



# URBAN TRANSPORT GROUP

---

Consultation response

**Improving air quality: reducing nitrogen dioxide in our towns and cities**

Defra and DfT

**June 2017**

---

Jonathan Bray

Urban Transport Group  
Wellington House  
40-50 Wellington Street  
Leeds – LS1 2DE  
0113 251 7445  
[info@urbantransportgroup.org](mailto:info@urbantransportgroup.org)



## Content

1. Introduction .....	1
2. Response to Questions 7-14.....	1



## 1. Introduction

- 1.1. The Urban Transport Group brings together the public sector transport authorities for the 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).

## 2. Response to Questions 7-14

### 7. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

We do not believe there is sufficient detail in the plan to know whether the problem will be addressed quickly however, as it stands, we are not satisfied that the draft strategy provides affected areas with the necessary clarity, commitment and funding from national Government that they will need given the scale of the task.

For example there is a lack of clarity in many key areas including:

- the future funding regime for the greening of freight vehicles, buses and coaches and specialist public service vehicles (such as ambulances and refuse vehicles).
- the future national fiscal regime for road vehicles including in relation to VED and Company Car Tax.
- the funding that national government will make available to affected areas.
- the measures that Highways England will be taking on their network in affected urban areas.

In addition there is a lack of clarity around:

- baselines, target dates, areas covered – all of which are clearly key to any effective air quality strategy.
- the extent to which the impacts of different elements of the strategy have been modelled individually or in relation to each other.
- the timescales over which the various national initiatives identified in the draft will take effect.
- how strategies and CAZs will be enforced and the relative roles of national and local agencies on enforcement.

These challenges are compounded by the mixed messages in the strategy where the need to meet specific legal air quality targets are set against vague and general references to the need not to impede economic growth without any clear definition of what the latter might mean and how this might be weighted against specific legal duties.

These problems are exacerbated by the Government's overall approach which at present could be summarised as:

- delegate 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.



- delay 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.
- retain 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.

These challenges are further exacerbated by the relatively coarse nature of the information derived from air quality monitoring on which the Government's strategy relies. Information which is sometimes in conflict with that derived from air quality monitoring by local authorities.

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.

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.

Overall there needs to be much more of an emphasis on Government action and funding given that local authorities do not control all the necessary (and some of the most effective) tools. Compliance can only be achieved as quickly as possible if Government uses its own powers, takes action and provides funding as part of a wider partnership and joint enterprise with the affected areas.

As part of this there should also be a New Clean Air Act to enshrine the limit values within law and provide a legally enforceable right to clean air.

#### **8. What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it? What factors should local authorities consider when assessing impacts on businesses?**

The proposed arrangements for Clean Air Zones appear to leave national Government with considerable leeway to micro-manage local Clean Air Zones including via ambiguous tests such as the need to be sure that there are 'no unintended consequences'.

This is out of line with Government's wider stated 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.

The ambiguity and scope for Government micro-management 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 in air quality plans that are ineffective.

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.



**9. How can government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them? Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects. How can government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives. How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?**

It is for city region authorities to best determine the most effective strategy and policies for tackling air quality problems.

National Government can support this through:

- ensuring that those authorities are adequately funded to deliver those strategies and policies (for example on the greening of bus fleets)
- influencing Network Rail and franchised rail operators, as well as Highways England, who all have a role to play in reducing 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 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 affects of the policies introduced to tackle those problems.
- Through tackling the issues identified in our response to question seven for which the Government has responsibility.

We also note the technological and infrastructure based approach of much of the consultation. 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.

Again this points to the need for adequate 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 of 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.

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).

#### **10. How best can governments work with local communities to monitor local interventions and evaluate their impact?**

Hitherto there has been a lack of cohesion within and between national Government (DEFRA, DfT, ULEV) 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.

In relation to the above the final plan should give greater detail on:

- What studies and consultation local authorities will be required to carry out to determine proposals to improve air quality
- How Government will work with local authorities to develop proposals
- How Government will require/mandate local authorities to implement proposals
- What additional support will be provided to local authorities to progress studies and implement proposals. In particular, what support for measures requiring revenue funding outlined in the CAZ framework will be provided

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.

#### **11. Which vehicles should be prioritised for government-funded retrofit schemes?**

We support proposals advanced by the Mayor of London and others for a national vehicle scrappage fund 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.



**12. What type of environmental and other information should be made available to help consumers choose which cars to buy?**

The impact of a vehicle labelling scheme would be much greater if this was also introduced for the sale of 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 CO<sub>2</sub>. 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.

**13. How could the Government further support innovative technological solutions and localised measures to improve air quality?**

See response to previous questions.

**14. Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?**

It is understood that the impact of fine particulate matter (PM<sub>2.5</sub>) on the health of the population is greater than nitrogen dioxide (NO<sub>2</sub>). More people suffer from ill health due to exposure to PM<sub>2.5</sub> than NO<sub>2</sub>. Despite this, the draft plan only considers the value of health improvements due to a reduction of NO<sub>2</sub> expected from measures and makes no attempt to quantify benefits from reductions of PM<sub>2.5</sub>. Not only does this undervalue the potential overall benefit actions will have to health, it also shows that Government are at risk of failing to develop a robust coherent and holistic approach to improving air quality that addresses wider responsibilities to improve other pollutants. This is concerning as it is apparent that there is a strategic opportunity to ensure we deal with multiple problems now rather than dealing with these issues separately, which we believe is inappropriate.