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This is a joint response to Bristol City Council's consultation on the new Traffic Clean Air Zone options, by Black South West Network (BSWN) and Bristol's Commission on Race Equality (CoRE). In the context of the disproportionate impact of pollution and climate change more broadly on Black and Brown people, any move to mitigate the effects of environmental degradation in our cities is a step in the right direction to racial equity. We therefore support the council's plans to introduce the Traffic Clean Air Zone (CAZ).

A report 2017 by Clean Air London found that one road in London exceeded the annual legal limit of nitrogen dioxide in the first five days of 2017. London's Ultra low emission zone decreased air pollution by a third and road transport emissions by 13 percent in six months. Closer to home, Bristol is among 44 UK cities which in 2017 failed a World Health Organisation test on the levels of harmful material in the air we breathe. The pollution is partly caused by the continued use of older vehicles. In Bristol, there are three deaths a year due to collisions on our roads versus 300 deaths a year from pollution, which illustrates that this is as much a health policy as it is a transport one. According to a report by King's College London in 2019, five people a week die in Bristol due to air pollution related deaths. Public Health England found pollution-related illnesses have amounted to £170 million in health costs in Bristol.

Environmental health involves factors of health and quality of life that are determined by physical and social factors in the environment. Highways and vehicle emissions are physical factors that harm the environment by causing air pollution. Social factors, including, race and socioeconomic status, increase the likelihood that certain groups of people will live close to busy highways and suffer disproportionately from the consequent pollution. Air pollution's harmful health consequences are undeniably linked to socioeconomic status. Being a racial minority or being poor makes a person more likely to disproportionately bear the costs of air pollution, particularly vehicle emissions. First, racism and class bias in the housing market may affect property value, causing the most affordable property to be located near undesirable areas, like motorways. Second, low-income households may be more susceptible to health threats because of jobs that include higher traffic exposure. For example, a taxi driver's job consistently exposes them to the brunt of Bristol's dirty air. The proposed charges are likely going to have a disproportionate impact on these very same people such as self-employed taxi drivers and small business owners where, for example, the cost of entering the chargeable zone will be passed onto the small business via the wholesale companies through delivery fees.

It is now well known that the Coronavirus has had a disproportionate impact Black and Brown people in terms of hospitalisations and the mortality rate. It is also known that these groups are represented in higher proportions in the areas with higher levels of pollution, thus these individuals will benefit by being exposed to fewer traffic pollutants. The areas with the highest level of air pollution coincides with the areas having the highest number of Black and Brown people and this racial marginalisation will not be helped by the CAZ unless resources are targeted to these communities. Mitigating any negative economic impact through the CAZ on these communities is crucial to reversing these health inequalities by ensuring that the financial burden of the lower emissions through the CAZ is not placed on the shoulders of those who are disproportionately affected by pollution.

There is no getting away from the fact that Covid-19 has had a significant impact on many businesses and this will be an additional cost that they have to consider. Businesses that operate vehicle fleets in and around Bristol will be hit especially hard by the efforts to reduce congestion. Operators with links to hospitality, entertainment and events have seen significant reductions in income and expect little to no opportunity for work to arise in the coming months due to social distancing requirements. Those

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individuals who are from BAME communities are disproportionately represented in these sectors. While the financial charges are such that businesses will not be able to ignore them, the transition to vehicles that are exempt cannot be done overnight. Particularly in the context Covid-19 in which the focus of local businesses will be to support employees rather than upgrading vehicles in line with the Clean Air Zone requirements.

A review of London's congestion charge zone in 2006 found that while the scheme had a neutral impact on London's economy, there was some evidence of structural changes including a decline in the proportion of enterprises with less than five employees which may have been caused by the charge. We therefore need to secure a considerable support package, including financial support, to help small business owners navigate the new system operationally and financially. We must provide targeted financial assistance to firms that need support in upgrading their vans or trucks and these funds should also be accessible for leased or rented vehicles. Moreover, without a system to enable businesses to register their vehicles and have them charged automatically as they enter a CAZ, this will add more pressure to already limited capacity of businesses of all sizes.

For BAME businesses, digital exclusion and language are additional barriers, particularly for recent migrants. Information regarding the CAZ requirements as well as the support available will need to be disseminated with this in mind. Access is central to the green revolution, including the way people and goods move across the city and the way we operate post-Covid. Businesses and households will need to manage the current and future impacts of Coronavirus recovery and Brexit, alongside their trade and way of life. If backed by help and support for people and businesses to transition to cleaner forms of transport, a scheme such as the CAZ can really make a difference to address air quality and help to tackle the climate emergency.

Recommendations

1. Clear links to a website to check whether vehicles will meet the CAZ standards.
2. Targeted support to small and medium-sized BAME-led businesses and organisations to help with the transition.
3. Reduced charges for businesses with low turnover.
4. A reduction on the daily charge for community or school transport vehicles.
5. Direct communication with CAZ recipients of financial support packages to ensure they are aware of the support and how to access it.
6. Option 1 and 2 boundaries are too small and may lead to parking displacement into surrounding areas. The zone(s) should cover all areas with air quality limit exceedances including more of Bristol's main arterial roads. The main purpose of the CAZ is of course to encourage the move to greener vehicles but a larger area would further encourage use of sustainable transport.
7. More broadly, the CAZ will do little to improve the city's emissions targets without improved public transport links, refined road layouts, and more cycle lanes.