of the Port, within the bonded area. Asking for change via “encouraging consideration” is too weak a suggestion. Port operators are businesses and the provision of major enhancements to air quality locally, such as shore to ship electricity provision, will only result if the Government decrees this should happen in all UK ports simultaneously. Corporate responsibility for the health of adjacent residents could, perhaps, be tested in court, but Government action would be preferable and faster. Ports should be asked to provide annual air quality monitoring of their sites, preferably assisted by local academics. In the short term, electric tugs should bring ships into Port from the Nab Tower/Isle of Wight.

97. Recent cuts to funding mean that our local authority is unable to provide a full school travel planning service. Doctors and MPs are telling us that we are experiencing a “public health emergency” from air pollution and local support for “modal shift”, especially walking and cycling/scootering to school, should be funded accordingly.

99. At times of high air pollution the RCP/RCPC recommended in their report “Every breath we take” that traffic should be diverted away from schools. Provision for this should be included in the Clean Air Zone minimum requirements. Thought should be given to air quality when locating new schools, which should always be sited away from main roads. Head teachers and their staff should be made aware of the impact of air pollution on pupils with asthma. Pupils with asthma, or other respiratory complaints, should not be made to play outside in break times during times when an air alert has been issued.

Question 3: In addition to the draft Framework, are there other positive measures that (a) local or (b) central government could introduce to encourage and support clean air in our cities?

1. A major development in the near future will be self-driving cars. This could introduce a subscription form of use, rather than ownership of individual cars – much more appropriate for city environments. These will probably be zero emissions vehicles and, as such, could be encouraged by specific policies within the Clean Air Zone framework. This change of ownership may also introduce different patterns of usage – older people will benefit from greater independence, without the need to own a car which is used mainly for short trips. Total car ownership should decrease over time.

2. Emissions from buildings should also be counted as part of the Clean Air Zone proposals, as these account for a substantial potential contribution. Work on upgrading gas heating systems in both the domestic and commercial sectors to low NOx boilers will bring measureable benefits.

3. Government should consider introducing planning controls on development situated upwind of Clean Air Zones. For example, the prevailing wind in Southampton is usually from the south west. On the western shore of the Solent there is an incinerator, a power station, a refinery and a proposed 40MW diesel powered backup power station. The siting of the latter, or the use of diesel powered backup to the grid at all, should be assessed as adding an unacceptable burden to air quality in Southampton if the Zone is to achieve integrity and any chance of reducing air pollution.
4. Power stations located within Clean Air Zones should be included in the set of minimum requirements, and assessed accordingly. This will help target where improvements could be made to NOx emissions. Southampton has a gas/geothermal CHP power plant located in the city centre.
5. Support should be given for the introduction of in-car monitoring devices, so that drivers can see firsthand the level of pollution in their vehicles. This would be a major factor in introducing the cognitive dissonance required to move people away from purchasing diesel engine vehicles in the shortest time possible. Additional information on live air quality data at bus stops and on other available signage will help keep the issue foreground for members of the public.
6. Recently emerging evidence on wood burning stoves in urban areas suggests that these may need to be banned in towns and cities, as coal already is.

Further ideas are contained in responses above to Question 2.

Question 4: Are the operational standards and requirements set out in Section 3 of the Framework acceptable? Please provide supporting evidence for your views.

Preparing and planning for a charging zone

110: This is too vaguely worded. Our children do not have a long time to wait for these changes. The Royal College of Physicians have told us clearly that child development is impaired by air pollution. Whilst taking the needs of businesses and individuals into account, tight deadlines must be set for change.

Classes of charging Clean Air Zone

114: Analysis of Southampton's air pollution by source shows that private vehicles make up more than 25% by volume. However, recent real world emissions monitoring shows that their contribution to air pollution (even the newest Euro 6 vehicles) will be higher than that from HGV Euro VI, by a factor of 4.5 it has been estimated³. Therefore Southampton should include private cars in the Clean Air Zone, which has not been allowed for in the categories presented in this consultation. This point was reinforced by Justice Garnham⁴. Traffic statistics show that the volume of LGVs has risen consistently over the last ten years in Southampton, and this is likely to continue because of the increase in home deliveries. For this reason, we argue that LGVs should also be included in the Clean Air Zone class and support should be given by central government to help owners of SMEs to transfer to ULEVs. Upfront investment by government in this transfer to electric delivery and tradesmen's vehicles will boost confidence in the use of ULEVs.

Vehicle standards for entering a charging Clean Air Zone

120: Because of the unreliability of motor manufacturers' claims for new diesel vehicles, we suggest that independent monitoring equipment be set up at main entry points to the Clean Air Zone to monitor actual emissions and any vehicles exceeding the legal threshold be reported for violation and taken off the road until rectified.

Residents who live within a Clean Air Zone

146: This section is written as though residents' private vehicles will be included in the Clean Air Zone class, as we have suggested. This being the case, any exemptions should take account of where the most polluted areas are, according to local air quality monitoring and hospital admission statistics for asthma and COPD. Those areas worst affected should have the shortest preparation time for changing away from diesel engines to ULEVs.

Question 5: Do you agree that the requirements in Clean Air Zones for taxis and for private hire vehicles should be equivalent? Please provide supporting evidence for your views.

Yes

Question 6: Do you agree the standards should be updated periodically? Please provide supporting evidence for your views.

Yes, monitoring of traffic volumes, emissions and modal shift should be reported annually and further targets set to ensure the ongoing reduction in traffic volumes and emissions.

Question 7: If yes, do you agree that the minimum vehicle standards set out in the Framework should remain in place until at least 2025? Please provide supporting evidence for your views.

No – sooner date. Private diesel vehicles and LGVs should be added immediately.

Question 8: Do you agree with the approach to Blue Badge holders?

Yes

Question 9: Is the approach set out in Section 3.9 suitable to ensure charges are set at an appropriate level?

Yes. We welcome the statement that any proceeds from charging should be re-invested in enhancing air quality in the city.

Question 10: **Do you have any comments on the secondary legislation as drafted?**

Question 11: **Do you agree with the approach undertaken in the impact assessment? If no, please provide supporting evidence.**

Question 12: **Do you agree with the conclusions of the impact assessment? If no, please provide supporting evidence.**

Question 13: **Are you aware of any additional data that could inform the impact assessment? If yes, please give details.**

References

³ <http://www.slideshare.net/ies-uk/routes-to-clean-air-2016-dr-norbert-ligterink-tno>

⁴ <https://www.judiciary.gov.uk/wp-content/uploads/2016/11/clientearth-v-ssenviron-food-rural-affairs-judgment-021116.pdf>