

## Response to the Defra/DfT consultation on the draft UK Air Quality Plan for tackling nitrogen dioxide

**Submission by Jean Lambert MEP, Keith Taylor MEP and Molly Scott Cato MEP, Green Party Members of the European Parliament for London, the South East and the South West.**

15 June 2017

More information about the consultation can be found at:

<https://www.gov.uk/government/consultations/improving-air-quality-reducing-nitrogen-dioxide-in-our-towns-and-cities>

**[Questions 1-6 administrative details to be completed upon submission]**

**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?**

Very dissatisfied.

The Government's Draft Air Quality Plan, reluctantly released in May 2017 following a court order, rests on 2 main approaches. Increasing road building projects and investing in the acceleration of electric vehicle technology. The Government has stated that these measures will bring about the necessary reductions in Nitrogen Dioxide (NO<sub>2</sub>) to bring the Country in line with the maximum permitted levels.

The main issues with the Government's plan are the lack of details about how the measures will be implemented, but also some of the approaches to tackling the levels of air pollution. The plan talks about increasing the uptake of ultra low emission vehicles, allocating funding to electric and hydrogen vehicle development, to provide support to tackle congestion on the roads and ensure the UK's local and strategic roads and public transport networks are fit for purpose. The UK government aims to tackle the issue of air pollution from road transport by getting people to buy new cars and by investing in road building. It states that road transport is a key part of almost everything we do. The Government is not committing to changing the status quo. These approaches are fundamentally flawed and will likely make the problem worse in the long run.

This is not a plan capable of addressing the fact that 90% of urban areas have experienced illegal levels of NO<sub>2</sub> since 2010. It is not a plan capable of preventing the premature death of some 12,000 from NO<sub>2</sub> pollution every year. It is a plan that is not fit for purpose.

**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?**

First and foremost, there needs to be better monitoring in order to establish where Clean Air Zones should be set up and to ensure that they are extensive enough to address the issue. The most appropriate way to determine the arrangements for Clean Air Zones should be by understanding the severity of the problem and taking action in line with reducing the pollution to within legal limits as a priority. Start with reducing one of the main sources of air pollution – road vehicles.

And action should not be delayed. A network of Clean Air Zones should be expanded and strengthened across the country - limiting the most polluting vehicles, including cars, from entering air pollution hot-spots - creating funding for local authorities to invest in walking, cycling and clean public transport. These should be strong enough to ensure legal compliance on NO<sub>2</sub> by the end of 2018.

The impact of measures on businesses should be a tertiary consideration. Considering the impact to people's health and wellbeing and the costs associated with treating these avoidable illnesses should be a central consideration. This would in turn save money. Encouraging affected businesses to adopt cleaner vehicles, to consider the use of non-motorised transportation for goods and employees would help address the problem – offering support to enable a switch to alternatives should be a key consideration for local and central government.

There are no cheap fixes when it comes to cleaning up the air we breathe: the long term solution is to completely change the way we travel to reduce the traffic on our roads. Further, any action we take now will relieve pressure on our health services in the future, and reduce the £20bn annual cost of dirty air - as calculated by the Royal College of Physicians.

The Air Quality Plan should ensure that car companies who cheated emissions are appropriately fined, and that such levies are used to fund action on air quality. UK regulators - namely, the Competition and Markets Authority, the Vehicle Certification Agency, and the Serious Fraud Office - should force car manufacturers in the UK to replace or retrofit polluting diesel vehicles.

**9. 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?**

Stopping the subsidising of the fossil fuel industry and propping up the car industry are both crucial ways in which funding could be diverted towards helping to cut air pollution in local communities. The onus should not be entirely placed on the local level when there are systemic issues that are contributing wholesale to the problem.

The plan barely references the need for more sustainable cities, e.g. through more planning for walking and cycling and local service provision to reduce the need to travel. And these are the areas that government should target funding for local communities. Offered a viable alternative to using the car for short distance urban journeys, people are much less likely to drive. This has an immediate, direct impact. Providing adequate infrastructure for people to travel by foot or bike takes polluting vehicles off the road. The schemes to deliver these provisions are much less costly than investing to increase the amount of vehicles on the roads, which is what road projects do, and also have associated co-benefits such as creating a healthier community in a variety of senses. The WHO's 'Age Friendly' Cities programme provides a useful basis, for example.

Investing in public awareness schemes around the associated health risks of air pollution would also be helpful to encourage people to choose to use alternatives to the car.

Scrappage and retrofitting schemes could be considered as part of the package of measures, but should be targeted to take diesel vehicles off the road as soon as possible and ensure that all those who live within Clean Air Zones can affordably replace polluting diesel vehicles. As well as offering replacement clean vehicles, these schemes should also offer alternatives such as car club membership and rail season tickets.

**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*

Ensuring that there is enough monitoring equipment in place (at the right locations), that it is regularly serviced, that the capture rate of each monitoring station is high enough to reflect an accurate picture of the problem. Also not only considering NO<sub>2</sub> would have a much greater impact on addressing the issue as a whole.

Almost 80% of towns and cities in the UK are also breaching safe levels of dangerous particulate matter (PM) pollution. PM pollution is linked to 29,000 deaths every year in the

UK. Not only do the Government's weak proposals not go nearly far enough in tackling the NO<sub>2</sub> problem, they don't even attempt to address the PM issue. It is also less well monitored so could be even more of a problem than we currently understand.

Ensuring that air quality is monitored around hospitals, health clinics, and schools, so that those who are most vulnerable to the impacts of air pollution, notably children, the elderly and infirm, are protected.

