



Sustainable Transport Alliance response to Department of Environment, Food and Rural Affairs: Consultation on Environmental Targets

June 2022

Introduction

The Sustainable Transport Alliance brings together eight leading NGOs working in the field of sustainable transport and travel: Bus Users, Campaign for Better Transport, Community Rail Network, Community Transport Association, Collaborative Mobility UK (CoMoUK), Living Streets, London Cycling Campaign and Sustrans. **The work we do – and that of our thousands of local groups, volunteers, campaigners and members – has a major bearing on the UK’s ability to achieve environmental targets, including on air quality, and serves to increase ambition and build public support, action and momentum.**

We also represent, support and champion groups that suffer serious harm from poor air quality but contribute least to it: pedestrians, people cycling, bus and rail users, community transport and shared mobility users, as well as working with low-income and left-behind communities and marginalised groups.

All our organisations work closely with the Department for Transport, but we have limited contact presently with DEFRA, so we are pleased to collectively feed in our expertise and recommendations to this consultation, and would be pleased to follow up with further discussion. Please contact Jools Townsend, chief executive of Community Rail Network, and chair of the Alliance, on jools@communityrail.org.uk.

The below response focuses on the consultation questions most relevant to our work.

For more information on the Alliance and our work together see <https://como.org.uk/sustainable-transport-alliance/>.

Summary of our position and recommendations

We believe that sustainable transport also means inclusive, healthy, beneficial transport – good for people, health and wellbeing, fair economic development, local places, and our climate. The experiences of our organisations, working with communities across the UK and advancing progress across the sustainable transport mix (active travel, public transport, community transport, and shared mobility), demonstrates the great importance of sustainable transport to improving air quality and local environments, and the imperative to accelerate progress in this area.

Transport is now the UK’s biggest source of carbon emissions, with no significant progress made to date in turning this around,¹ related to the number of private vehicles, and miles driven, continuing to rise.² As well as threatening our ability to hit Net Zero targets, vehicle emissions have a huge bearing on local air quality, health, wellbeing, safety, places and spaces, and quality of life. Our organisations’ manifold experiences of working with communities across the UK suffering the ill-effects of ever-increasing traffic, noise and pollution – and increasingly concerned about this – brings this to bear.

If Net Zero is to be achieved and air quality improved, it is paramount we shift journeys away from private cars, and onto public, shared and active travel. We have increasing evidence from transport

¹ Department for Transport, 2021, Transport Decarbonisation Plan, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1009448/decarbonising-transport-a-better-greener-britain.pdf

² Aside from during the pandemic, road vehicle mileage has steadily and dramatically risen, by 40% 1989-2019. See Department for Transport statistics, including <https://www.gov.uk/government/statistical-data-sets/road-traffic-statistics-tra>

academics and experts that car mileage must be reduced by at least 20-27% by 2030 to stay within our carbon budgets and deliver wide-ranging social and environmental co-benefits³. Shifting to electric vehicles will not get us far enough and fast enough from a decarbonisation perspective⁴, and EVs also don't address local environmental problems around particulate pollution from brakes and tyres, traffic congestion, road danger and disturbance, and inequitable and inefficient use of public space⁵. Nor is a heavy focus on EVs an inclusive pathway for decarbonisation. We support a stronger focus on modal shift, and the development and prioritisation of public, shared and active travel, as a powerful means to achieving net zero, local environmental improvements, and Levelling Up ambitions, simultaneously.

For these reasons, and drawing on our respective experiences and expertise, the Sustainable Transport Alliance recommends:

- i) **stronger ambitions and targets for tackling air pollution** than are currently proposed in the consultation, and specific attention to the role of transport, modal shift, and private car reduction in achieving these;
- ii) **targets are put in place with the DfT, starting with a mileage reduction commitment** for private cars (as has been adopted by governments of New Zealand and Scotland), given their major contribution to air pollution alongside other environmental issues, and complementing the DfT's policy objective to 'accelerate modal shift' to decarbonise transport⁶;
- iii) **close cross-departmental working**, including with those leading on the Department for Transport's Transport Decarbonisation Plan, and DLUHC, to ensure joined up thinking and action, and to identify where more work and support is required, particularly **support for local leaders and communities wanting to contribute to positive change** on sustainable transport, air quality, climate action, and other environmental objectives such as waste reduction and biodiversity.

Do you agree or disagree with the level of ambition proposed for a PM2.5 concentration target?

The consultation proposes two targets for air pollution:

- The concentration of fine particulate matter (PM2.5) pollution of 10 micrograms per cubic metre will be met by 2040 – this is equivalent to the old 2005 World Health Organization guideline for PM2.5.
- A 35% reduction in population exposure to PM2.5 by 2040 (compared to a base year of 2018).

We are concerned that the proposed PM2.5 concentration target is insufficient, and so will unnecessarily delay and stymie action to reduce particulate matter pollution. In 2021, WHO updated its Global Air Quality Guidelines, recommending that the concentration limit for PM2.5 should be halved from 10 to 5 micrograms per cubic metre of air ($\mu\text{g}/\text{m}^3$). According to a study from the Clean Air Fund and Imperial College London it is possible for the UK to reach the proposed level of air pollution by 2030, not 2040⁷. This would have substantial benefits on child and adult health, especially in terms of reductions in asthma and coronary heart disease as well as increasing average life expectancy of those born in recent years⁸. As there is no safe level of particulate matter, the UK Government should set the deadline for reaching $10\mu\text{g}/\text{m}^3$ to 2030 with a long-term target of $5\mu\text{g}/\text{m}^3$ by 2040, to maximise ambition and progress, and commit to a high level of transparent pollution monitoring and modelling (see below).

