



URBAN TRANSPORT GROUP

Consultation response

Improving air quality

Joint Select Committees:

Environmental Audit, Environmental Food
and Rural Affairs, Health, Transport

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Content

1.	Introduction	1
2.	How effectively do Government policies take into account the health and environmental impacts of poor air quality?	1
	Do these plans set out effective and proportionate measures to achieve necessary emissions reductions as quickly as possible?	1
3.	Are other nations or cities taking more effective action that the UK can learn from?	2
4.	Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?	3
5.	How can those charged with delivering national plans at local level be best supported and challenged?	4



1. Introduction

- 1.1. 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, North East Combined Authority, Merseytravel, South Yorkshire PTE).
- 1.2. As transport authorities we will focus on the elements of poor air quality which transport is most responsible for and which have been the subject of successful court actions by Client Earth. The Government's current approach to which is summarised in the 'UK plan for tackling roadside nitrogen dioxide concentrations' of July 2017.

2. How effectively do Government policies take into account the health and environmental impacts of poor air quality?

Do these plans set out effective and proportionate measures to achieve necessary emissions reductions as quickly as possible?

- 2.1. Given these questions are connected, and to avoid repetition, we will cover these questions together.
- 2.2. The Government is looking to address the health and environmental effects of poor air quality through its emerging strategies and policies on air quality. However it is not yet possible to say how effective these policies will be for a number of reasons, including:
 - The policies have a tendency to focus on what the Government judges will meet the legal minimum required and then are incrementally revised when the courts do not share the Government's judgement on their efficacy.
 - Key elements in Government policy have not yet been determined. These include any changes to the fiscal or taxation regime for diesel vehicles, and support for measures which may need to be taken in affected areas (such as investment in provision for public transport or active travel).
 - Highways England's response to the air quality challenge is also unclear, and yet traffic on HE routes are significant contributors to air quality problems. This is particularly significant in urban areas, where HE roads can be bordered by densely populated areas and key motorway junctions are served by highways managed by local highway authorities.
 - It's unclear the extent to which the impacts of different elements of the strategy have been modelled individually or in relation to each other, or could be given the complexity of the Government's approach with multiple relevant documents and funding programmes being developed to different timescales and to different levels of detail. In particular we await a suite of documents which are clearly relevant to an understanding of how effective the Government's overall approach will be. These include a wider Clean Air Strategy document expected in 2018 and a further strategy on the pathway to zero emission road vehicles (expected in March 2018). The wider clean air strategy is particularly important as the current focus is very much on reducing nitrogen dioxide concentrations from road traffic and achieving safe EU mandated limits, and does not consider, for example, other harmful air borne pollutants such as particulates. Indeed it could be argued that it would



have been more logical to start with a clean air strategy within which a specific strategy for nitrogen dioxide could have sat.

- 2.3. Overall, although we welcome the commitments the Government has made to provide a degree of policy and funding support for affected areas, we remain concerned that as yet proposals, policies and resources from Government to date have been insufficient to meet the scale of the challenge or have been focused on the long term (for example the 2040 ban on sales of petrol and diesel cars and vans) rather than the immediate action which is urgently needed.
- 2.4. In order to bind the Government's complex and sometimes ambiguous policies on air quality into something which is driven in a proactive and focused way we support the proposal for a New Clean Air Act to enshrine the limit values within law and provide a legally enforceable right to clean air.

3. Are other nations or cities taking more effective action that the UK can learn from?

- 3.1. This is difficult to judge given that the causes of air quality problems vary from place to place, as does the efficacy of different packages of measures that different nations or cities might adopt. However, there is scope for the UK to learn more about the different approaches that have been taken around the world and their pros and cons.
- 3.2. We provide the following examples with the caveat that we would not recommend simple cutting and pasting of individual measures, without a thorough understanding of the wider context of the nature of the local air quality problems and the other complementary policies in place.
 - Norway has the highest per capita number of all electric cars in the world. Last year Electric Vehicles (EVs) constituted nearly 40% of the nation's new vehicle registrations. Norway also aims to phase out all fossil fuel automobiles by 2025. EVs benefit from exemption from a 25% sales tax, free power charging at public charging stations and other incentives such as priority parking, access to road space and toll exemptions. Since 98% of Norway's electricity comes from hydropower the country's growing EV fleet leaves almost no carbon footprint. Although it's worth noting that Norway is partly able to afford these incentives to EVs off the back of an economy and tax base which is heavily dependent on its oil production and exports.
 - Many German cities (around 80) have environmental zones (*Umweltzone*) where any vehicle entering the zone has to display a sticker in the windscreen to indicate the emission standard of the vehicle. Currently there are three different colored emission stickers (the same traffic light system applies in each city). A green one certifies that a vehicle is Euro Four or better. A yellow sticker is for less compliant vehicles (Euro Three engines). A red one is for the lowest level (Euro Two engines). Many cities already only allow green sticker (Euro four or better) vehicles to enter the zone. Fines apply for vehicles that do not display a sticker within a zone or contravene the standards set in the zone. When only vehicles with a green sticker are allowed access it is estimated that air quality in inner cities becomes significantly better with 10 to 12% less particulate matter



