

INTRODUCTION

About Cycling UK

Cycling UK was founded in 1878 and has 65,000 members and supporters. Our central mission is to make cycling a safe, accessible, enjoyable and 'normal' activity for people of all ages and abilities. We were 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. Our activities include representing the interests of current and would-be cyclists on public policy matters, and running practical projects to enable people of all ages, backgrounds and abilities to experience the benefits of cycling.

Key points

A summary of our response is available online at <https://bit.ly/2Bd6NCd>. However, its key points are as follows:

- *Focus on the impacts of pollution, not just the volumes of pollutants.* The draft strategy provides evidence on the quantity of key pollutant emissions but lacks data on the health and environmental impacts of those emissions. A greater focus on the latter would, we believe, reinforce our calls for a stronger focus on tackling road transport emissions, especially in urban areas, given serious resulting health impacts.
- *Aim for fewer cars, not just newer cars.* The draft strategy's response to road transport emissions relies almost entirely on replacing diesel engines with hybrid or electric engines. Whilst this is laudable, we urge the Government to give far greater weight to the wider health, congestion-reduction, road safety and quality of life benefits of aiming for overall reductions in road traffic, rather than simply for cleaner traffic. It should also bear in mind that cleaner engines would do nothing to reduce carcinogenic pollution due to the wear-and-tear of brakes and tyres.
- *Support local road user charging schemes, alongside a targeted national scrappage scheme for dirty diesels, funded by revenues from Vehicle Excise Duty (VED).* The Government's own evidence shows that road user charging is the most effective measure for achieving compliance with air quality standards as soon as possible, as required by law. Hence it is irrational that Government continues to place hurdles in the way of local authorities seeking to implement them, rather than providing support. Charging could not only help reduce demand for motorised travel but could also provide local authorities with a valuable funding stream for investing in cycling and other clean and healthy alternatives.

However we recognise the need to avoid unduly penalising those who bought diesels in good faith (believing them, incorrectly, to be an environmentally preferable alternative) or who can ill afford either to replace old polluting diesel vehicles or pay for their continued use. Hence we would support a targeted vehicle scrappage scheme, funded by a time-limited increase in Vehicle Excise Duty (VED). This would have the benefits of: (a) deterring the purchase of the dirtiest new vehicles; (b) enabling vehicle emissions standards to be progressively improved; and (c) securing funding to help improve air quality from the manufacturers of the vehicles which contributed most to the problem in the first place.

- *Rebalance overall transport spending to allow significantly increased investment in the Government’s Cycling and Walking Investment Strategy (CWIS), and support the uptake of ‘e-bikes’.* Cycling UK welcomed the laudable ambition set out in the CWIS, namely to make cycling and walking the normal options for short journeys by 2040. However we do not believe the current levels of investment are anywhere near adequate to achieve this ambition, nor the more immediate targets and aims for increased cycling and walking and improved safety by 2025. In addition to enabling local authorities to use local road user charging schemes to invest in improved cycling and walking provision, the Government also needs to increase the proportion of overall transport spending invested in the CWIS. Support for cycling, including the UK cycling industry, should be seen as a key element of the Government’s Industrial and Clean Growth Strategies, as well as the Clean Air Strategy itself.

With this in mind, we specifically call for greater support for the uptake of electric pedal cycles, or ‘e-bikes’. It makes no sense that the Government’s Office for Low Emissions Vehicles (OLEV) to provide generous support for electric cars and vans, but none whatsoever for e-bikes, especially given the role they too could play in the Government’s Industrial and Clean Growth Strategies. We welcome the prospect of potential support for electric cargo-bikes, expected to be announced in the autumn, but also urge the Government to go further on this issue.

- *Positively promote cycling while tackling two key myths that impede this aim.* We welcome the draft strategy’s recognition of the widespread misapprehension that people are better protected from pollution inside a vehicle than outside. As well as urging the Government to tackle this misapprehension, we also urge that the relevant evidence should inform public awareness campaigns on responding to pollution, by generally encouraging people to cycle rather than believe they need to remain indoors (though this advice may not apply to people with some health conditions). For most people, the health benefits of cycling far outweigh the risks.

This principle should also inform the Government’s response to misguided (albeit well-intentioned) calls for indirect back-street cycle routes as a means to avoid pollution. Cycle use can best be maximised by creating direct routes, which will often be on main roads. The aim must be to reduce the pollution on these roads, not avoid it. With this in mind, the Government also needs to tackle the myth that main-road cycle facilities “cause” pollution, rather than reducing it. Cycling UK knows of no evidence whatsoever to support this belief, and we urge the Government to support efforts to counter it.

- *Commit to new clean air legislation, reflecting the idea of air quality as a human right, and incorporating updated powers and duties from the existing Traffic Reduction Acts.* Such laws should set out the roles of the Environment Agency and Committee on Climate Change in informing pollution standards, and the roles of all relevant public bodies in setting, achieving, monitoring and enforcing these standards. The legislation should also incorporate and update powers under the existing Road Traffic Reduction Acts to co-ordinate national and local policy on reducing the pollution and other adverse impacts of road traffic.

* * *

On the following pages, we set out our fuller responses to the consultation questions relating to each chapter of the draft strategy.

CHAPTER 1: UNDERSTANDING THE PROBLEM

Q1. What do you think about the actions put forward in the understanding the problem chapter? Please provide evidence in support of your answer if possible.

Focus on the impacts of pollution, not just the volumes of pollutants

Section 1.2 of the draft strategy rightly distinguishes between:

- 'How much' of each pollutant is emitted – i.e. volumes of different pollutants; and
- 'How harmful' these emissions are i.e. the extent to which populations and or environments (particularly sensitive populations and environments) are exposed to those pollutant emissions.

