



Transition Chesterfield Comments on draft AQAP Summary, February 2020

Air pollution contributes to increased mortality equivalent to 59 attributable deaths in Chesterfield each year, and all residents are impacted, particularly if they have pre-existing conditions like asthma. We are thus disappointed at the small number of actions and lack of detail in this report, given that an Air Quality Management Area was declared in 2015. We think this reflects a lack of urgency in reducing air pollution by the leadership of both the borough and county councils which is even more disappointing given that many of the actions to reduce air pollution will also reduce carbon and dovetail with both Council's emerging climate action plans. We have the following suggestions for specific actions that both Councils can take:

Education/campaigns

- Large scale events for Clean Air Day in June eg road closures outside schools, engaging with GPs and pharmacists, cycle events, electric car displays etc.
- A car free day in Chesterfield in September as part of international World Car Free Day on 22 September, supported by CBC, major employers and schools.

Information

- Formal anti-idling signage installed around schools, the hospital and train station and organise regular anti-idling events.
- Create a borough wide traffic management order to support the enforcement of idling.

Sustainable travel

- DCC and CBC to conduct a pilot of the 'School Streets' initiative in Chesterfield, closing the streets in front of schools at pick up/drop off times. This has successfully reduced air pollution around schools in other local authorities.
- CBC should work with major employers and businesses to promote car sharing, public transport, active travel, and offer incentives to travel sustainably to work.

Fleet management

- CBC to conduct a grey fleet/green fleet review of its own fleet
- CBC to consider retrofitting some of its larger vehicles with batteries and ensure that future contracts, eg for waste delivery vehicles, specify that these be zero emission.
- CBC should specify that new taxis are low emission and provide information for taxi drivers on the cost savings and benefits of electric taxis.

Planning schemes

- CBC should include stronger policies in its new Local Plan on construction and new developments.
- Members of the Planning Committee and Development Control officers should have carbon and air pollution training, and ensure that existing policies are properly implemented.

Guidance documents

- CBC should expedite production of Supplementary Planning Guidance on active travel

Traffic management

- DCC should investigate the option of reducing queueing traffic on Church St, Brimington, for example by removing the current gyratory system and making Hall Rd two-way.

Relocate traffic

- CBC to scrap plans to develop a new bypass as an air quality improvement measure, which will only increase traffic and simply shift air pollution from one area to another.

Ultra Low Vehicle Emissions Strategy

- CBC to set up a working group of EV users to advise on charging point location and usability
- CBC to implement its own planning policy on EV charging points in new developments
- CBC to develop an e-bike public hire scheme

Transition Chesterfield have also suggested a number of actions we can deliver to promote the reduction air pollution.



Transition Chesterfield Comments on draft AQAP February 2020

Transition Chesterfield is a community group whose aims include raising awareness of the issues associated with Climate Change and providing the encouragement and support necessary for Chesterfield to become a low carbon, sustainable, locally self-sufficient community. As many of the actions required to address climate change are also beneficial for air quality, we have in the past conducted a wide range of activities that are helpful to improving air quality in and around Chesterfield:

- Commented on planning policy and numerous planning applications to improve walking and cycling access and provide EV charging points in new developments
- Produced a series of car-free walking leaflets and organised guided walks in Chesterfield
- Conducted a comprehensive audit of strategic pedestrian routes in Chesterfield to identify actions needed to improve routes and encourage more walking in urban areas
- Promoted safer routes to schools to encourage more children to walk and cycle to school
- Lobbied the council to provide more EV charging points in council carparks
- Objected to cuts in bus services by Derbyshire County Council
- Promoted renewable energy schemes and improved energy efficiency of homes

Transition Chesterfield is concerned about the poor air quality across the borough. Work done by Public Health England shows that air pollution contributes to increased mortality equivalent to 59 attributable deaths in Chesterfield each year¹. All residents are impacted by air pollution, particularly if they have pre-existing conditions like asthma. Although Brimington and Sheffield Road are the only areas where legal limits of air pollution have been exceeded (as recently as 2016), because there is no safe threshold for air pollution the aim should be to reduce air pollution in every district. The head of the NHS has declared a health emergency as a result of air pollution².

Overall we are very disappointed at the small number of actions in this report and lack of detail, given that an Air Quality Management Area (AQMA) was declared in 2015. By comparison the Camden's Clean Air Action Plan contains 114 detailed actions with timescales and monitoring details³. We think this reflects a lack of urgency in reducing air pollution by the leadership of Chesterfield Borough Council (CBC) which is even more disappointing given that many of the actions to reduce air pollution will also reduce carbon and dovetail with the Council's emerging climate action plan. There also needs to be better joint working with Derbyshire County Council (DCC), particularly the Highways Authority, the schools' teams and public health.