- In Stuttgart (a city which has some of Germany's worst urban air pollution) the price of day ticket public transport tickets is automatically cut by a third on poor air quality days. Although we understand that the evidence is mixed about how effective this policy is in attracting motorists on to public transport on poor air quality days especially given the wider financial implications for the transport authority of lost income from passengers who would have used public transport anyway.
- In recent years Paris has made public transport free on the very worst days for air quality, however we understand that the high costs of this (four million euros per day) has led to a revised policy of offering a significantly discounted air pollution action day tickets €3.80. Paris has also introduced a 'Crit air' system of stickers (with six tiers of vehicle categorisation by emissions) which all vehicles should display when operating in Paris. The most polluting vehicles are banned on weekdays during the daytime. During high pollution days other categories can also be banned.

4. Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?

- 4.1. Hitherto there has been a lack of cohesion within and between national Government departments (DEFRA, DfT, OLEV, DCLG) and the city regions with insufficient sense of common purpose, consistent policy and sharing of information and good practice. Tackling air quality problems effectively requires a joint endeavour between national and local government with national Government providing a clear framework which includes specific plans and strategies for those areas which are clearly the responsibility of national Government (such as the national fiscal and taxation regime for transport) with the city regions given the autonomy and funding they need to deliver effective local air quality plans that are tailored to local circumstances and requirements.
- 4.2. The establishment of the Joint Air Quality Unit has gone some way to bringing greater cohesion and a single point of contact for local transport authorities. However there is still a sense that the writ of the Joint Air Quality Unit does not run as far as it needs to do (for example in relation to Highways England and the rail industry). Having said this we do not see the extent to which different Government departments effectively communicate and collaborate with each other as the primary stumbling block to setting the right fiscal and policy incentives.
- 4.3. The more important factor is the political will of the Government as a whole. The key issue here being concerns about a backlash from those who believe themselves to be negatively affected by any of the more radical options that might be necessary to tackle air quality problems.
- 4.4. The other key problem is the Government's approach to the role of local authorities and local transport authorities in tackling air quality. Instead of a sense of joint endeavour between national government and local authorities there is a sense that the Government is:
 - Delegating the responsibility for tackling the problem to local government, as well as much of the research and evaluation of the most effective combination of measures.
 - Delaying key decisions on the national funding, taxation and policy framework which necessarily create the context for any effective local government air quality strategy in a



way which puts the two processes (local air quality strategies and national funding and fiscal policy) out of sync.

- Retaining a defacto veto over local government air quality plans on the basis of criteria the ambiguity of which gives national Government the scope to second guess, amend and veto a local air quality strategy to the extent that it wishes to do so.

- 4.5. One of many examples of Government delegating the objective whilst micro-managing the means can be found on parking where the document says that: *'The UK government is not proposing that councils should seek to impose higher parking charges on vehicles or specific types of vehicle. Since 2010, the UK government has implemented a series of policies to rein in over-zealous parking enforcement...Higher charges would represent an unfair charge on local residents who do not have an off-street parking space, and would undermine local shopping centres¹.*' The inference that parking charges always undermines local shopping centres is dubious in itself given that for many shopping centres the majority of shoppers do not arrive by car. But the wider point is that this is excessive micro-management given that the need to tackle air quality problems is both a legal and a public health requirement and that the consequences of not doing so are greater levels of ill health and reduced life expectancy. Whilst we are not arguing that higher or variable parking charges would always be an effective part of any local air quality strategy, if it is the case that higher or variable parking charges could or would be an effective measure then the Government should not be implying that they may well seek to veto such a measure, thus deterring local authorities from investigating all the relevant options in a rational and objective way. It is also worth noting that Westminster council has already introduced variable parking charges as part of its wider strategy for improving air quality. This does not appear to have led to the dire consequences the Government is so keen to avoid elsewhere.
- 4.6. The challenges set out above are further exacerbated by the relatively coarse nature of the information derived from air quality monitoring (Pollution Climate Mapping) on which the Government's strategy relies. Information which is sometimes in conflict with that derived from air quality monitoring by local authorities. The areas which the Government has identified as in breach does not always relate well to local authority Air Quality Management Areas.
- 4.7. All of which means that the timescales risk becoming unrealistic when taking account of the need for a robust evidence base, proposal development, consultation, procurement and evaluation.
- 4.8. The strategy's focus on clean air zones at the expense of a broader strategy also risks displacement as, for example, dirtier vehicles migrate to other neighbouring areas. Government needs to more clearly factor in the dangers of displacement and how it intends to mitigate these risks in its emerging policies and strategies.

