CLEAN AIR STRATEGY

Department for Environment, Food and Rural Affairs, 2018 Summary of the response from Cycling UK



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. Our interests cover cycling both for day-to-day transport and for leisure activity. We seek to promote the health, economic, environmental, safety and quality of life benefits of cycling, 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

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

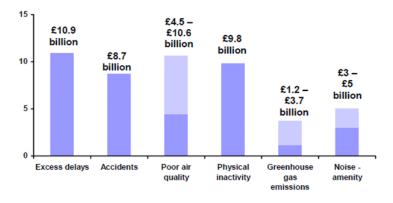
The draft strategy has an undue focus purely on the volumes of pollutants emitted, paying insufficient attention to where they are emitted and the resulting harm to human health. A clearer focus on tackling the harm caused (rather than the simple volumes of pollutant emissions) would result in a greater emphasis on tacking emissions from road transport, and nitrogen dioxide (NO_2) in particular. NO_2 is the one pollutant for which the UK (along with other countries) is illegally exceeding the concentrations limits set in EU law.

Aim for fewer cars, not just newer cars

The need to tackle road transport emissions – and specifically the legal requirement to reduce NO_2 emissions as quickly as possible – should in turn reinforce the case for action to reduce the overall use of motor vehicles, particularly in urban areas. By contrast, the draft strategy's current emphasis purely on replacing diesel and petrol engines with electric motor vehicles represents a serious failure to support cycling and other clean and healthy transport options, not least for tackling wider societal problems such as congestion, physical inactivity and road danger as well as air pollution.

Evidence shows that the societal costs of these problems in English towns are all of a similar magnitude: around £10bn annually. Hence we find it remarkable that this 100-page draft contains just one paragraph on walking and cycling – and even that says nothing new.

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



Source: Cabinet Office (2009)

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

Tackling road transport emissions should be achieved by enabling and supporting local authorities to introduce local road user charging schemes, both to deter motor vehicle use and to provide the revenues needed to invest in improving the safety and convenience of cycling and other clean and healthy transport options.

Cycling UK acknowledges the need to address concerns that charging for the dirtiest vehicles risks penalising (a) people who bought diesel cars in good faith, in the (misplaced) belief that they were environmentally preferable; and (b) people on lower incomes who can least afford to upgrade to newer, cleaner vehicles.

To address these concerns, local road user charging schemes should be complemented a national scheme that would involve:

- Raising Vehicle Excise Duty (VED), at least in the short term, to deter the purchase (and hence the manufacture) of new vehicles with the poorest emissions standards – with these standards being progressively strengthened up over time; and
- Using the revenues to fund a targeted national scrappage scheme, enabling people from lower income groups to trade in dirty older vehicles, and to support the replacement of older buses.

Conversely, VED should *not* be used to fund an expanded programme of national or local road building, as the Department for Transport currently proposes. This proposal is both socially and environmentally regressive, as it employs a fixed-rate tax (i.e. one that is paid equally by those who make extensive use of the roads and those who only make very occasional short car trips – typically older people on lower incomes) to fund a transport network that mostly benefits those who drive the most (i.e. predominantly people on higher incomes) and whose travel habits therefore impose the greatest environmental and economic costs on society.

Shifting VED towards meeting the need for a vehicle scrappage scheme would be far more justifiable, not least because it would involve raising funding for a scrappage scheme from the manufacturers of the dirtiest vehicles, i.e. those who caused the problem in the first place.

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

Besides enabling local authorities to use road user charging income streams to support cycling and other clean and healthy transport options, the Government should ensure, through its forthcoming Spending Review, that its 2nd Cycling and Walking Investment Strategy (CWIS2) receives considerably greater funding than was available for the first one (CWIS1). The allocation should be based on an assessment of what is needed at least to meet its initial targets for increased walking and cycling, and preferably some greatly strengthened targets to set the strategy on course for achieving its admirable ambition to make cycling and walking the normal options for short journeys by 2040. At present, CWIS1 is not remotely on course to achieve these aims.

The Government should also provide support to boost the uptake of electrically assisted pedal cycles (or "e-bikes"). There is very good evidence that such measures can increase cycle use and reduce car use (and hence pollutant emissions), partly by making cycling available to people who would otherwise not feel able to consider it (older people, people with health conditions or disabilities etc) and partly by increasing people's willingness to cycle for longer (or hillier) journeys that they would otherwise have made by car. There can be no rational justification for the Government's Office for Low Emissions Vehicles (OLEV) supporting the uptake of electric cars and vans, but not e-bikes. If anything, the wider benefits – reducing congestion, road danger and physical inactivity, particularly among groups who are least active (older people, people with health conditions or disabilities) – argues strongly in favour of targeted support for e-bikes.

Promote cycling positively, while tackling two myths which currently hamper this aim

The draft strategy rightly notes the common misconception that people inside motor vehicles are better protected than those on the outside. We urge the Government to raise awareness of the contrary evidence, while echoing calls from the Royal College of Physicians and others for public information messages which encourage people to cycle in response to pollution, rather than to feel they should stay indoors (while recognising that this advice may not apply to people with certain health conditions).

For similar reasons, we also call on the Government to support cycle facilities which enable people to cycle using direct routes along main roads, rather than indirect backstreet routes. While the idea of helping cyclists to avoid pollution is well-intentioned, back-street routes are generally less convenient and hence less likely to encourage people to cycle in the first place, thereby negating both the pollution-reduction and wider benefits of increased cycle use. Cycle facilities need to help reduce pollution, rather than merely avoiding it.

This in turn will involve addressing a second myth, namely that main road cycle routes "cause" pollution instead of reducing it. Cycling UK urges the Government to proactively counter this myth, as we know of no evidence whatsoever to support it.

New clean air legislation, incorporating the existing Traffic Reduction Acts

Cycling UK supports calls for a new Clean Air Act. This should not only transpose pollutant limits into UK law that are at least as strong as current EU limits (preferably shifting to the tighter limits recommended by the World Health Organisation) but should ensure that there is at least as effective an enforcement mechanism as that currently available under EU law. It should incorporate the principle of a right to clean air, setting out the powers and duties for national and local Governments and other public bodies necessary to ensure this right is upheld.

We also recommend that new legislation on clean air should incorporate the existing powers and duties under the Traffic Reduction Acts, requiring that national Government should periodically review the adequacy of its policies to meet the objectives of the 1998 Act, and issue guidance accordingly to local authorities under the 1997 Act.

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