

31 October 2020

Dear Sirs,

Birmingham Air Quality Action Plan

Birmingham Friends of the Earth (BFOE) welcomes the opportunity to comment on Birmingham City Council's Air Quality Action Plan. We are an environmental campaigning and educational organisation based in Birmingham, engaged with advancing the principles of environmental sustainability and positive environmental change with an emphasis on issues which affect Birmingham.

Introduction

Our consultation has been based on comments and suggestions from our meetings and email feedback collated from other members. Please note that in addition to this email response we have also submitted a response via the Birmingham Be heard on line survey form which reflects our comments given here.

Could we make any improvements to the air quality action plan?

Action 1 - Implement Clean Air Zone and Mitigation Measures

We believe the CAZ should still be introduced at the earliest opportunity. While COVID-19 measures resulted in reduced levels of air pollution, the reluctance of people to use public transport has led many people to switch to using their cars. Consequently traffic and air pollution has now almost returned to pre COVID-19 levels despite the fact that around 59% of people are still working from home. So the temporary fall in air pollution resulting from COVID-19 restrictions must not be used as a reason for postponing the introduction of the CAZ any further, less still for postponing it.

Financial mitigation measures aimed at individuals and groups adversely impacted by the CAZ may need to be reinforced and strengthened, given the economic impact of COVID-19.

It is right to deter the most polluting vehicles, based on the principle of 'polluter pays'. There is a strategic need to push the most polluting vehicles off the road and to encourage people and businesses to invest in low emission transport. Postponing the CAZ any further or abandoning

altogether would send the wrong signal to the car industry and to those purchasing vehicles at this time.

Driving is still too cheap, relative to public transport, to make the required modal shift happen. The CAZ makes charges relate to pollution emitted, which is a correct principle for air quality.

The recent Emergency Transport Plan has enabled schemes for making cycling and walking safer to be implemented very quickly to prevent traffic and air pollution levels from rebounding and potentially exceeding pre COVID-19 levels. The deterrent effect of a charging CAZ will reinforce this push to prevent undesirable traffic growth.

In the longer term a more flexible conurbation-wide road user charging scheme should be considered which could supplement or replace the CAZ.

Action 2: Support and Implement Strategic Transport Improvements

We support the aim for an integrated public transport system which has a pricing structure, frequency and quality to attract people from their cars. However, to enable this vision to be achieved the bus system in the West Midlands will need to be re-regulated such that the WMCA sets routes timetables and ticketing. This could take the form of the long established franchising system in London, This option is already open to Combined Authorities under the terms of the 2017 Buses Bill.

We would urge the city council to work with the WMCA and its constituent authorities to ensure that re-regulation of buses in the West Midlands occurs within the next mayoral term.

We agree that the A38 trunk road through the city centre should be examined as to whether it should continue to function as a through route. Removal of structures and closing the tunnels is discussed but alternatively, these could be repurposed for use by potential new cross city Metro or Sprint routes.

We would like to see what is envisioned, what the potential benefits are deemed to be and how this is to be consulted on before supporting this strategy. We would question whether the A4540 Middleway should be upgraded to accommodate all of the traffic currently using the A38 through the City Centre. There is no information on what an upgraded Middleway would actually mean, but we assume it would involve increasing capacity by widening and constructing grade-separated junctions to accommodate displaced traffic from the A38. We would strongly oppose such an upgrade because it would undermine the city council's stated aim of reducing private car use and could undermine the planned Clean Air Zone. In effect air pollution from the city centre A38 would be displaced to parts of the Middleway, particularly the northern and Western sections.

Any strategic transport improvements should not include any element of increasing road capacity as this will just undermine improvements to active travel and public transport infrastructure by inducing increased car traffic and air pollution.

Reference to upgrades and re-opening rail routes should be backed up with lobbying the DfT and WMCA to electrify any remaining unelectrified routes in the West Midlands. This could be full electrification or partial electrification with battery / hydrogen power for the unelectrified sections.

Action 3: Promote Behaviour Change from Single Occupancy Private Cars

We see behavioral change as essential in bringing about a modal shift away from single occupancy private cars. It is stated that access to efficient public transport will be of high importance in reducing demand for car trips. However, given the continued reluctance of people to use public transport in light of COVID-19, emphasis should be given to enabling people to walk or cycle safely for shorter journeys.

Promoting more lift sharing is problematic given current COVID-19 guidelines on social distancing. Emphasis should therefore be on promoting a shift away from private car use altogether. Heightened measures to promote and facilitate active travel and integrate with public transport are necessary.

We would also suggest integrating some basic air quality and CO2 emission info into existing travel sites such as networkwestmidlands.com to help travellers plan their journeys to minimise their emissions.

Action 4: Promote the Use of Alternatively Fuelled Vehicles

While we accept that increasing the adoption of zero emission vehicles is an important strategy in reducing emissions we would like to emphasise that reducing car use is the most effective means of reducing air pollution. It is also worth bearing in mind that one third of the air pollution from road vehicles is from non emissions sources such as from brake and tyre wear.

Retro fitting LPG systems to certain vehicles is, we believe, a useful stop gap measure to tackle emissions from certain types of vehicle particularly hackney carriages where new electric vehicles are expensive and in short supply. However it should not be used to delay or avoid replacement by zero emission vehicles. We regard it as a stop gap as it still contributes to CO2 emissions and NO2 and PM 2.5, albeit to a lesser degree than diesel fuel.

It is encouraging to that NXWM have stated that as from this year, they no longer intend to buy any new straight diesel buses and are already operating a small fleet of electric buses. However it must be remembered that other places in England such as London and Nottingham are far ahead of the West Midlands in terms of electric bus use. We believe that re-regulation of buses in the West Midlands will be necessary to accelerate the adoption of electric buses.

