Coventry Green New Deal

Submission to Coventry City Council’s

Air Quality Consultation

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An historical opportunity

We welcome the Council’s decision to reject the introduction of a Clean Air Zone, which would have had an uneven, negative impact on the poorest communities in our city. We also realise that the focus of the Local Air Quality Action Plan (LAQAP or Action Plan) is to ‘achieve compliance in the shortest possible time with legal limits’ on NO₂ emissions in particular ‘hotspots’. However, we hope that it is only one more step towards reducing air pollution across the city as a whole and making Coventry a flagship for green and sustainable transport as well as for the international Green New Deal movement.

Reducing the number of vehicle movements, increasing active travel and limiting tailpipe emissions are all ways to achieve this goal; but we believe they must be deployed at a greater level of ambition than shown in the Plan. It took real vision at the municipal level for Amsterdam to progress in less than 30 years from a choked city of cars to a city of bikes, with some of the lowest air pollution levels of any city in the world. Coventry, where the modern bike was invented, is eminently cyclable in size and, with that same vision, it could become a city of bicycles once again.

As we prepare to exit from the tragedy of the Covid-19 crisis, we have an opportunity to re-evaluate the future we want to build. We can choose to build a healthier, less auto-centric city that reclaims our heritage as the workshop of Starley, Singer, Rudge and of the Safety Bicycle.

Similarly, the pressing issues of air quality, biodiversity loss and climate change give Coventry an historic opportunity to become the progressive mobility city of the future that is low carbon, shared, active, connected and autonomous.

In our response to the latest version of LAQAP, we set out below what we consider to be:

- the urgent problems raised by the traffic management elements in the Action Plan;
- the more longer-term issues that arise from its proposal to create only one high quality, segregated cycleway;
- the strategic importance of trees in de-carbonising transport and the missed opportunity to link the Action Plan to the Council’s broader strategies on climate change, green spaces and urban forestry;
- the opportunities for linking the electrification of transport to greening and localising the energy supply chain; and lastly,
- the need to scale up hydrogen as a complementary energy source for green transport.

In each area of concern, we outline practical solutions that could be developed by the Council.

Finally, we reaffirm the importance of genuine community engagement and the role Coventry for a Green New Deal could play in this vital area in partnership with the Council.
Immediate issues with the LAQAP

While we support the Council’s commitment to reduce pollution in the city, we believe the LAQAP raises issues that need to be addressed now.

The removal of the Barras Lane connection to Holyhead Road is clearly required. However, the proposal to connect Upper Hill Street to city-centre traffic is problematic for several reasons. Firstly, as the road contains two churches of archaic construction and, more importantly, a primary school, the current proposal is likely to expose many high-risk individuals to increased air pollution. Given that the current level of NO₂ in Upper Hill Street is below EU limits but already above those recommended by the WHO, we think it imprudent to route more traffic along that road.

Having reached out to St Osburg’s, we found that both the school and the diocese are strongly opposed to the LAQAP’s current proposals for this area. According to a staff representative, the school had raised concerns; but they had not been meaningfully addressed by the Council.

Nicola Rynott, Headteacher, St Osburg’s Catholic Primary School

As a school and as part of the parish community and local neighbourhood we too are greatly concerned about this proposal and the impact it will have on our school, children, families and neighbours.

I did have an initial meeting with the council transport team when they were drafting ideas but nothing concrete was produced and they do seem to think they can change exits and entrances to our school and car park etc. without permission from ourselves or the diocese who actually own the land.

The diocese has been in contact to ask if they can hold fire as no site visits or meetings can happen at the moment but I’m not sure where we are at as I’ve had no response since I wrote to them on the 2nd April. I have copied my latest correspondence below for you to read. I have also written to our MP but have not heard anything back yet.

Evidence suggests young people are at increased risk from air pollution. The greater number of cars travelling along Upper Hill Street will also pose a danger to the children moving around the school. As St Osburg’s said, they would “become a traffic island with cars and pollution all around us.”

