

Web site: <http://www.DurhamCity.org>

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7 December 2023

Air Quality Action Plan refresh

Dear David Gribben,

Trustees from the City of Durham Trust took part in the Air Quality event hosted on 23 November 2023 in Durham Town Hall. You invited further comments via e-mail by 30 November. Please accept our apologies for the delay, but we hope that the following will be helpful in shaping the new AQAP which will be put out to formal public consultation in the New Year.

The Trust's main points are:

- more measures placing additional costs on users of polluting vehicles must be included
- actions which also respond to the climate emergency should be prioritised, especially demand management of private car travel
- any actions to “investigate” or “study” possible interventions should rapidly be developed into firm proposals
- measures which tackle air quality but which are also visible to the public will help with awareness of the issues and potentially build public support
- annual targets should be set, progress reviewed, and additional measures swiftly actioned where necessary.

We trust that there will be an evaluation of the measures in the previous plan, and clear explanations of why any measures were not implemented, along with an assessment of the likely impact of any new measures proposed.

Costs on the polluter

In its response to the 2015 consultation the Trust noted that none of the proposed measures placed any additional costs on those causing the pollution – going against the “polluter pays” principle. Following the consultation, the Council added Action 13, which was to explore variable charges for residential car parking permits based on emissions. The action, to “explore” may have been carried out, but no emissions-based permit charges were brought in. The Trust would like to see action on this, as it could have a significant effect on the choices people make when purchasing vehicles: choices which, in the absence of such influences, could lock in higher pollution for many years. Several councils have now introduced variable charges for residents' and visitor permits, for example Islington: <https://www.islington.gov.uk/parking/parking-permits/>

The latest proposed list of actions is also very short on measures which make the polluter pay. The new Action 3 promises to “investigate the introduction of an emission-based car parking regime” and mentions a revised parking strategy for Council-owned car parks and on-street parking. Action 11 relates to workplace travel planning, which might result in charging employees for parking, but is very far from definite. Action 15 regarding planning conditions may also create some leverage. Given the very limited improvement in air quality over the course of the previous plan, and fact that the World Health Organisation recommends even lower levels of

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pollutants, surely there should be more stringent measures which create stronger economic incentives for reducing cars in the Air Quality Management Area?

The Trust welcomes the proposal in Action 3 to review parking policies. In 2015 the Trust suggested better management of car parking to reduce long-stay parking and improve turnover of vehicles. Other charging measures we suggested included a peak time congestion charge or low emission zone on the Milburngate Bridge, and a Workplace Parking Levy.

Weak actions

It is disappointing that some measures in the 2016 AQAP seem to have been downgraded. Action 2 of the previous plan involved retrofitting emissions abatement to buses. Eight years on, Action 8 of the new proposals is mainly about tracking the buses, with a stretch target of retrofitting buses or purchasing hybrid buses.

Many of the new proposed actions are about conducting feasibility studies, or investigating, rather than actual measures to be taken: “investigate intelligent transport systems” (Action 1); “potentially followed by a feasibility study” (Action 2); “investigate the introduction” (Action 3); “investigate the feasibility” (Action 4); “investigate extending...” (Action 5); “identify opportunities” (Action 6) etc. Some of the proposals are very speculative. Introducing other mobility services at the Park and Ride sites is one: e-bike hire will only meet its full potential if a cycle network is introduced first.

It is a shame that the investigations into these measures have not already been done, so that the new AQAP could prioritise those which are feasible, affordable and will have the greatest impact. Given where we are, the Trust hopes that the new plan will include clear deadlines for the evaluation activity so that the Council can swiftly move to delivery of an effective plan. There must be annual targets for air quality improvements, and the plan should be ramped up as soon as it is apparent that targets are being missed.

Demand management and modal shift

It is clear that improved air quality will only come with a combination of measures which achieve:

- cleaner motor vehicles
- reduced demand for travel through the AQMA
- modal shift to public transport, walking and cycling

Not enough has been done to reduce the demand for private motor travel through the city centre. The Council needs to move on from the environmentally-damaging relief road proposals, and implement the many sustainable transport measures in the Durham City Sustainable Transport Delivery Plan (DCSTDP).

In 2015 the Trust commented regarding Action 5 in the previous plan (provision of cycleways) supporting the proposal strongly and noting that progress had been disappointingly slow. Nothing has changed in that regard: despite the adoption of the DCSTDP in 2019 and the Local Cycling and Walking Infrastructure Plan in 2021, few cycle routes have been created in the past eight years. Can the Council really be said to be backing this properly, when major developments like Bent House Lane are approved without any active travel gain, key roads are resurfaced (e.g. New Elvet, Church Street, Potters Bank) without any review of the scope for cycle lanes, and major junctions like Whitechurch are rebuilt without cycling provision?

The Council needs to be more joined up in its strategy and delivery. The Trust would urge, in particular, the prioritisation of any measures which will also be effective in tackling the climate emergency. Reducing motor traffic through increased charging and enabling bus and active travel alternatives should therefore be prioritised over measures like SCOOT which will ease motor traffic flow and potentially increase the attractiveness of car journeys.

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The Council should consider the scope for traffic filtering on historic routes which have now been bypassed by modern roads such as the A690, A167 etc. It is still possible to drive the full length of the historic route through Carrville, Gilesgate and Claypath to the city centre, and despite SCOOT there is considerable congestion on the historic routes through the Gilesgate roundabout at certain times of day. Point closures, bus gates or congestion charging at strategic points in Carrville, on the Sunderland Road and Claypath could divert traffic onto the A690 and simultaneously create faster bus routes through the main residential areas which will also benefit bus travellers from the surrounding villages. Space would be freed up, relatively cheaply, for cycle routes and walking improvements. There need to be vigorous measures like this which tackle both the climate crisis and air quality.

Public awareness

While the Trust is convinced that promotional activities alone will be ineffective, raising public awareness of the health and environmental issues will be key in gaining acceptance for the less popular interventions which are bound to be necessary. Action 10 of the last AQAP covered this. What has the Council learned about the effectiveness of any publicity? Some possible interventions will also raise public awareness. Actions which the Trust suggested in 2015 which would also be very visible to the public included:

1. Closing roads near schools, hospitals and other sensitive receptors when air quality is poor.
2. Ceasing the free parking before Christmas promotions which send the wrong message about car use.
3. Peak time congestion charge or low emission zone on the most polluting vehicles on the Milburngate Bridge.
4. Travel plans for all schools, which would raise awareness amongst parents.

Trustees look forward to the opportunity to comment on the full Air Quality Action Plan, in the hope that some of these suggestions can be incorporated.

Yours sincerely,

John Lowe,

Chair, City of Durham Trust