**THE GOVERNMENT’S DRAFT AIR QUALITY STRATEGY**

**A consultation response from Cycling UK**

**INTRODUCTION**

**About Cycling UK**

1. Cycling UK was founded in 1878 and has 64,000 members and supporters. Cycling UK’s central mission is to make cycling a safe, accessible, enjoyable and ‘normal’ activity for people of all ages and abilities. It was historically known as CTC or the Cyclists’ Touring Club. Our interests cover cycling both as a form of day-to-day transport and as a leisure activity, which can deliver health, economic, environmental, safety and quality of life benefits both for individuals and society. We represent the interests of current and would-be cyclists on public policy matters.
2. Cycling UK is a member of the [Healthy Air Campaign](https://www.healthyair.org.uk/). We support the broad thrust of the responses presented by our partners in this coalition, e.g. Client Earth, the Campaign for Better Transport and the British Lung Foundation. We are of course concerned to protect existing and would-be cycle users from the ill effects of air pollution. However we also believe the promotion of cycling, as part of a wider package of measures to promote healthy and sustainable transport, can play a significant role in tackling pollution, with a wide range of additional benefits for the economy as well as for people’s health and well-being.

**Key points**

1. The case for action on air quality is well made in the draft strategy itself, and the responses of other responses from our [partners](https://www.healthyair.org.uk/partners/) in the Health Air Campaign. In summary:

* Air pollution has been classified by the World Health Organisation (WHO) as a leading cause of cancer, especially lung cancer. WHO recognises that transportation is one of the predominant sources.
* Every year in the UK, outdoor pollution is estimated to cause around 29,000 deaths.
* Road transport is likely to be responsible for about half of the deaths attributed to air pollution in the 34 OECD countries. In the UK, road transport is responsible for about a third of nitrogen oxides emissions, and over a quarter of particulate matter. These are known health hazards.
* Exposure to roads with high vehicle traffic accounts for 14% of all asthma cases in children (a similar impact to that of passive smoking).

For more on air quality and cycling’s role in tackling it, see [Cycling UK’s briefing on air pollution](https://www.cyclinguk.org/campaigning/views-and-briefings/air-quality).

1. A [Cabinet Office report](http://webarchive.nationalarchives.gov.uk/+/http:/www.cabinetoffice.gov.uk/strategy/work_areas/urban-transport.aspx) into the economic costs of urban transport showed that urban transport-related pollution costs the English economy between £4.5 to £10.6 billion a year (at 2009 prices and values). However, it also showed that congestion, physical inactivity and road injuries have economic costs of a similar magnitude: around £10bn each.
2. The Strategy should therefore give priority to air quality improvement measures which also tackle these wider problems, thereby maximising the benefits of the funding allocated to, and generated by, this Strategy. It should not focus simply on replacing dirty diesel cars with cleaner cars: an approach which would still perpetuate congestion, physical inactivity and road danger (particularly to children and others who do not or cannot drive). Instead, the focus should be on promoting walking, cycling and other forms of healthy and sustainable transport. There is a desperate need to strengthen the funding for the Government’s recently-announced [Cycling and Walking Investment Strategy (CWIS)](https://www.cyclinguk.org/category/tags/cycling-walking-investment-strategy), and for the [Local Cycling and Walking Infrastructure Plans (LCWIPs)](https://www.gov.uk/government/publications/local-cycling-and-walking-infrastructure-plans-technical-guidance-and-tools) which local authorities are being asked to deliver as part of the CWIS. The Air Quality Strategy should be seen as an opportunity to deliver this additional funding.
3. Our response to the measures proposed in the draft Strategy can be summarised as follows:

