



Department
for Environment
Food & Rural Affairs

www.gov.uk/defra

Summary of responses to the government's consultation on draft air quality plans

January 2016



Llywodraeth Cymru
Welsh Government



Department of
the Environment
www.doeni.gov.uk



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1. Introduction

1. The UK Government published a plan in December 2015 which set out actions at local, regional and national levels needed to improve the UK's air quality, reduce health impacts, and fulfil our legal obligations in the shortest possible time.
2. Defra consulted on draft plans¹ which set out actions needed to meet the annual and hourly EU limit values for nitrogen dioxide. The consultation ran between 12 September 2015 and 6 November 2015. The results from this consultation, and wider public engagement, informed the Government's final Plan² which was published on 17 December 2015.
3. This document summarises the consultation responses and the Government's position on the issues raised, including resultant changes to the plan.
4. This consultation applied to England, Wales and Northern Ireland. A separate consultation was carried out by the Scottish Government.

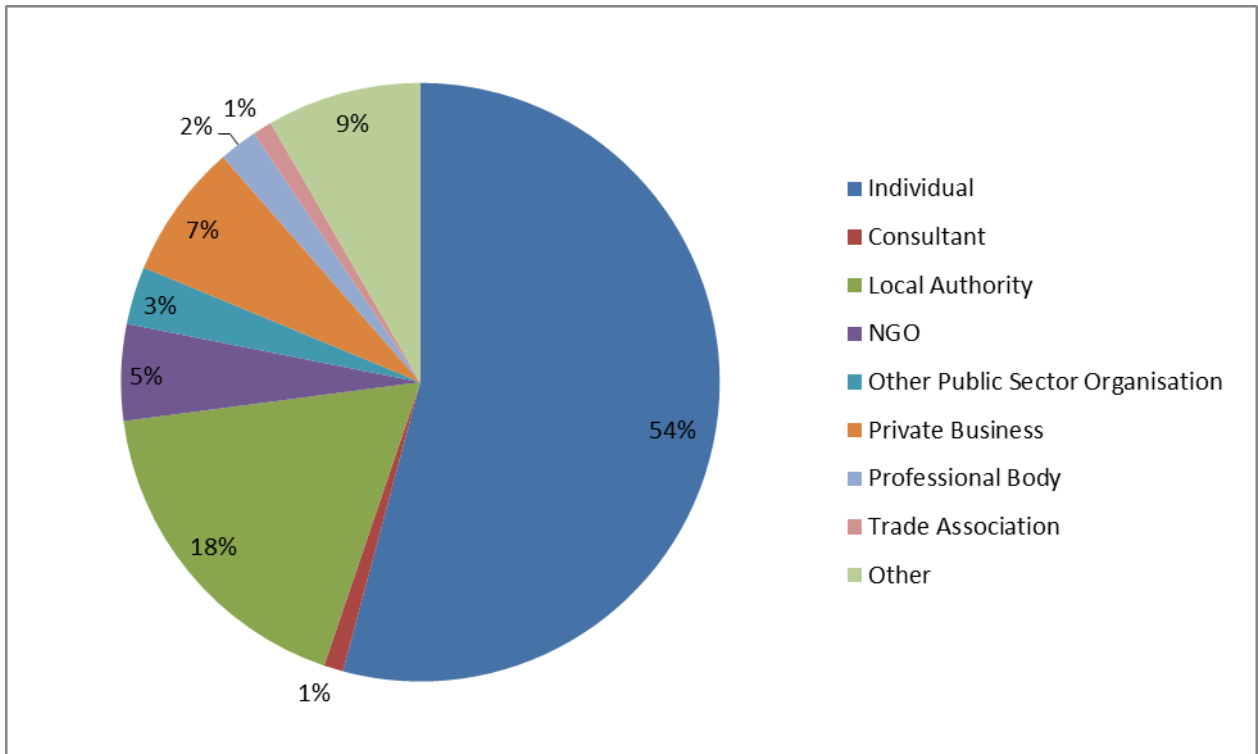
1.1. Number of responses

5. In total 729 responses to the consultation were received. These were made up of:
 - 403 responses through the Citizen Space online portal responding directly to the questions;
 - 79 responses by email or post; and
 - 247 duplicated campaign responses, organised through the Campaign for Better Transport.
6. For the email or postal responses, where respondents answered the specific consultation questions these have been included in the analysis statistics throughout this document. Where they provided more general comments the views have been picked up in the broader analysis and in picking out key themes from all of the comments. A breakdown of the type of respondents can be found in figure 1.

