

Coventry and Warwickshire Air Quality People's Chamber Response to the Coventry Air Quality Plan

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Summary – This report presents the views of the of **Coventry and Warwickshire Air Quality People's Chamber (CW-AQPC)** on the city plan to improve air quality and outlines several specific concerns with regard to the Air Quality Plan presented for consultation. The aim of this report is to help Coventry City Council to find sensible and long lasting solutions to the problem of poor air quality. Mistakes have been made in the past so it is no shame to go back and learn from these. Coventry is one of the most heavily polluted cities in the UK. The Government admits that these high concentrations can exacerbate respiratory conditions such as asthma and have also been linked to dementia. They can cause significant problems even for otherwise healthy people. The City Council have been told that they must take urgent steps to understand the impact on health for the local population – knowing the baseline is vital before improvements are made. The air quality plan should primarily be about reducing vehicle use, manufacturing vehicles which pollute less and protecting pedestrians and residents from harmful pollutants. Errors in granting permission for so many housing sites have been based on erroneous data relating to Coventry's projected population growth. Since we all know that the figures used are false, then we need to go back and make sure no more developments take place until the air pollution problems in the City are resolved. Issues with regard to the projected growth of the population in Coventry are presented as an **Appendix** to this report. Transport Secretary **Grant Shapps** said; namely that, '*Public transport and active travel will be the natural first choice for our daily activities.*' He stated that, '*We will use our cars less and be able to rely on a convenient, cost effective and coherent public transport network.*' These statements are music to the ears of the CW-AQPC members.

Introduction

Air pollution is a major public health risk ranking alongside cancer, heart disease and obesity. It poses the single greatest environmental risk to human health. Although it is claimed that air pollution has been reduced significantly since 2010, based on local studies, this is in fact, not true. The level of pollution has been increasing. The Government, the Department for Environment Food and Rural Affairs (DEFRA), has put in place a £3.8 billion plan to reduce harmful emissions from road transport. This includes: nearly £1.5 billion between April 2015 and March 2021 to support the uptake of ultra-low emission vehicles; £1.2 billion for the Cycling and Walking Investment Strategy to increase these activities and make our roads safer for vulnerable users; and £850 million to help local authorities develop and implement local air quality plans and to support those impacted by the plans.

Yet, despite such huge funding, DEFRA recommended that the local authorities monitor these fine particulates (see Technical Guidance), but sadly they have not mandated it. The reason given by the City Council, in a report to Professor Ziarati, Chair of CW-AQPC, for not monitoring the level of these fine particulates is that equipment for measuring particulates is very expensive, costing tens of thousands of pounds. In a letter to Professor Ziarati, the DEFRA Minister responsible for Air Quality, stated that there are 171 certified automatic monitors which continuously measure pollutants on a near real-time; and that two of these monitoring stations are located in Coventry. Both stations measure NO₂ and PM₁₀ and one of the stations in Coventry measures Ozone and PM_{2.5}. Despite several promises by Coventry City Council to provide data, to-date, none has been given to the Chair or members CW-AQPC. With such huge funding, as outlined above, it is really unacceptable that these particulates, specifically PM₁₀ and PM_{2.5} are not measured in all of the City's hot spots and that the data available is not shared with local bona fide communities or residents.

In their response to Professor Ziarati's inquiry, the City Council states that in an ideal world the Council would purchase good air quality analysers but they are very expensive to purchase along with significant ongoing operating costs so the tubes have an important part to play in our monitoring strategy. The point Professor Ziarati was making was that the Diffusion Tubes are inaccurate and that the way they are installed, adds to inaccuracies. To this end, the recommendation was to continue with diffusion tubes but have one accurate system of measuring NO₂ for calibration and re-calculation of the readings from the diffusion tubes.

