

DRAFT CLEAN AIR ZONE (CAZ) FRAMEWORK

A consultation response from Cycling UK

About Cycling UK

Cycling UK is an independent charity, with around 70,000 members and supporters. Founded in 1878, we have championed the cause of cycling for well over a century. Our vision is of a healthier, happier and cleaner world, because more people cycle. We want people of all ages, backgrounds and abilities to be able to cycle safely, easily and enjoyably, and we promote all forms of cycling.

We advocate cycling for many reasons, not least because it is amongst the solutions to many serious challenges now facing the UK, including physical inactivity, rising obesity, climate change, maintaining a good quality of life for all citizens and, of course, illegal levels of air pollution.¹

We provide information and legal services to cyclists, organise cycling events, protect the interests of existing and would-be cyclists, and make representations on issues of public policy.

Introduction

Encouraging increased cycle use is a highly cost-effective way to reduce air pollution from motor vehicles. Crucially, it has a wide range of co-benefits, which are generally not achieved (or achieved to a lesser degree) by focusing on cleaner cars:

- Reduced road danger, safer streets and more attractive neighbourhoods;
- Greater freedom of movement for those who cannot or do not drive, including children and many older, less well-off or disabled people;
- Reduced greenhouse (as well as pollutant) emissions;
- Reduced demand for energy and improved energy security (n.b. whilst it is possible for motor vehicles to be 'zero-carbon' as well as 'zero-pollution', simply switching to zero-carbon motor vehicles for our existing travel patterns would make it increasingly difficult to meet the extra demand for zero-carbon energy);
- Reduced demand for road-space and parking space, reducing the pressures for additional road network capacity and freeing up space in towns and communities for alternative uses.

Cycling: problem or solution?

Generally speaking, findings show that it is better to exercise (or cycle) in a polluted environment than to remain inactive. Research also tends to suggest that car drivers are exposed to more pollution than cyclists, although not all studies come to this conclusion:

- In 2016, an academic paper which examined the risk v benefits of travelling actively at the same time as being exposed to polluted air, concluded that the benefits "*outweighed the harm caused by air pollution in all but the most extreme air pollution concentrations.*" It also said that if cycling replaces driving, the trade-off would be even more beneficial.²
- An earlier study (2001) from Copenhagen, concluded that "*... even after taking the increased respiration rate of cyclists into consideration, car drivers seem to be more exposed to airborne pollution than cyclists.*"³

For details of a range of other research into cyclists' exposure to air pollution, see Cycling UK's briefing on Air Quality. www.cyclinguk.org/campaigning/views-and-briefings/air-quality

¹ For more detail on cycling's contribution to cleaner air, tackling climate change, public health, the local and national economy and enhancing the quality of life, see Cycling UK's briefings at: www.cyclinguk.org/campaignsbriefings

² Tainio M, et al. *Can air pollution negate the health benefits of cycling and walking?* Published in *ScienceDirect*. 2016. <http://www.sciencedirect.com/science/article/pii/S0091743516000402>

³ Rank J et al. *Differences in cyclists and car drivers exposure to air pollution from traffic in the city of Copenhagen.* Published in *Science of the Total Environment*, vol 279, p 131-136, 2001. <http://www.sciencedirect.com/science/article/pii/S0048969701007586>

Our key points

- Investing in high-quality cycling and walking conditions is a highly cost-effective means of tackling pollution, in ways that also have wider synergistic benefits in terms of reducing congestion, greenhouse gas emissions and noise, while creating a safer and more equitable transport system for those who are unable to drive – including children, as well as many older people, people with disabilities and those from lower income groups.
- We therefore urge that the CAZ guidance should reference: the *Local Cycling and Walking Infrastructure Plan* (LCWIP) process; and ‘cycle-proofing’ (see our response to Q2). Both of these should be compulsory for CAZ areas.
- Finally, we urge that the revenues from CAZ charging should be specifically earmarked for investing in cycling and other forms of healthy and sustainable transport (see our response to Q3).