While we support most of the proposed general actions in the consultation we find that there is a lack of detail or that the actions are either very unambitious (eg all new development to have EV charging points is council policy already and not a new action) or advisory only (eg encouraging taxi drivers to improve the quality of their fleet).

We also object strongly to the inclusion of the Brimington Bypass renamed 'Chesterfield-Staveley regeneration route' which may reduce air pollution from the immediate vicinity of Brimington in the short term but which will simply displace the pollution elsewhere, and will in the medium-long term increase traffic, carbon and air pollution in Chesterfield.

We have the following suggestions for actions that CBC and DCC could take:

¹ <https://www.derbyshire.gov.uk/site-elements/documents/pdf/council/meetings-decisions/meetings/improvement-scrutiny/places/28-11-2018-air-quality-in-derbyshire-report.pdf>

² <https://www.england.nhs.uk/2020/01/greener-nhs-campaign-to-tackle-climate-health-emergency/>

³ https://www.camden.gov.uk/documents/20142/0/Clean+air+action+plan+2019-2022_final2.pdf/f7cd1a68-e707-0755-528a-59388adf0995

1. Education/campaigns

We support a programme of educational campaigns, including large-scale events similar to those that other councils organise for Clean Air Day in June. For example some of the actions undertaken by Camden Council include: play street events, working with pharmacists, engaging with GPs, anti-idling campaigns, taxi engagement projects, cycle events and a green school run, as well as working with local community groups. There are downloadable resources on the Clean Air website.⁴

We would also support a car-free day in Chesterfield in September as part of international World Car Free Day on 22 September⁵. CBC and other major employers could incentivise their staff to either work from home or commute to work other than in a car. Senior cabinet members and management staff would set an example by taking public transport or walking or cycling. DCC and CBC could encourage all schools to promote walking and cycling to their pupils.

In Sheffield a local community group works with Sheffield City Council to run local monitoring using low cost diffusion tubes⁶. This has built local understanding of air pollution and engaged local communities in assessing and taking action on local issues. We would be happy to work with the council on a similar programme.

2. Information

We support providing information, particularly on the simple actions that people can do to reduce air pollution such as not idling their engines. Formal anti-idling signage should be installed in key areas such as schools, the train station and the hospital. The Council can also organise regular anti-idling events. The Council could also implement the powers they already have to fine drivers who continue to idle after a warning, or create a borough wide traffic management order (TMO) which will further support the enforcement of engine idling.

3. Sustainable travel

DCC and CBC should conduct a pilot of the 'School Streets' initiative⁷ in Chesterfield, closing the streets in front of schools at pick up and drop off times. This has been implemented successfully in a growing number of local authorities. This has reduced air pollution in the vicinity of schools as well as encouraging students to be more active, with benefits to their health and well-being.

There also needs to be closer working with the major employers (eg the hospital) and businesses to promote car sharing, public transport, active travel, and offer incentives to travel sustainably to work. For example a Zero Emissions Network (ZEN) has been established by local businesses in Shoreditch with the help of Hackney Council.⁸ The network offers advice to businesses who wish to reduce their emissions, free trials of electric vehicles and cargo bikes, consultation on reducing energy demand and on reducing emissions resulting from supply chains. While the Plymouth Hospital Travel Plan resulted in a reduction in staff arriving by car allocation, supplemented with improved Public Transport services, discounted Public Transport tickets and promotion of car sharing.⁹

There also needs to be some measures to reduce the pollution from deliveries and freight.

⁴ <https://www.cleanairstay.org.uk/forms/clean-air-day-resources>

⁵ <https://www.awarenessdays.com/awareness-days-calendar/world-car-free-day-2020/>

⁶ <https://www.derbyshire.gov.uk/site-elements/documents/pdf/council/meetings-decisions/meetings/improvement-scrutiny/places/28-11-2018-air-quality-in-derbyshire-report.pdf>

⁷ <https://www.livingstreets.org.uk/get-involved/campaign-with-us/safer-routes-to-school>

⁸ <https://www.derbyshire.gov.uk/site-elements/documents/pdf/council/meetings-decisions/meetings/improvement-scrutiny/places/28-11-2018-air-quality-in-derbyshire-report.pdf>

⁹ Reference as above

4. Fleet management

CBC should conduct a grey fleet/green fleet review¹⁰ to reduce air pollution and carbon as well as costs to the council. Given the much lower whole life costs of EVs, which will fall even further in the coming years, it may be cost-effective to retire diesel vehicles even before the end of their useful life.