Yet the data presented in chapter 1 focus entirely on pollutant volumes (i.e. 'how much'). By failing to document exposure (and thus 'how harmful'), the draft strategy underplays the importance of tackling the serious adverse health impacts of pollution from road transport.

This is all the more pressing given that, as noted in section 1.3 of the draft strategy, nitrogen dioxide is the one pollutant for which the UK (along with several other EU countries) is not meeting its statutory air quality obligations under the EU's Air Quality Directive (Directive 2008/50/EC).

We believe a clearer focus on harm caused (rather than simply the volumes of pollutants emitted) would reinforce our case that this draft strategy, like its predecessors, needs to include far stronger action to tackle road transport emissions, particularly NO₂.

Q2. How can we improve the accessibility of evidence on air quality, so that it meets the wide-ranging needs of the public, the science community, and other interested parties?

Provide better information on exposure to pollutants and harm caused

Our response to this question follows on from our response to Q1. Professionals responsible for air quality and public health need better local data on exposure to pollution and the resulting harm caused (rather than simply the volumes and concentrations of pollutants), to give them a clearer understanding of the public health priorities arising from air pollution in their areas.

CHAPTER 2: PROTECTING THE NATION'S HEALTH

Q3. What do you think of the package of actions put forward in the health chapter? Please provide evidence in support of your answer if possible.

Q4. How can we improve the way we communicate with the public about poor air quality and what people can do?

In response to Q3, we start by reiterating our response to Q2, namely that professionals responsible for air quality and public health need better local data on exposure to pollution and the resulting harm caused (rather than simply the volumes and concentrations of pollutants), to give them a clearer understanding of the public health priorities arising from air pollution in their areas.

Information campaigns should support cycling and tackle two myths

We urge the Government to ensure that public information campaigns on how people can best respond to air pollution should generally encourage people to cycle, rather than to avoid doing so (though we acknowledge this may not apply to people with certain medical conditions).

However this in turn will require the Government to take a more active role in dispelling two myths relating to cycling and air pollution:

- Firstly, the belief that road users are to some extent protected from air pollution by being inside a vehicle – and that cyclists should be advised to take less convenient routes in order to avoid that pollution.
- Secondly, the belief that cycle facilities “cause” pollution.

Myth no 1: Cyclists and pedestrians are more exposed to pollution than motor vehicle occupants.

Section 2.2 of the draft strategy (p22) rightly notes that “There is a common misconception that the air outside a car on a busy road is more polluted than inside”. It then helpfully cites evidence to counter this misconception. We are pleased to see this, having documented a similar finding (based on a significant number of references) in our own briefing on cycling and air pollution¹.

It is therefore vital that any public information campaigns do not deter people from cycling by giving the impression that members of the public in general are inherently more at risk from pollution when cycling, and/or should take less convenient routes (a position advocated, unhelpfully, by National Institute for Health and Clinical Excellence (NICE) in its guidance on air pollution and health² - this is at odds with NICE’s own guidance on Physical Activity and the Environment, which rightly calls for direct cycling routes in order to maximise cycle use). We would agree that distinct advice may need to be offered for people with respiratory conditions. However care should be taken not to deter cycling in general, to avoid unwittingly doing more harm to public health than the benefits that might be achieved. In terms of life-years gained and lost, or quality-adjusted life years (QALY’s) the health benefits of cycling far outweigh the risks involved, even taking account of injury risks as well as pollution risks.³

Myth no.2: Cycle facilities “cause” pollution

Although it is obviously difficult to prove a negative, Cycling UK knows of no evidence to support the myth spread by some politicians and media outlets that cycle facilities “cause” pollution.

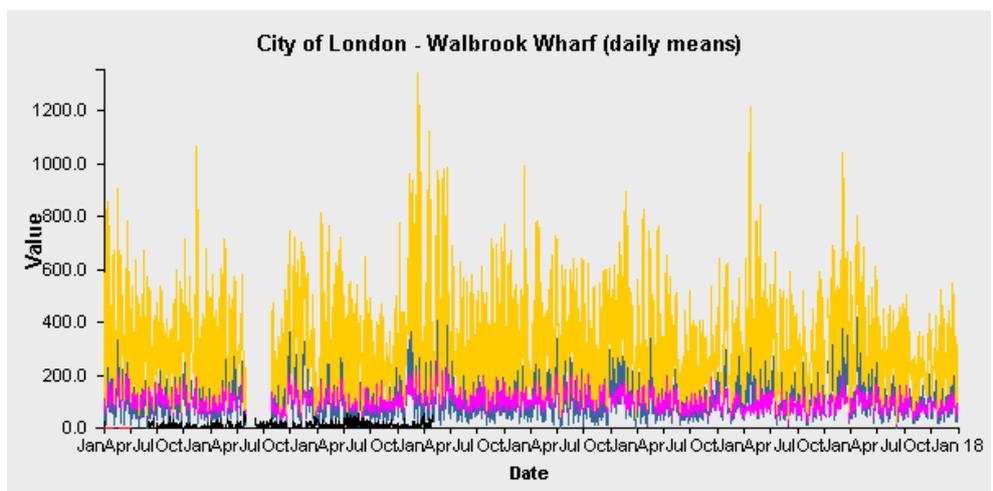
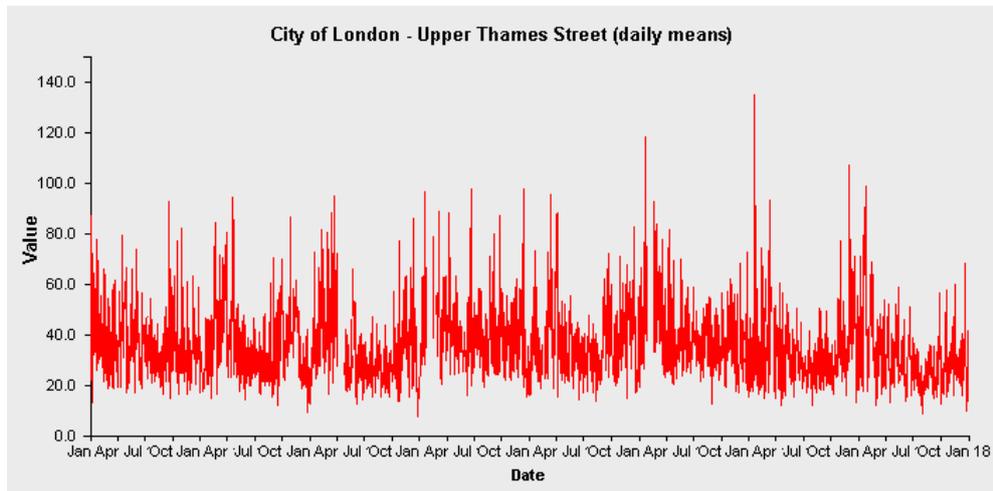
¹ For a summary of the academic debate and key references, see pp11-12 of Cycling UK’s briefing on Cycling and Air Pollution: www.cyclinguk.org/sites/default/files/document/2017/08/air-quality_1e_brf.pdf.