¹ "Draft plans to improve air quality in the UK: *Tackling nitrogen dioxide in our towns and cities*"

² <https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emissions>

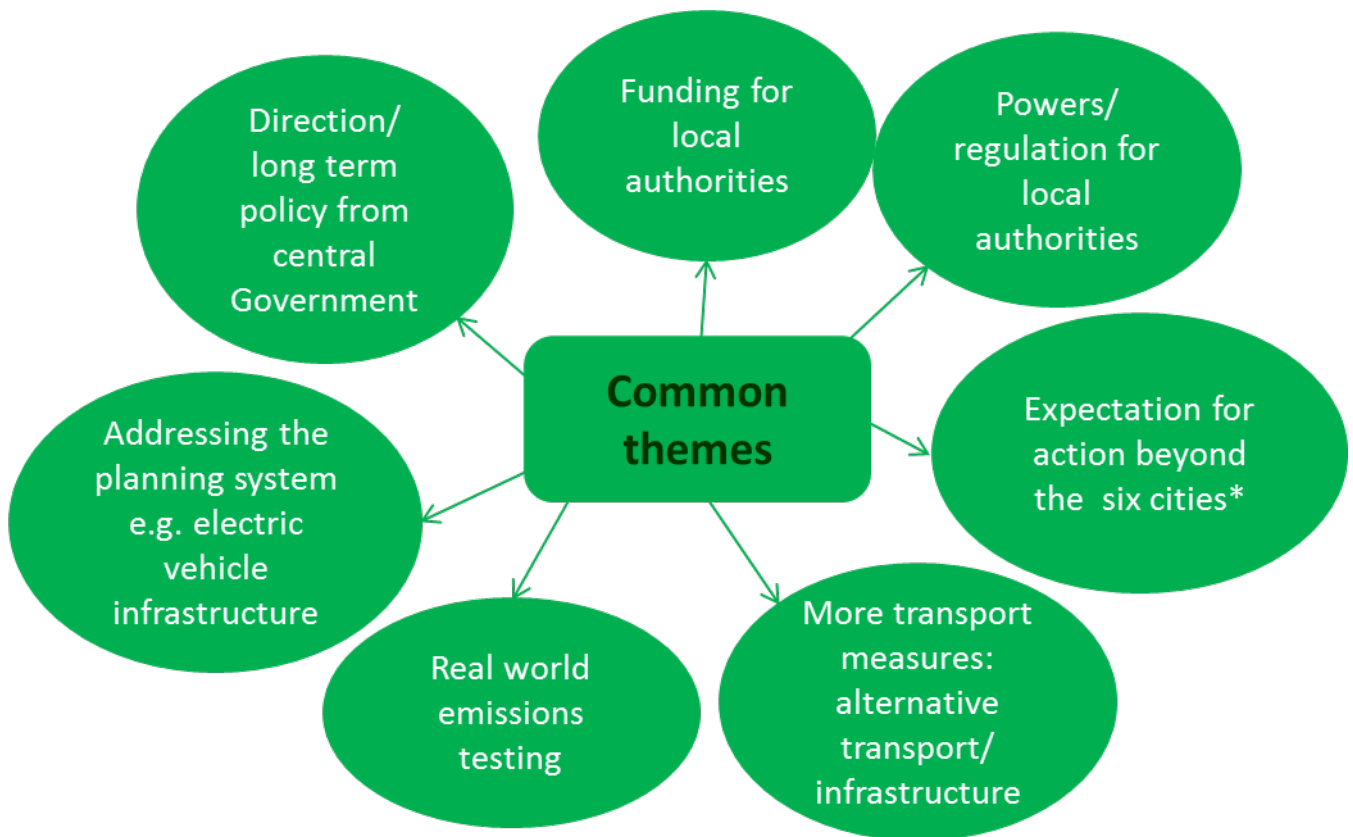
Figure 1: Breakdown of respondent types



1.2. Common themes

7. Common themes that came out of the responses are summarised in figure 2.

Figure 2: Common themes



*The six cities are Birmingham, Leeds, Nottingham, Derby, Southampton and London – the only cities projected not to meet the EU limit values in 2020 without additional measures to those already implemented since our 2011 plans, alongside natural fleet turnover.