Accelerating modal shift onto active travel, public and shared transport, can make a major contribution to this heightened ambition, and our experience shows great positivity and opportunity at a local and regional level for contributing towards such nationally-led goals. We note that the consultation document refers to

³ A 2021 report by Green Alliance estimated that a car km reduction of 20-27% is needed by 2030, see <https://green-alliance.org.uk/publication/not-going-the-extra-mile/>. Experts, academics and sector leaders appear to be coalescing around this estimation, and increasing numbers of devolved authorities and sub-national transport bodies are setting corresponding targets. See for example Greener Transport Solutions' 2022 report Pathways to Net Zero: <https://greenertransportsolutions.com/wp-content/uploads/2022/03/PATHWAYS-TO-NET-ZERO-MARCH-2022.pdf>

⁴ For example, see analysis by IPPR <https://www.smarttransport.org.uk/news/latest-news/shift-to-evs-not-enough-to-achieve-net-zero-says-ippir>, Green Alliance <https://green-alliance.org.uk/publication/not-going-the-extra-mile/> and CREDS, <https://low-energy.creds.ac.uk/the-report/>

⁵ Jones, S.J. (2019) 'If electric cars are the answer, what was the question?' *British Medical Bulletin*, Volume 129, Issue 1, March 2019, Pages 13–23, <https://academic.oup.com/bmb/article/129/1/13/5274656>

⁶ Department for Transport, Transport Decarbonisation Plan, 2021

⁷ Pathway to WHO: achieving clean air in the UK, Faculty of Medicine, Imperial College London

⁸ Air quality in UK could reach WHO targets by 2030 if reforms delivered - AirQualityNews

national action and international collaboration to deliver on the targets. We want to emphasise that collaboration with local and regional leaders and networks is also vital, not least to support place-based change towards a climate-safe, sustainable, inclusive and healthy transport system that enhances rather than degrades our environment. This would also help to contribute towards and build on the increased commitments of COP26 to set a world-leading example on climate change initiatives.

As well as being expert in the ways that change within transport, at different levels, can contribute towards this enhanced ambition, our organisations are acutely aware of the ways that individuals, families and communities suffer from poor air quality and inadequate action to address it. People who walk, cycle, wheel and use public, community and shared transport (those contributing least to vehicle emissions) invariably spend a significant time alongside busy roads, exposed to toxic pollutants that are well-evidenced to increase risk of wide-ranging health conditions and bring tens of thousands of premature deaths per year. Our organisations work with thousands of communities and volunteer groups across Britain desperately concerned about local traffic and its environmental, social and health implications, and wanting to lead local change towards more sustainable mobility, streets and local places. Our work also reinforces the academic evidence showing how some groups and communities suffer disproportionately from air pollution and other ill-effects of traffic, and demonstrates the opportunities for simultaneously empowering and benefitting left-behind places and excluded groups, supporting the Levelling Up agenda, while achieving environmental targets, through developing more sustainable forms of mobility and reducing car dependency.

Do you agree or disagree with the level of ambition proposed for a population exposure reduction target?

Through our respective activities, members of the Sustainable Transport Alliance can attest to the current approach to pollution monitoring being patchy and in need of improvement. This includes a need to align and integrate with sustainable transport policy and development, from which it appears to be presently decoupled. We recommend that enhancement of this system should involve close working with DfT and sustainable transport experts, and take into account opportunities to work with and empower communities and local and regional leaders to act on air pollution, including specifically to advance sustainable transport.

DEFRA's proposals only aim to reduce the amount of pollution monitored in 2040 by the Automatic Urban and Rural Network to "on average, 35% less polluted than in 2018". This will not address pollution hotspots and places where there are particular ramifications from pollution for local people's health and quality of life (e.g. outside homes, schools and workplaces), unless they happen to be close to a monitoring station. It also doesn't appear to offer local communities and leaders the ability to access data and information to inform and guide their actions to tackle air pollution.

We recommend that there should be many more monitoring sites to build a more nuanced picture of air pollution and how to tackle it in different communities - urban, rural and everywhere in between – and this monitoring should be assimilated and linked with transport decarbonisation data and policy. It may not be practical to provide every community with the ability to monitor air pollution at a very local level, but DEFRA should consider as part of this work how the monitoring system and data available can be put to best use to support and empower the growing number of communities who want to take action on air pollution and climate, and local authorities with responsibilities for doing so, including through promoting and developing more sustainable transport networks, innovations and behaviours. For example, DEFRA may be able to provide data from monitoring stations in an accessible, engaging way that enables local councils and community groups to look up typical readings and air pollution profiles in comparable areas, and examples of actions that may be effective in their locality. This could be joined up with the current work by the DfT to support and inform local authorities on transport decarbonisation, and work carried out through our own grassroots networks of community groups and volunteers.

We also recommend joint working with the transport industry to enable understanding of air pollution at major transport hubs and different types/size of rail, bus and coach stations. For example, work is already being undertaken within the rail industry (led by RSSB) to undertake and further develop air quality monitoring at railway stations: there is an opportunity here, and no doubt others, for collaboration and potentially combining and assimilating data, achieving more efficient and swift progress towards cleaner air, better local environments, and sustainable and inclusive transport.

For all queries on this submission, please contact jools@communityrail.org.uk