² www.nice.org.uk/guidance/ng70/chapter/recommendations#walking-and-cycling (see section 1.6).

³ For references, see Cycling UK’s briefing on Cycling and Health, particularly pp6-9: www.cyclinguk.org/sites/default/files/document/2017/09/health_1c_rv_brf.pdf.

The claim is regularly directed in particular at London's 'East-West Cycle Superhighway' (along Victoria Embankment – incidentally we are not aware of any similar claims ever being made about any other cycle superhighways, either in London or elsewhere).

However the only two pollution monitoring stations on or near the Superhighway show no signs of any change in pollutant levels coinciding with its construction (starting in April 2016) or completion (April 2017). N.B. Both graphs cover January 2010 to 2018.⁴



The most authoritative figure to have claimed the Superhighway has “caused” increased pollution is Prof Lord Winston of Imperial College.⁵ He has been repeatedly challenged to produce evidence to support his claim, however has at no point attempted to do so.⁶

On the contrary, reallocating road space to create cycle facilities can enable a lot more people to travel along a given section of road (as has happened on the East-West Superhighway⁷), each of them causing less pollution *throughout their journeys* than if they were driving. Hence the net effect is a reduction in overall pollutant levels when viewed across a wider geographical area.

⁴ <https://bit.ly/2B6PbrR> and <https://bit.ly/2vFaRpT>.

⁵ <https://www.standard.co.uk/news/london/londons-cycling-campaigners-hit-back-at-robert-winstons-latest-claims-that-cycle-lanes-cause-a3741156.html>.

⁶ <https://www.theguardian.com/environment/bike-blog/2018/feb/05/why-are-politicians-getting-away-with-bike-lane-claims-based-on-hearsay>.

⁷ <http://foi.tfl.gov.uk/FOI-1235-1718/20170317%20STB%20CSEW%20Journey%20Times%20V1.9%20R.pdf>.

Despite this, Cycling UK would not deny the possibility that cycle facilities could in some circumstances cause localised, short-term increases in pollution along particular roads where those facilities had been introduced (though we have no reason to believe this has happened in the case of the East-West Cycle Superhighway). However even those increases can be expected to disappear over time, for two reasons:

- In the relatively short term, people will adjust their travel habits, switching from driving to alternatives which have been made safer and more convenient;⁸
- In the long term, more people will progressively take up cycling as the network of cycle facilities becomes more comprehensive, allowing more journeys to be made by cycle in conditions which are safe and convenient. Hence every addition made to a cycle network will progressively increase the usage of other previously-built facilities.

Hence it was regrettable that Transport Minister Baroness Sugg perpetuated the myth about cycle facilities ‘causing’ pollution during a parliamentary debate on 15th January this year⁹ – though we note that subsequent ministerial answers on this point have been more cautious.¹⁰ We urge the Government to be more proactive in clarifying that there is no evidence that cycle facilities cause pollution, and that the opposite can be expected over a wider geographical area, and/or when viewed over a longer time-frame.

CHAPTER 4: SECURING CLEAN GROWTH AND DRIVING INNOVATION

Q.7. What do you think of the package of actions put forward in the clean growth and innovation chapter? Please provide evidence in support of your answer if possible.

Q9. In your view, what are the barriers to the take-up of existing technologies which can help tackle air pollution? How can these barriers be overcome?

Q10. In your view, are the priorities identified for innovation funding the right ones?

Aim for fewer cars, not just newer cars

We are pleased to note the recognition (in section 4.3) that “Many technologies and solutions support multiple aspects of clean growth”, and the statement (at the start of section 4.1) that “Clean growth means growing our national income whilst tackling air pollution, protecting the natural environment, and cutting greenhouse gas emissions.”

