

26 April 2019

Birmingham Air Quality Strategy

Birmingham Friends of the Earth (BFOE) welcomes the opportunity to comment on Birmingham City Council's Draft Air Quality Strategy. 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 meeting and email feedback gathered and collated from other members.

1 Priorities

Although we broadly agree with the six priorities highlighted in the Strategy, there are some additional considerations which we think should be included.

- 1.1 We believe that in building support for the agenda, a specific reference should be made to the West Midlands Combined Authority because of its role in determining many transport policies. A conurbation-wide strategy should be developed with a view to introducing a CAZ for the whole West Midlands conurbation. Ultimately this could take the form of a variable road user charging scheme to cover the whole West Midlands conurbation, based on GPS and transponders fitted to vehicles.
- 1.2 A specific mechanism for monitoring how proposed transport schemes, planning approvals and master planning accord with the objective of improving air quality. Steps should be taken to ensure that transport investment and new development supports policy aims of improving air quality and cutting carbon emissions. We are aware of a number of transport schemes and new developments which either do not support the objective of improving air quality or even undermine it. For instance the proposed widening of the A457 Dudley Road / Spring Hill will increase road traffic and air pollution therefore potentially undermining the effective functioning of the CAZ and appears to be in contradiction of wider air quality objectives for reducing emissions.

- 1.3 We believe improving and extending the air pollution monitoring network should be included as one of the priorities.

We welcome that the strategy recognizes the need to maximize synergies between improving air quality and reducing carbon emissions. In general, tackling air pollution will also reduce carbon emissions.

2. The Pledges

Pledge 1: We will introduce a Clean Air Zone in Birmingham City Centre

This pledge will have a significant positive impact on air quality in Birmingham City Centre.

However we believe this statement should be amended and words 'city centre' should be removed. Although the CAZ just covers the city centre, the modeling undertaken for BCC indicates that the CAZ should produce improvements in air quality across the whole city. Furthermore, as BCC has already committed to introducing the CAZ, we believe this pledge should be updated so that if reductions in air pollutants are not being achieved, then consideration should be given to extending the boundary of the CAZ or introducing 'satellite' Clean Air Zones in other parts of the city. Please see our response to the CAZ consultation.

Pledge 2: We will continue to deliver a world class transport system, which prioritises public transport, cycling and walking.

The successful delivery of this pledge will make it easier for people to choose cleaner and environmentally friendly forms of transport.

We agree that successful delivery of this pledge will make it easier for people to choose cleaner and environmentally friendly forms of transport. However we believe the actual pledge is flawed.

- Given that Birmingham is a long way off having a world class transport system which prioritises public transport cycling and walking, continuing with the current system will not result in significant improvement.
- The pledge should make it clear that the world class transport system to which it refers should be a low emission one where public transport should ultimately be a zero-emission, decarbonised system.
- Re-regulation of the bus system is essential to achieve a world-class bus network with good value fares. The current system means that bus routes and timetables are designed by operators to achieve their own profitability targets and pays little regard to environmental or social objectives such as the need to reduce air pollution. If buses are to play their part in tackling air quality they must be re-regulated.
- Stronger enforcement of parking and driving laws is necessary. For example, cars parked on footways discourages walking.
- There is a lack of safe crossings on busy roads and at some junctions which further discourages walking. Walking should be made safer and more attractive. Quite often, the needs of pedestrians are relegated to third place below those of car users and cyclists.
- Cycling routes could be significantly improved in terms of breadth and safety.
- New suburban rail stations to be opened where practical.
- BCC and TfWM should lobby central government for electrification of the remaining non-electrified

network within the West Midlands.

- Increased capacity and breadth of the tram network.
- Freight transport is a significant source of emissions. Consideration should be given to lorry restrictions in urban areas, freight consolidation centres, and planning policies which encourage transport of freight by rail or canal - even into the city centre to serve stores. New Street and Moor Street stations could be used for goods delivery very early in the morning before most passenger trains have started running. Lighter cargos for local delivery could be transported by cargo bikes or e-trikes instead of vans.

Pledge 3 - We will identify schools which are exposed to air pollution problems and work with the school to identify intervention strategies to reduce the exposure of the children.

This pledge will help reduce the number of journeys in the most polluting vehicles.

We strongly agree with the above.

- We would ask over what time frame should these schools be identified?
- We would suggest some of the following intervention strategies to reduce exposure such as:
 - Wider roll-out of school streets – i.e. closure of roads serving schools around school opening and closing times.
 - Reintroduction of walking buses.
 - Creating low traffic neighbourhoods e.g. by closing off rat-runs for through traffic (for example in the Little Holland scheme in Walthamstow),
 - Safer routes to school – cycle friendly routes using quiet roads and/or segregated paths.
 - Anti-idling enforcement supported by education/public information campaigns to reduce unnecessary idling.