Additionally, the school is concerned that the LAQAP will involve changes to entrances, exits, car park access and loss of school green space – especially important given the school’s inner-city position – none of which have been presented in any concrete plans by the Council.

Given this lack of meaningful engagement, and with the pandemic preventing the school from gathering evidence to present to the Council, we believe that, in this current situation, an extension to the deadline date for the plans should be sought.

In addition to the concerns raised by the school, we also see the potential for other negative impacts of the Upper Hill St redevelopment. It is likely that opening this road to traffic will see the destruction, in the short term at least, of the footbridge linking that area to the centre - a crucial artery for active travel in the area. Severing this link, even temporarily, is likely to increase air pollution in the area as more people use their cars in the absence of a safe, convenient route into town by active travel.
Connecting Upper Hill Street to the slip road onto the ring road will also complicate the junction, making it less safe motorists either accelerating onto the ring road or decelerating in order to make the corner onto Upper Hill Street. Some traffic exiting the junction will have to cross multiple lanes, into an existing traffic stream at varied speeds to get onto the ring road, whilst other traffic is either pulling off the ring road or joining the ring road from the existing junction. In addition, this triple cross configuration is likely to increase the volume of traffic in the area as it offers a more direct, though also more hazardous, route into the city centre.

Whilst alleviating pollution levels at sometimes during the day, pollution peaks will still be seen at peak times and are likely to be higher. The proposal is also likely to increase traffic onto the Junction 9 roundabout as traffic from Upper Hill Street will have to use it in order to go up Holyhead Road (with no other route across to Holyhead Road outbound) and increase traffic at the Junction 8 roundabout as traffic from Radford Road will have to use it to access Barker Butts Lane (with no other routes across to Radford Road at the city end). So, instead of alleviating traffic volume, the proposal is likely to increase it.

This outcome may then lead to a proposal to redirect traffic across the ring road, following the route of the existing footbridge crossing from town. However, this would take traffic past several high-density student blocks, where most of the occupants will be of an age that is more susceptible to the effects of air pollution, as well as those at St Osburg's School. In other words, this change has the potential to increase morbidity rates rather than lower them.

The remaining proposals to shift traffic to reduce pollution levels in areas currently over the EU limit are also problematic in that they displace the problem, rather than reduce the overall pollutant load.

For example, the proposal to shift traffic to Allesley Old Road is likely to increase emissions in the densely populated Chapelfields area and thus impact on the already high, if currently legal, levels of NO₂ pollution. This is not simply a compliance issue: it is a human health issue and the Council has a responsibility to ensure those harms are limited for the people of Coventry.
Towards an integrated green transport system

We fully support the creation of a high-quality segregated cycle route linking Coundon with the city centre. However, we hope this is the first step towards the creation of an integrated green transport system in the city with cycling and walking at its centre.

One of the main barriers to cycling is the absence of safe and enjoyable cycle routes, particularly those connecting people to their workplaces. While the proposed cycle route in Coundon would indeed connect people in the suburbs of West Coventry to the city, we hope that this route will also be far enough away from motor traffic so that cyclists are not exposed to the NO₂ emissions, as well as particulates from car exhaust, tyres and brakes, and attractive enough to encourage people to use it.

As the Council notes in its communication with Coventry Green New Deal (26 March 2020), ‘detailed plans of the Coundon cycle route are not currently available, but we are working on the detailed design of the scheme and will be consulting on this later in the year.’ We look forward to seeing these detailed plans and would like to work with the Council in meaningfully engaging with Coventry’s current and potential cyclist community.

We were surprised to see no mention of the planned Coventry University to Binley Business Park cycle rout in the LAQAP. The West Midlands Combined Authority has provided £4m for this route, and we understand that the details of the plan will be out for consultation later this year. We appreciate that the funding streams are different; but we think that the Council is missing an opportunity to promote this additional route as part of Coventry’s climate change strategy.

