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Improving air quality in the UK: Tackling nitrogen dioxide in our towns and cities.

Thank you for the opportunity to comment on the draft document: Tackling nitrogen dioxide in our towns and cities.

The documents do not recognise that Government has a significant role to play in delivering air quality improvements in urban areas, particularly London. Air quality is being treated as a local problem in the draft plan, with only local solutions required, the key one being Clean Air Zones. Full responsibility is being passed down to Local Authorities (LA's). The plan contains no detail of any additional regulatory powers or targeted financial support that LA's need to affect a measurable difference.

The key proposal is to mandate LA's to introduce 'Clean Air Zones'. The system of Local Air Quality Management has been in place for years and LA's with levels of air pollution in breach of limit values all declared Air Quality Management Areas (AQMA) in the early 2000s. Following the declaration of AQMAs, authorities then developed, and have been implementing, action plans, which are almost identical to the concept of a Clean Air Zone. It is not clear within the consultation document whether LA's in London will have access to the proposed funds for Clean Air Zone or continue to bid for funds through the GLA.

The London Borough of Haringey has had an AQMA, and a corresponding action plan, in place since 2001. Our action plans have included the vast majority of measures listed in the consultation documents as possible actions local authorities could take in a 'non- charging Clean Air Zone'. These are detailed in the draft Clean Air Zone framework. Below are some examples that illustrate the point. All of these have been detailed in our annual progress reports submitted to the Government:

- **Engaging local communities:** Haringey's Air Quality Apprentice has been engaging with the local school community, delivering air quality assemblies, lessons and events to raise awareness around air pollution, aided by the use of 'air monsters'. We recently delivered a series of air quality workshops and seminars for community groups focussed on raising awareness and gathering ideas for the preparation of a new action plan.
- **Land use planning:** All planning applications are assessed for air quality impact. Major developments are required to be air quality neutral. Haringey council requires developers to adhere to the requirements of both the GLAs SPG Sustainable Design & Construction and SPG Control of Dust and Emissions at Demolition and Construction sites.
- **Non Road Mobile Machinery:** Haringey council shares an NRMM and dust officer with three neighbouring boroughs, funded through the Mayors Air Quality Fund to enforce the London-wide NRMM LEZ.
- **Low NOx boilers:** We have required ultra-low NOx boilers as standard in new developments for a number of years.

- **Traffic management:** The local road network throughout the borough is a 20mph zone. However, there has been no noticeable reduction in NO₂ concentrations. Recent projects have included cycling and walking projects and programmes and promotion of public transport schemes:
 - Cycling and Walking
 - Cycle parking programme for on-street short stay parking and bike hangars for longer stay parking
 - Working with TfL on the implementation of Cycle Superhighway 1 between Tottenham and central London
 - Development of Quietway proposals with TfL for a north south route from Bowes Park to Farringdon and an east west route from Hornsey to Finchley
 - Ongoing smarter travel programme which provides a range of projects, events and activities to support more sustainable travel and hence reduce transport related emissions. Projects such as personalised travel planning, school travel planning and cycle training as well as marketing and publicity to encourage modal shift from private cars
 - Investment in local cycle facilities
 - Pedestrian enhancements to Priory Road
 - Highway and footway maintenance programme
 - Street lighting programme which would enhance feelings of personal safety and encourage more walking

We also work closely with TfL and bus operators holding bi-annual 'Transport Forums' attended by Councillors and local residents. Recent issues of concern have included:

- Public transport
 - Delivering measures to enhance bus service reliability
 - Improving bus stop accessibility
 - Lobbying for major infrastructure investment such Crossrail 2 and enhancements to the West Anglia main line
 - Support for electrification and train lengthening on the Barking Gospel Oak line to be delivered from 2018.
- **Collaboration and joining up approaches:** Haringey council has worked in partnership delivering air quality awareness raising projects with neighbouring authorities and other London boroughs. We also work closely with the Greater London Authority, TfL and London Councils as well as with internal partners such as Public Health, Smarter Travel team, Planning team and Transport team.

Consultation Questions

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?*

Overall we are dissatisfied. Responsibility appears to be passed down to Local Authorities (LA's). Most of the measures are outside of the expertise of the LA's and require significant action without any regulatory support. The plan promises 'Regulatory changes' and 'clear legal duties' for LA's yet contains no details of any additional regulatory powers or targeted financial support that local authorities need to affect a measurable difference. The Government has been aware of the failure of Euro emissions standards for diesel vehicles for many years (research published in 2013) and has not significantly addressed this point. There is also no significant change proposed in the policy. We believe there needs to be a collective policy from Central Government to bring down emission levels rather than just individual policies of LA's. In addition, there are no details of how Clean Air Acts would be revised.

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?*

Haringey Council, as a London borough, already has a regional strategy in place in the form of the GLA's 'Clearing the air' as well as our own Air Quality Action Plan. Most of these measures are also detailed in the Clean Air Zone Framework. The GLA has in place a central London Congestion Charging Zone and is planning to implement a T-Charge zone in central London. Whilst these do not cover the London Borough of Haringey, being an outer London borough, other GLA schemes which do include Haringey are the LEZ and the proposed ULEZ scheme. Therefore a boroughwide Clean Air Zone or an area based Clean Air Zone is neither practical nor cost beneficial to implement in Haringey.