Comments on introductory paragraphs

The formal consultation questions do not include an invitation to respond to the introductory Section 1 of the draft CAZ framework. We have two comments, as follows:

Para 8: We support the recognition that CAZs can, and should, focus on measures that also support the aim for the UK to meet its carbon emissions targets as set out in the Climate Change Act. We believe it should also aim to meet the UK’s obligations under the 2015 Paris Agreement of the UN Framework Convention on Climate Change (UNFCCC) and the European Union’s 2030 climate and energy framework.

Para 9: We agree with the need for “immediate action” to improve air quality. However, we also believe that more intensive action is needed in the light of the High Court’s ruling on the inadequacy of the Air Quality Strategy itself. In our view, CAZs need to be implemented in more towns and cities, and to be wider in scope.

RESPONSES TO CONSULTATION QUESTIONS

Q1: Are the right measures set out in Section 2 (the general approach to Clean Air Zones) of the draft CAZ framework?

In general, Cycling UK supports the measures proposed in the draft CAZ framework. We particularly support:

- The recognition of the need for “immediate action” to improve air quality (para 9), and that CAZs can and should focus on measures that also support the aim for the UK to meet its carbon emissions targets as set out in the Climate Change Act (para 8);
- The aim to ensure that new developments support the wider aims of CAZs (para 41);
- The use of traffic management measures to improve cycling conditions and facilitate the creation of high-quality local cycling networks (para 47); and
- Measures to encourage healthy and active travel (paras 96-99).

However, our answers to questions 2 and 3 below highlight a number of additional measures which we believe should be included, or existing proposals that need to be strengthened.

Q2: Are there additional measures that should be highlighted under each theme? Please give evidence of impact if possible.

- ***Theme 1: Supporting local growth and ambition (decoupling growth and pollution)***

Paras 28 - 37: Engaging local communities

We agree with the aim to engage local communities in supporting, and actively contributing to, action to improve local air quality, e.g. through awareness campaigns to encourage more walking and cycling. However, there are two additional points which need to be recognised in the CAZ framework:

- i. Experience (e.g. from the Cycle Superhighway projects in London) suggests that travel behaviour change campaigns to promote cycling are most effective when combined with physical improvements to cycling conditions in the same area.
- ii. The most effective behaviour change campaigns on cycling do not merely offer information and encouragement, but provide targeted opportunities for different groups to give cycling a try. For instance, Cycling UK's Community Cycling Club projects offer opportunities for groups such as women, health patients, people with disabilities, from BAME communities, deprived areas and other disadvantaged groups the opportunity to give cycling a try in a context which meets their needs and circumstances. This approach is a lot more effective than awareness campaigns alone. (<http://www.cyclinguk.org/project/community-cycle-clubs>).

With this in mind, we specifically urge that projects of this kind are included in the toolkit guides to support Public Health Directors in delivering Clean Air Zones.

Paras 41-46: Making the best use of the local authority role in land use planning

We agree with the aim to ensure that new developments support the wider objectives of CAZs. Below, we highlight two specific measures that should be referenced in the CAZ framework to further this aim:

- i. It should make reference to the principle of 'cycle-proofing', adopted by the Department of Transport in 2013. 'Cycle-proofing' is about ensuring that opportunities to create good cycling conditions (or to improve existing conditions) are designed in at the outset when planning new highway and traffic schemes, new developments and indeed planned highway maintenance works. See www.gov.uk/government/groups/cycle-proofing-working-group.
- ii. It should also reference the *Local Cycling and Walking Infrastructure Plan (LCWIP)* process, due to be adopted as part of the Government's forthcoming *Cycling and Walking Investment Strategy (CWIS)*. English highway authorities will be encouraged (but not required) to draw up LCWIPs following DfT guidance to be issued shortly. These should set out evidence-based plans to develop comprehensive local cycling networks, and a programme of schemes to improve both walking and cycling conditions. The DfT is likely to recommend that LCWIPs should have the status of Statutory Planning Documents. This will help local authorities secure improved cycling and walking conditions through the planning system.

Both the LCWIP process and 'cycle-proofing' are advisory for English highway authorities (though in Wales, the *Active Travel (Wales) Act* makes it a legal requirement for Welsh highway authorities to follow a similar process). Cycling UK believes both LCWIPs and 'cycle-proofing' should be compulsory in CAZ areas.

