

Department for Environment, Food
and Rural Affairs:

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

Consultation response of the Chartered Institute of Environmental
Health (CIEH)

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Responses to consultation questions

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

__deselected__ra Very satisfied Satisfied Neither satisfied nor dissatisfied Dissatisfied **Very dissatisfied** Don't know

Please provide comments to explain your answer

The CIEH and its members take the view that the proposals set out in the consultation are wholly inadequate in terms of addressing the current national air quality emergency. Given the absence of substantive proposals, timescales for addressing the key challenges, clarity around targets or even availability of resources to support necessary actions, we take the view that these proposals do not amount to the strategic approach that is expected of a national government to a national problem. At best, the proposals amount to no more than 'a plan for a plan'. We also take the view that expecting local authorities to develop novel and innovative solutions to national problem amounts to an abdication of a responsibility by the national government. We feel that such an approach will lead to the development of incoherent and inconsistent approaches to a national problem that does not recognise local authority boundaries.

We would have hoped that tackling air pollution would be seen as being part of a coherent approach to making our economy 'fit' for the 21st century. This does not appear to be the case and a fresh approach is required that can tackle the challenges brought about social and demographic change and health inequity. Such an approach, requires a more co-ordinated response than is shown in this consultation and our members take the view that this consultation bears the hallmarks of a hasty, ill-prepared and piecemeal response.

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?

Please provide your views

Poor air quality in the UK is a national issue. Air pollution does not recognise boundaries and all UK countries, regions, towns and cities and even rural areas are affected to a greater or lesser extent. It is, therefore, wholly inappropriate to focus to English local authorities. That said, CIEH is concerned that the focus on Clean Air Zones (CAZ) is not an appropriate way forward at this time. The mandated CAZ are taking place in just 5 English cities. Due to the work involved of forming a CAZ the implementation dates for the 5 cities are likely to be late 2019.. It, therefore remains unclear whether these will provide any kind of solution to the current challenge of poor air quality, and NO₂ in particular, as it is just too early to say and no evaluation of their success has been undertaken or even planned at this stage. In addition it brings into question how other Local Authorities, who are mandated to introduce a CAZ can do so before 2020.

CIEH also takes the view that the arrangements for CAZ are not dissimilar to those for Air Quality Management Areas (AQMAs) which have been in operation across the UK for many years. AQMA have, in the main, not been a success as demonstrated by the fact that over 200 such areas remain un-rescinded. It is also clear that AQMAs, and the fact that with very few exceptions they follow artificial physical boundaries, have demonstrated that they merely lead to problem hotspots being relocated. Consequently, we take the view that CAZ and potential access charging, will lead to a similar result in the displacement of older more polluting vehicles seeking alternative routes around the zones unless the whole concept is better thought through and full engagement achieved between local and national Government, urban planners, transport planners, highways engineers, safety groups and environmental health professionals.

CIEH is also concerned that that the consultation's focus on the business impact of CAZ is inappropriate. Surely, the key issue is one of public health and, therefore, the emphasis should switch to traffic reduction and the health benefits brought about by co-ordinated, concerted action to achieve greater and better provision for people to access towns, cities and workplaces via the use of public transport, cycling and walking.

The Government should provide clear information for businesses on the economic and social benefits to them from improving their poor air quality footprint. The report "Valuing the impacts of AQ on Productivity" quotes a cost of £2.7bn, however there are many assumptions made in coming to this conclusion.

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?

Please provide your views

Solutions to the problem begin via developing a better understanding of it. More and better 'real-time' monitoring of air quality and consequent health related data should be required by both environmental health and public health professionals and Government should appropriately resource this. It, therefore, follows that appropriate Government financial support should also follow to enable local authorities to target areas for action where levels of air pollution are highest and where the largest number of people are exposed to that pollution.

It is clear that the only real solution is to either significantly reduce overall vehicle numbers on the road or take action to remove vehicles that do not comply with EuroVI/6 or petrol Euro 3 standards as a minimum. Both of these options are probably impractical, at least in the short term; however, CIEH does advocate CAZ charging, removal of tax incentives on diesel

and their transfer to ULEV's and ZEV infrastructure development, a significant switch to good quality, integrated public transport and a phased reduction in sub Euro VI/6 diesel vehicles via a properly supported scrappage scheme introduced as part of a well-managed, co-ordinated set of long-term responses to the problem.