Given this, we wish to reiterate our concern that the draft strategy pays so little attention to the role of cycling and other clean and active travel in achieving ‘Clean Growth’. We would highlight the findings of a 2009 Cabinet Office report on the costs of transport in English towns. In essence, it found that congestion, air pollution, road injuries and physical inactivity all had costs of a similar magnitude: around £10bn each (in 2009 prices).¹¹

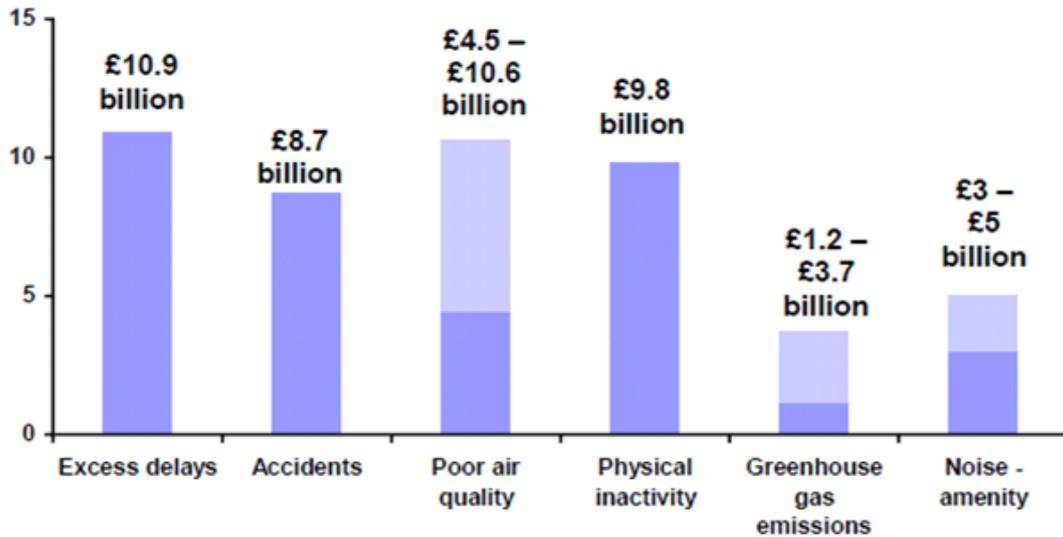
⁸ Cairns et al, 2002 (not available online but discussed at <http://rachelaldred.org/writing/thoughts/disappearing-traffic>).

⁹ <http://bit.ly/2vtgWWr>.

¹⁰ <https://www.theyworkforyou.com/search/?q=scully+superhighway>.

¹¹ <http://webarchive.nationalarchives.gov.uk/+http://www.cabinetoffice.gov.uk/media/307739/wider-costs-transport.pdf>.

Comparison of the wider cost of transport in English urban areas (£ billion per annum, 2009 prices and values)



Replacing diesel and petrol engines with electric power would tackle local air pollution and, to some extent, greenhouse gas emissions (though the scale of the latter benefit will depend on how far the UK manages to transition to low or zero carbon electricity generation). It would however do nothing to address the other problems caused by over-dependence on private motorised transport. For that, we need fewer cars, not just newer cars.

Our response to Chapter 5 includes our comments on the wider need for the Clean Air Strategy to support local measures aimed at reducing overall road traffic and increasing the use of cycling and other healthy and clean transport options. Meanwhile our response to this chapter focusses on the specific role of cycle manufacturing, and the manufacturing of e-bikes in particular, as measures that should be incorporated into the Government’s Industrial and Clean Growth Strategies, as well as its Clean Air Strategy.

Support the manufacture and uptake of pedal cycles, especially ‘e-bikes’.

The Bicycle Association has recently made the case for the economic benefits of increasing cycle use.¹² It found that, if the Government were to meet its targets to double cycle use by 2025, this would provide a £10bn boost to the British economy and sustain more than 100,000 jobs. It is thus more valuable to the economy than steel manufacturing.

We specifically advocate that Clean Air, Industrial and Clean Growth Strategies should support the manufacture and use of electrically assisted pedal cycles, or ‘e-bikes’.

The European market for e-bikes grew nearly 12-fold from 2006 to 2014 (from 98K to 1139K units annually).¹³ Yet the UK’s e-bike market is very under-developed, compared with countries like the Netherlands (where e-bikes account for 21% of bike sales) or Belgium (50% of sales).¹⁴

¹² <http://s27245.pcdn.co/wp-content/uploads/2018/06/The-Value-of-the-Cycling-Sector-to-the-British-Economy-FINAL2.pdf>.

¹³ www.ziv-zweirad.de/uploads/media/European_Bicycle_Market_Profile_2015_by_CONEBI_01.pdf.

¹⁴ <https://ecf.com/news-and-events/news/62-million-electric-bicycles-2030-eu-need-home>.

Initial feedback from demonstration projects run by the charity CoMoUK (previously known as Carplus Bikeplus) found that that 46% of participants were using e-bikes for regular trips that they had previously made by car or taxi.¹⁵ A separate e-bike hire project in Brighton found that participants reduced their car use by an average of 20% during the project.¹⁶ These results match findings of reduced car-use from other e-bike projects in the UK and the Netherlands¹⁷, Norway¹⁸, Switzerland¹⁹, Australia²⁰ and California.²¹

Taken together these studies also indicate that:

- People are willing to use e-bikes for longer and/or hillier trips than they would be willing to make using conventional bicycles;
- Their additional speed means they can compete with cars on journey times over longer distances than conventional bicycles can;
- For drivers wishing to reduce their car use, e-bikes are in many ways a preferable alternative to e-cars. They cost less to operate, they provide additional health and (in many cases) time-saving benefits, they are easier to store (avoiding the need to find and pay for parking spaces), and their batteries are easier to charge.

We know of no direct comparisons of the cost-effectiveness of support for electric cars and e-bikes respectively. However we strongly suspect that support for e-bikes is likely to be a lot more cost-effective than for e-cars in reducing greenhouse and pollutant emissions, bearing in mind the evidence of reductions in car use and also the far greater energy-efficiency of e-bikes compared with electric cars. The associated health, safety and congestion-reduction benefits would, of course, be added bonuses.

