Chester Cycling Campaign's Response to the Consultation on the Air Quality Action Plan for Chester City Centre

February 2020

Chester Cycling Campaign welcomes the development of an Air Quality Action Plan (AQAP) for Chester City Centre.

We appreciate that the AQAP is short-term (to 2022) because the year of compliance without intervention is estimated to be 2023.

But we feel strongly that the AQAP needs to be more ambitious. Also that change needs to be effected very quickly, for the sake of those people in Chester who will die prematurely as a result of air pollution before the end of the AQAP. The figures are worrying: the AQAP's own figures (which exclude the effects of NO_2!) put the number of deaths at 91*, whilst figures from CWAC's Low Emission Strategy (which include both particulates and NO_2) put the number of deaths at more than double: 190†. Even in 33 months, great progress could be made on reducing this alarming number of deaths.

We are disappointed that the AQAP:

- does not mention the Council's Climate Emergency declaration.
- does not do enough to encourage a modal shift away from motor vehicles and towards non-polluting means of transport – cycling and walking - for shorter journeys. This contradicts CWAC Chief Executive's Report "Cheshire West and Chester's Response to the Climate Emergency Declaration", which stated that:
    - the most impactful intervention is distance reduction, i.e. avoiding powered travel entirely
    - by 2025, a 17 per cent reduction in total travel demand will be required, alongside a 25 per cent reduction in car travel.
- does not give top priority to the speed of reduction air pollution, given that 190 people will die as a result of air pollution before the end of the AQAP.

The Consultation document (Non-technical summary) states that "The responsibility for reducing emissions and protecting the health and environment is everyone's". But the AQAP in its current form does not help people to contribute by driving less and cycling more.

Of the 11 measures selected for possible inclusion in the AQAP, only one (Measure 26) mentions cycling - and it is merely to improve cycle route signage. Signage alone will not make people feel safe enough to cycle.

Disappointingly, measure 26 says *"..cycling is unlikely to deliver tangible benefits in the life time of this Action Plan."* We disagree strongly. Even though the lifetime of the AQAP is short, moves could be made to make cycling in Chester safe, convenient and easy. It could become a normal thing to do rather than driving. Many other cities in the UK and around the world have already made impressive changes to infrastructure and have altered travel behaviour to sustainable modes. Chester could do this too.

Chester Cycling Campaign's (CCC) members know (because people tell us) that very many people would love to use their bike as transport in and around Chester. Our experience of is that people who don't' cycle often tell us "you're brave"! People want to be able to cycle safely – and let their children cycle safely - from their homes to their work, school, leisure, shopping, etc. But they don't even try because they do not feel safe to cycle around Chester. How many parents drive their children though the Air Quality Management Area every morning and evening because it is not safe for the children to cycle? How many more will do so as more homes are built at the Saighton and Wrexham road developments? How many teenagers are driven around by their parents because those parents think it is too unsafe for their children – or themselves?

Electric bike sales are increasing rapidly. Electric bikes will allow more people to travel by bike, many of whom would not contemplate using an ordinary bike, including people with disabilities.

Measures 14, 16 and 17 all include "raising awareness". We suggest that awareness should be raised of the evidence that, during slow-moving and queuing traffic, air quality inside vehicles is worse than for people outside. Also that, at times of peak concentrations of pollutants, cycling has the lowest cumulative exposure to air pollution compared with walking, using a bus or a car.

Of the measures excluded on the grounds of feasibility, our opinion is that a Low Emission Zone/Clean Air Zone (Measure 9) should be included, for these reasons:

- The Chief Executive's report states that "Where car travel is unavoidable, these cars would need to be low or zero carbon".
- The new Northgate development will, hopefully, attract many more visitors to Chester. Nearly 800 car park spaces are planned, which will generate huge numbers of vehicle movements in the Air Quality Management Area.
- We will need to continue reducing air pollution even when this plan has ended. We should therefore start working on this now, even if costs are deemed to be high, as part of our actions to combat the Climate Emergency.