Action 5 When locations are identified as having an exceedance of the air quality objectives, assess traffic management options relevant to the location

Although we appreciate that work to identify these exceedance locations is ongoing, we would like to have seen more information about where these locations are and what the monitoring strategy will be once they have been identified.

This section refers to the use of traffic management to ease the flow of traffic. However, the priority should be to reduce traffic and specifically car traffic given that this accounts for the majority. Priority at junctions should be given to cycles and buses. Options to be considered at such locations should include cycle lanes, Low Traffic Neighbourhoods and Car Free School Streets rather than just management of traffic flow at the junctions.

If reductions in air pollution are not being achieved at these locations then consideration should be given either to extending the CAZ boundary to include such locations if they are near the Middleway or introducing localised Clean Air Zones in other parts of the city where additional monitoring has identified air pollution hot spots.

Action 6: Develop Policies to Support Better Air Quality

We strongly support measures to encourage walking and cycling. However we feel that annual targets should be set and regularly reviewed and assessed for compliance.

Action 7: Control Industrial and Domestic Emissions

We agree regarding the problem of wood burning stoves and with the measures proposed. In general such stoves adversely impact air quality.

This should also apply to large biomass burners, which are an additional source of air pollution that should be identified and controlled. They are not 'renewable energy' unless the wood source is local and is grown on a sustainable scale.

Tyseley Incinerator is a huge omission in the Action Plan. Birmingham City Council owns the plant and has 'power to prevent' its emissions and therefore has a responsibility to plan to prevent its future emissions. BCC is also the public health authority, so is responsible for seeing that waste disposal is compatible with public health principles, primarily "do no harm". In the period 2020 to 2025, the Council has to make decisions about the future of its plant; it having been designed in 1995 to have a 30 year life. The same argument about moving away from polluting vehicle technology applies equally to waste incineration. The plant converts municipal refuse into air pollution and ash on a huge scale. This was a technology choice by BCC in 1995 and a decision to ignore the waste hierarchy. Birmingham has been made dependent on its big burner by a long-term failure to re-use, recycle, compost or digest the waste, putting it at the bottom of the recycling league of local authorities. This Air Quality Action Plan should recognise the air quality issues created by this choice.

In the CAZ, BCC will charge drivers for bringing older cars into city centre, but its own plant at Tyseley will pay no charge at all for emissions equivalent to hundreds of cars being on the road, giving itself the benefit of 'free to pollute' instead of 'polluter pays'. There is an obvious contradiction and arguably a conflict of interest between the air quality and waste disposal functions.

Birmingham City Council is the waste authority and it has the monopoly on household waste collection for 400,000 households, with weekly collection rounds that are delivered to the Tyseley plant, all being paid for by the council tax payers. Residents cannot choose a different service and their waste legally belongs to Veolia in BCC's contract which ends in 2024.

Tyseley incinerator is the largest combustion plant in the city, burning 340,000 tonnes of mixed waste per annum. This makes it the largest point source of CO₂ emissions in the city with 308,485 tonnes emitted in 2019 and reported to Environment Agency. We calculate this to be equivalent to about 208,000 new cars driving an average mileage for one year. The electricity generated at the plant has a carbon footprint much greater than the average for grid electricity. Its operation is not compatible with the Climate Emergency Declaration of Birmingham City Council June 2019 which committed it to take steps to reduce to net zero the carbon emissions by the council by 2030. Birmingham Friends of the Earth argues that a plan to run down and close down the plant should be developed, urgently.

A co-product of combustion is Nitrogen oxide NO_x is 300 times more powerful as a greenhouse gas than CO₂.

From a public health standpoint, the plant is located in a built-up area, with more than one million residents living within 10 miles who are potentially exposed. We note that under conditions of 'temperature inversion', the emissions will not disperse from the chimney, but remain near the ground.

East Birmingham (downwind) has the worst health statistics of any part of the city, burden of excess morbidity and mortality according to the "Birmingham Public Health Strategy 2019-2023", to which health inequality emissions from the Tyseley plant are contributing.

The plant produces chemicals that are known toxins and carcinogens, similar to those from vehicle exhausts, e.g. Nitrogen oxides (NO_x) and Particulate Matter. The plant also emits dioxin, furan, metals and acids into the air, as reported to the Environment Agency. The plant smells of rotting organic matter and sulphur etc, before it is burned; the smell often being detectable across a wide area of the city. The process also produces a lot of dust, i.e. 72,000 tonnes of ash reported in 2019.

Tyseley plant burns whatever refuse goes into it, i.e. the input is uncontrolled and emissions are variable. Spikes of pollution will be emitted when it is starting up or shutting down, so not working at optimum burn temperature. Reporting as compliant to the Environment Agency's permit is not equivalent to having no impact on public health. It produces toxins for which there are no safe minimum levels; hence these should be minimized, and prevented, by a plan to end the incineration of mixed waste.

The levels of the pollutants to air are self-reported by the operator Veolia plc. BCC should check them at intervals, but we do not believe that this happens.

Emissions from the plant are additional to those from other sources, e.g. neighboring industrial plant and nearby road systems and junctions. There should be a point source measuring device next to the plant to discover its contribution to bad air in this neighbourhood.

The plant is today burning a very different feedstock from what it originally designed to burn, and further big changes to waste composition are predictable by 2024, with less organics and a greater proportion of plastic. It may well not be able to operate within the limits of its EA permit for much longer. If it is compliant with Environment Agency regulations today it may not be by 2024. The regulations are anyway due to change and the permit to be reviewed.

BFOE expects to see identification in the Air Quality Action Plan of BCC's Tyseley incinerator as a major issue for Air Quality over next 10 years, and a commitment to plan to end the incineration of waste at this plant.

Yours faithfully

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Birmingham Friends of the Earth