DEFRA is aware of the situation and states that many areas in the UK are exceeding legal levels of nitrogen dioxide. The statement that this is the only statutory air quality limit the UK is currently failing to meet is not true as local measurements have shown levels of PM₁₀ and PM_{2.5} have also been exceeding the Government's own targets. The two PM measuring stations in Coventry are not installed in hotspots, therefore the claim that PM levels do not exceed the

targets set, is untrue. In any case, repeated requests for the release of PM data has so far fallen on deaf ears despite promises made to publish them. In 2017, the Government set out in its Plan for Tackling Roadside Nitrogen Dioxide Concentrations that, given the local nature of the problem, local action was needed to achieve improvements in air quality. Local knowledge, it was stated, is vital to finding solutions for air quality problems that are suited to local areas and the communities and businesses affected.

City Air Quality Plan

The CW-AQPC have found the plan to be a disappointing document, that fails to take into account factors which are vital to the local population. Some of the specific comments are as follows:

1. The plan seems to lack any clear modelling of the impact on Air Quality of the population growth, economic growth and housing contained in the Local Plan. So what are the baseline measures? What would happen over a ten-year period if we had no action plan? What effect will the plan have at each stage?
2. It is recognised that NO₂ is a major problem, but particulates are an even greater problem, they are not mentioned. Currently no effective measurement of NO₂ or particulates are in place, we therefore have a Plan with no quantified starting point.
3. The Plan is in reality, a Traffic Management Plan and as such, lacks the imagination needed to make lasting change. It is effectively an attempt to apply a sticking plaster over a gaping wound.
4. The Plan looks for quick fixes, using electric vehicles and re-routing traffic flow. Yet there is no evaluation of the success of early investments e.g. What is the usage of fixed charging points? What is the market penetration of electric vehicles in Coventry.
5. The plans for cycle-ways and walk-ways have been dramatically scaled back in order to look for quick wins. This is a clear example of a kneejerk reaction and a lack of any inventive strategic thinking. Modal shift has to be a major part of the solution
6. It is particularly disappointing and unacceptable that the vital part that trees and open spaces play in improving Air Quality has been ignored. Not really a mention, in stark contrast the City Council continues to progressively remove more and mature trees and build on Green spaces.
7. Specifically, there is an issue in solving the problems of Air Quality on the Holyhead road. The proposed plan includes a new junction off the ring road and past St Columbus school entrance. This is a move that should be instantly rejected, diverting more traffic past a school is counter intuitive. We must protect our children from poor Air Quality, not move it towards them.
8. The Plan, clearly now (£24.5m) has to be framed within a drastically reduced financial envelope, but there is no tracking of the proposed changes or any quantification of the impact from the original plan that was costed at nearly £90m.
9. Covid-19 has impacted on Coventry in the same way as in all parts of the UK. When we emerge from it, nothing will be the same as before. It is therefore irrational to be rushing into a plan of this nature, without time to reflect. The reflection time could be used to ask the following questions: a) Should we use our green spaces differently? b) How can trees help us? c) What has the air quality been like during the lock down? d) Can we come up with a better and more creative solution for the long term, and engage our schools and colleges to do so?

Cycle and Cycling routes

Since the air quality plan also intends for people to ditch their car and cycle to work, planning for example, to provide a cycle route the whole length of the Binley Road is unwise. Surely the cyclists would prefer to use quieter and less polluted routes. Those who live in Stoke, not far from Binley Road, do not dare to cycle. Some keen cyclists when cycling on busy roads have ended up in hospital and it may be the case that debris falls on the proposed cycle routes that are near very busy roads. It is said that Binley Road would be the main route to the University Hospital. There are those who cycle to and from there, but are not known to have been using Binley Road. If City planners contact the cycling groups, perhaps it would be a useful exercise to ask their opinion. The answer to the question that would a cyclist want to cycle along these main roads on a regular basis is surely **no**.

The tree wardens are also concerned that these main roads into the city are, in places, lined with old and beautiful trees. How would the proposed cycle-ways avoid damaging them? The City's track record is not a good one in this respect! Those of us who often walk our dogs on the roads nearby eg on the land off WykenCroft, where the cycle-way was put in along

the river from Wyken Croft to Ansty Road a few years ago, recall that the first high wind after the installation brought down three big trees into the river. All their roots had been severed. This would be very worrying along a main road. And of course, our precious trees need to be replaced to absorb pollution and to disperse it.

