

BLF response to Greater Manchester Clean Air Plan proposals

Lung disease is one of the three biggest killer disease areas in the UK. It kills 115,000 people each year, the equivalent of one person every five minutes, and approximately 12 million people in the UK (around 1 in 5) have a history of asthma, Chronic obstructive pulmonary disease (COPD) or another longstanding respiratory illness.¹ The British Lung Foundation is the only charity looking after the nation's lungs. We provide hope, help and a voice for people with all lung conditions through our research, our helpline and local groups, and our local and national campaigns. Our aim is to make sure that one day everyone breathes clean air with healthy lungs.

Across Greater Manchester there are unsafe and illegal levels of air pollution, and it is therefore crucial that strong action is taken to tackle this issue.

We are delighted to respond to this consultation and will outline our view that:

- Greater Manchester has some of the worst lung disease outcomes in England, therefore action on air quality urgently needs to be taken and be as far-reaching as possible.
- These current plans do not go far enough to deliver the legal or public health changes that are needed, we are hugely disappointed that a class-D charging clean air zone (CAZ) is not being considered.
- Facilitating a move away from petrol and diesel vehicles towards electric vehicles must be joined with action to ensure there are fewer, not just greener, vehicles on the streets.
- A public health engagement campaign, providing accurate, timely and localised data on air pollution should be introduced, enabling people to protect their own health.

The process

Do you have any comments on the process and selection of the GM Clean Air Plan proposals?

We are disappointed that these proposals contain little about how the public will be engaged in this process. There is no discussion of how key stakeholders such as schools and healthcare centres will be engaged.

¹Respiratory Health of the Nation, British Lung Foundation, 2016, Available at: <https://statistics.blf.org.uk/lung-disease-uk-big-picture>

Further, the process has not included any discussion of the importance of public health alerts for people living with a long-term lung health condition. These are vitally important and will be discussed later in this response.

There is a strong focus within this process on cleaning up the fleets of vehicles which belong to schools and businesses, which is an important aspect of tackling the area's toxic area. However, this approach puts the burden on organisations, rather than on systemic changes which can embed long-term modal shift in the behaviour of the public.

There is a disappointing lack of vision in this strategy for the role of active travel infrastructure and modal shift. The current work of Greater Manchester's Cycling and Walking Commissioner Chris Boardman is to be welcomed, but it is important that this work is linked up with the GM Clean Air Plan proposals to ensure both can reinforce each other.

And finally, we are disappointed that a class-D CAZ which includes private cars has been ruled out in the selection process, as this would be the strongest possible CAZ option and would bring legal compliance as soon as possible as well as the maximum benefits for people's health.

CAZ

Do you have any comments on the boundary?

We welcome the boundary of the CAZ, which is planned to cover a broad area encompassing the whole of Greater Manchester. As the plan states, it is important that the boundary covers a broad area to ensure that the transportation sources of air pollution are systemically tackled, rather than shifted to a nearby area. We recommend this boundary should be maintained between now and the formal consultation.

However, with multiple roads on the Strategic Road Network (SRN) passing through the area but exempt from the CAZ, dirty vehicles will be able pollute in Greater Manchester without charge. Therefore, Greater Manchester should work with Highways England to include the relevant sections of the SRN in the CAZ.

Do you have any comments about the Clean Air Zone? This may include the area the zone covers and the timescales for introducing the zone

Road transport is one of the biggest sources of air pollution in Manchester and therefore the introduction of a CAZ is critically important for the health of everyone who lives in the city. We welcome the introduction of a charging CAZ which will have a much more positive contribution to clean air than a non-charging zone would, as evidenced by DEFRA.²

However, the British Lung Foundation is very disappointed to see that private cars are not included in the CAZ. Private cars represent a substantial share of the city's vehicle fleet and thus contribute extensively to the public health impact of air pollution. As shown by the road traffic section of the Transport Statistics for Greater Manchester, last published in

² UK plan for tackling roadside nitrogen dioxide concentrations: Detailed plan, DEFRA, 2017, Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/633270/air-quality-plan-detail.pdf

2016, cars make up the vast majority of miles driven in the Greater Manchester area. In 2016 they were responsible for 10,696 million kilometres (driven on motorways, A and B roads) from a total of 13,285 million kilometres driven by all motors.³ Many of these journeys could be made using other cleaner, healthier and more sustainable modes of transport, such as public transport, walking or cycling.

The inclusion of private cars would allow Greater Manchester to deliver cleaner and safer air as quickly as possible, which is both essential for reaching legal targets and to protect the most vulnerable people's health. This would mean that more people would be able to benefit from cleaner air and would make a substantial difference to people living with a lung condition, who can often find their conditions worsened by exposure to pollution. Therefore, we urge GM to reconsider your approach, and to implement a class-D CAZ to maximise health benefits of the CAZ.

We are also disappointed that vans, minibuses, motorhomes and motorised horseboxes will not be included until 2023. Air pollution is an urgent problem that is affecting the health of the people of Greater Manchester right now, and these vehicles should not be left out from the scheme for an extra two years.

Do you think the following penalty payments for those vehicles that do not meet minimum emission requirements are too much, too little, or about right?

Payments should be set at a level high enough to change behaviour, drawing from research on existing schemes. These charges should remain under review to ensure they are resulting in the desired behaviour change impact.

Which other vehicles do you feel should be eligible for exemption from the daily penalty?