Para 47: Optimising traffic management

We support the stated aim to use traffic management to encourage more active travel. We have two comments on this:

- i. The first bullet point refers to the option of “improving road layouts and junctions to improve traffic flow”. We suggest adding the words: “*or to create safer and more convenient cycling and walking conditions*”. The lack of safe cycle provision on main roads and junctions (which generally provide the most direct and convenient routes for cycling) is a major reason why UK cycle use is so low compared with many of our continental neighbours. Junction design is particularly important, given that 75% of cyclists’ injuries happen at or near junctions (and this percentage is higher still in urban areas, where CAZs will apply).
- ii. The *LCWIP process* (see above) should also be referenced in bullet-point 5 (“creating safe, continuous and convenient cycling and walking networks”). This bullet-point should also appear earlier in the list, preceding the 3rd bullet-point (“public realm improvements to create town centre environments that are attractive to cyclists and walkers” – a point we strongly welcome) on the basis that these improvements can themselves form part of the cycle network planning process which is expected to appear in the forthcoming LCWIP guidance.

Paras 48-51: Local authority leadership in fleet procurement and operations

We agree that councils and other public bodies can play a role in supporting the uptake of clean vehicle fleets, through their procurement roles. We add the following points:

- i. Local authorities should be encouraged to support the provision of *hire-bikes* (such as the Santander Cycles scheme in London), both as an adjunct to the public transport network and as fleet bikes for their own staff.

Electric bicycles (or e-bikes) are particularly suitable as hire-bikes, as these enable people to “try before you buy”. Recent DfT-funded research by Bike Plus (to be published shortly) has shown that e-bikes can benefit all sorts of people in all sorts of ways. As a way of introducing people to cycling, they provide a great deal of reassurance, enabling them to cycle for longer or hillier journeys than they would otherwise make, and/or to cycle (or continue cycling) in old age or when suffering disabilities which limit their ability to use regular bicycles. Crucially, offering people e-bikes on a ‘try-before-you-buy’ basis can overcome the inhibitions of those who would like to try cycling, but who fear being too slow or running out of energy. Electric hire-bikes – notably at stations – are a fantastic complement to the public transport network, providing an attractive door-to-door combination for longer journeys.

- ii. Investing in electric cargo-bikes could take a lot of white vans off our streets too.
- iii. The CAZ framework should reference the potential co-benefits for cycle safety from procuring lorries that are not only cleaner but also safer for pedestrians and cyclists. There is now growing recognition of the opportunities to reduce the risks of cyclist injuries and fatalities by progressively adopting *safely designed lorry cabs*, which improve drivers’ ability to see cyclists and pedestrians by placing them nearer to the road level and surrounding them with more window area and less metal, thereby eliminating the lethal ‘blind spots’ which cause so many cyclists’ and pedestrians’ deaths. The Mayor for London and HS2 Ltd have adopted policies to promote safe lorry designs (e.g. see [www.cyclinguk.org/press-release/2016-09-30/london-mayor-announcement-%E2%80%9Censure-dangerous-zero-star-rated-lorries-remove](http://www.cyclinguk.org/press-release/2016-09-30/london-mayor-announcement-%E2%80%9Censure-dangerous-zero-star-rated-lorries-remove%20)), and Highways England plans to do likewise. We urge that the CAZ framework commends other public bodies to adopt similar policies.

Paras 58-61: Working with businesses to recognise and incentivise action

We urge the inclusion of two additional points in the bullet-point list of measures which businesses can be encouraged to adopt (see para 59):

- i. They should be encouraged to become *cycle-friendly employers*, e.g. by providing cycle parking, showers and lockers, by improving cycle access to their sites, by supporting a workplace-based Bicycle User Group (BUG), by procuring fleet cycles (potentially including electric bikes or e-bikes) and by offering incentives and activities to encourage a shift from car to cycle use (e.g. bicycle breakfasts, cycle repair days and cash incentives to give up car parking spaces). These measures will often involve partnership with the local authority. Cycling UK's briefing on cycle friendly employers provides numerous examples: www.cyclinguk.org/article/campaigns-guide/becoming-cycle-friendly-employer.
- ii. The second, third and fifth bullet-points relate to the adoption of cleaner vehicle fleets. As with local authorities (see above), we urge that the CAZ guidance also references the scope to link this with the adoption of *safe lorry cabs*.

