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| Consultation response |
| Additional measures on clean air |
| DEFRA |
| January 2018 |

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# Introduction

* 1. The Urban Transport Group brings together the public sector transport authorities for England’s largest city regions (West Yorkshire Combined Authority, Transport for London, Transport for Greater Manchester, Transport for West Midlands, Nexus, Merseytravel, South Yorkshire PTE). We also have the following associate members: Tees Valley Combined Authority, Strathclyde Partnership for Transport, West of England Combined Authority, Nottingham city council. However this response is on behalf of our full members.

# Response

## Question 1 - Are there other policy options not set out in the list above that should be considered in order to minimise the impact of local air quality interventions on individuals or businesses? This could include measures such as guidance or communications material. Please provide evidence to support your proposal. Any proposals should take into account the assessment criteria set out in the next section.

* 1. Firstly, we are concerned that this consultation exercise reflects the wider problems with the Government's approach to air quality challenges which include:
* Delegation of responsibility to local authorities whilst seeking to micro manage, and retain the right of veto, over the way that local authorities fulfil those responsibilities;
* Passing on to local authorities the considerable technical, legal and political challenges around measures such as charging and scrappage schemes whilst seeking to micro-manage, and retain the right of veto, over such schemes;
* Adopting an overall approach of seeking to do the minimum necessary in order to satisfy successive court judgements in a way that repeatedly fails to do so and thus leads to a constant shifting of the goalposts for local authorities as well as ever tightening timescales;
* Limiting the approach to air quality problems to NOx from road vehicles rather than starting with a wider national air quality plan of which NOx from road vehicles can then form part.
	1. This latest consultation also reflects a misguided attempt to target measures on the smallest areas for the least amount of time when the costs and benefits of some of the approaches set out in the consultation would be better justified and realised over larger areas and for longer timescales especially given the dangers of displacement of air quality problems and when poor air quality is still a significant problem even in areas which are not covered by contestable Government modelling exercises. This is exacerbated by the fact that many of the worst air quality problems occur on key orbital or radial routes with high volumes of through traffic.
	2. We have consistently made the case for an alternative approach based on a long term partnership between national government and local transport authorities to tackle air quality problems with national Government taking responsibility for the national fiscal policies for vehicles that it is clearly responsible for whilst giving local authorities the freedoms, flexibilities and funding they need to devise and implement appropriate policies for the communities they serve given very different local circumstances.
	3. The full implementation of the Traffic Management Act would also assist by allowing for better enforcement of the full range of moving traffic offences so as to improve bus journey times and reduce emissions problems arising from stop/start traffic conditions.

## Question 2: Please provide evidence on what else could be done to support people to upgrade or retrofit their vehicles in line with the assessment criteria set out above. If there are specific sectors that need support, please set out evidence to support this.

### Please provide evidence on potential limitations to uptake (e.g. industry capacity, refuelling infrastructure, consumer acceptance, examples of where retrofit has not worked as expected) and evidence of environmental impacts and the costs of potential technology for different vehicle types.

* 1. Notwithstanding the issue of how retrofitting of vehicles / incentivisation of ULEVs (which can operate over wide areas) fits with the Government's preference for targeting small areas for short period of times, other vehicles which could be included within the ambit of this approach includes vehicle fleets over which local authorities have significant direct, or indirect, control including fleets associated with education, social services, health services and council services (such as refuse wagons). In some areas emissions from idling diesel trains can also contribute to local air quality problems. The Government has significant leverage over the rail sector, including via the franchising regime.
	2. Emission abatement retrofit technology has value for money benefits in achieving compliance for taxis, buses and light/heavy goods vehicles, public service fleets (such as refuse wagons) in the shortest period of time. However it has the disadvantage of potentially extending the life span of older vehicles when new vehicles would offer wider advantages (such as encouraging modal shift or providing greater accessibility for disabled people).
	3. A vehicle scrappage scheme towards ULEV purchase is likely to be effective in bridging the financial gap for many residents, businesses and public sector fleet operators in purchasing a new low emission equivalent vehicle. This also needs to be supported by a substantially increased electric vehicle charge point network.

## Question 3: We welcome views from stakeholders on what else government and industry can do to support local authorities to encourage the uptake of ultra-low emission vehicles.

* 1. For the ambitious plans for the uptake of ultra-low emission vehicles to be achieved in an efficient way national Government needs to work in partnership, and in a long term and structured way, with local government partners (in particular in the largest urban areas) including in relation to installation of networks of charging points and promotion and support of ULEVs.
	2. The national vehicle taxation framework is also clearly critical to incentivising the uptake of ULEVs and we are sceptical that the changes announced in the Budget are sufficient in this respect.
	3. It is worth noting that the most polluting diesel vehicles will be those that are already on the road. National action on VED for all diesel vehicles alongside a diesel scrappage scheme would send a strong signal to consumers as well as accelerating the transition towards low emission vehicles.
	4. Also see response to question two in respect to taking a broader view of vehicle fleets.