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?

Funding should be prioritised and targeted to areas where levels of air pollution are highest and with the largest number of people exposed to high levels of pollution. Support for reducing emissions from vehicles, such as buses, coaches and LGV's in areas with an air quality problem, should be prioritised. Retrofit needs to be affordable and reliable for all vehicles. While we are supportive of a diesel scrappage scheme, the amount offered per vehicle needs to be realistic if it is to be effective. The Government could offer more as an incentive to replace a diesel vehicle with an electric vehicle or other lower emission vehicles.

LA's need regulatory powers to control emissions from appliances e.g. boilers, combined heat and power plant and generators. The existing Clean Air Act 1993 is outdated and not fit for today's fuels and technologies. It is set to get worse as London grows in size and population and more power is required to charge an increasingly electrified fleet. There needs to be a detailed national plan rather than just a local plan for progression of effective measures. For example, it is possible that support to local communities will be seen as piecemeal if neighbouring areas have limited plans for change.

4. *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.

Across Haringey's AQM, a total of 16 NO₂ hotspot areas have been identified through analysis of the following factors: Baseline air quality for NO₂ and PM₁₀, locations where air pollution limit values have been exceeded, level of human exposure, local geography and topography, local sources of air pollution, traffic patterns, and future predicted air quality trends.

Haringey is committed to its air quality monitoring programme, with 15 monitoring locations across the borough. Diffusion tubes are regularly deployed to known hotspot locations to assess the NO₂ levels. The monitoring programme helps us to monitor the impact, if any of the awareness raising projects delivered.

Our data is made available to the public. Along with the other 32 London boroughs, the council promotes airText and Walkit.com, which predicts pollution levels in order that users can plan their journey, provides alerts and helps users find low pollution routes.

Progress on actions, including the monitoring data, is already reported annually to the Mayor of London and Government, a requirement of an Air Quality Management Area.

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.

Diesel vehicles that travel most miles in areas of poor air quality should be prioritised for retrofit. These are likely to be buses, coaches, taxis and delivery vehicles. Retrofit is very effective for large vehicles and should be supported wherever possible. HGVs should be assessed on the amount of time they spend in urban areas with poor air quality. A Clean Vehicle Retrofit Scheme is urgently required. Any approved retrofit system needs to be robust and reliable and not subject to degradation over time. Consideration should also be given to the required temperatures that diesel vehicles need to operate for filtration / catalysts to be effective. Slow moving vehicles that stop and start can produce high emission even when retrofit has been applied.

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

The plan promises a review of information provided on environmental performance/fuel efficiency at point of sale. We believe that this is insufficient as information on real-world driving pollutant emissions (or Euro emission standard plus realistic conformity factor) for all vehicles should be provided to consumers so that they are aware of all pollutant emissions (particularly the higher emissions from diesel even at the same Euro Standard). Clear information on real on-road emissions should also be made publicly available so that manufacturers are encouraged to ensure emissions meet Euro standards. In AQMA's / hotspot locations consumers should be discouraged buying diesel or petrol vehicles, but be incentivised to purchase electric vehicles, the Planning system needs to support this and in AQMAs – developments should be car free or, electric vehicle only.

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

The Government should invest in research and development. There are excellent Universities in the UK undertaking incredibly useful research into air quality. The need for funding will become more important when the UK leaves the European Union following Brexit negotiations. Funding should also be made available for smaller companies to develop solutions and turn research into real world solutions.

The Government should review existing powers available to LA's to improve air quality. For example, a new, updated Clean Air Act that covers the PPC 1999 act, the Environment Act 1995, Part IV and the Clean Air Act 1993 (which can be repealed) is needed. The Clean Air Act for example is outdated, for example, wood burning stoves simply need to operate without producing 'any smoke or a substantial quantity of smoke' as opposed to gas boiler technology to which stricter pollutant emission standards apply.

By setting emission standards for wood burning stoves and applying restrictions to where such appliances can be used will lead to innovative solutions for cleaner technologies. Only through such measures and effective legislation can local authorities address the growing contribution of wood burning to fine particle pollution (in addition to NOx) and reduce smoke emissions from buildings, and canal boats moored in urban areas.

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

LA's do not have the resources and are not in a position to explore new technologies and support the Government's industrial strategy to deliver the air quality improvements. This is a Central Government position, not local authorities. Primary nitrogen dioxide is also increasing as a proportion of NOx. This needs to be addressed.

The draft plan in its simplest form is a 'rebadge' of Local Air Quality Management and we believe that it would be preferable to build upon the existing Air Quality Management Area provision. Weight and recognition should be given to AQMAs, with respect to planning, transport, highway improvements and walking / cycling infrastructure. Similar to a Smoke Control Area which automatically means that only smokeless fuel can be burned or exempt appliances installed.

The existing powers to issue Fixed Penalty Notices for the offence of unnecessary engine idling are ineffective and require urgent review as penalties are not high enough and enforcement is difficult.

A more strategic approach is required for the provision of infrastructure for alternative fuels, for example, electrical infrastructure both in terms of the capacity of the national grid, as well as the provision of charging points. It should not be left to individual local authorities to install infrastructure in a piecemeal way when the air quality problem crosses administrative boundaries and organisations.