Electric cargo-bikes also have the potential to replace vans, particularly for 'last-mile' goods deliveries in urban areas. The EU-wide Cyclelogistics project²² (to which Cycling UK contributed) found that 51% of motor-vehicle trips in EU towns involving the transport of goods could be accomplished by cargo bikes.²³ Supporting the manufacture of electrically-assisted cargo bikes could also prove significant benefits for UK businesses.

It therefore makes no sense that the Government's Office for Low Emissions Vehicles (OLEV) provides generous subsidies for the uptake of electric cars and vans, but no support whatsoever for e-bikes. It claims that e-bikes would not attract people to switch from car use, however this is flatly contradicted by the many studies referenced above. Support for the uptake of e-bikes in the UK could also enable strengthen UK-based e-bike manufacturers like Wisper and Urban Mover²⁴, contributing further to the Government's Industrial and Green Growth strategies.

¹⁵ <https://como.org.uk/wp-content/uploads/2018/05/Shared-Electric-Bike-Programme-Report-Year-1-2016.pdf>.

¹⁶ <https://www.smart-ebikes.com/smart-ebikes/>.

¹⁷ www.sciencedirect.com/science/article/pii/S0966692316301934#bb0065.

¹⁸ <http://dx.doi.org/10.1016/j.trd.2015.02.005>.

¹⁹ www.bfe.admin.ch/energie/00588/00589/00644/index.html?lang=eng&msg-id=54695.

²⁰ <http://dx.doi.org/10.1016/j.jth.2015.03.001>.

²¹ <https://linkinghub.elsevier.com/retrieve/pii/S2214367X13000185>.

²² <http://cyclelogistics.eu/>.

²³ http://cyclelogistics.eu/docs/111/D6_9_FPR_Cyclelogistics_print_single_pages_final.pdf.

²⁴ See <http://wisperbikes.com/> and <https://urbanmover.com/>.

We are heartened that the Government has committed to an announcement of some support specifically for electric cargo bikes later this year²⁵, and there has been a suggestion of a possible further announcement of wider support for e-bikes through the Cycle to Work scheme.²⁶ Much as Cycling UK will doubtless welcome these developments, we would point out that supporting e-bikes through the Cycle to Work scheme would not reach many older people, people with disabilities and/or inactivity-related health conditions, i.e. some of the people who could potentially benefit the most from having access to an e-bike but who are least likely to buy one without some additional support. We therefore urge the Government also to consider ways to support the uptake of e-bikes, perhaps on a ‘try-before-you-buy’ basis, for the following purposes: (a) for people using electric pedal cycles as mobility aids, (b) for people signed-off by a health professional as needing an e-bike as part of an exercise on referral programme, and (c) for ‘community cycle club’ projects involving e-bikes, such as those run by CoMoUK²⁷ and the inclusive cycling charity Pedal Power.²⁸

CHAPTER 5: ACTION TO REDUCE EMISSIONS FROM TRANSPORT

Q11. What do you think of the package of actions put forward in the transport chapter? Please provide evidence in support of your answer if possible.

Rebalance overall transport spending

In response to Chapter 4, we have spelled the case for a wider policy aim not merely to replace diesel and petrol powered motor vehicles with electric power, but also to reduce the volume of motor traffic: i.e. to aim for fewer cars, not just newer cars.

It therefore concerns us that the draft Clean Air Strategy pays so little attention to this aim – and that the Department for Transport’s spending plans are tending in exactly the opposite direction.

When the Government’s Cycling and Walking Investment Strategy (CWIS) was published in 2017²⁹, it identified £1.2bn of funding over five years (2016-7 to 2020-21) that “may” be spent on cycling and walking.

Only £314m of this, however, was specifically earmarked by central government for investing in cycling and walking – the rest was expected to be allocated by local authorities (albeit from general funding streams such as Local Transport Plan and the Local Growth Funds, which stem ultimately from central government). This £314m comprised four budget lines, only two of which were due to last for the full five-year duration of the CWIS – as shown on the following graph:

²⁵ www.gov.uk/government/news/birmingham-to-host-worlds-first-zero-emission-vehicle-summit.

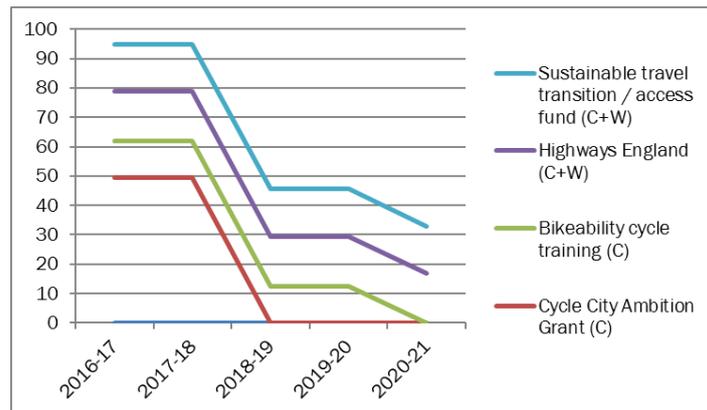
²⁶ www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2018-07-19/166234/.

²⁷ <https://como.org.uk/shared-mobility/shared-bikes/shared-mobility-shared-bikes-projects/>.

²⁸ www.cardiffpedalpower.org/our-bikes.

²⁹ www.gov.uk/government/publications/cycling-and-walking-investment-strategy.