Even if the projects are not explicitly linked, it is imperative these schemes connect in a sensible way to make cycling a normal choice for short journeys. Improved signposting of the Council’s existing recommended cycle routes, potentially with painted road markings, would also encourage increased cycling as people would no longer think of them as the same (scary) roads they are used to driving on.

We understand that the original LAQAP proposed a network of four high quality cycleways that was rejected by DEFRA and replaced by a single cycleway. We hope that the Council will now explore new funding opportunities – for example, those outlined in the Department for Transport’s latest report on decarbonising transport – to work towards a coherent, overall Cycle Strategy that joins up the whole city and is, itself, part of a coherent Climate Change Strategy.

Spon End and Foleshill are some of the poorest areas of our city, with much high-density, multilevel housing. A major barrier to cycle use for many people in these areas is the lack of a bike and/or somewhere secure and convenient to store it. The first of these issues could be solved by linking up with the universities and local cycling organisations, including the Peace House, to reuse the hundreds of bicycles abandoned by students at the two universities and provide them at low cost to people in those communities. The second is primarily an infrastructure challenge, but not necessarily an expensive one, as vacant shops in those areas could be re-purposed into secure bike stores, like those at the train station, using a token system administered by local shops.

Another key part of cycle infrastructure that is often overlooked is bike loops (secure places to store bikes at their destination that allow people to use bikes as a normal method of transport around the city). Such loops could be developed across the city at minimal cost.

The city should also expand last mile transit rental options, learning from cities like Antwerp, where there is a network of mopeds, e-scooters, bicycles and e-bikes for use by the public and, consequently, much less car-use in the city. This integrated network would encourage those who are...
less confident in cycling, or less fit, and those from communities where active travel is culturally derided, to switch from their car to a lower carbon option.

Two infrastructure modifications could also improve the situation in Foleshill. First, the expansion of the local canal towpath as a cycling superhighway could normalise cycling into the city. Apart from ensuring upkeep, this would entail building more entrance/exit points, so people can join this safe, car-free route from their street, and putting up safety barriers to prevent cyclists wobbling off into the canal.

Measures to reduce traffic on the Walsgrave Road should also be looked at as a matter of urgency, as it has high, if currently legal, levels of pollution. This includes improving traffic flow, reducing traffic volume and improving active travel options in line with examples outlined in Foleshill and Spon End.

Also, a cycling superhighway in Spon End, utilising the existing infrastructure while connecting Cumbria Close to the Arches Industrial Estate directly and with a footbridge between Alvis Business Park and Sussex Road, could be developed and integrated into other, similar schemes elsewhere in the city.

Patrick O’Kane, a retired member of Bikeability, Coventry

“To be successful, and by that I mean provision that puts more bums on saddles, cycle lanes need to have an overall plan that joins up the whole city. Isolated lanes, however safe, simply drop the nervous cyclist in a challenging traffic environment. By joining the system up, we make cycling into a routine and enjoyable activity for all ages, for both pleasure and for commuting.

A local member of Cycling UK:

Cycle routes, if they are to attract a lot of cycling, need to be:

• Coherent, linking trip origins and destinations, including public transport access points.
• Continuous and easy to navigate
• Direct in terms of distance and journey time
• Comfortable. No steep gradients or bumpy/muddy surfaces. They must cater for all types of user, including children and disabled people.
• Attractive. Aesthetics, noise reduction and integration with surrounding areas are important
• Safe. Not only from motor traffic, but from anti-social behaviour as well.”
Trees: A missed opportunity?

Trees do not absorb and store NO₂. This may explain why they are never mentioned in the Action Plan, which was produced solely to help the Council meet the Government’s demand to ‘achieve compliance in the shortest possible time with legal limits for NO₂’. This focus may also explain why there is no link in the Plan to the Council’s forthcoming Urban Forestry Strategy, nor to the promise in the Green Spaces Strategy to plant a new tree for every resident in Coventry – i.e. roughly 360,000 trees. However, trees do sequester carbon dioxide (CO₂) in the tailpipe emissions of diesel, petrol and hybrid vehicles. We accept that this pollutant is not present on our roads at levels that directly threaten our health. But CO₂ is a greenhouse gas that, as it accumulates in the atmosphere, is largely responsible for the climate change that is already beginning to have a devastating impact on our planet.

