

Draft UK Air Quality Plan for tackling nitrogen dioxide, Questions for Consultation:

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?

The consultation indicates that it will be for Local Authorities to implement the measures that they see fit. This is unlikely to address the problem as quickly as possible, as each individual authority will have to decide which measures are worth implementing, and which are not, and then potentially make an application for funding which could be rejected.

It would be helpful if the government, along with its access to experts (COMEAP, AQEG etc), would determine which of the measures available should be implemented by ALL local authorities, rather than create a piecemeal approach across the Country.

For example, it would make sense that all older more polluting (not meeting the appropriate Euro standard) buses travelling through an AQMA be retrofitted or upgraded through a subsidy or scrappage scheme. Additionally, if a targeted scrappage scheme for taxis operating in urban centres is effective on one area, there is no reason that it would not be effective in another. Any AQMAs that have been specifically caused due to road layout should have a mandatory requirement that the layout is examined, and if a significant improvement can be made, then it must be made (within reason). Perhaps requiring an investigation and subsequent categorisation of all AQMAs would facilitate this.

This 'national' approach would give confidence to local authorities implementing these measures, and also remove a great deal of time spent making decisions. Additionally, this type of approach would alleviate the possibility of highly polluting vehicles simply being moved from one area to another. In fact, measures should be put in place to specifically prevent this from happening.

Of course, giving local authorities some flexibility will also be beneficial, as each district will have its own unique characteristics, and will understand where action should be focused.

A concern with the current proposal is a lack of understanding on how the Government will be monitoring the measures taken by each local authority. As it appears that each local authority is able to carry out whichever measures it chooses, there is scope for the wrong decisions, or worse still no decisions, to be made at a local level. On this basis, it is easy to imagine that the proposed measures will not address the problem of nitrogen dioxide as quickly as possible.

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?

It should be for Government to provide guidance/legislation on the implementation of a Clean Air Zones and the measures that should apply within it. This would provide Local Authorities with some comfort in ensuring they have got it right and also demonstrate consistency of approach to arrangements across the Country.

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?

Perhaps the allocation of funding could be based on the following objective factors:

- Number of AQMA's within a district
- The number of people living within an exceedance-declared AQMA (consideration and weight should also be given to people living in areas with poor air quality, even if it is not bad enough to qualify as an AQMA)
- The feasibility of reducing the levels of NO₂, without shifting the problem to a new area.

Some AQMAs could potentially be solved with investment in infrastructure. For example, the Borough Green AQMA could be resolved (as could many) through the development of a bypass. Others, such as the M20 AQMA would be much harder to resolve, and as such would come lower down the priority list for funding.

4. How best can governments work with local communities to monitor local interventions and evaluate their impact? [committed to an evidence based approach, and will closely monitor the implementation of the plan and evaluate the progress on delivering its objective]

Evaluating the impact of local interventions to air quality can only be achieved effectively through monitoring, either through diffusion tubes or continuous analysers. A resident's questionnaire could also be useful in seeing progress (or lack of) from their perspective. Additional funding for enhanced monitoring in problem areas could be implemented.

- 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.]**

Focusing primarily on AQMAs, the vehicles that are contributing most to NO₂ levels are those that should be prioritised for retrofit schemes. This is likely to be buses, coaches, HGVs, vans and black cabs.

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

- Real world emissions
- Cost of charging / refuelling v.s. other options available
- Maximum distance achievable with one charge / tank
- Any restrictions and charges for using their vehicle
- Any likely future impacts of the purchase e.g. potential additional costs in future for polluting vehicles

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

By offering funding for development and real world trials of new technology. To support localised measures, there also needs to be funding available.

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

No