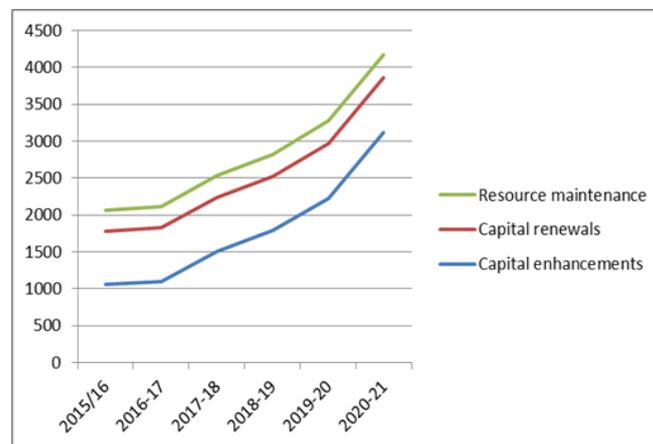
Dedicated funding for active travel in the Cycling and Walking Investment Strategy (CWIS):



With almost half of the above funding being short-term commitments, the Government’s own annual investment in cycling and walking was therefore set to decline markedly over these five years: from £95m in 2016/17 (amounting to £2.07 per person annually outside London) to just £33m in 2020/21 (just 72p per person).

This 65% reduction was in marked contrast to the £15.2bn allocated for capital spending on England’s motorways and trunk roads (the Strategic Road Network, SRN), via the Government’s first Roads Investment Strategy (RIS1). Over the same five-year period, the annual allocations for RIS1 were set to increase from £1.83bn (or £40 per person outside London) in 2016/17, to £3.86bn (or £84 per person outside London) in 2020/21.

Capital funding for the Government’s Roads Investment Strategy (RIS):



These contrary funding trends are all the more curious, given that investment in cycling and walking is recognised by DfT as having a “very good” average benefit : cost ratio (BCR).³⁰

As noted in our comments on Chapter 4, investing in walking and cycling can also help tackle all of the major costs of urban transport identified in the 2009 Cabinet Office review – not to mention climate change, noise and other more localised adverse impacts of motor traffic – without presenting any significant downsides. By contrast, motorway and trunk road investment might reduce congestion for inter-urban traffic at ‘bottleneck’ locations

³⁰ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/371096/claiming_the_health_dividend.pdf.

where investment is made, but is also likely to generate increased traffic overall, thereby potentially exacerbating congestion, pollution and other adverse impacts elsewhere.³¹

Cycling UK therefore believes that, if the Government genuinely wishes to see walking and cycling become the norm for short journeys, while reducing the external costs of road traffic and motor vehicle dependence, it needs to significantly shift the balance of transport funding from inter-urban roads towards more local transport solutions that encourage active travel. We return to this point in our comments below on the need to strengthen the CWIS itself.

Support local road user charging schemes, alongside a targeted national scrappage scheme for dirty diesels, funded by VED revenues

The Government's most recent NO₂ reduction strategy³² followed two previous attempts to adopt an air quality strategy. Like its predecessors, it has been subject to a successful legal challenge,³³ with the court allowing for further challenges to be brought if current failures of compliance are not on course for being remedied.³⁴

Cycling UK believes the Government's plans for tackling NO₂ are still inadequate, for three main reasons:

- They fail to support, and even hinder, local authorities who wish to introduce road user charging schemes as part of their Clean Air Zones (CAZ) plans.
- They fail to spell out plans for an effective, well-targeted scrappage scheme to help less well-off people in switching from polluting vehicles to cleaner ones.
- They fail to ensure sufficient funding is available to achieve the admirable stated ambition of the Government's Cycling and Walking Investment Strategy (CWIS).

We set out our solutions to each of these in the following paragraphs.

Provide support, and remove obstacles, for local authorities wishing to introduce local pollution-based road user charging schemes as part of their Clean Air Zone plans

Cycling UK is fully supportive of the aims of Clean Air Zones. However the Government's recent NO₂ reduction strategy argues that councils should seek to implement Clean Air Zones (CAZs) to meet this objective using packages of measures which do not include charging, and only to implement charging where this cannot be achieved.

This makes no sense, given the acknowledged legal requirement to achieve compliance with legal limits as soon as possible. Any policy package which is effective in delivering NO₂ reductions without charging would achieve those same reductions more quickly if charging was added to that package. It is therefore irrational to insist that local authorities should prefer CAZ policy packages without including charging. We strongly urge the Government to reconsider its position on this, not least given the potential for further legal challenges if compliance failures persist.

³¹ CPRE. *The end of the road? Challenging the road-building consensus*. March 2017. www.cpre.org.uk/resources/transport/roads/item/4543-the-end-of-the-road-challenging-the-road-building-consensus.

³² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633269/air-quality-plan-overview.pdf.

³³ www.clientearth.org/government-loses-third-air-pollution-case-judge-rules-air-pollution-plans-unlawful/.

³⁴ <http://www.bailii.org/cgi-bin/format.cgi?doc=/ew/cases/EWHC/Admin/2018/315.html>.

We also urge the Government to provide support for local authorities wishing to introduce charging schemes by providing advice on the practicalities of implementing charging schemes. It makes no sense that local authorities are all being left to find their own different answers to this.

In terms of helping build public support for charging-based Clean Air Zones, we urge that the requirement for local authorities to earmark the proceeds for investment in healthy and clean alternatives needs to be much more widely communicated. There is public support for action to reduce motor vehicle use³⁵, for investing in cycling³⁶, and indeed for road user charging if the public has confidence that this will deliver benefits³⁷. The Government should therefore support councils in making the case that the proceeds from CAZs will be used for aims for which there is public support.

Support targeted vehicle scrappage schemes, funded through an increase in VED

Although Cycling UK strongly supports local road user charging schemes, we also recognise the need to address the concerns that such charging schemes would most affect those who would be least able either to afford to pay the charges or to swap their cars (bearing in mind that less well-off people are likely to have older and dirtier cars) for newer low or ultra-low emissions vehicles.