1.3. Clean Air Zones

8. Clean Air Zones were the key new measure in the draft plan and there were two specific questions on them in the consultation. The main points raised in the responses to the consultation were:

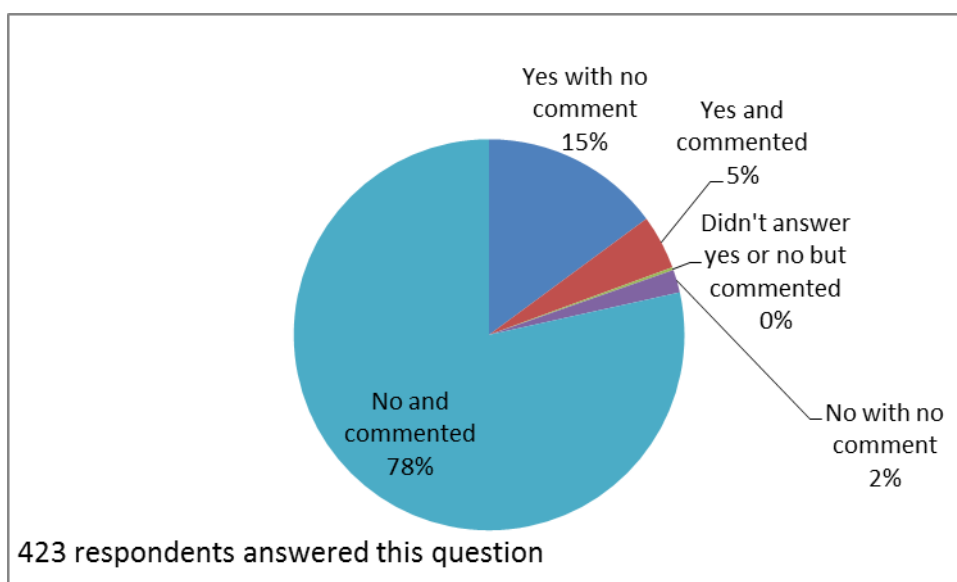
- Around three quarters of consultation respondents (304) favour a **consistent framework for Clean Air Zones**. Those in support generally feel there should be funding and additional complementary measures in place alongside them.
- The most significant common theme raised in connection with the Clean Air Zones was around the potential **impact on neighbouring areas** with displacement of pollution and/or traffic (18 local authorities mentioned this).

- A few local authorities mentioned that from a **competitiveness** viewpoint, a Zone could be seen as a barrier to business moving to their city compared to other cities without a Clean Air Zone.
- Some raised **technical points around the defined standards for the Clean Air Zone**.