The urgency of tackling CO₂ emissions was recognised in the DfT’s latest report, Decarbonising Transport, which outlined a range of strategies, and new funding programmes, to lower these emissions.

In addition, trees can be used to block particulates created by road traffic, as detailed below.

Lastly, trees, as an essential part of the green spaces in our urban environment, are vital to our mental health and general wellbeing. We are also aware of the high correlation between areas of poverty, poor air quality and a paucity of trees. So, trees, and how we treat them in our city, are both a health issue and a question of social justice.

Ann Wilson, Coventry Tree Warden:

“I often walk my dog on the land off Wyken Croft where the cycle-way was put in along the river from Wyken Croft to Ansty Road a few years ago. I recall that the first high wind after the installation brought 3 big trees down into the river. All their roots had been severed. This would be very worrying along a main road. And of course, we need our precious trees to absorb the pollution.”

The above comment emphasises the importance of incorporating adequate root protection measures in any works carried out close to trees. It goes without saying that such protective measures should also be applied to works carried out as part of longer-term air quality planning (eg the remaining cycle paths and the installation of EV charging points.).

Where conventional planting is difficult in some areas, Professor Barbara Maher’s research has shown that ‘tredges’ (trees managed as hedges) consisting of selected species can act as a natural filter, capturing substantial amounts of particulates generated by passing traffic. Alternatively, trees could be planted in boxes, as the Tree Warden Network is proposing for Ball Hill.
Electric vehicles: Greening and localising the energy supply chain

While the Council has not explicitly linked the LAQAP with its Climate Change Strategy, it has linked it with wider commitments to electrify the city’s transport system by, for example, ‘working with bus companies so that, by 2021, all of Coventry’s buses are low or zero emission vehicles, including 10 new electric buses with dedicated charging infrastructure.’

We welcome the Council’s commitment to electrify the bus services, as well as taxi services, and to encourage its residents to shift to electric cars by installing more EV charging points across the city.

However, in general, we believe that the city’s transport infrastructure should also be insourced as soon as possible, following examples set by Nottingham, Cardiff and Reading. This would remove the need to lobby bus companies, which currently pay out a large proportion of their profits to shareholders rather than reinvesting in the bus service itself. If such services were restored to public ownership, they could be electrified much faster and more easily and profitable routes used to subsidise less profitable, but socially useful, ones.

Also, we must recognise that while electric energy in the UK is greener than petrol or diesel, with zero carbon emissions and lower particulate emissions than those from internal combustion engine vehicles, unless the energy is generated and stored from zero emission sources, we are just pushing a portion of the problem down the supply chain.

Again, we think that all the above policies should be integrated into a coherent and inclusive Climate Strategy that looks at how energy for all residential, business and Council activities can be produced locally, using green and sustainable suppliers.

This aim can be achieved in two ways. First, the Council could explore how public-private partnerships with large energy companies committed to decarbonisation can be brought in to supply green energy to Coventry in the short term - on the conditions that they are accountable to residents, pay at least the Living Wage, and recognise and support trade union representation for all its employees.

Second, the Council could support the creation of local community-based green energy ‘start-ups’, ideally as cooperatives, to supply as much of this green energy as possible. Community energy schemes such as in Bristol, Birmingham, Derby offer models for this approach. This approach could then be part of a general ‘community wealth building’ strategy - along the lines of Preston model, as well as those developed by other, progressive local authorities in the UK and abroad.

We have both green energy and community wealth-building experts in our steering group and within our network who are available to assist the Council in developing its LAQAP and all the related policies mentioned above.

At peak production, 40 to 50% of green power in the UK is consumed by buildings. The envisaged increase in the volume of electric-powered transport would drain that supply and threaten to overload a grid system that is almost at breaking point.
This suggests that we need to give serious attention now to the development of green hydrogen (i.e., produced from renewable sources) and biomass gas as a complementary energy for transport, as exemplified by the “poo bus” in Bristol.

