



Association of Black Country Authorities
Dudley, Sandwell, Walsall and Wolverhampton

Our Ref:
Date: 17 August 2018
Please ask for: Stuart Everton
Direct Line: 01902 554097

Councillor Ian Ward
Leader of the Council
Birmingham City Council
Birmingham B1 1BB

Dear Councillor Ward

Response to the Clean Air Zone for Birmingham Consultation
Consultation Reference: ANON-N8Q9-SPTN-N

This is a joint response submitted on behalf of Dudley Metropolitan Borough Council, Walsall Metropolitan Borough Council and Wolverhampton City Council.

Sandwell Metropolitan Borough Council are submitting a separate response.

The three Authorities welcome the opportunity to comment on Birmingham City Council's Clean Air Zone (CAZ) proposals. The response has been developed from a workshop held in Wolverhampton on 11 July 2018 as well as consultation with the Heads of Regeneration on 9 August.

The information used to inform the workshop was the brief provided by Birmingham City Council 'A Clean Air Zone for Birmingham.' This response document will be submitted in addition to individual responses from each authority using the 'Consultation Questionnaire'.

We recognise the challenges facing the City of Birmingham in terms of air quality and the requirement for significant measures to reduce vehicle emissions, particularly within the city centre. The three Authorities support the principle of a charging mechanism to influence the travel choices of people living and working within the region as means to redressing poor air quality.

There are a number of concerns however around the plans put forward for consultation. The level of information provided so far has been limited and relatively narrow in focus. Whilst we acknowledge the greatest potential impacts will be on the city centre, this should not detract from the need to consider any likelihood of significant impacts both positive and negative on our communities and the wider West Midlands region.

Further detailed assessment work must be undertaken in order to determine the implications on residents and businesses within the region before the three Authorities can endorse the specific details of this proposal. The role that national Government can play, for instance in influencing purchasing decisions for new vehicles must also not be ignored amidst the shift in responsibility for air quality towards regional and local authorities. Taking account of the relatively short time organisations have been given to respond to the consultation, and especially given the timing which has encompassed the summer holiday season, we would urge Birmingham City Council to either extend the time allowed or hold a further round of consultation to permit further evidence gathering and more detailed impact assessments of the proposals to take place. Views and concerns presented here are therefore necessarily limited and qualitative in nature.

With this in mind, we emphasise the need for closer cooperation on this issue and for Birmingham's proposals to form a major part of a wider, integrated air quality strategy across the West Midlands.

The following sections address each of the open ended questions circulated in the consultation questionnaire. The closed questions have also been circulated and are provided separately.

Key Points

- The three Authorities support the need to significantly influence the travel choices of people accessing the city centre in order to improve air quality.
- Large concerns remain however around the specific details of Birmingham's proposal and the need to consider the impacts on people and businesses across the region, as well as within close proximity to the Clean Air Zone.
- Further information is required around the distributional impacts of what is proposed prior to the three Authorities being able to formally endorse the plans.
- There is a need to consider if and where national Government (i.e. Defra/DfT) can play an influencing role, either in terms of national initiatives or redressing negative impacts of displacement, for example greater demand for Park and Ride facilities.
- Additional focus is required around the displacement effects at the border of the CAZ both in terms of bus and taxi cascading (the transfer of older vehicles to other areas as new vehicles are brought into the fleet) as well as the use of the park and ride facilities.

- Charging for private vehicles may not be sufficient enough to achieve a modal shift away from the car for people and businesses outside the Birmingham area and may have wider implications for visitors to the city and surrounding areas.
- There is a need to ensure that the CAZ fits well with supporting public transport infrastructure in that it is available when charging commences and is not undermined by the low pricing of private cars within the CAZ charging structure.

Location of the Clean Air Zone

The three Authorities agree that the use of the Middleway Ring Road (A4540) provides a logical starting point in terms of location for a CAZ, as it is a clearly identifiable boundary which captures the 'hot spots' of air pollution subject to review of the evidential case. It also provides the opportunity for road users to avoid the zone and divert using the ring road. The best way to reduce emissions being to manage travel demand within the city centre.