2. Responses by question

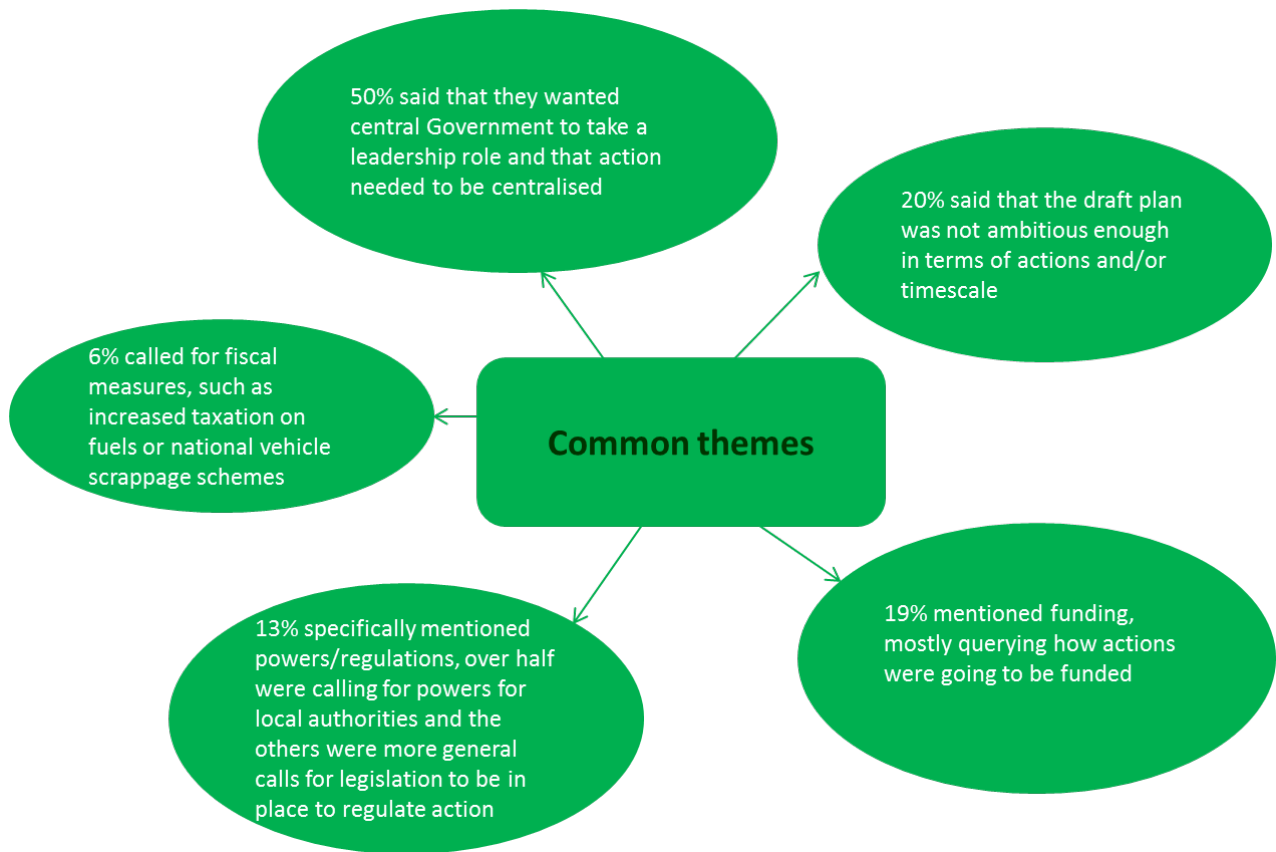
Q1. Do you consider that the proposed plan set out in the overview document strikes the right balance between national and local roles?

Figure 3: Breakdown of answers to the question “Do you consider that the proposed plan set out in the overview document strikes the right balance between national and local roles?”



9. 83% (353) of respondents commented on this question. Figure 4 shows the common themes from those responses.