**Tony McNally, Managing Director, Climate Change Solutions:**

On carbon emissions, the UN Secretariat Climate Action Plan for 2020-2030 calls for “absolute and per capita reductions” of 25% of carbon emissions within 5 years and 45% by the end of the decade. For us to contribute to those targets meaningfully, we need to think outside the box.

Currently, nearly 100% of transport in the city is powered by petrol and diesel. To cut those carbon emissions by 45% in just 10 years we will need to do more than simply switch to electric vehicles. We must devise strategies now that both (a) promote the take-up of engines driven by an alternative source of energy, green hydrogen, and (b) scale up the local generation of green energy.
Community engagement

We know that decisions that have a direct impact on the day to day lives of residents can prove highly contentious, often mistakenly so. However, working together with the local authority, we believe we can help build the confidence of local communities in the policies developed and implemented.

It is our intention to develop our relationship with Coventry’s communities in order to discuss and secure a mandate for our own policies and campaigns. To this end we have planned training in community facilitation for our members and experts and would very much like to work together with the local authority on its consultation processes for this and other environmental initiatives.

We have already also started building links with some ethnic minority groups, trade unions, religious groups, some residents associations, tenants’ groups and community groups. We recognise that a depleted environment is worse for some sections of our society and we will be focusing on them in our campaigns. Once the lockdown is over, we will be contacting these groups once again to facilitate discussions, giving residents the opportunity to identify their priorities and offer workable solutions for local problems.
Postscript May 2020

This paper was drafted before the Council decided to extend the deadline for public consultation. Since then, we can report that the Council is now:

- in active dialogue with St Osburg’s community on the proposed changes to Upper Hill Street;
- seeking additional funding (recently announced by the DfT) to improve the cycleway network; and
- planning - in consultation with the cycling community, including the Bicycle Mayor of Coventry - additional, temporary improvements for cyclists and pedestrians in order to preserve physical distancing as the Covid lockdown is relaxed.

We also used the extended deadline to seek comments from the public on our paper. The written response was limited: only three people submitted any substantive comments; but the quality of their response persuaded us to report them in Appendix 1.
Appendix A: Responses to draft

When we published the draft version of our response to the Council’s Action Plan, three respondents offered the following written comments.

**Respondent 1** informed us that he felt “very uninspired” by both the Action Plan and our draft response, observing that “a few bike lanes and minor traffic flow tweaks will make no real or meaningful difference in the long term”. He then set out his own vision in the following suggestions:

1. Strategically placed Park & Ride facilities surrounding the city, having a single Park & Ride at the Memorial Park is wholly insufficient for a city this size. It is also obvious for those travelling from the north/north east/eastern side of the city are likely to use the ring road to get there, surely the objective is to alleviate/reduce city centre/ring road traffic.
2. Electrify or clean alternative (hydrogen) the local fleet, starting with council vehicles, taxis, buses, privately owned vehicles will take time for conversion as Coventry is a relatively poor city. There would need to be large incentives to convert private road users.
3. Reduce - Taxis - Limit Licences issued, reductions are required. The city over the last few years has been flooded with taxis, these same vehicles clog the street and tend to "idle" a lot causing pockets of bad air quality, especially around the Railway Station.
4. Ban Uber in Coventry, now I believe Uber is not meant to operate locally, but we seem to have Uber taxis migrating from Wolverhampton and Birmingham circulating in Coventry, we have an abundance of taxis already, we don't need anymore, regulation in space is probably required to address.
5. Promote cycle to work schemes, if more Park & Rides are created (bullet point 1) than maybe bike hire (as per Boris bikes in London) should be available from the park & ride parking arrangement to give people the choice of onward travel, or give commuters the opportunity to ride bikes to Park & Ride location and catch bus into town, need to have safe storage solutions at park & ride locations.
6. Improve traffic flow, more than just a couple of junctions, the suburbs also need review, we need to reduce "idle" traffic.
7. Open discussions with local employers to stagger work start times, again this looks like it will be part of the Coronavirus exit from lockdown, maybe it should be a more permanent solution to reduce traffic.
8. Green Walls installed to soak up emissions, capture particulates.
9. Plant more trees as above.
10. Promote or incentivise local businesses to continue or adapt working practices for more home working, 1 or 2 days are week is a game changer (a potential 30-40% reduction in journeys will make a difference) as we have seen over the last 7 weeks in lockdown.
11. Promote car-pooling, car park fee reductions or similar.
12. The gig economy has exploded in recent years, courier vans/cars now flood our streets, can this fleet be consolidated? This seems like a place to look. I don't have an answer but there must be thousands of journeys in and out of our city contributing to the pollution.