The vast majority of traffic uses the A38 (M) Aston Expressway to access the City Centre from M6 J6, which passes alongside Aston University as well as a number of residential areas. As such, further consideration of that corridor through to the Park Circus (also giving vehicles the opportunity to avoid the charging zone) may be pertinent. Figure 1 shows this in more detail. The wider impacts however need to be looked at in terms of the level of diversion and displacement the CAZ may cause, particularly close to the ring road boundary.

A particular concern from the perspective of the three authorities is the impact on demand for Park and Ride facilities, which cater for city centre demand including those at extant and proposed railway stations with lines serving Birmingham City Centre, but are funded by the surrounding Local Authorities. Existing sites are already at capacity and further demand may lead to greater amounts of inappropriate parking on the surrounding routes, as a result of drivers avoiding the CAZ charge. It is recognised that some people could choose not to travel or travel to alternative destinations for work/leisure purposes and this could include locations within our boroughs/city and so have a positive effect on the local economy.

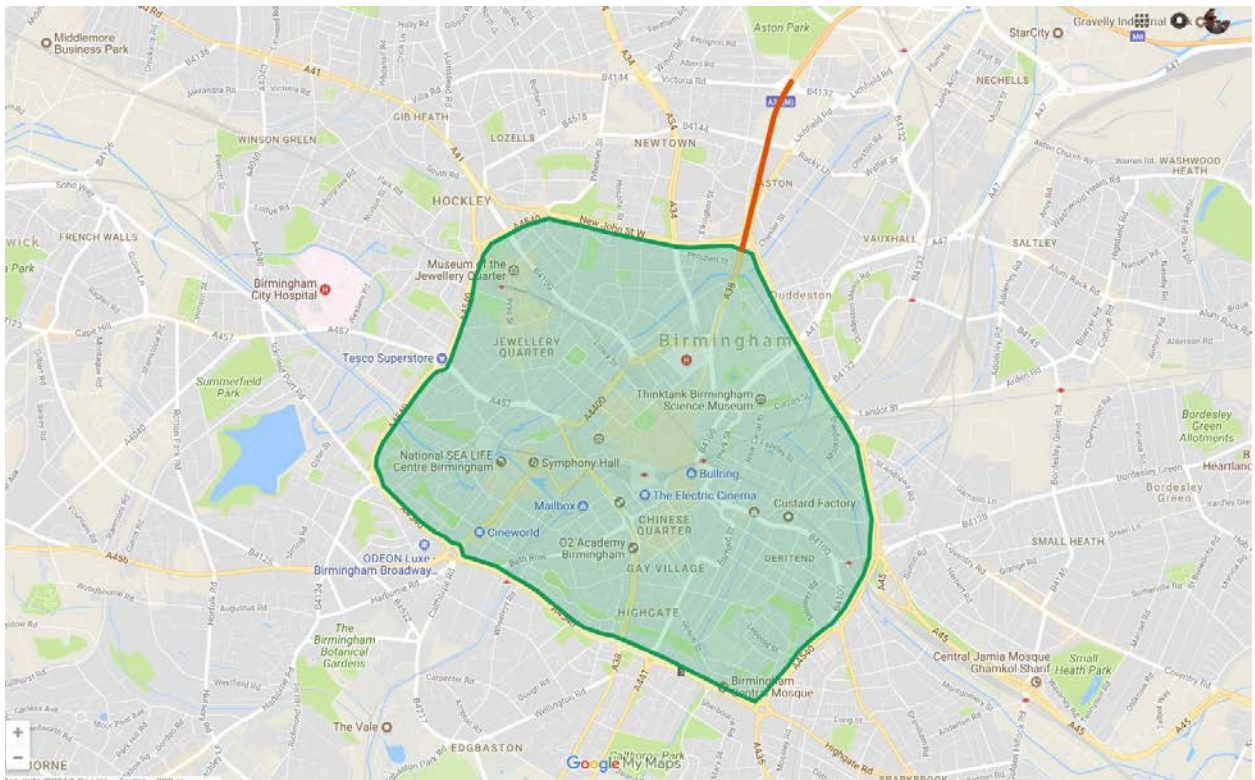


Figure 1: CAZ Proposals via Google Maps™

The concept of an area charge is valid, though it is unclear whether the charge will apply to vehicles that move within the zone but do not cross the CAZ boundary. This should be further clarified.

