

Department for Environment, Food and Rural Affairs and Department for Transport

Draft air quality plan for tackling nitrogen dioxide

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.

CIWEM welcomes the opportunity to comment on the draft 2017 air quality plan. The new government must urgently tackle the issue of poor air quality across the UK. This should be an opportunity to not only protect people's health but also make the UK a world leader in tackling air pollution and developing low emission technologies.

Summary

As drafted the proposed air quality plan (AQP) is a missed opportunity and will not result in legal limits being met in the shortest time possible. It ignores its own technical evidence that identifies *charging* Clean Air Zones as the most effective way to reduce air pollution in towns and cities quickly and fails to propose much needed changes to the vehicle tax regimes or outline details for a targeted diesel scrappage scheme.

The draft 2017 AQP does not actually commit to practical measures to tackle the illegal levels of nitrogen dioxide (NO₂) and is instead largely a plan to make another plan. It also fails to provide a clear timetable or plan for meeting air quality limits in Scotland, Wales and Northern Ireland.

It fails to address national policies that are identified as contributing to the problem. In particular, despite identifying the role of the vehicle tax regime in worsening air quality by encouraging the increase of diesel vehicles, no measure has been proposed and the matter has been left to the Treasury to explore at a later date.

The government must commit to ensuring that effective measures will be appropriately funded and incentivised. Air quality is a major public health crisis which has been allowed to perpetuate, in full government view, for many years. It has a responsibility to its citizens to act in their best interests, with a proactivity befitting the nature of the challenge. We hope to see significant improvements to the plan following this consultation period.

CIWEM is a partner in the [Healthy Air Campaign](#), calling for:

1. A comprehensive network of Clean Air Zones (CAZs) across the UK - these must keep the dirtiest vehicles out of the most polluted parts of our towns and cities and champion public transport, walking and cycling.
2. A series of measures to help people switch from the dirtiest vehicles to cleaner forms of transport including tackling the perverse fiscal incentives for diesel cars.
3. A new UK Clean Air Act to ensure and preserve our rights in law to breathe clean air.

The draft 2017 AQP not only fails to include practical measures to tackle the illegal levels of air pollution but also fails to provide sufficient information:

- Modelling of possible projections for complying with legal limits and the impact of possible measures is lacking.
- Non-charging CAZs are preferred over charging CAZs but the impact of this approach on reducing air pollution has not been quantified.
- The consultation also explains that "around forty local authorities in England have one or more roads projected to remain in breach of air quality limits for some years ahead unless action is taken" but highlights that this is not a list of local authorities that will have to implement a CAZ and that further modelling may reduce this list.
- The plan is unclear about what the proposed date for compliance in London will be and what measures will be needed to meet the limit values in the shortest time possible.
- The consultation document asks questions about targeted scrappage schemes but these proposals are not mentioned in the draft plan.

Answer to consultation questions

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

CIWEM is very dissatisfied that the measures will address the problem of nitrogen dioxide in the 'shortest possible time'. The draft 2017 AQP fails to do this by ignoring the evidence from its own technical report.

In England, the steps set out in the draft 2017 AQP are said to "rely on the development of comprehensive Clean Air Zone (CAZ) plans by the local authorities in each of the English towns and cities where action is needed." A CAZ can be non-charging or charging. Charging CAZs can include the same measures as non-charging CAZs but in addition "designated vehicles are required to pay a charge to enter or to move within the zone, if they are driving a vehicle that does not meet the particular standard for their vehicle type in that zone."

The technical report published with the draft 2017 AQP identifies charging CAZs as by far the most effective measure to reduce emissions. The draft 2017 AQP, however, says they are effectively only to be considered as a last resort. Local authorities will have to instead prove that there are no other actions it can take that will be "at least as effective at reducing NO₂"

as a charging CAZ. It will also have to demonstrate that charging CAZs will not have unintended consequences for local residents and businesses and demonstrate value for money in order to be "approved by Government, and thus be considered for appropriate funding support."

As neither the UK government's draft 2017 AQP, the technical report or the CAZ framework, published at the same time, identify any measures which it is said will meet legal limits as quickly or quicker than a charging CAZ, or provide any evidence of the impacts of non-charging CAZs it seems likely that seeking to identify equally effective alternative measures will be a waste of valuable local authority resources.

The draft plan does not make sense, because it does not say what a non-charging Clean Air Zones will actually be, it just says they must not charge cars to enter. It is hard to see how a clean air zone will effectively reduce air pollution if the most polluting vehicles are not discouraged from driving into the most polluted parts of town and the draft plan does not provide any evidence to show how it could work.

Secondly, the draft 2017 AQP simply requires the production of several new plans for further public consultation by central government, the devolved administrations and local authorities, again failing to address the problem in the shortest time possible.

The draft plan also fails to address national policies that are identified as contributing to the problem. In particular, despite identifying the role of the vehicle tax regime in worsening air quality by encouraging the increase of diesel vehicles, no measure has been proposed and the matter has been left to the Treasury to explore at a later date.

2. [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?](#)

Legal limits of nitrogen dioxide should be met in the shortest time as possible. The technical report accompanying this consultation identifies charging Clean Air Zones, as the most effective way to reduce levels of nitrogen dioxide in the shortest time possible. In addition, the 2015 air quality plans identified mandated charging Clean Air Zones as more effective than voluntary Clean Air Zones.