Cycling UK advocates a time-limited increasing Vehicle Excise Duty (VED) (even though we favour its abolition in the longer term), in order to fund such a scrappage scheme. This would not only deter the purchase – and hence the manufacturing – of the most polluting vehicles, it would also mean that the manufacturers of those dirtiest vehicles would be contributing to the cost of alleviating the problems caused by past production of those vehicles.

What we do not support is the use of VED to fund increased road-building in the forthcoming spending round, on either the Strategic or the Major Road Networks.³⁸ This policy, announced by the previous Chancellor,³⁹ is entirely regressive both environmentally and socially. VED is a fixed-rate tax on the ownership of a vehicle of a particular type – i.e. the amount paid is unrelated to how much that vehicle gets used. It does not differentiate between those who use their vehicles extensively (who tend to be in higher income brackets) and those who hardly use their vehicles at all (who are often older people and/or with limited income). Using this revenue stream to build more roads is therefore a tax which falls disproportionately on those whose vehicle use imposes the lowest societal costs, to provide infrastructure which benefits those who impose the greatest costs. Worse still, it would result in ‘traffic generation’ (i.e. the well-recognised phenomenon whereby increased road capacity tends to generate additional traffic, particularly when provided in areas of greatest traffic pressure),⁴⁰ thereby increasing rather than reducing the problems of air pollution and other adverse impacts of excessive motor vehicle dependence.

³⁵ www.gov.uk/government/uploads/system/uploads/attachment_data/file/724824/att0332.ods.

³⁶ www.sustrans.org.uk/sites/default/files/file_content_type/bike-life-2017-summary-report.pdf.

³⁷ www.ibtta.org/sites/default/files/unrestricted/win08_Zmud.pdf.

³⁸ www.gov.uk/government/publications/highways-englands-strategic-road-network-initial-report and www.gov.uk/government/consultations/proposals-for-the-creation-of-a-major-road-network.

³⁹ This policy was originally announced in the 2015 Budget: see www.gov.uk/government/news/summer-budget-2015-key-announcements.

⁴⁰ <https://bettertransport.org.uk/sites/default/files/trunk-roads-traffic-report.pdf> and www.cpre.org.uk/resources/transport/roads/item/download/4858.

Strengthen the funding for the Government's Cycling and Walking Investment Strategy (CWIS), including support for the uptake of e-bikes

We have previously noted that the aims of local charging schemes should be not only to deter motor vehicle use but also to invest in cycling and other clean and healthy transport options. In cities which introduce charging CAZs, it could therefore be a valuable source of funding to support the introduction of Local Cycling and Walking Infrastructure Plans (LCWIPs), in accordance with the Department for Transport's recommendations (which Cycling UK strongly supports).⁴¹

However we also believe there is a pressing need to increase the amount of funding earmarked for the CWIS, and (as argued earlier) to shift the overall balance of transport funding from investment in longer-distance road travel to more local travel, particularly by clean and healthy means.

The 2013 'Get Britain Cycling' (GBC) inquiry report, issued by the All Party Parliamentary Cycling Group (APPCG), called for measures to increase cycling from 2% of trips to 10% by 2025, and to 25% of trips by 2050. To achieve this, it recommended investing at least £10 per person annually on cycling, rising over time to £20.⁴²

The CWIS contains a more modest target, to double cycling trips by 2025 (this was initially proposed in the draft Cycling Delivery Plan, CDP, which had preceded it).

To find out how much these two targets would each generate, Cycling UK commissioned research from Leeds University (2015).⁴³ This calculated that, in 2015 prices:

- Meeting the CDP target would generate annual benefits worth £6.4bn in 2050, and 'discounted' cumulative benefits of £46.4bn;
- Meeting the GBC's targets would generate annual benefits worth £42bn in 2050, and a total cumulative benefit between 2015 and 2050 of almost £¼ trillion (£248bn).

Sustrans later estimated (in 2016) that achieving the Government's target to double cycle use over 10 years would require investment of £8bn over that period.⁴⁴

We would add that the value of these estimates is gradually declining in real terms due to inflation. Moreover, they only covered cycling, i.e. they did not cover walking, as they pre-dated calls for (and the adoption of) a Cycling and Walking Investment Strategy, rather than a Cycling Delivery Plan.

Cycling UK therefore believes the Government now needs to raise cycling and walking investment to at least 5% of transport spending by 2021 (when its 2nd Roads Investment Strategy is due to start, and when we believe a new CWIS also needs to commence), rising to 10% over the next five years. We urge that this is considered as part of the Government's forthcoming spending review.

⁴¹ www.gov.uk/government/publications/local-cycling-and-walking-infrastructure-plans-technical-guidance-and-tools.

⁴² <https://allpartycycling.org/inquiry/>.

⁴³ www.cyclinguk.org/press-release/2015-01-19/%C2%A3248bn-economic-benefits-2050-cycling-says-national-charity.

⁴⁴ www.sustrans.org.uk/sites/default/files/images/files/Achieving%20the%20Government%27s%20targets%20for%20cycling%20in%20the%20Cycling%20and%20Walking%20Investment%20Strategy.pdf.

CHAPTER 9: LEADERSHIP AT ALL LEVELS

Q25. What do you think of the package of actions put forward in the leadership chapter? Please provide evidence in support of your answer if possible.

Q26. What are your views on the England-wide legislative package set out in section 9.2.2? Please explain, with evidence where possible.

Q27. Are there gaps in the powers available to local government for tackling local air problems? If so, what are they?

Q28. What are the benefits of making changes to the balance of responsibility for clean local air between lower and upper tier authorities? What are the risks?