Vehicles included in the Clean Air Zone restriction

The need for Birmingham to adopt a Class D CAZ (meaning all vehicles, except motorcycles are charged) is recognised by the three Authorities notwithstanding that such a scheme is forecast to remain insufficient in making the region compliant with the National Air Quality Objective annual average concentration of NO_2 not exceeding $40\mu\text{gm}^{-3}$. We also acknowledge that such a scheme gives greatest scope for flexibility in terms of charging. Notwithstanding, further information on the additional measures required in order to meet thresholds is required before it can be fully supported.

We are concerned regarding the potential for non-compliant vehicles to be displaced into other local authority areas as a result of the CAZ, particularly our boroughs/city as direct neighbours. The three authorities have a number of existing air quality problems and such displacement, particularly of buses and taxis, could potentially exacerbate this problem. The Advanced Quality Partnership scheme, ensuring the

vast majority of buses are Euro VI by 2020 could mitigate this to an extent. As such, these issues are important to consider in planning the CAZ.

Determining the best charging rates relative to each type, and appropriate 'sunset' periods could be used to mitigate this risk and are discussed in the next sections. Additionally, as highlighted by TfWM, many of the public transport alternatives are not fully on stream until 2022. This is relevant to consider and could be reflected in terms of a sunset period for certain newer petrol/diesels for example.

We also recognise that the nature of charges and the Euro standards that incur a charge are set by National Government to ensure consistency. The three authorities request further information on the way Birmingham City Council proposes to update/change the CAZ as the vehicle parc renews and a greater percentage of Euro 6/VI vehicles and low emission vehicles reduce the revenue available to run the scheme.

Proposed Clean Air Zone Charges

The proposed charges for entering the CAZ were discussed in relation to both the proposed timing as well as the proposed rates for each vehicle type.

Timing

A charge proposed over an entire 24 hour period recognises the fact that emissions are generated regardless of the time of day. This said, differential charging between off-peak and peak times, in terms of either discounts for off peak or a surcharge during peak travel times is a potential incentive for off-peak travel and/or promoting alternative means of travel during peak times and gives an opportunity for people to re-time their journeys where changing modes might not be possible. Reducing traffic volumes during peak periods is likely to have benefits for air quality.

A further point of clarity was raised around the period of access granted through payment of the charge and if the 24 hour period started at the point of access or at midnight. For example, transport operators making trips between Birmingham and the surrounding area may make out of hours deliveries within Birmingham on either side of midnight, in which case they would they be charged for two entire days despite only spending a couple of hours in the CAZ.

Similarly, should a cordon charge be deployed, with vehicles charged each time they cross the cordon and therefore according to the emissions they create? Multiple trips to origins and destinations that both lie within the cordon should also be taken into account.

Rates

Charging for different vehicle types allows a greater level of price discrimination to address the varying impacts they have on emissions within the city centre. The following addresses comments around each of the vehicle types in turn:

Bus/Coach: The authorities recognise the need to charge for older and more polluting buses in principle, given the levels of emissions generated by buses as opposed to other vehicles, though the city needs to be mindful of the potential for these buses to be displaced into the surrounding boroughs. There is also concern that councils will need to subsidise operators to off-set the charge in order to ensure services are maintained, particularly when buses can provide the best alternative to driving for transport users.

Further consideration should also be given to the implementation of charges on the bus rapid transit corridors once they become operational and what the implications are in terms of competition with the existing bus network.