Figure 4: Common themes from the comments to question 1

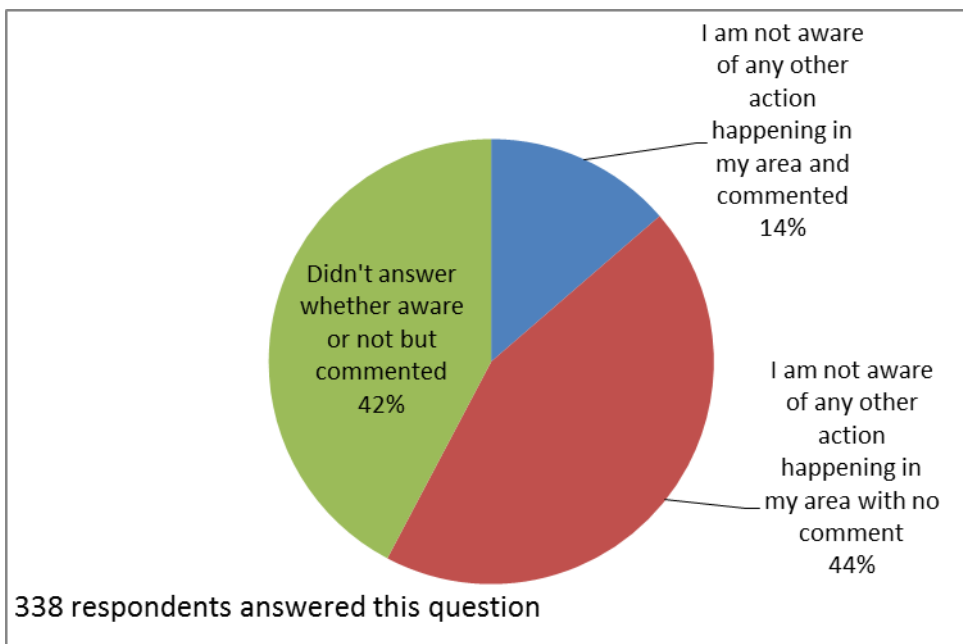


10. Other points raised in responses were: real world emissions testing; so called defeat devices; and highlighting that there was too much emphasis on the key six cities and that more action should be included for the rest of the UK.

Q2. 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).**

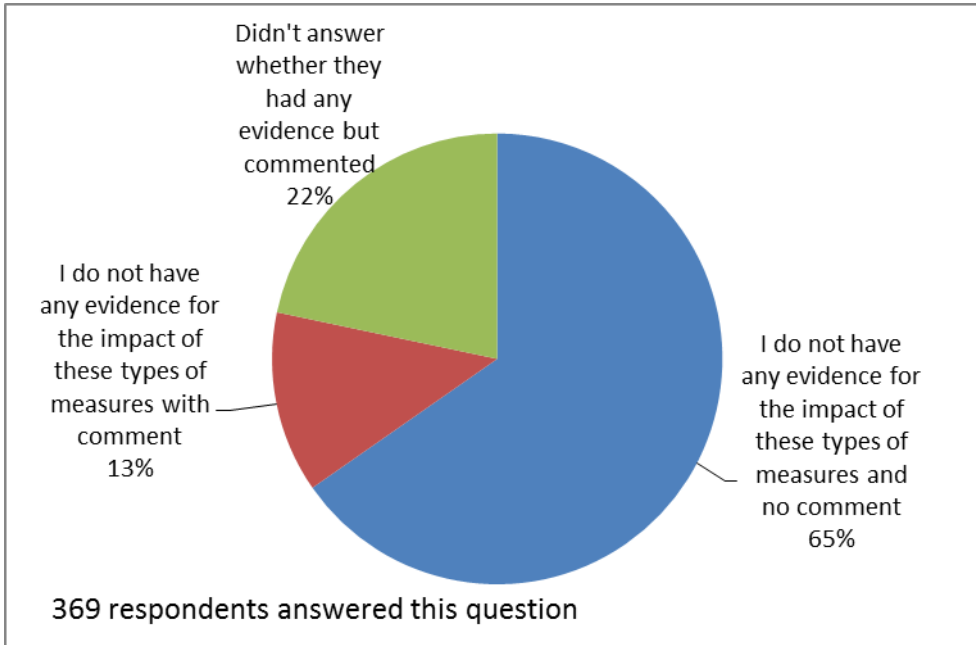
Figure 5: Breakdown of answers to the question “Are you aware of any other action happening in your area which will improve air quality and should be included in the plan?”