The Council can also consider retrofitting some of its larger vehicles with batteries (eg see Magtec, a Sheffield company which does this¹¹). CBC should also ensure that future contracts eg for waste collection, specify that the vehicles be zero emission.

DCC's Low Emission Vehicle Infrastructure strategy states that "*Derbyshire County Council will maximise opportunities to support public transport and taxi operators to embrace alternative technologies and infrastructure.*"¹² This includes working with Borough council partners to assess and implement mechanisms to support taxi operators as well as specifying potential use as part of council supported service contracts.

As the taxi licensing authority CBC should be able to specify that new taxis are low emission. This can save taxi firms and individual operators money due to the much lower operating costs of EVs¹³. A taxi firm in Cornwall converted all its fleet to electric taxis with great benefits (cost, operational and health) for operators¹⁴. Derby City have a target that 50% taxis and private hire fleet will be electric by 2025 (25% by 2020) and are proposing electric-only taxi ranks and charging facilities¹⁵. We suggest that DCC and CBC should consider similar targets; as well as provide information and advice to taxi drivers on the business case and benefits of electric taxis, and lobby government for a fund to help taxi drivers get low interest loans to purchase electric taxis.

Buses – DCC and CBC should lobby government for additional funding to improve the bus fleet and reduce emissions through replacement low-emission buses or retrofitting vehicles with cleaner engine technology. Many other local authorities are now replacing their bus fleets with electric buses. For example York has one of the biggest fleets of double deck electric buses outside of London, largely due to funding secured by City of York Council from the Office for Low Emission Vehicles (OLEV)¹⁶. It is not clear why Chesterfield has not applied for similar funding.

5. Planning schemes

CBC should consider much stronger measures in its new Local Plan such as requiring new developments to be sited near to good public transport¹⁷, as well as using developer contributions to improve walking and

¹⁰ <https://energysavingtrust.org.uk/policy-research/green-fleet-review> and <https://energysavingtrust.org.uk/scotland/businesses-organisations/transport/grey-fleet-review>

¹¹ <http://www.magtec.co.uk/index.php/en/ev-repower>

¹²

<https://democracy.derbyshire.gov.uk/documents/s2339/Delivering%20the%20Climate%20and%20Carbon%20Reduction%20Manifesto.pdf>

¹³ <https://energysavingtrust.org.uk/sites/default/files/William%20Purnell%20-%20Electric%20taxi%20case%20study.pdf>

¹⁴ <https://www.fleetnews.co.uk/news/environment/2017/05/19/no-return-to-diesel-for-all-ev-taxi-firm-with-dozen-leafs-on-its-books>

¹⁵

https://www.derby.gov.uk/media/derbycitycouncil/contentassets/documents/consultationpapers/consultationdocuments/DerbyCityCouncil_Proposed_Taxi_Private_Hire_Vehicles_Strategy_2020.pdf

¹⁶ <https://www.itravelyork.info/news/york-to-boast-one-of-the-biggest-fleets-of-double-deck-electric-buses-outside-of-london-double-deck-electric-buses-outside-of-london>

¹⁷ The South Yorkshire Passenger Transport Executive (SYPTe) developed a simple traffic light system of grading sites by how public-transport-accessible they are, to identify the most suitable sites for housing growth. SYPTe (undated) Land Use Planning & Public Transport. A Developer's Guide. Prior to the development of the Sheffield City Region Combined Authority, the SYPTe used the system to grade all potential development sites across 4 South Yorkshire

cycling links. The development control team at CBC also needs to be much more pro-active in implementing its own policies on sustainable travel and reducing travel demand rather than recommending approval of car-dependent developments such as the Wheeldon Mill development near Sainsburys or drive-through takeaways. We would like all members of the Planning Committee and the Development Control team to have both carbon awareness and some sort of air pollution awareness training.

There is also a need to control particulates and other pollution from construction sites, as well as burning of waste. CBC and Environment Agency enforcement of this problem is severely lacking. Much more emphasis needs to be placed on preventive measures. For example the Camden Air Quality Plan includes 15 actions to reduce air pollution from construction alone¹⁸ while there are a further 9 actions for reducing building emissions¹⁹. Not all of these 24 actions will be relevant to Chesterfield but it gives an indication of how seriously some local planning authorities are taking air pollution.

6. Guidance documents

The Council should expedite the long overdue Supplementary Planning Guidance on active travel which will help ensure better design of walking and cycling infrastructure in new developments.