Pledge 4 - we will expand our air quality monitoring network, incorporating new technologies and through partnership working with educational institutions and citizen science projects we will make the results readily available to all.

This pledge will help reduce the number of journeys in the most polluting vehicles.

We strongly agree with the above. However we would like to add the following

- Figures should be paired with facts to give context on the consequences of the emissions of NO₂ and PMs.
- As suggested, data from the traditional monitoring stations and diffusion tubes could be supplemented and enhanced by the inclusion of data from new portable monitoring technologies which can be integrated with real-time GPS.
- The locations of existing fixed monitoring stations should be reviewed and consideration given to adding new ones, although we appreciate these are quite expensive.
- We suggest that introducing many additional lower cost monitors would be better and more cost effective than a having few additional but expensive fixed monitoring stations. Diffusion tubes and portable monitoring equipment may be able to provide sufficient data of acceptable quality instead of additional monitoring stations.
- The expense of some monitoring equipment may mean it is more cost effective to spend the money on low cost solutions to air pollution such as employing more lollypop people.

- We would ask how the monitoring network will be expanded. We also believe a time scale should be established for expanding the monitoring network. For instance some expansion and enhancement of the monitoring network should be in place for the commencement of the CAZ, so that its impact can be better monitored.

Pledge 5 - we will further develop our approaches to tackling emissions from both existing buildings and proposed developments,

This pledge will help ensure that reducing emissions and exposure to air pollution are key considerations for decision making when planning the development of buildings and public space.

We agree that any proposed development should be carefully assessed both in terms of its role in producing emissions e.g. from increased road traffic and in terms of the exposure of its occupants/users to the emissions.

Tackling emissions from proposed developments can be addressed through the planning system, but this may be more difficult to apply with existing developments. Could measures be introduced which are retroactive? If so, how will they be enforced?

- The planning system has a crucial role to play in ensuring that new developments can be safely and conveniently accessed by walking, cycling and public transport so that fewer people have to drive there. Too often, car access is prioritised over access by cycling, walking and public transport. Walking to some developments is unsafe, unpleasant and inconvenient. One only has to look at the car-centric design of the recent retail developments in Selly Oak to see this in practice.
- Given the above we would suggest planning policies be re-assessed to see if they support air quality objectives and where necessary updated to reflect the need to address air pollution.
- Zero car parking could be applied to some proposed developments located in the city centre or indeed in other parts of the city where access by public transport, walking and cycling is possible.
- A workplace parking levy could be introduced in the city centre. This could provide an important source funding for new or improved public transport, cycling and walking infrastructure.
- Tyseley Incinerator is owned by BCC and represents a large source of emissions. These could be reduced with higher recycling rates.
- Replacing gas as a heating source in buildings with cleaner, zero-carbon alternatives now needs to be considered. Domestic gas heating accounts for around 16% of total NOx emissions. The government plans to ban all domestic gas heating in new housing from 2025. Planning policies should be assessed and amended where necessary to address this issue.

Pledge 6 - We will work with key partners and stakeholders throughout the West Midlands region to help inform our own work and provide leadership where required.

This pledge will help build a broad base of support at a local, regional and national level to improve air quality in the city

We strongly agree with the above but would like to add the following:

- Stakeholders must include individual members of the public.

- As action is taken, some groups may need particular support such as those who cannot avoid vehicle use and are unable to upgrade to low or zero emission vehicles. The support will ensure that as many people as possible remain 'on board' and that as wide a consensus as possible is built and maintained.
- We would suggest that air pollution can only be tackled effectively on a conurbation-wide approach. Please see our comments in Section 1.1 under 'Priorities'.

3. Are there any other suggestions or comments about the overall strategy, priorities or the pledges?

- 3.1 The city council should join with other local authorities and organisations in lobbying central government to adopt the more stringent World Health Organisation (WHO) annual average limit for PM 2.5 of 10ug/m³. The current EU and UK limit value is more than double this at 25ug/m³. While waiting for the government to act, the city council could take a lead by adopting the WHO value for its own monitoring and reporting purposes and attempt to reduce PM 2.5 to below the WHO guidelines.
- 3.2 We believe the strategy should mention aviation emissions. Although Birmingham Airport is located outside the city boundary, it is a significant source of emissions which will contribute to background levels of air pollution across the city as well as creating more localised adverse effects in parts of East Birmingham.
- 3.3 How will the strategy and the implementation of associated measures be funded? With central government unable or unwilling to provide sufficient financial backing for measures which improve air quality, we would suggest that an additional funding stream needs to be established to make these necessary measures possible. In addition to any excess revenue generated by the CAZ, examples of other funding mechanisms which could be considered include:
- work place parking levy
 - local payroll levy
 - local property taxes
 - a developer levy

Yours faithfully
Martin Stride

Birmingham Friends of the Earth