

Consultation on a Clean Air Zone for Leeds ~ Response from Campaign for Better Transport

February 2018

Campaign for Better Transport is a leading charity and environmental campaign group that promotes sustainable transport policies. Our vision is a country where communities have affordable transport that improves quality of life and protects the environment.

We welcome the opportunity to respond to the consultation on a Clean Air Zone for Leeds as part of a wider set of proposals for cleaning up the city's air pollution. We welcome Leeds City Council's decision to introduce a charging Clean Air Zone. Using charging to discourage the most polluting vehicles, and to generate a funding stream for operating the Clean Air Zone and funding positive alternative travel choices, is the best approach to deliver the cleaner air that people who live, work, and visit in Leeds deserve.

Scope of the Clean Air Zone: vehicles

We note that the City Council is proposing a type B Clean Air Zone, which will place restrictions and charges on buses, coaches, taxis, private hire vehicles and HGVs, but will exempt LGVs and private cars.

It is important that high quality affordable bus services can continue to operate across the city, and we welcome the work being done through the Connecting Leeds project on bus priority routes, with all three major bus operators committed to ensuring their buses will meet the standards for the proposed Clean Air Zone by 2020. Buses have great potential to be part of the solution to air quality problems: the latest Euro VI diesel buses produce 95 per cent fewer emissions than previous models, and less emissions overall than a Euro 6 diesel car, despite having the capacity to carry up to 15 times more passengers. On a per passenger basis, modern diesel buses also produce 10 times less NOx emissions than modern diesel cars.

We welcome the inclusion of HGVs in the proposals. We would encourage the Leeds city region to support provision of rail freight interchanges as an effective alternative to cross-country HGV traffic. Rail freight produces 76 per cent less carbon dioxide and up to fifteen times less nitrogen oxide emissions and 90 per cent less small particulate matter than the equivalent road journey.

The growth in light motor vehicle traffic makes a considerable contribution to the problems of congestion and pollution, in turn making it harder to deliver high quality bus services, walking and cycling routes. We would like to see the Clean Air Zone include LGVs which are a major source of diesel pollution. At local level, we would urge the City Council to embrace smarter delivery solutions, including local consolidation centres, customer collection points at railway stations and other interchanges, and greater use of electric vehicles and cargo bikes for local distribution. A joined-up logistics plan would provide alternatives to large volumes of private van deliveries.

We are concerned about the exclusion of private cars. We note the concerns expressed about the financial impact including private cars would have on some of the most deprived areas of Leeds. In fact, the lowest income households are least likely to own cars, while the poorest households, including vulnerable children and older people, are most likely to live in areas worst affected by air pollution; in short, those least responsible for creating the pollution suffer most from it. Continuing to allow dirty diesel vehicles on the city's streets is not in their best interests. A better solution would be to invest in better public transport links, including concessionary fare schemes where appropriate, to tackle transport poverty and pollution together, rather than trading one for the other.

Scope of the Clean Air Zone: boundaries and pricing

We note that under the current proposals, the Clean Air Zone will follow the boundary of the outer ring road, down to the M621 in the south of the city. It makes sense to have a clearly defined boundary that is easy to administer, set at a sufficient distance from the centre to bring air pollution within legal limits. With pricing at an appropriate level, and with good quality public transport alternatives available, this should have a beneficial impact beyond the zone boundary, by encouraging whole journeys to switch to less polluting modes.

We note the proposal to base the CAZ charges on those currently used in London, which are £12.50 per day for cars and £100 per day for buses and HGVs. However, we urge Leeds City Council to keep both the pricing and the boundary under review, and to consider changing them if that is necessary to achieve clean air compliance.

We believe any exemptions should be very carefully targeted as all exemptions potentially undermine the efficacy of the CAZ in cutting pollution. Any sunset period should be used to maximise information to the motorists affected on the many alternative options available, such as enhanced active travel and public transport options, or car club membership, rather than simply purchasing a newer vehicle.

We welcome the commitment to reinvest any surplus revenue from the charging zone on further initiatives to improve air quality within the city, such as investing in public transport and other environmentally friendly projects.

Additional measures

We strongly welcome the additional measures which Leeds City Council is currently investigating to off-set the effects of poor air quality. These include encouraging further use of public transport and cycling networks; promoting the uptake of ultra-low emission vehicles and electric vehicles both in the Council fleet; and working with organisations across Leeds to cut the level of emissions from road traffic.

We believe there is great potential for the City Council to continue to work with major employers and destinations on travel plans that can cut motor traffic while improving access for local people to jobs and services, and to join up transport and planning policy, locating new homes and employment sites near good public transport links.

We commend to Leeds City Council some of the successful interventions from other local authorities. These include the Workplace Parking Levy in use in Nottingham, where a modest charge is levied on larger commuter car parks for investment in public transport; and the 'school streets' schemes in some London boroughs, where streets around primary schools are closed to all motor traffic at either end of the school day.

We would be happy to discuss these and other policy ideas with the City Council as your exciting plans for Connecting Leeds and the Clean Air Zone progress.

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Bridget Fox
Campaign for Better Transport

Campaign for Better Transport's vision is a country where communities have affordable transport that improves quality of life and protects the environment. Achieving our vision requires substantial changes to UK transport policy which we aim to achieve by providing well-researched, practical solutions that gain support from both decision-makers and the public.

16 Waterside, 44-48 Wharf Road, London N1 7UX
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