## Question 4: Please provide evidence on how the measures to support individuals to switch to other forms of transport set out above could be designed to meet the assessment criteria. In particular, responses could include suggestions on:

### How the ideas above could be designed to support those most in need such as low income households or small businesses

### How the options could be geographically targeted at people most affected by local air quality interventions

### What else could local authorities or industry could do to encourage people to change their mode of transport, including measures such as communication campaigns.

* 1. As set out in our response to question one we do not think the premise behind this question is sensible. In that it assumes that the best approach to air quality problems is to take a highly spatially targeted approach for the shortest possible time and where the onus is on the affected authority to devise complex schemes which will not only be effective in reducing air quality problems but also have minimal impact on as many people as possible. Whilst at the same time the Government retains the right to micro manage and veto proposals and schemes as it sees fit. And all on the basis of extremely challenging timescales and when local government planning and delivery capacity has been significantly impaired following year-on-year cuts in revenue funding from central Government.
	2. Having said that there are a host of ways in which individuals could be supported to switch to other forms of transport (though most of these measures would be best applied at a wider geographical scale) which include:
* Pricing mechanisms which either increase the cost of car use or reduce the cost of public transport use (or both)
* Road space reallocation which favours public transport and active travel
* Travel demand management policies (for example through working with key employers and schools)
* Freight and logistics strategies (for example around routing, drop off, consolidation and modal shift)
* Communications campaigns
	1. Some of these measures would require more capital investment or revenue support which in turn requires more central Government funding or greater freedom and flexibilities for local government to raise more funding locally (or both).
	2. In terms of supporting ‘those most in need’ a targeted scrappage scheme would be sensible, however it is difficult to see how this would work in a highly localised area and for a short time period given that vehicles currently based in the area will likely frequently travel out of the area, and given that in many areas of low air quality there is a great deal of through traffic with vehicles that are based elsewhere. It would be more logical to operate such a scheme at a national level.
	3. In terms of bus fleets small operators in particular may struggle with finding the capital investment necessary for new vehicles without targeted support. The taxi sector can also in many cities be made up to a greater or lesser extent of poorly capitalised and low return businesses based on various formats for self-employment, It is unlikely that these businesses will be able to fund a switch from second or third hand taxis to a new ULEV without targeted financial support.
	4. General communications campaigns can play a role but to be effective moral exhortations need to be backed up by concrete measures and incentives for travel behaviour change as well as carried out in a consistent way and at scale.
	5. We have also consistently made the case for more effective vehicle labelling schemes for both new and second hand sales which should include:
* Simple information on a range of emissions that the vehicle emits (NOX, CO2 etc)
* Estimated operational savings
* Simple payback on the investment (based on the whole operational lifetime)
* Whole lifecycle analysis and the potential operational and maintenance cost savings likely over the lifetime of ULEVs
* Indicative wider economic, social and health benefits that ULEVs will help to make in the future i.e. reduce cost to NHS etc.

## Question 5: We welcome views from stakeholders on how local authorities could use exemptions to support individuals and businesses affected by a charging Clean Air Zone taking into account the assessment criteria set out in this document and working within the terms of the Clean Air Zone Framework.

* 1. Given the varying causes of air quality problems by different vehicle fleets in different areas this is best determined locally rather than be subject to micro management by central government.
	2. It is also still unclear how charging Private Hire Vehicles (PHVs) will operate in practice given the ability of those licensed outside of a zone to work in it without the knowledge of the licensing authority. This will act as a dis-incentive for PHVs to license in those areas that introduce a chargeable CAZ.
	3. This plays into the need for a wider overhaul of the legislative framework for taxis and PHVs which we summarise in our recent report: ‘Taxi! Issues and Options for city region taxi policy’ which can be downloaded here: <http://www.urbantransportgroup.org/resources/types/reports/taxi-issues-and-options-city-region-taxi-and-private-hire-vehicle-policy>
	4. The four key asks were
* New statutory national minimum standards for taxi and PHV licensing (in particular to ensure passenger safety) whilst allowing local transport authorities to set higher standards as they see fit (for example in order to tackle poor air quality);
* Ending the race to the bottom and closing enforcement loopholes through ensuring that a vehicle has to start or finish its journey in the area it was licensed and strengthening enforcement powers;
* Introducing clear statutory definitions of ‘plying for hire’ and ‘pre-booked services’ to remove legal ambiguities and move more of taxi and PHV policy making out of the courts and into wider city planning functions;
* Giving local authorities the powers to limit taxi and PHV numbers so that they can better manage the implications for air pollution, traffic congestion, and the urban realm

## Question 6: Please provide evidence on whether a targeted scrappage scheme could be designed to meet the assessment criteria. In particular, responses could include evidence on:

**How to target vehicles affected by local air quality measures geographically so as to:**

* **Minimise the extent to which there are arbitrary winners and losers**
* **Minimises overly complex implementation requirements**
* **How to direct support to low income households or small businesses most in need of support**
* **The impact a scheme could have on the car and van market**
* **Suggestions on how to maximise value for money for the taxpayer**
* **Suggestions on how a scheme could be delivered to minimise fraud, including how a scheme could be designed working with the second hand market**
	1. See our response to questions four and five.