7. Traffic management

We consider that some of the air quality problems in Brimington, caused largely by queueing traffic on the A619, could be alleviated by removing the current gyratory system. By blocking off access from Church St onto the A619, while still allowing traffic to access shops and the church. Two mini roundabouts could be installed at the junctions of A619 with Hall Rd, and Hall Rd with Manor Rd, allowing 2-way traffic along Hall Rd. There is enough room on Hall Rd to make 2 lanes approaching the mini roundabouts. This could be done much quicker and cheaper than by building an entire new bypass. DCC should investigate this and other traffic management measures.

8. Engineering solution

Generally engineering solutions are more expensive than demand reduction or behaviour change solutions. However, if there are effective solutions which can be incorporated at Brimington they certainly should be considered.

9. Relocate traffic

We strongly object to the proposal of a new bypass as an air quality improvement measure. This may well remove traffic from the immediate vicinity of the homes that are suffering from poor air quality, but this will only serve to increase traffic and add to air pollution elsewhere. And given that it will be years before this measure can be implemented anyway it is of little immediate benefit to Brimington residents. Other measures that can be implemented immediately should be the priority to reduce air pollution in Brimington, and throughout the borough. Given that there is no safe threshold of air pollution, the action should be on measures that can cut air pollution generally, and not just shift it from one area to another.

10. Ultra Low Vehicle Emissions Strategy

planning authorities, with the most accessible sites prioritised for development in the various South Yorkshire Local Plans

¹⁸ For example: ensure all major development sites have a demolition management plan (DMP) and/or a construction management plan (CMP) approved by the air quality officer; ensure all medium and high-risk sites have real-time particulate monitoring on site and that the information from this monitoring is easily accessible to the public; produce a construction code of practice for small developments; create clean air zones (areas of exclusion for construction vehicles) around schools/ hospitals. (and if the area needs to be entered, the developer will be required to install extra measures for the duration of the project to protect the schools / hospitals for example: green infrastructure or air filtration systems; improve communications with local communities about the pollution impact of large construction projects, how impacts will be minimised, and how residents can report concerns.

¹⁹ For example: ensure all major domestic and nondomestic developments achieve zero carbon status through exemplar energy efficiency standards and renewable energy installations; enforce Air Quality Neutral and Air Quality Positive planning policies for new developments.

Although DCC has developed a LEVI strategy we believe more could be done by CBC and partners to facilitate the uptake of electric vehicles and especially electric bikes (e-bikes).

The council could set up a working group of EV users to advise on measures such as the location and usability of charging points. The chargers should generally be in more accessible places (the current one in Saltergate is badly positioned and behind a barrier in an expensive carpark). And the Destination chargers should not be the cheapest ones that require a special card for payment, but be able to be used with a debit/credit card (similar to out of hours petrol pumps). It may be beneficial to install some Rapid Chargers (20-60 mins) as well as Destination chargers (6 – 12 hours) which could attract people into Chesterfield.

The Council could also use ZapMap which shows users' comments to get an up to date idea of how the EV chargers are performing and any difficulties with them. For example the slower chargers in carparks in Durrant Road and St Mary's Gate are nearly always taken up by non-electric vehicles which was under review by the council. We would be interested to know how well these are used and what the council review has concluded. There could also be better promotion of the new chargers, for example other councils have offered a few weeks of free charging when new chargers are installed as a promotion.

The Council should also implement its own planning policy to ensure that new developments include EV charging points. It is incredible that the Council allowed LIDL to erect a new store without installing the charger that was shown on the plans. The majority of LIDL stores in England have chargers; and, ironically, LIDL announced some 6 weeks after the opening of Chesterfield LIDL that all future large stores would have rapid chargers.

The Council should also be putting in communal EV charging points for council housing tenants and could invite community benefit company Charge My Street²⁰ to help develop community chargepoints in areas without off-street parking.

To promote electric bikes CBC could introduce an electric bike hire scheme initially with docking hubs at the railway station, College, Football stadium, Town Hall, Royal Hospital, Walton Hospital and prioritise creating traffic free links between each hub.

How Transition Chesterfield can help

We propose the following actions we can deliver to support to the Council to reduce air pollution:

1. Promote council action and events on air pollution to our mailing list (approx 600 people)
2. Organise an event for the public to talk to owners of electric cars and e-bikes to dispel myths and encourage more uptake of ULEVs (planned for 13 June)
3. Work with the council to develop a SPD on active travel and continue to comment on planning applications that fail to implement the council's policies on walking and cycling
4. Work with DCC and CBC to develop a pilot of 'School Streets' in Chesterfield
5. Work with both councils on an education campaign using air pollution monitors outside schools and on busy roads.

²⁰ <https://www.chargemystreet.co.uk/>