

## Defra

### Draft Air Quality Plans

#### Background to CIWEM

CIWEM is the leading independent Chartered professional body for water and environmental professionals, promoting excellence within the sector. The Institution provides independent comment on a wide range of issues related to water and environmental management, environmental resilience and sustainable development.

#### General comments

##### Technical supporting information

CIWEM considers that it is not possible to respond to the consultation without the publication of the supporting technical detail. Without this evidence it is not possible to provide proper scrutiny of the plans to see how the wish-list of emission reductions has been quantified and accounted for in the modelling. The 25 page Evidence Annex is not adequate.

It is clear that Defra has changed its views on how emissions will reduce in the future and is more optimistic, however, there is no evidence for exactly what these changes are. Given that in July 2014 Defra reported that the majority of zones would still exceed the NO<sub>2</sub> limit value in 2020, it appears to have changed its views considerably and it is important to be able to understand the rationale behind this and comment accordingly.

The consultation is also impenetrable regarding the assumptions that have been made in the future regarding major transport developments. For example, it does not note, the assumptions regarding road improvements on the strategic highway network or if any large new developments have been included such as new towns. It cannot be commented on without the supporting technical material which must be in existence.

##### Achieving limit values as soon as possible

The draft plan is not a plan to achieve the NO<sub>2</sub> limit values as soon as possible, it appears to be a low cost 'wait and see' approach.

The only change proposed is the suggestion of Low Emission Zones in seven areas because they will not meet the limit value by 2020. If the Plan was supposed to achieve limit values as soon as possible then it should suggest the implementation of Low Emission Zones more widely and earlier.

The plan accepts that breaches will happen until the general emission control measures, largely relying on the Euro 6 standard, have transitioned sufficiently into the fleet. However there is no indication as to how the Government expects the Clean Air Zones to increase the uptake of Euro 6 standards or what the fleet composition in the zone is assumed to be.

Defra indicates that the Clean Air Zone emission limits are set at the Euro 6 emission limits (for diesel cars). Current Euro 6 diesel cars do not meet the emissions standards in the real

world, most by some margin, which means it will be a number of years before diesel cars can comply.

The consultation notes the disparity of test cycle results with real world emissions. Paragraphs 64-65 of the Annex present the results of this more probable situation (at least by 2020 before real driving emissions are introduced and complied with). Table 6.2 shows that should Euro 6 emissions standards not perform as modelled, it could result in up to 22 additional zones, 30 in total, being non-compliant in 2020.

## **Conclusion**

As published, the draft plans appear to be formatted to avoid any scrutiny, with a lack of technical supporting data and figures too small to determine detailed information. The more detailed model results need to be made publically available. CIWEM will provide a full response once the supporting technical information is published to allow for a genuine consultation on the plans with stakeholders.

The plans need to be more ambitious if the Government is to tackle the public health crisis from air pollution. A wider national framework of low emission zones needs to be adopted sooner than stated and updated regularly to reflect the changing fleet.

To read more about CIWEM's work in this area and our recommendations for policies and practical action see our report [Clearing the Air](#).