Final remarks - The key to achieving 50% reduction in carbon emissions footprint in the region is a radical shift to green energies, smart systems and maximising local community generation of clean energy. The focus in the region should be on reducing road transport and vehicle use. The protection of pedestrians against pollution from vehicles must be a top priority. The key pollutants harming the public are Particulate Matters, PM₁₀, PM_{2.5}, PM_{less than 2.5} and NO₂ as well as Ozone. According to RSP, (2016) exposure to PM_{2.5} costs the UK some £20 billion and the deposition of pollutants to vegetation can save the UK £1 billion per year in Health care and loss of production. Whilst it is acknowledged that vegetation only removes a small % of PM_{2.5} and even less NO₂ yet provides the barrier needed to keep pedestrians protected from vehicle pollution. Furthermore, vegetation controls the distribution pollutants. A well designed vegetation barrier can reduce the exposure to vehicle pollution by as much as 50% in its immediate wake (Air Quality Expert Group, 2018). It has to be understood that electric cars should be considered part of the solution. These machines still produce PM's, particularly the most harmful ones which are less than 2.5 Micron and a significant PM of particles as small as 0.1 Micron. The latter are much smaller particles emitted from tyres and road surfaces. A medium solution is the use of hybrid cars in urban areas. The City has already stated that the traffic network is in gridlock and and '*Current plans for a shift to cycling, walking and bus use, are entirely unrealistic. A 10% shift to sustainable transport - has not been demonstrated anywhere in the country.*'

The Coventry air quality plan should be studied in relation to the recent and on-going plans for new housing estates.

The points worthy of consideration are given in the following appendix.

Appendix – Impact of recent and on-going development in local areas on air quality

New evidence show it is possible that all housing needs in the period 2011-2031 circa 17-19000 homes, for Coventry can all be accommodated on brownfield land within the city, as per estimates in 2009. Supporting papers are available and will be forwarded on request. There are significant endangered species living in the development zone: badgers, rare bats, great crested newts. The Government has promised to reverse losses to biodiversity by 2020 under the Aitchi Convention. The development of important habitat, as recognised by the wildlife trust and natural England, will make losses of biodiversity worse, not better. The Lawton Report of 2011, said we are in the last chance saloon with our wildlife. Development will materially damage ancient woodland through overuse, cats and dogs disturbing wildlife and excess human use will interfere with plant and tree regeneration in the woods. There will be significant damage to the land that is archeologically significant some sites contains a complete stone age economy - containing living areas, hunting, grazing and cultivation areas spread from Corley Rocks Ancient Monument all along Hall Brook to Manor Farm. It contains a rare standing medieval village - behind the homes in Bennetts Road, and the likely remains of a buried Saxon barrow (off Penny Park Lane). It contains remains of a Medieval Fish Pond, and possibly the currently unknown site of Keresley Castle. According to Natural England, the nation has lost 70% of its specialist farmland birds and 70% of butterfly species in the last 40 years. Splitting and taking out these corridors, accelerates loss of bio-diversity. Development with all associated roads, drives, and patios, will worsen an already acute flooding situation - homes flood regularly in Bennetts Road and Watery Lane. Development of Keresley, taken together - ie "cumulatively"- with Finham, Westwood, Cromwell Lane and Eastern Green, will inevitably make existing illegal levels of air pollution worse along main commuter routes in and around the city. There is no need, under the latest population analysis, to build on this scale (42400 homes over 20 years). It will unnecessarily make the air quality even more toxic. The law requires a precautionary approach to air pollution; the air quality directive requires a "cumulative" assessment.

Gavin Barwell said: "We need to build more homes in this country so making sure that we re-use brownfield land is crucial. We want to bring life back to abandoned sites and protect our valued countryside". Brownfield registers were first piloted in 2016, when 73 local planning authorities across the country pioneered the measures. Clearly the Minister's view has not been seriously considered by the City.