This suggests that local authorities should not be left to determine the arrangements for a Clean Air Zone. Therefore, where legal limits of air pollution are being broken and road transport is identified as a significant source, the UK government and devolved administrations should mandate charging Clean Air Zones. To support this, they should provide a clear and comprehensive national framework to ensure consistency in the approach throughout the UK.

The UK government and devolved administrations should then work with the relevant local authorities to determine the appropriate local arrangements. The UK government or devolved administrations, however, should mandate the category of charging Clean Air Zones, based on the evidence, to include all types of vehicles that make a significant contribution to the problem.

Charging Clean Air Zones should be complemented by supporting measures to help individuals and businesses make cleaner transport choices. People should not be penalised for driving existing diesel vehicles and should be helped to switch to cleaner forms of transport. A range of policies such as a targeted scrappage scheme and changes to Vehicle Excise Duty need to be introduced.

3. 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?

The best way for the government to target funding to cut air pollution would be by having a comprehensive and strategic national plan based on a robust analysis of the problem. This should first address national policies that contribute to air pollution, such as the vehicle tax regime, or that could help reduce it across the UK and not just in some hotspots. It should then look to optimise opportunities at a regional and local level.

The UK government should fund an effective national network of charging Clean Air Zones based on a robust national framework to ensure a consistent approach across the country. These should be complemented by measures to help individuals and businesses move to cleaner forms of transport, such as:

- Greater investment in public transport, walking and cycling infrastructure.
- A targeted diesel scrappage scheme particularly to lower income drivers and small businesses. This scheme should offer a vehicle exchange in return for help with the cost of an ultra-low or zero-emission vehicle, subsidised car club membership, free public transport season tickets or e- bike purchase loan.
- Changes to the vehicle tax regime to stop incentivising diesel vehicles and instead encourage a shift to cleaner forms of transport. For example, an additional charge could be applied to new diesel cars on their Vehicle Excise Duty first year rate to address the greater impact of diesel cars compared to their petrol equivalents.
- Retrofitting initiatives for private, passenger and commercial vehicles

4. How best can governments work with local communities to monitor local interventions and evaluate their impact? The Government and the devolved administrations are committed to an evidence based approach to policy delivery and will closely monitor the implementation of the plan and evaluate the progress on delivering its objective.

The best approach would be for government to proactively engage with the relevant authorities and the general public to ensure local interventions are being delivered and are

having an impact. This should be part of a comprehensive national public engagement strategy that proactively raises awareness of the problem and the actions being carried out to tackle it.

Current information sharing via government and local authority websites are not user-friendly for the general public, lack information and are often out of date. The government should facilitate a national system that ensures transparency and allows local communities to directly access relevant and up to date information at a national and local level.

The UK government should also ensure that the general public are proactively alerted about high pollution events when they are forecasted and as they happen. This will help people protect their health and consider how they can reduce their contribution to the problem. The current system is based on thresholds that are too high and don't cover all pollutants. It is also a passive system that relies on individuals looking for the information online. An air pollution alert system could use the similar systems in place for heat waves and cold weather warnings.

5. Which vehicles should be prioritised for government-funded retrofit schemes? We welcome views from stakeholders as to how a future scheme could support new technologies and innovative solutions for other vehicle types, and would welcome evidence from stakeholders on emerging technologies. We currently anticipate that this funding could support modifications to buses, coaches, HGVs, vans and black cabs.

The government should prioritise retrofit schemes according to the available technology that will have the greatest impact towards meeting legal limits of air pollution in the shortest time possible.

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

Consumers should be provided with the information that assures them that the vehicles they purchase are as clean on the road as the legal limits allow in the laboratory tests. The information should help the consumer understand how well the vehicle performs in the real world for both air pollution and climate change emissions, compared to other similar vehicles. The information should also help consumers understand whether their vehicles comply with air pollution measures, such as Clean Air Zones and any future changes to the vehicle tax regime.

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

The UK government could help support innovative technological solutions and localised measures by providing a comprehensive, long-term, strategic and funded plan to improve air quality beyond the current legal limits. Nationally coordinated measures, such as a national network of charging Clean Air Zones and changes to the vehicle tax regime, will help send a clear signal to businesses, local authorities and the general public of what investments they should be making. The government should accelerate implementation of an industrial strategy that will make the UK a world leader in clean technology, creating the jobs and industries that will help clean up our air.

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

The draft UK Air Quality Plan is weak. Firstly the government's plans and consultation do not match its own evidence. If the evidence shows that taking certain measures will be necessary to tackle the public health crisis of polluted air, then the plan needs to make that clear.

Secondly, this is a plan to make more plans later when action is needed now. For consistency a national network of clean air zones to protect people's health is needed alongside measures to help people switch to cleaner forms of transport such as a scrappage scheme and changes to vehicle taxation.

Finally, the government must commit to ensuring that effective measures will be appropriately funded and incentivised. Air quality is a major public health crisis which has been allowed to perpetuate, in full government view, for many years. It has a responsibility to its citizens to act in their best interests, with a proactivity befitting the nature of the challenge. We hope to see significant improvements to the plan following this consultation period.