Ensuring that an undue burden is not placed on local government to manage the issue. Councils are facing severe budget cuts due to austerity and it is of fundamental importance that air pollution is not one of the issues where the most appropriate response is sacrificed due to the need for cost savings. Local government must be supported in its legal duties on public health. The proposals in the plans talk of applications for Clean Air Zone support – this process should not be too onerous – taking action to reduce pollutants needs to be prioritised over unnecessary bureaucracy.

### **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 oldest and most polluting vehicles and other vehicles that make up the largest proportion of the fleet (taxis, buses, lorries where appropriate). It should also work to ensure that the vehicle manufacturers responsible for cheating on emissions tests should pay some (if not all of the costs) for retrofitting affected private vehicles.

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

An emissions label like the CO<sub>2</sub> standard would be useful. Consumers should also be made fully aware of the need for transparency around real world emissions testing. Any information scheme needs to be implemented with a guarantee that the Vehicle Certification Agency is an independent body. This would require a change to the way it is funded to ensure that the car industry doesn't have a disproportionate influence on its activities.

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

Active Transport: It should undertake a national review of our transport system with serious investment in buses, trams and trains along with safe routes for walking and cycling. There is a lot of potential for integrating sustainable waterborne transport (inland waterways, canals and rivers) in intermodal mobility chains. Electric mobility can be one part of a solution to cut emissions from the transport sector. It should focus on e-bikes, trains, trams, cable cars, buses, shared cars and taxis. Electric vehicles must run on green power and be assessed throughout their lifecycle.

People need an alternative to car use and we must protect our towns, cities and countryside from the pollution and congestion that comes with new roads.

Clean Energy: It should scale-up investment in renewable energy - which, as it stands, is set to drop by 95% over the next two years. Harnessing the clean energy that we have in abundance would be a win-win, both in terms of tackling climate change and air pollution.

Ditch Coal: It should bring forward the coal phaseout date to 2023 at the least, and gradually end the £6bn a year subsidies in the UK to dirty energy. Pollution from the UK's coal-fired fleet causes roughly 2,900 premature deaths a year.

Urban Design: It should re-evaluate urban design and planning, embedding the values of sustainable transport, demand management, residential and commercial car parking provision, facilitating and encouraging non-motorised transport, and transport improvements (e.g. staggered commute times, increased home working, major employer own staff transport schemes etc.)

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

The current Government draft plan will lead to the avoidable premature deaths of thousands of residents exposed to deadly air pollution. The plan is non-committal and seeks to shift responsibility from the Government; it offers no guarantees air pollution will be reduced. It is, therefore, not fit for purpose. Whilst it is true there is no one magic solution to air pollution, thinking about how people and goods get around is the most important element of any plan. Dissuading local authorities from implementing effective charging Clean Air Zones is extremely short-sighted. As is focusing just on NO<sub>2</sub>.

Thanks to the original Clean Air Act, we no longer experience episodes of the sulphur dioxide 'pea souper' smog in our cities today. But the act is desperately in need of renewal. The understanding we have of other deadly air pollutants and their health impacts require that we create new legislation that is better able to tackle the current challenges we face.

Whilst the plan references wider actions to reduce other harmful air pollution emissions, it offers no details. Only looking at NO<sub>2</sub> is putting lives at risk. Annual NO<sub>2</sub> levels are breaching EU legal limits while, at the same time, almost 80% of towns and cities in the UK are breaching safe levels of PM pollution. Measures need to consider more than just one

pollutant to bring the health risks down. PM and ozone cause the most harm to human health. PM pollution is linked with 29,000 deaths every year in the UK. They are also less well monitored so could be even more of a problem than we currently understand. NO<sub>2</sub> pollution is a widespread problem but just focusing on this alone is like applying a plaster to a severed limb.

PM pollution doesn't just come from diesel exhaust fumes, but also from braking. Therefore the Government's plan to accelerate vehicle fleet turnover, to invest in ULEVs and the associated infrastructure won't go anywhere towards addressing the harm caused by PM<sub>10</sub> and PM<sub>2.5</sub>. Vehicle design needs to take an holistic approach to its overall environmental effect.

New ULEVs will still have brakes and won't reduce the total number of vehicles on the road – the problem won't go away. In defining the solution, it is clear that the Government does not consider reducing the use of private cars as an option. In fact, their strategy rests on selling new cars, whatever the cost to people's health.

Similarly, it has been proven time and again that adding capacity to the road network just adds more vehicles to the roads. Yet Government's main effort to tackle congestion is to build and expand more roads. The Plan outlines a plan to use the National Productivity Investment Fund to expand and upgrade key pinch-points on the strategic road network in England. Major projects that fall under this banner, like the Thames Crossing, stand to make our air quality far worse and these factors must be considered from a health perspective. The economic case for a project becomes meaningless if it doesn't take into account the human cost of air pollution.

Building more roads will not solve the problem. Educating people about the dangers of air pollution and helping them to make informed travel choices will, both these measures are missing from the current Plan.

The Government hints that it is ready to explore the opportunities for changing tax structures and stopping the use of the worst fuel, but is vague and noncommittal. In only just now calling for evidence on this measure, Ministers highlight just how slow moving the Government's approach to tackling this public health emergency is. Red diesel is heavily polluting – its use should be restricted. More polluting vehicles should pay more tax; a Government serious about tackling air pollution would not stall in implementing these measures.

Jean Lambert, MEP for London

Keith Taylor, MEP for South East England

Molly Scott Cato, MEP for South West England and Gibraltar

ENDS