- **Theme 2: Accelerating the transition to a low emission economy.**

Paras 65-67: Actively supporting and facilitating the use of ULEVs; and

Paras 68- 71: Providing incentives and benefits for the use of ULEVs

We urge that these sections should also refer to the potential to support the growth of cycling, and particularly the adoption of electric cycles or 'e-bikes' (see our response to paras 48-51 above), and electric cargo bikes for delivery purposes in urban areas. We particularly flag up the potential for encouraging cycle use by making e-bikes available as public hire-bikes (i.e. schemes such as London's Santander Cycles) or through 'try-before-you-buy' schemes run in conjunction with various community projects (e.g. for women, older people, health patients and people with disabilities earlier comments on paras 48-51). We urge the inclusion of a reference to these types of schemes in the CAZ framework.

We do NOT support the proposal to *exempt ULEVs from bus lanes and other traffic management measures*. For one thing, this would be hard to enforce, as ULEVs are not visually distinct from other vehicles. For another, if the aim is to make ULEVs the norm over time (see para 127), this is a privilege that would have to be withdrawn at a later date (as ULEV use grows) if bus lanes are not to lose their value. We therefore urge the omission of this bullet-point.

Paras 78-79: Developing and evaluating new approaches

We have already highlighted the role of e-bikes in encouraging and enabling a wide range of people to enjoy the benefits of low-emissions active travel. We suggest the inclusion of a reference to e-bikes as a new technology that will benefit from good monitoring of interventions, to quantify the benefits more fully and to disseminate information on successful measures.

- **Theme 3: Immediate action to improve air quality and health**

Para 97: Raising awareness of the options (for encouraging healthy and active travel)

We support the measures listed in this paragraph. However, we reiterate our earlier comments (see response to paras 28-37) that:

- i. Behavioural interventions to promote cycling are most effective when *introduced in conjunction with local improvements to cycling conditions*, rather than in isolation;
- ii. Behavioural interventions should not focus simply on provision of information and encouragement. There is real value to *community-based projects* which provide enable

people from specific target groups (e.g. women, health patients, people with disabilities and others from groups under-represented in cycling) to 'give cycling a try'.

Para 99: Making active travel safer and easier

We support the measures in this paragraph. However, we would reiterate our earlier comments (see responses to paras 41-47) on:

- i. The relevance of the *Local Cycling and Walking Infrastructure Plan process* (LCWIPs) and the accompanying LCWIP guidance (forthcoming), which advises local authorities on planning and implementing comprehensive local cycling networks, and a programme of walking and cycling schemes (see response to Q2);
- ii. The need to apply the principle of 'Cycle Proofing', i.e. ensuring that opportunities to create quality cycle provision (or to improve existing conditions) are incorporated at an early stage in the planning and design of highway and traffic schemes (particularly at junctions), new developments and planned highway maintenance projects.

Q3: 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?

- i. Cycling UK believes that CAZ guidance should take account of the powers and duties that local authorities have under the Road Traffic Reduction Acts of 1997 and 1998. Putting both of these Acts into practice has the potential to make significant contributions to air quality objectives.
- ii. With regard to the charges for non-compliant vehicles entering a CAZ, we believe they should be set at a level likely to maximise levels of compliance. Furthermore, the revenue generated should be sufficient not merely to cover the cost of administering the Zone, but also to provide funding for high quality walking and cycling schemes within it to encourage non-polluting travel.

Qs 4-13

These questions generally relate to policies on different vehicle types in various situations, and the regulatory framework that will underpin Clean Air Zones. These issues go beyond our remit as a national cycling charity. However, as a member of the Healthy Air Campaign (www.healthylair.org.uk), we are happy to support Client Earth's responses on these matters.

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