Of the measures which were excluded as they have already been approved through the Low Emission Strategy and are subject to implementation, our opinion is that:

- the Low Emission Strategy's 'shift measures' have not been given the priority or funding necessary to produce change in the timescale needed.
- The iTravelSmart app (Measure 29) should be included and the app should be updated. Currently it has serious limitations, eg it does not suggest the canal towpath as a cycle route.

- A more active programme of anti-idling publicity and enforcement (Measure 32) should be included. This is particularly important at places areas such taxi ranks, Chester bus station and Chester railway station.

Measures which are not included at all, but which should be included:

- Policies, plans and strategies. Reference was made in the consultation documents to related policies, plans and strategies (Planning, Local Plan, Local Transport Plan, etc.) These already mandate good provision for alternatives to car travel as a means to reduce air pollution. They have been in effect for years but it seems that the active travel aspects have been enforced weakly and there has been little "joined up" planning. The result so far is a very low level of walking and cycling in Chester. An example is the new development on Wrexham Road where there was no planning for how people will safely walk or cycle from the development to other places, such as into Chester City Centre and to Chester railway station. Implementation of the active travel requirements of all these policies, plans and strategies must be stepped up, especially in light of the Climate Emergency. Many of our communities probably do not realise that it is possible to have good infrastructure for cycling and walking. People tell us that, if safe cycle routes were available, they would use them.
- Measuring air pollution. Currently, we do not know what peak levels of NO2 commuters, particularly children, are exposed to at times of peak vehicle usage (some of which will be generated by their parents driving them to school). We do know, however, that the levels are higher than they could or should be. We understand that real-time monitoring apparatus is expensive, but suggest a rolling programme, re-siting the monitors, to build up a picture of pollution on routes used by children.
- Create a culture where it's normal to cycle or walk. Currently CWAC's transport plans do not seem to recognise cycling as a significant means of transport around Chester.
- Reallocate road space from vehicles to cycling and walking, making provision for an increase in the cycling population. A one-way system into and out of Chester could be implemented fairly quickly, certainly in the lifetime of this AQAP, to free up road space for reallocation to cycling.
- Divert a meaningful proportion of the Network Development/ Highways maintenance to fund the above.
- Review plans for road improvements outside Chester by examining through a carbon lens and divert this money to fund a Low Emission Zone/Clean Air Zone.
- Introduce 20mph speed limits throughout the AQMA – (ie all roads, including the ring road and distributor roads which need to be used or crossed in many journeys) to aid flow, reduce emissions (by reducing acceleration and deceleration between 20mph and 30mph over short distances) and make cycling and walking feel less dangerous and more comfortable.
- If new parking spaces are provided, make them for electric vehicles only. Do not provide any more for cars which are petrol or diesel.

Looking beyond the lifetime of this AQAP, our opinion is that improving the air quality in Chester City Centre should be ongoing.

***Calculation of number of people who will die as a result of air pollution in the lifetime of the AQAP – using figures from the AQAP, which exclude the effects of NO2:**

Deaths per 100,000 per year attributable to air pollution (remembering that this figure only accounts for one pollutant (PM2.5) and not NO2, for which the AQMA is declared, so the true figure is possibly even higher)	41
Residents in Chester	81,000
Therefore deaths of Chester residents per year	33.2
Therefore deaths of Chester residents per month	2.77
Therefore deaths of Chester residents in the lifetime of the AQAP (33 months from March 2020 to the end of 2022).	91

†Calculation of number of people who will die as a result of air pollution in the lifetime of the AQAP, using figures from the Low Emission Strategy (which include NO2 as well as particulate matter). From the Low Emission Strategy: "The burden of mortality in Cheshire West and Chester attributable to long-term exposure to PM2.5 is estimated to be 5.2% 8 which equates to approximately 161 deaths per annum and this total rises to 285 a year when deaths attributable to NO2 (124 deaths a year9) are taken into account."

Deaths per year in Cheshire West and Chester attributable to particulate matter + nitrogen dioxide (NO2)	285
Residents in Chester / Residents in CWAC	81,000/333,900 = 24.3%
Therefore deaths of Chester residents per year	69.3
Therefore deaths of Chester residents per month	5.8
Therefore deaths of Chester residents in the lifetime of the AQAP (33 months from March 2020 to the end of 2022).	190