It is important that those living with a long-term lung condition which affects mobility - for example COPD, idiopathic pulmonary fibrosis and asthma - who require a private vehicle for mobility reasons are not penalised. Therefore, were these proposals to be changed to a class-D CAZ, we would strongly support a temporary exemption for blue badge holders.

We would also encourage GM to look at introducing a scheme similar to Transport for London's Congestion Charge NHS Reimbursement Scheme, under which people who are clinically assessed as too ill to travel to an appointment on public transport claim back any Congestion Charges and/or Ultra Low Emission Zone (ULEZ) charges.

³Transport Statistics Greater Manchester Public Transport Section, Transport for Greater Manchester, 2018, Available at: <https://data.gov.uk/dataset/16bb4b09-f69c-42f0-9e3e-9bcf6dc4f886/transport-statistics-greater-manchester-public-transport-section>

Funding

Do you have any comments on the funds?

It is to be welcomed that Greater Manchester are looking at facilitating a shift towards greener vehicles through the provision of funding. However, as acknowledged in the plans, these funds are not yet confirmed by central government. Therefore, we would encourage GM to make plans to seek alternative funding streams if needed.

Would giving advice to your business or organisation and its employees help them to use greener travel for their commute and work activities? Yes/no

Yes

To what extent do you think that giving advice and support for residents, schools and businesses to use less polluting transport is a priority for improving air quality in Greater Manchester?

Advice on using less polluting transport is to be welcomed. This must be accompanied by health promotion and awareness raising efforts in schools, hospitals and care homes, as well as training of health professionals.

The provision of data on air quality will not solely be enough to change travel behaviour if people don't have the skills, knowledge and guidance to interpret this data and to make changes to the way they behave, so these two streams of communications work must be joined-up to maximise synergies.

Going electric

Where do you think the charging points should be installed?

- All

To what extent do you think the installation of more charging points across Greater Manchester is a priority to help improve air quality in the region?

Facilitating a move away from petrol and diesel vehicles towards electric vehicles is a crucial part of cleaning up GM's air, therefore it is important that the infrastructure for this move is introduced.

However, it is important that this is joined with action to ensure there are fewer, not just greener, vehicles on the streets. There must be investment in active travel infrastructure, alongside investments in clean public transport. Further, the introduction of new EV infrastructure must not come at the expense of active travel infrastructure.

Are there any modifications which could make you more likely to support the proposals?

The inclusion of private cars and the charging of all vehicle-classes from 2021.

Do you have any other comments?

Lung disease is one of the three biggest killer disease areas in the UK. It kills 115,000 people each year, the equivalent of one person every five minutes.

Greater Manchester has some of the worst lung disease outcomes in England. The costs to the NHS for respiratory illnesses across the Greater Manchester health system are substantial. In the 2016/17 spending period, £22,032,311 was spent on acute elective and acute non-elective across North, South and Central Manchester. In 2016/17 the cost of providing respiratory disease services within the community for Pennine Acute, University Hospitals South Manchester and Central Manchester Foundation Trust was approximately £806,200. Manchester has the highest acute non-elective spend for asthma in the country.⁴

By introducing a class-D CAZ and encouraging and facilitating the greatest possible modal shift, costs to the NHS in the GM area could be reduced alongside significant improvements to public health in the area.

There are a number of other ideas that would rapidly help protect those most vulnerable to the effects of air pollution, such as children and those with a long-term lung condition. These include:

Public Health Information Campaign

We know that the provision of accurate, timely and localised data on air pollution is critical for enabling people to protect their own health. Therefore, we would encourage Greater Manchester to fund a public health campaign to provide this information. Any data must always be accompanied with robust health advice to ensure people are empowered to make decisions on how to protect themselves.

This work should be targeted to areas where vulnerable people live, work and play. It should seek to engage these groups directly and establish robust guidelines for citizen science monitoring so that local campaign groups are able to accurately collect air pollution data and use this to meaningfully support and develop the council's work.

Tailored interventions around schools

Evidence shows that children are more vulnerable to air pollution and could be put at risk of life-long health conditions such as asthma, and that children growing up in areas of higher pollution are up to four times more likely to have reduced lung function when they reach adulthood.

Therefore, GM should be looking at introducing specific interventions across Greater Manchester to protect children including the following, as advocated by the Clean Air Parents' Network "Clean Air for Children Programme".

- Comprehensive air quality audits of schools, nurseries and playgrounds in known pollution hotspots to identify all those affected by illegal and harmful levels of air pollution and to further identify and implement policies and actions to protect children's health.

⁴ Manchester Joint Strategic Needs Assessment Adults and Older People: Long Term Conditions - Respiratory diseases, Manchester City Council, 2017, Available at: https://www.manchester.gov.uk/downloads/download/6813/adults_and_older_peoples_jsna_-_respiratory_diseases

- Banning the creation of new schools, nurseries and playgrounds in pollution hotspots.
- Introducing traffic exclusion zones around schools, nurseries and playgrounds where this will help to reduce children's exposure.
- Promoting and enabling walking, cycling and public transport as key options for journeys to and from schools, nurseries and playgrounds.
- Providing schools and nurseries with a proactive alert system for high pollution events and guidance and support on how to protect children from air pollution throughout the year.

Strong developments on work like this have been seen already across England. For example, in Birmingham the 'Clean Air Cops' programme has increased parental engagement in air pollution. Further, in London there have been audits of schools to propose tailored interventions for each one.