



Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities

About Living Streets

We are Living Streets, the UK charity for everyday walking. We want to create a walking nation, free from congested roads and pollution, reducing the risk of preventable illnesses and social isolation and making walking the natural choice. We believe that a walking nation means progress for everyone. Our ambition is to enable people of all generations to enjoy the benefits that this simple act brings and to ensure all our streets are fit for walking.

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?

Living Streets is dissatisfied with the new draft plan that has been put forward for consultation. The draft plan does not set out measures that will enable the government to meet its legal duty of ensuring that legal limits of nitrogen dioxide are met in the shortest time possible.

The draft plan put forward for consultation contains insufficient detail and no new concrete measures are proposed. The draft plan merely outlines the need for further consideration by central government, the devolved administrations and local authorities. The responsibility for delivery of the plan is placed on local government but adequate resources to fulfil this role are not identified. The draft plan indicates local authorities must bid for funding and there will not be enough money to fund all local authorities. With this proposed allocation of resources, it will not be possible for local authorities to comply with legal levels of nitrogen dioxide in the shortest time possible.

The plan is insufficiently joined up to other government and local government policies, such as the Cycling and Walking Investment Strategy, Roads Investment Strategy, local cycling and walking infrastructure plans and local spatial plans. We would expect to see strategic direction and resources identified to coordinate these plans to encourage modal shift from cars to walking, especially for short everyday journeys. All local authorities need to have up to date local plans and transport plans to demonstrate how they would achieve this through planning and transport policies. In 2016 60% of English local authorities did not have up to date local plans.

In addition to a built environment response, more must be done to encourage behaviour change. The plan does not set out wider government department cooperation and we would expect to see a joined-up policy with the departments of Transport, Education, Communities and Local Government, Work and Pensions and Health. Encouraging modal shift from cars to walking, especially for short journeys, has an important role in improving health and wellbeing as well as reducing congestion and pollution. It is disappointing that the draft plan does not go far enough to encourage behaviour change through multi-department working.

Proposed policies such as the non-charging Clean Air Zones are outlined with insufficient detail, making it unclear how they will operate or how they can effectively reduce air pollution. The most effective way to reduce air pollution is to encourage modal shift to discourage from driving into the most polluted parts of towns. The draft plan does not provide any evidence to show how non-charging Clean Air Zones would work.

The technical report published with the draft plan identifies charging Clean Air Zones as by far the most effective measure to reduce emissions. The draft plan says they are to be considered as a last resort despite the evidence showing they are the most effective measure to clean up our air quickly and protect people's health and the legal duty on government to achieve legal limits of nitrogen dioxide in the shortest time possible. The draft plan does not increase the number of mandated Clean Air Zones from the 2015 plan which is concerning as the new draft plan is supposed to be an improvement on the last. We would expect to see a national network of Clean Air Zones to deliver a reduction in nitrogen dioxide emissions in the shortest time possible.

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 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 the type of vehicles that make a significant contribution to the problem.

9. How can government best target any funding to support local communities to cut air pollution?

Although we would expect to see a national comprehensive response to tackling air pollution, funding should be targeted to communities who disproportionately feel the effects. The impact of air pollution is felt the most by those whose lungs are already vulnerable, such as the elderly and children. There are also inequalities in the distribution of pollutant concentrations (higher relative concentrations in the more deprived deciles). For nitrogen dioxide (NO₂) and particulate matter (PM), this distribution can largely be explained by the high urban concentrations driven by road transport sources, and the higher proportion of deprived communities in urban areas. Funding for infrastructure and behaviour change should be targeted on communities where there is the potential to reduce car use and enable more people to walk, cycle or use public transport.

The school run is a major cause of traffic and air pollution during the morning peak. The government should target investment in communities with lower rates of walking to school to improve air quality and achieve the aim in the Cycling and Walking Investment Strategy that 55% of primary school children will usually walk to school by 2025.

What options should the Government consider further, and what criteria should it use to assess them?

The priority should be to encourage modal shift from cars to walking, especially for shorter journeys. This is the most sustainable form of transport and represents the greatest potential reduction in emissions. The potential for a shift towards more people walking and cycling for everyday journeys is greatest in urban areas where the problems of air pollution are greatest.

To facilitate this there should be greater investment in walking and cycling infrastructure and public transport. The updated Roads Investment Strategy for the strategic roads network should do more to prioritise cycling and walking, especially where the network enters urban areas. We would also expect to see funding allocation move away from the strategic road network (currently 3% of roads and £1.1m per mile planned investment to 2020) to local roads (97% of roads and £27,000 per mile investment). Modal shift out of cars to walking, especially for shorter journeys is much easier to achieve on the local roads network. Living Streets' Walking Cities Blueprint¹ outlines seven steps to enable more people to walk more often in cities across the UK.

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.

¹ <https://www.livingstreets.org.uk/media/2527/blueprint-for-change.pdf>

References in the draft plan to reducing traffic calming measures such as 'speed bumps' should be removed. There is no evidence to suggest this would reduce air pollution on the most polluting roads and such interventions would discourage walking and modal shift as safety would be reduced on the roads most suited to shorter walking journeys.

'Low traffic neighbourhoods', where through motor vehicle traffic has been reduced or removed through 'modal filters', are low cost and can have an immediate impact on the air quality of local streets, as well as encouraging more people to walk and cycle.

There should be retrofitting initiatives for private, passenger and commercial vehicles.

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.

A targeted diesel scrappage scheme particularly to lower income drivers and small businesses could 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.

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?

There should be 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.

10. 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

Ultimate responsibility for reducing nitrogen dioxide emissions in the quickest time possible rests with the UK government. Although much of the implementation will take place at the local level the government must be responsible for evaluation of impact. It is an unrealistic burden on local communities to evaluate impact and for the evaluation to be consistent, well-resourced or thorough enough. That said, some element of local evaluation can form part of the evidence base, such as community pollution monitoring initiatives, but the evaluation of the Air Quality Plan should not rely on this evidence alone.

11. 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.

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

Information must include alternatives to buying cars. It should help consumers understand how well the vehicle performs in the real world for both air pollution and climate change emissions, compared to other similar vehicles, public transport and active travel (walking and cycling) alternatives. The information should also help consumers understand whether their vehicles comply with air pollution measures, such as Clean Air Zones.

13. 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 reduce air pollution beyond the current legal limits. The Cycling and Walking Investment Strategy must be implemented at the local level through properly funded local cycling and walking infrastructure plans.

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

The draft UK Air Quality Plan lacks the measurable targets necessary to achieve its aims. Responsibility is passed to devolved and local authorities with inadequate resources. The plan as outlined ignores the technical evidence that should underpin it. The most effective strategy to implement Clean Air Zones should be incentivised but instead it is presented as an option of last resort. The plan misses the significant opportunity to reduce emissions by encouraging as many journeys as possible from motor vehicles to walking.

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Steve Chambers
Policy and Research Coordinator
Living Streets