We believe that local authorities should be financially supported to take a number of actions and these include but are not limited to:

- Providing new and better designed cycle routes that physically separate cyclists from other traffic
- Purchasing and ULEVs and ZEVs for their own purposes
- Developing and extending infrastructure to support ZEV's
- Supporting moves to progress infrastructure projects that provide alternatives to driving through AQMAs or CAZ

We take the view that the consultations reference to 'value for money' is inappropriately situated. This consultation must be about addressing a public health emergency and any cost/benefit analysis must also include costs and benefits to the health of the people; the burden on the NHS of failing to act and the health implications on lives, families and communities across the whole country of failing to act. To merely look at this from the point of view of business or from the perspective of minimising overall expenditure is wholly inappropriate.

The effectiveness of LEV/ULEV/ZEV/ retrofit vehicles at reducing the pollution they emit is dependent upon how they are driven. The CIEH believes that compulsory driver training should be introduced for all such vehicles that are purchased, to ensure that the gains in improved AQ are maximised.

Finally, fraud is possible and likely in any system and we need to ensure that procedures are first of all properly thought through and that appropriate systems are in place to monitor for and to address possible fraud where it is expected. The problem is that that cuts in the current systems that are designed to protect society against fraud, such as Trading Standards, means that it will be more difficult to detect and police.

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

Please provide your views

CIEH takes the view that local authorities have an important role to play here; however, it is first of all the responsibility of Government to provide leadership, to properly design concerted and coordinated approaches and to set the criteria for success. With appropriate support from Government, local authorities can then properly gather the necessary evidence to demonstrate impact in terms of both pollution levels and associated public health benefits.

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

Please provide your views

CIEH is of the view that retrofit funding should be targeted at vehicles where real emission improvements can be robustly demonstrated at a reasonable cost relative to replacement. This logically means targeting those vehicles that travel most miles in areas of poor air quality. This is likely to mean a focus on larger diesel vehicles with long lifespans such as buses and coaches, HGVs and specialist vehicles such as black cabs. CIEH is cognisant of and supports the moves by TfL to only license new ULEV or ZEV black cabs from 2018 and we advocate national measures to ensure that this approach is taken by all local authorities across the UK.

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

Please provide your views

CIEH does not believe that, at present, consumers pay particular attention to the emission profile of the vehicles that they choose to buy. The adoption of additional national measures that will adversely impact on the new and ongoing costs of more polluting vehicles, particularly diesel powered vehicles is, however, likely to change that position. CIEH, along with other interested parties, therefore, recommends that information from the EQUA index <http://equaindex.com/> is made readily available. This index, is supported by the Mayors of London and Paris provides real world, free data for new vehicles for air quality, carbon emissions and miles per gallon. We strongly support such independently tested, real world data being actively promoted to the public.

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

Please provide your views

CIEH is of the view that national problems require properly evaluated national solutions. This means conducting robust, properly funded and appropriately evidenced research to not only work out what currently works, but to also identify innovative solutions that will work. This is not the role of local authorities and it is, therefore, unfair of this consultation to expect local authorities to fulfil that role. Government must at least lead in this respect to ensure that we do not end up with a patchwork of local schemes, providing varying solutions with uncertain outcomes and, potentially, providing barriers and a lack of clarity to not only the operators of multi-site businesses but to consumers too.

CIEH will, however, support any proposals to ensure that, wherever possible, proposals for new urban developments include provision of infrastructure to support ZEVs; increase insulation standards of all new buildings to reduce energy use, restrict the use of wood burning

stoves in domestic situations and require all new buildings to incorporate the use of ultra-low NOx boilers

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

Please provide your comments

CIEH is of the view that the draft plan is trying to be everything to everybody, using a scatter-gun approach of possible measures - the majority of which will have a negligible impact on air quality and which, therefore, distract from the key objective to achieve compliance. Placing the responsibility on local authorities without backing this up with funding is setting local authorities up to fail. The plan needs to be much more succinct, target those things that will have an immediate short-term impact and ensure that these are properly resourced.

Finally, we would suggest that this is not an Air Quality Plan, but a NO₂ Compliance Plan (or a Transport Emissions Plan)– the problem with considering this as an Air Quality Plan is that it largely overlooks Particulate matter as the single biggest contributor to premature deaths and ill-health. The two objectives of achieving NO₂ compliance in the short term and the wider actions necessary to improve air quality and achieve a zero emission and low Carbon economy in the longer-term, need to be separated out. The latter should be the subject of a more comprehensive strategy and the former a more succinct, focused and properly funded plan.

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