Q29. What improvements should be made to the Local Air Quality Management (LAQM) system? How can we minimise the bureaucracy and reporting burdens associated with LAQM?

In response to Q25, we reiterate points made in response to Chapters 4 and 5, namely:

- The need not only to improve the pollutant emissions standards of our motor vehicle fleet but also our overall usage of motor vehicles: we need fewer vehicles not just newer vehicles. This requires overall leadership in setting the direction of national policy.
- Specifically, national Government needs to support, and not hinder, local authorities in implementing charging-based Clean Air Zones, and to rebalance overall transport spending from investment in increased road capacity to support for walking and cycling, including the uptake of e-bikes.

We also make the following additional points.

New clean air legislation

Cycling UK supports calls for a new Clean Air Act, including an effective means of holding public sector bodies and others to account for meeting their legal obligations on air quality.

We support calls for new clean air legislation, which we believe needs to draw on elements of the complementary Clean Air Bills tabled by Geraint Davies MP (in the Commons)⁴⁵ and by Baroness Jenny Jones (in the Lords).⁴⁶ In essence, it should:

- Recognise clean air as a human right;
- Set out the role of Environment Agency and the Committee on Climate Change in informing the setting of air quality standards in accordance with this right, and the roles of national and local government in setting, measuring and reporting on compliance with these standards (including the establishment of Clean Air Zones), and taking enforcement action against polluters (e.g. those who use illegal wood-burning stoves);
- Set up a Citizens' Commission for Clean Air to ensure effective enforcement where national or local government bodies themselves fail to comply with these standards.

⁴⁵ <https://services.parliament.uk/bills/2017-19/cleanair.html>

⁴⁶ <https://services.parliament.uk/bills/2017-19/cleanairhumanrights.html>.

Cycling UK's preference is that this legislation should take the form of a distinct Clean Air Bill, rather than simply being incorporated into a wider Environment Bill. Given the urgency of action to comply with air quality standards as soon as possible, we believe this legislation should be fast-tracked and not subjected to the risk of potentially being derailed by other, potentially more controversial, elements of an Environment Bill.

We would add that the establishment of effective enforcement mechanisms matters more than the setting of standards per se. Getting the standards right is obviously important, but is somewhat meaningless unless they can be enforced at least as effectively as is currently possible under EU law.

Incorporate the powers and duties contained in the existing Traffic Reduction Acts, updated as required.

We would suggest further strengthening any clean air legislation by incorporating within it an update to the existing powers and duties under the Road Traffic Reduction Act 1997 and the Road Traffic Reduction (National Targets) Act 1998.⁴⁷

Section 2 of the 1998 Act⁴⁸ creates an ongoing duty on the Secretary of State to “have regard to the adverse impacts of road traffic”, including “effects on air quality”, in deciding either to publish a report setting targets for road traffic reduction, or to publish a report setting out what other targets or other measures he considers are appropriate for reducing the adverse impacts of road traffic, including his reasons for this decision and an impact assessment of the proposed measures.

Having done so, this decision could inform guidance to local traffic authorities on the fulfilment of own duties in accordance with Section 2 of the 1997 Act.⁴⁹ We suggest this would be a highly effective means by which the Government could co-ordinate the responses of local transport authorities to air pollution, and indeed to other adverse impacts of road traffic.

CHAPTER 10: PROGRESS AGAINST TARGETS

Q30. What do you think of the package of actions in the strategy as a whole?

Q31. Do you have any specific suggestions for additional or alternative actions that you think should be considered to achieve our objectives? Please outline briefly, providing evidence of potential effectiveness where possible.

Q32. If you have any further comments not covered elsewhere, please provide them here.

We reiterate our concern that the draft strategy pays insufficient attention to the need to reduce the pollutant and other) impacts of road traffic.

We note that the chart on p89 in this chapter, showing the contributions of different sectors to the predicted levels of abatement of the 5 key pollutants, shows that road traffic

⁴⁷ www.legislation.gov.uk/ukpga/1997/54/contents and www.legislation.gov.uk/ukpga/1998/24/contents.

⁴⁸ www.legislation.gov.uk/ukpga/1998/24/section/2.

⁴⁹ www.legislation.gov.uk/ukpga/1997/54/section/2.

is expected to deliver only 19% of the abatement of nitrogen oxides (including NO₂, the one pollutant for which we are already non-compliant) and only 2% for PM_{2.5} particulate matter – even though transport accounts for 34% of NO_x emissions and 12% of PM_{2.5} emissions. (N.B. PM_{2.5} is very small particulate matter which is produced, among other things, from brake dust, as well as from diesel engines. There is no safe exposure level.)⁵⁰

We therefore reiterate our call for a strengthened strategy that:

- Focuses on the impacts of pollution, not just the volumes of pollutants;
- Aims for fewer cars, not just newer cars;
- Supports local road user charging schemes, alongside a targeted national scrappage scheme for dirty diesels, funded by revenues from Vehicle Excise Duty (VED);
- Rebalances overall transport spending to allow significantly increased investment in the Government's Cycling and Walking Investment Strategy (CWIS);
- Supports the uptake of e-bikes;
- Positively promotes cycling through public awareness campaigns on responding to pollution, while tackling two myths (on the overall health benefits of cycling, and the justification for main-road cycle provision) that could otherwise impede this aim;
- Commits to new clean air legislation, reflecting the idea of air quality as a human right, and incorporating updated powers and duties from the existing Traffic Reduction Acts.

We would be more than happy to engage in fuller discussion with DEFRA ministers and officials to help inform the development of such a strategy.

Cycling UK
August 2018

⁵⁰ [https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1212141150_AQEG_Fine Particulate Matter in the UK.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1212141150_AQEG_Fine_Part particulate_Matter_in_the_UK.pdf).