* Cycling UK objects to the way the Strategy effectively creates a presumption against local authorities using charging mechanisms to support the aims of Clean Air Zones. This is contrary to the evidence presented in the technical report accompanying the draft strategy, namely that charging zones are the quickest way to achieve compliance with air quality standards.
* It is irrational to suggest that local authorities should introduce charging in Clean Air Zones only where they cannot achieve air quality standards more quickly through a policy-package *without* charging. Once a policy-package to achieve air quality standards had been identified, it is self-evident that those standards could be achieved more quickly if some form of charging was then added to that policy-package. Hence the draft Strategy cannot possibly deliver its stated aim – and the legal obligation it is supposed to fulfil – namely to achieve air quality standards *as quickly as possible*.
* We therefore advocate the introduction of Clean Air Zones involving some form of pollution-related charging (which could also take account of congestion).
* Charging CAZs should be required to include the development and implementation of a Local Cycling and Walking Infrastructure Plan (LCWIP), in accordance with the [guidance on LCWIPs](https://www.gov.uk/government/publications/local-cycling-and-walking-infrastructure-plans-technical-guidance-and-tools) recently issued by the Department for Transport. LCWIPs involve the planning of comprehensive local cycling and walking networks, and the identification and implementation of a prioritised list of schemes to help develop these networks. These networks and measures should then be embedded within other local transport and land-use policies and programmes, e.g. local transport plans, new developments and local highway maintenance programmes.
* Charging CAZ revenues should also be available to fund [non-infrastructure measures](https://www.cyclinguk.org/campaigning/views-and-briefings/smarter-choices) to enable people of all ages and backgrounds to discover or rediscover the benefits of cycling, e.g. through [cycle training](https://www.cyclinguk.org/campaigning/views-and-briefings/cycle-training) (not just for young people but also for adults) and through [community-club programmes](https://www.cyclinguk.org/project/community-cycle-clubs) for people of all abilities and a range of demographic groups.
* The Strategy should include a nationally-coordinated vehicle scrappage scheme. Scrappage scheme incentives should initially be targeted at the most polluting vehicles, progressing over time to less polluting vehicles. It should be funded at least in part through a purchase levy on sales of the most polluting new vehicles - and here too the threshold should shift over time. This progressive shift in the thresholds both for the purchase levy and for scrappage scheme incentives would help ensure the removal of the most polluting vehicles from the UK’s vehicle fleet initially, while gradually improving the emissions standards of the vehicle fleet over time.
* The vehicles eligible for scrappage scheme incentives should include not only the dirtiest cars but also diesel buses and lorries. As well as having ultra-low emissions standards, new lorries should be required to have [safe “direct vision” cabs](https://www.cyclinguk.org/category/tags/direct-vision-lorries) in order to attract scrappage scheme purchase incentives. That way, the scheme would not only save lives through reduced pollution but also by helping to remove lorries with lethal ‘blind-spots’.
* Scrappage scheme incentives should be available not only to support the purchase of the cleanest new cars, vans, buses and lorries, but also for pedal cycles, including electrically assisted pedal cycles (or “e-bikes”) and cargo-bikes (which can also be electrically assisted). Increased incentives should be available for people with disabilities, not least to enable them to purchase non-standard e-bikes that can be used as mobility aids.

**RESPONSES TO QUESTIONS**

**Q1: How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?**

1. Cycling UK is not at all satisfied that the measures proposed will reduce NO2 pollution as quickly as possible. On the contrary, we fear paragraph 25 of the draft Strategy is entirely contrary to this aim.
2. Paragraph 25 states:

*Clean Air Zone proposals are not required to include a charging zone. The Government believes that charging zones should only be used where local authorities fail to identify equally effective alternatives. If local authorities do conclude that charging is the only way to achieve compliance in the shortest possible time, they will be required to set out the detail of where and when charges would apply, and the vehicle types to which they would apply. They will also be required to engage with local people and fully assess the impact of such an approach and how it could be mitigated. In all cases, charging zones would apply only to older, higher-polluting models of the vehicle types, so as to have a targeted impact on pollution. Any revenues collected by local authorities will be reinvested to support local transport policies, which could cover public health projects or better town and city planning, promoting cleaner air.*