5. How can those charged with delivering national plans at local level be best supported and challenged?

- 5.1. It is for city region authorities to best determine the most effective strategy and policies for tackling air quality problems. This would be in line with the Government's wider stated

¹ Department for Environment, Food and Rural Affairs, (2017), Air quality plan for nitrogen dioxide (NO₂) in UK, <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>



commitment to devolution on the basis that local areas are best placed to determine the most appropriate response to specific local public policy issues and challenges.

- 5.2. Indeed city region transport authorities have a strong track record of ambitious and innovative measures to tackle air quality in relation to transport which includes:
 - electric vehicle infrastructure charging facilities;
 - pioneering the implementation of zero and low emission bus vehicle technologies;
 - promoting active travel through cycle hire schemes, urban realm and street works and soft measures (like training and support).
- 5.3. The ambiguity and scope for Government micro-management in urban air quality plans could also hinder the development of effective air quality management strategies as local areas will need to second guess what the Government would find acceptable. Given the tight timescales for achieving air quality targets this could lead to valuable time being wasted and air quality plans that are ineffective.
- 5.4. Locally accountable authorities are best placed to balance the needs of local business and communities with the need for an effective plan to improve air quality. We do not believe there is a need for this to be second guessed by national Government.
- 5.5. National Government can support this in a range of ways, including through:
 - Ensuring that those authorities are adequately funded to deliver those strategies and policies (for example, support for a new Clean Green Bus fund to green bus fleets operating in areas where air quality problems are most marked).
 - Influencing Network Rail and franchised rail operators, as well as Highways England, who all have a role to play in improving air quality. For example on diesel train use and idling in city centre rail stations or on the national strategic highway network where it operates in affected, typically, urban areas.
 - Unlocking more electric vehicle charging infrastructure by addressing structural power grid barriers and providing additional funding through OLEV.
 - Updating the DVLA database to include Euro standards for all registered vehicles to help enforce charging schemes as cheaply and efficiently as possible.
 - Targeted investment in local air quality monitoring and a strong monitoring and evaluation framework will provide better analysis of air quality problems and the effects of the policies introduced to tackle those problems.
 - Providing greater clarity on the long term fiscal and taxation framework for diesel vehicles as this will clearly influence vehicle use in a direct way which will have a knock on effect on the various options for local air quality strategies.
 - In relation to fiscal measures, we support proposals advanced by the Mayor of London and others for Government funded vehicle scrappage schemes to help drivers who bought diesel cars in good faith. The scheme should be time limited, targeted at the most polluting vehicles and in relation to low income households.
 - Ensuring an effective vehicle labelling scheme through extending it to second hand vehicles. New and second hand sales information should be clear and concise and follow the 'washing machine' efficiency scale model. It should form a prominent part of sales



information to help increase public awareness of the issues. It should include all relevant pollutants not just CO₂. Information should take into account typical life time impacts, real driving conditions and life time costs. Manufacturer real driving information should be published by Government to help in the comparison and purchase of vehicles; again, there should be life time factors and a calculator should be available to make comparisons.

- Full implementation of the 2006 Traffic Management Act which would allow local transport authorities (only London can do so in England at present) to enforce all moving traffic offences (including those at yellow box junctions). The ability to better enforce a fuller range of traffic offences would have air pollution benefits by reducing stop-start traffic and also making bus travel a more attractive alternative to car travel.

- 5.6. We also note the technological and infrastructure based approach of much of the Government's strategy. Of course greener vehicle technologies in particular have a key role to play. However, softer measures like support for travel planning schemes or encouraging a shift to active travel can also make a significant contribution. Some of these measures have had to be scaled back in some areas due to declining revenue funding. Following a 40% reduction in central Government core funding for local authorities in the last Parliament, local government revenue funding continues to be under pressure from increases in demand for services, such as adult social care. This in turn means that funding for non-statutory revenue funding for transport is under pressure including the revenue spend associated with capital schemes. For example significant officer time is need to access fragmented funding streams, often through competitive bidding. Even limited interventions like signage need to be maintained otherwise their effectiveness is reduced.
- 5.7. Again this points to the need for adequate, multi-year funding but also to the importance of giving city region authorities the autonomy to devise air quality plans which they judge to be most effective for their areas. We are also concerned about references to removing traffic calming measures because of the affect they could have on vehicle emissions. This speaks to our wider concern about inappropriate micro-management as well as the narrowness of focus of the document on technological, vehicle and infrastructure solutions.
- 5.8. Other measures that can have positive benefits for air quality (alongside other wider benefits) include better linkage between transport and land use planning, modal shift to public transport, 'last mile' freight strategies that ensure that more long distance freight is trunked by rail or water for 'last mile' delivery by low or zero emission means (be it electric vans or cycle logistics).
- 5.9. We would oppose any move towards competitive models to fund proposals as this will introduce an unnecessary element of risk that will jeopardise the ability of the UK and local areas to achieve compliance.