



## Response to the Government Air Quality Consultation 2017

**Question 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?

**Answer:** Very dissatisfied.

**Comments:** The law requires the Government to produce plans that will bring air pollution down to legal levels in the shortest time possible. Levels of nitrogen dioxide, emitted mostly by diesel vehicles, have been above legal limits in almost 90% of urban areas in the UK since 2010. The fumes are estimated to cause 23,500 early deaths a year and the problem was declared a public health emergency by a cross-party committee of MPs in April 2016. In the light of this the proposed measures need to be implemented as a matter of urgency. Instead they contain no clear time lines and are based on an optional approach to local authorities to 'bring pollution levels within the legal limits **within the shortest time possible**'. This may sound like urgency but by devolving the decision to local authorities with no time scale it fails to address the seriousness of the problem. There is an assumption made in the document that clean air zones will take up to 3 years to introduce. This is far too long for such a serious public health risk. A maximum of 2 years is more than adequate time to complete the necessary consultation and drafting process. Other government initiatives identified below can take place within a much shorter timeframe.

**Question 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?

**Comments:** Air pollution is a national emergency and therefore requires a nationally-led response in conjunction with local authorities. National data provides government with identifiable priority areas. The consultation document itself points out that *'the Technical Report show 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'*. *The plan puts the onus for initiating action on local authorities: "Local authorities are already responsible for improving air quality in their area, but will now be expected to develop new and creative solutions to reduce emissions as quickly as possible, while avoiding undue impact on the motorist."* This 'undue impact on the motorist' is the rationale behind a failure to call for Charging Clean Air Zones. 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. Charging zones will generate funding for additional measures that will support the public, including motorists, to reduce emissions and reduce their exposure to emissions. In the 2016 Consultation on Clean Air Zones 77% of respondents identified 'that there are additional measures that should be highlighted'. Many of these measures require national policy rather than delegating to a local level. For example, a targeted diesel scrappage scheme and changes to vehicle excise duty.

Local Authorities need to assess business impact but more importantly they need to start from the premise that businesses are the largest contributor to air pollution. Most pollution is caused by their operations or the transport required to get their staff to and from work. In other words,

local authorities also need to understand **what impact businesses have on air pollution. There should be a legal duty on large businesses** to carry out an emissions assessment. For example, a single employer may be responsible for generating thousands of vehicle movements every day by their staff and suppliers. They need to provide evidence that they have a transport policy in place to bring their emissions down within clear time limits. Too often the only policy they have is to levy a parking charge on staff who use a company car park with the money raised not being designated for cleaner transport provision.

**Question 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?

**Comments:** Funding should be targeted to support the measures identified in designated Clear Air Zones. There needs to be a clear understanding that current funding available to Local Authorities is not capable of addressing the scale of the challenge. Only a co-ordinated approach across government departments to prioritise and fund priority measures will be effective. These measures would include:

- Provide guidance to employers on completing 'Business emissions impact assessments'
- Co-ordinate support for businesses to identify logistical improvements in supply and distribution. In many cases this will be needed across more than one local authority.
- Greater investment in public transport, walking and cycling infrastructure.
- Liaise with school and tertiary education bodies to identify opportunities to incorporate air quality in to the curriculum
- Liaise with skills organisations to incorporate air quality in specific job categories. For example, urban planning.
- Enhance research programmes and international co-operation to develop ambitious programmes around clean energy and 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 a less 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

**Question 4:** How best can governments work with local communities to monitor local interventions and evaluate their impact?

**Comments:** Empower community organisations to monitor air quality and play an active role in consultations on the implementation of local authority air quality action plans. Each local authority with a designated clean air zone should have a working group to monitor progress. Community groups should be offered membership.

**Question 5:** Which vehicles should be prioritised for government-funded retrofit schemes?

**Comments:** 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.

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

**Comments:** 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.

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

**Comments:** 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 us, and others, clean up our air.

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

**Comments:** The consultation document is flawed partly because it starts on this false premise 'The Government has already taken action to improve air quality by delivering a stronger economy' Para 4 (P.1). It begs the question 'stronger' for which groups. Between 2010 and 2015, there was a 37% cut in real terms in central government funding to local authorities. It is estimated that, by 2020, England's councils will face a near £6bn funding gap between what they need to spend and what they receive. Most of this shortfall is due to rising costs linked to social care.

Action on air pollution at the scale required will not be cheap. How will local authorities be able to do this when they are struggling to deliver basic services? Unless the Government can guarantee these resources then claims of a stronger economy will be treated as meaningless. It is why the Air Quality Plan needs to be predicated on the introduction of a Clean Air Act which will target the resources needed and how to generate them. It will also have the advantage of tackling the full range of hazards – not just nitrogen dioxide. An integrated approach will ensure that particulate matter and other pollutants will be addressed as part of a comprehensive plan.

***Greener Jobs Alliance***  
***June 7th, 2017***