HGVs: The need for charging HGVs is supported, particularly in the context that all other vehicles are charged, though more information is needed concerning the profile of HGVs entering the city centre. The charge for HGVs is significantly higher than for vans, which could encourage a shift towards van traffic. Whilst this might reduce emissions on a vehicle for vehicle basis, it could increase traffic levels and congestion. Furthermore vans are less regulated, creating a potential safety concern.

Taxi/Private Hire: Taxis can generate emissions more intensively, assuming they operate throughout the entire day compared to only a few trips for private vehicles. That said, they can prevent congestion to an extent and provide last mile services for public transport users.

Consideration may need to be given to the way Hackney Carriages are charged over private hire. Hackney Carriages are often specialist vehicles that are more expensive to purchase and therefore depreciated in value over a much longer period. This may need to be considered alongside the support/derogations for the scheme. A common platform for taxi licensing across the West Midlands, possibly under the auspices of the Combined Authority, would feasibly make this a simpler exercise to administer.

Vans: Already addressed in the HGV sector, the growth of vans over the last decade has been rapid, driven by the demand to replace HGVs in increasingly crowded urban areas as well as the rise of internet shopping and last mile deliveries of small quantities of goods directly to households. This growth in the van market is an increasing cause of congestion in urban areas and vans also have a propensity to be travelling in the zone much more intensively than private cars and potentially HGVs.

Any cost increases may also be simply passed on to the consumer, or given the rate of competition, further subcontracted to smaller companies/self-employed drivers using cars.

Private Cars: The Authorities are aware of the need to balance the cost of pollution with the public acceptability of a charge and the equity/distributional impacts it may have. We are concerned that the level of charge may be insufficient to deter people from using their cars in comparison to the cost of other modes. This can apply to either commuting or leisure if originating some distance from Birmingham. A disincentive should be sufficient to promote trains/tram/bus usage even when the relatively low cost of parking is taken into account. Whilst there is potential for the charges to encourage a modal shift for commuting trips originating in close proximity to the CAZ, it is essential to ensure that this is only in the case where there is an existing viable public transport alternative. For a modal shift to occur on these types of trips, the public transport option must be of approximately the same or shorter journey time, have suitable capacity and be significantly lower cost. It is likely that public transport is already relatively competitive with driving on these trips.

Clean Air Zone Support and Exemptions

The three Authorities recognise that the CAZ will have a number of distribution effects on the public and businesses in Birmingham and the wider region. To this end, we support the need for a limited number of assistance packages for user groups particularly disadvantaged by any changes. It should be recognised that to undertake and administer such exemptions could imply significant costs as well as reducing the levels of revenue available. Support packages will need to balance these considerations and be introduced on a case by case basis following an appropriate level of consideration and review.

The role of national Government in both influencing travel choices, as well as supporting the financial costs in terms of implementation and compensation for negative impacts on Birmingham and the surrounding authorities needs to be further explored. This will create an understanding of the level of support that can be offered.

Packages might include exemptions, financial support and 'sunset' periods – where implementation is delayed for certain sectors or categories of user. It should be noted that the packages discussed here would be intended as an addition to those already proposed, for which the three Authorities would give their support. Any exemptions/sunset periods need to clearly state their eligibility criteria as well as the time over which they apply.

Based on this we urge Birmingham City Council to explore potential sunset periods for SME haulage operators. This recognises the importance of the sector as well as SMEs to the economy. It also acknowledges that they may not have access to leased vehicles or finance deals afforded by larger operators and the large capital cost involved in purchasing new vehicles that may have to be depreciated over a longer period of time. Retrofitting of HGVs and buses is also possible and consideration of this will be accounted for when enforcing the zone needs to be considered.

Similarly an appropriate sunset period for bus companies to allow greater time for fleet replacement/retrofitting (if allowed) could help to prevent cascading of older buses into none CAZ areas as well as limit the need to further subsidise buses in order to maintain service viability.

The three Authorities also support the need to review exemptions for both patients and visitors to hospitals within the zone and potentially students attending specified academic institutions.

We hope that you find this response helpful in developing your proposals and look forward to hearing about the next steps.

Yours sincerely

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Council