**Respondent 2** argued that the Council should, like the C40 Mayors across the world, review its plans in the light of the corona virus.

On a more specific point, she went on to suggest that, in order to lessen air pollution for older people living in Earlsdon Park Village, motor traffic should be prevented from using Broomfield Road as a through route from Albany Road to Hearsall Common. She added:

“The extension to Earlsdon Park Village currently being built will mean that up to 400 people will soon be living on the whole site. We now know that older people are more vulnerable to air pollution. Also
that both age and air pollution have been risk factors in the high toll of coronavirus deaths. The new Village building is only a short distance from the pavement on Albany Road. To make matters worse, we have now lost almost all our green space that mitigated the effects of air pollution. The Council gave planning permission for this development and, in my view, should now be prepared to attempt to look for ways of improving air quality here.”

Respondent 3 also described the Council’s plan as “very unambitious” as it does not consider the road pollution that will be generated by the new housing estates being planned around Coventry, nor adequately address the “fears” that discourage many people from switching to cycling as their main mode of transport.

Finally, he asked if the disability laws have been considered. He continued:

“Many disabled need electric scooters that are unsafe on roads and footways are not the answer.”
Appendix B: About Coventry Green New Deal

While the Council omits to contextualise the Local Air Quality Action Plan as part of its Climate Change Strategy, we see air quality as not only linked with climate justice but as something that can only be addressed within an integrated climate change strategy that brings together all stakeholders in order to meet the city’s targets.

As an international movement, the Green New Deal is widely recognised as a coherent attempt to meet the challenge of climate change, and associated environmental harms, through a raft of ambitious and progressive policies. These include creating thousands of decent green jobs, retrofitting houses so that they are more energy efficient, making renewable energy accessible and affordable to everyone in the community, easing traffic congestion and reducing transport emissions by developing local and regionally integrated public transport networks.

The Green New Deal fits well with Coventry City Council’s aim of ‘driving the shift toward a low carbon economy whilst continuing to meet the housing, transport and other needs of the city’, and recognises the same benefits: ‘Becoming a low carbon city will have wide ranging benefits such as job creation, industrial competitiveness and increased economic opportunities, energy security, improved public health, reducing inequality, social inclusion, ecosystem resilience, more green space, healthier lifestyles and improved accessibility.’

In the UK, Green New Deal is also a network of grassroots action, with new local groups being established across the country. Coventry for a Green New Deal brings together community activists, grassroots organisations, NGOs, trade unions, local businesses, campaign groups, community groups, progressive councillors and local business leaders, we look forward to working with the Council on the next phase of its climate change strategy.

We are non-partisan in our approach to developing suggestions on how climate policy can be deepened, extended and democratised, and offering support to the Council in its community engagement programme in order to help build support for its policies and ultimately drive behaviour change at the grassroots that is the crucial to the success of any policy-driven climate action.

We also have several experts, community leaders and third-sector representatives in our steering group and wider network who would be happy to help on the design and implementation of specific policies, such as the LAQAP. We strongly urge the Council to reach out before policies get to the consultation stage, as this is often too late to substantially change these policies.

We hope that you will accept our contribution as a constructive first step towards building an inclusive and democratic public, private and third sector coalition to deliver a greener and fairer city.