

Response to Defra consultation on air quality plans, 28 October 2015

Submitted by London Forum of Amenity and Civic Societies (an NGO)

The response relates to the whole of the UK

We do not require our response to be confidential.

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Question 1: Do you consider that the proposed plan set out in the overview document strikes the right balance between national and local roles?

Single choice radio buttons (Required)

No

If no, please tell us why:

The consultation document, with its evidence annex, suggests that the introduction of Clean Air Zones (CAZs) will have a positive net present value of about £1½ billion (benefits minus costs). It also suggests that the effect of their introduction would bring forward compliance with EU NO₂ standards by about 5 years. However there is no commitment in the document actually to introduce CAZs. The judgment of the UK Supreme Court in April 2015 required the UK Government to produce by the end of 2015 plans for achieving compliance with EU air quality standards and that the period before compliance should be as short as possible.

However, while we welcome the fact that the consultation document proposes a national framework for CAZs, it is most disappointing that the document does not commit to introducing any CAZs, but merely says this will be a matter for each local authority. In the detailed plan for London, for example, there is no commitment given to introduce a CAZ; instead the London plan merely rehearses measures that have already been announced. While those announced measures do include the plan for an ultra low emission zone inside the London inner ring road, this is quite different, and far smaller in extent, than the CAZ which would be needed to be consistent with the proposed national framework, which would need to include all areas in London where this will bring forward the date of compliance.

We therefore consider that the Government's plans to be submitted to the EU Commission by the end of 2015 need to be revised to show a firm commitment now to introduce CAZs in all parts of the UK where this will bring forward compliance. This is especially important in London, given the greater gap between actual air quality levels and EU limits than elsewhere in the UK.

Question 2: Are you aware of any other action happening in your area which will improve air quality and should be included in the plan? If yes, please identify in the space provided as far as you are able: a. What the additional actions are; b. The zone(s) in which they are being taken; and c. What the impact of those actions might be (quantified impacts would be particularly useful). If there is more than one action please separate them with numbering.

Single choice radio buttons I am not aware of any other action happening in my area

Question 3: Within the zone plans there are a number of measures where we are unable to quantify the impact. They are included in the tables of measures. Do you have any evidence for the impact of these types of measures? If yes, please provide the name or code of the zone plan and measure codes of the measure you are referring to in the space provided.

Single choice radio buttons I do not have any evidence for the impact of these types of measures

Question 4: Do you agree that a consistent framework for Clean Air Zones, outlined in section 4.3.6 of the draft UK overview document, is necessary?

Single choice radio buttons (Required) **Yes**

If yes, do you think the criteria set out are appropriate?

As noted above, the main need is to introduce a firm commitment to introduce CAZs in all parts of the UK where this will bring forward compliance with EU air quality limits.

The criteria appear to propose emission limits in London inside the CAZ based in Euro 6/VI limits for diesel vehicles and Euro4/IV limits for petrol vehicles. However the criteria for Euro 6 vehicles ought to be based on realistic driving cycles and not simply on the more tolerant levels reflected in the method of testing currently applying in the EU. If realistic driving cycles are not agreed within the EU in time for incorporation in CAZs, then the UK should consider proceeding anyway with such standards applying within the CAZs

Question 5: What do you consider to be the barriers that need to be overcome for local authorities to take up the measures set out in section 4 of the UK overview document? How might these be overcome?

Single choice radio buttons There are likely to be considerable barriers based in the reluctance of some local authorities to take decisions that may be initially unpopular with some local groups. For this reason it is particularly important that the Government gives the clearest possible signal that it intends that CAZs, on the basis of its proposed national framework, should apply in all areas of the country that would otherwise be out of compliance.

Are there alternative measures which avoid these barriers? If so, please set these out in the space provided.

Single choice radio buttons **Yes**
Another important barrier is the current tax system for both fuel duty and vehicle excise duty. Both these systems should be urgently reformed to reduce incentives to the purchase and use of diesel vehicles.

Question 6: Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plan? If so, please set out in the space provided.

Single choice radio buttons I am not aware of any additional action