1. Cycling UK agrees with the final sentence of the above paragraph (i.e. the requirement that revenues raised from charging CAZs should be reinvested in local transport policies which contribute to the CAZ’s aims).
2. However we believe the rest of paragraph 25 would hamper local authorities’ efforts to achieve compliance with air quality limits as quickly as possible, by creating an unjustified presumption against charging CAZs. It would also force local authorities into providing unnecessarily onerous justifications for decisions to use charging as a way to enhance the effectiveness of a CAZ. The technical report published alongside the draft Strategy identifies charging zones as being the most effective way to achieve compliance with air quality standards. Conversely, if a local authority identified a package of measures that did not include charging, it would stand to reason that it could achieve air quality compliance more quickly by applying the same policy package with the addition of some form of charging. Hence the presumption against charging CAZs is not merely contrary to the aims of the strategy – and the legal requirement it is supposed to fulfil – but is downright irrational in the light of the evidence presented in the technical report.

**Q2: What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it?**

**What factors should local authorities consider when assessing impacts on businesses?**

1. The arrangements for a Clean Air Zone should of course be subject to widespread consultation. Local authorities should be encouraged to make the positive case for action on air quality, emphasising not only the health benefits of taking action to reduce clean air but also the wider benefits that can be achieved through reducing car use and increasing the use of healthy and sustainable forms of transport, such as walking and cycling (see paragraph X). Beyond that, Cycling UK does not believe the Strategy needs to offer any particular advice on how to consult on CAZs, beyond the normal processes for good local community involvement.
2. As regards the factors that local authorities should consider, they should be mindful not only of the need to ensure the efficient functioning of businesses, but also the benefits to businesses and the wider local economy which can be achieved by creating cleaner, less car-dependent local streets and communities. These include increased retail vitality, reduced absenteeism (thanks to the wider health benefits of cycling) and the creation of an environment which attracts businesses to locate to the area. Evidence for these benefits is set out in [Cycling UK’s briefing ‘Cycling and the Economy’](https://www.cyclinguk.org/campaigning/views-and-briefings/cycling-and-economy), and in the numerous references provided at the end of that briefing.

**Q3: How can Government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them?**

**Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects.**

**How can Government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives. How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?**

1. In outline, we believe the key measures of the Air Quality Strategy should include the following:

* Local authorities should be encouraged to set up charging CAZs in areas where exceedance of air quality standards is greatest and where compliance within two years or so is unlikely to be achieved without charging. The Government should provide technical support to help co-ordinate the set up of charging mechanisms, partly to reduce unnecessary duplication of effort for local authorities to assess different charging technologies, partly to ensure the compatibility of data between them. Ensuring data compatibility would in turn support the co-ordination of a well-targeted vehicle scrappage scheme – see next bullet-point.
* The Government should co-ordinate a vehicle scrappage scheme, funded primarily through an additional levy on the purchase of the dirtiest new vehicles, but also partly from some of the proceeds from local charging schemes. The emissions-threshold above which this levy would be payable should decline over time, as should the threshold for eligibility for scrappage scheme incentives. That way, the system would initially incentivise the removal of the most polluting vehicles from the UK vehicle fleet, with the fleet’s overall emissions standards becoming progressively cleaner over time.
* In the case of new lorries purchased under the scrappage scheme, the requirements should not only specify clean lorries but also safely-designed ‘direct vision’ lorry cabs, which enable drivers to see pedestrians and cyclists around them as easily as a bus driver can. Transport for London (TfL) has already set out measures to incentivise (and ultimately to require) a progressive shift towards ‘direct vision’ cabs, as has the High Speed 2 Rail Ltd (the Government-owned company set-up to deliver the High Speed 2 rail scheme). By making ‘direct vision’ cabs a requirement for new lorries purchased through the scrappage scheme, the Government could reduce not only the death toll due to air pollution but also that due to lethal lorry blind spots.
* Eligibility for ‘scrappage’ subsidies could also be based on the frequency with which a vehicle was incurring CAZ charges – e.g. a vehicle would become eligible for the scrappage scheme having incurred (say) £400 worth of CAZ charges. In this way, the incentive payments would be focussed on vehicles that were being used regularly in the most polluted areas. The requirement to pay a certain level of CAZ charges for a given vehicle before it became eligible for scrappage subsidies would also deter people from “gaming the system”.
* Scrappage incentives should be available for individuals not only to replace the dirtiest motor vehicles with clean new ones, but also to purchase pedal cycles, including electrically-assisted pedal-cycles (or e-bikes).
* The Strategy should stipulate that charging Clean Air Zones should include a requirement to develop and implement a Local Cycling and Walking Infrastructure Plan (LCWIP). The development of LCWIPs should be carried out in accordance with the [guidance on LCWIPs recently issued by the Department for Transport](https://www.gov.uk/government/publications/local-cycling-and-walking-infrastructure-plans-technical-guidance-and-tools) – in other words, it should involve the identification of comprehensive local cycle and walking networks, a prioritised list of schemes, and the incorporation of the LCWIP into other local transport plans and programmes (including new developments and highway maintenance programmes). The development and implementation of an LCWIP should be one of the eligible uses of the proceeds from charging CAZs.
* In addition to LCWIPs, CAZ charging revenues should also be available to support complementary action to encourage cycle use among people of all ages and backgrounds, e.g. the provision of cycle training and other opportunities to ‘give cycling a try’ and to gain the necessary skills and confidence. Cycle training and community-based opportunities to discover or rediscover cycling should be targeted at a range of demographic groups: e.g. for children and teenagers, for adults in workplaces, for health patients and people with disabilities, for community clubs serving diverse ethnic and other demographic groups.

**Q4: How best can governments work with local communities to monitor local interventions and evaluate their impact?**

1. As a cycling charity, the monitoring of air quality is an issue outside of Cycling UK’s expertise. We defer to the responses of our partners in the Healthy Air Campaign on this matter.

**Q5: Which vehicles should be prioritised for government-funded retrofit schemes?**

1. As a cycling charity, Cycling UK does not have the technical expertise to know when it is more cost-effective to retrofit a vehicle, rather than simply replacing it under the scrappage scheme. However, the basis for this trade-off should be the option which is most cost-effective for achieving compliance with air quality limits within the minimum time possible.

**Q6: What type of environmental and other information should be made available to help consumers choose which cars to buy?**

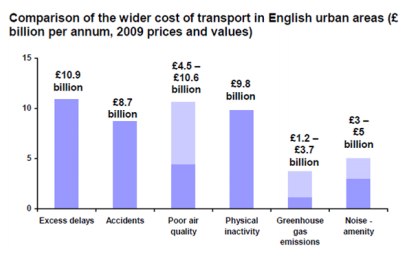
1. The provision of environmental information for prospective car purchasers is also an issue outside of Cycling UK’s expertise. We defer to the responses of our partners in the Healthy Air Campaign on this matter.

**Q7: How could the Government further support innovative technological solutions and localised measures to improve air quality?**

1. The Office for Low Emissions Vehicles (OLEV) should provide subsidies not just for the purchase of electric cars and vans, but also for electric-assisted pedal-cycles, including electrically assisted cargo-bikes. In other words, subsidies for e-bikes (including electric-assisted cargo bikes) should not be available only to those trading in an existing dirty car or van, but also for those wishing to buy a new electrically-assisted pedal cycle – whether for personal or business use – in the same way as is already possible for electric cars and vans.

**Q8: Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?**

1. A 2009 report by the Cabinet Office on urban transport problems in England found that the societal costs of these problems was, in round numbers, around £40bn, with the costs of air pollution, congestion, road danger and physical inactivity being of roughly equal magnitude (around £10bn each).



1. It is for this reason that Cycling UK strongly advocates that measures to promote cycling and other forms of healthy and sustainable transport should be at the heart of this strategy, i.e. it should not simply focus on replacing diesel vehicles with cleaner alternatives. The latter approach might tackle air pollution but would fail to address the other major costs of urban transport problems. Conversely, focusing on walking and cycling in particular would be a highly effective and cost-effective way not only to reduce air pollution but also to tackle these wider problems.

Roger Geffen

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