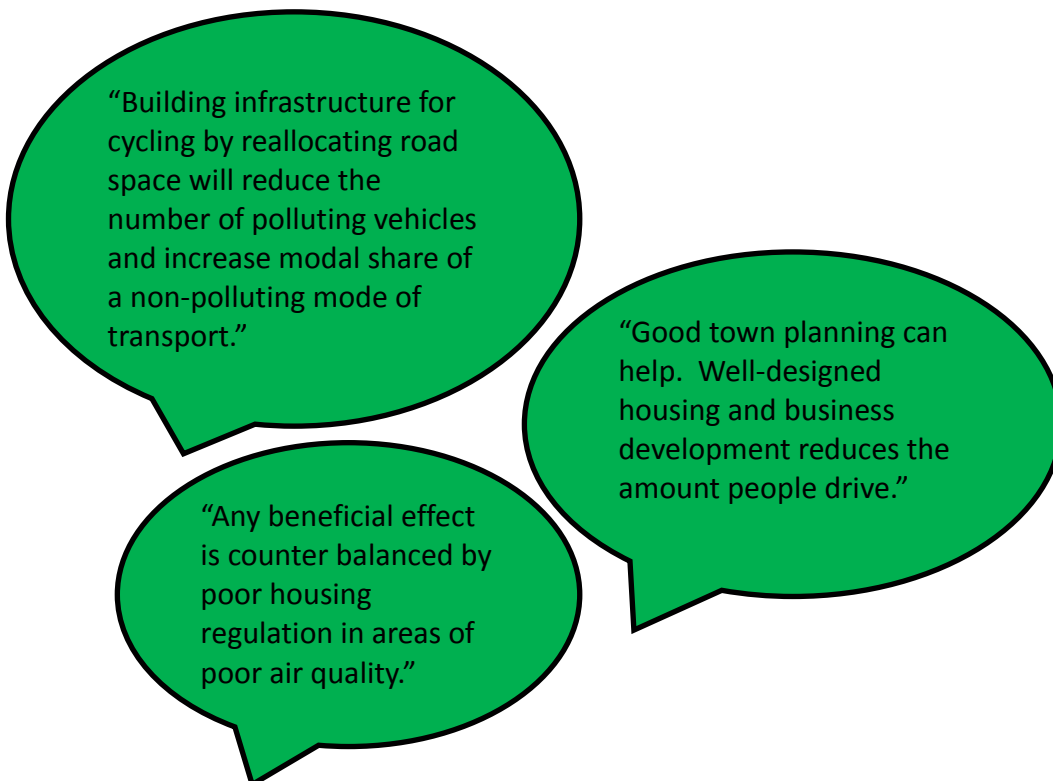
- 11. 217 respondents provided comments on additional measures. Of these, 164 didn't answer the first part of the question and 53 answered they were not aware of any other action.
- 12. The two most common categories of responses were high level descriptions of local measures with no quantification of impacts, for example local walking or cycle routes, and comments about local policies for example planning and building and their impacts on air quality or general comments about a lack of action.
- 13. Some updates to individual zone plans were submitted by local authority respondents.

Q3. 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?

Figure 6: Answers to the initial question “Do you have any evidence for the impact of these measures?”

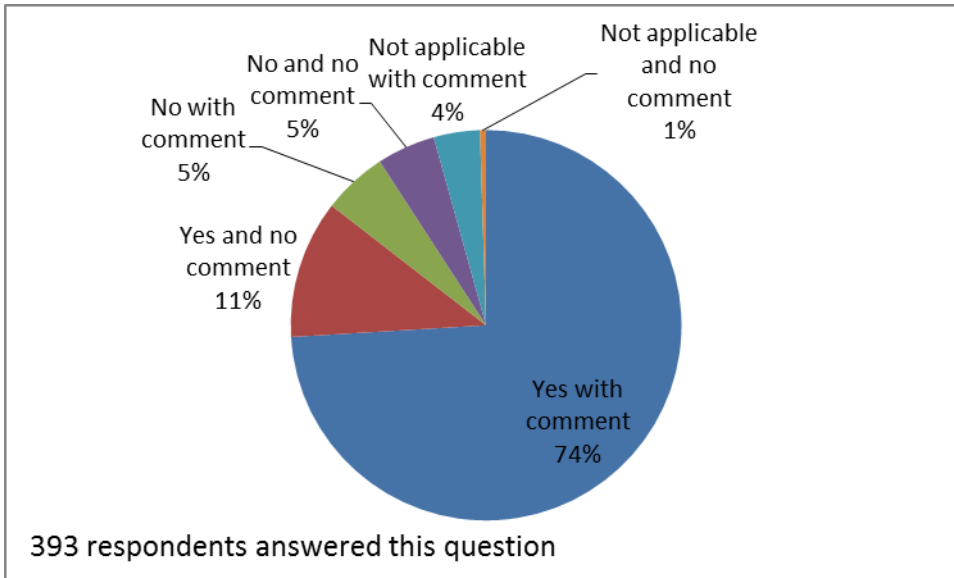


14. The comments were largely unquantified anecdotal evidence, general comments or comments expressing an expectation for the Government to provide the evidence. Examples are:



Q4. 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?

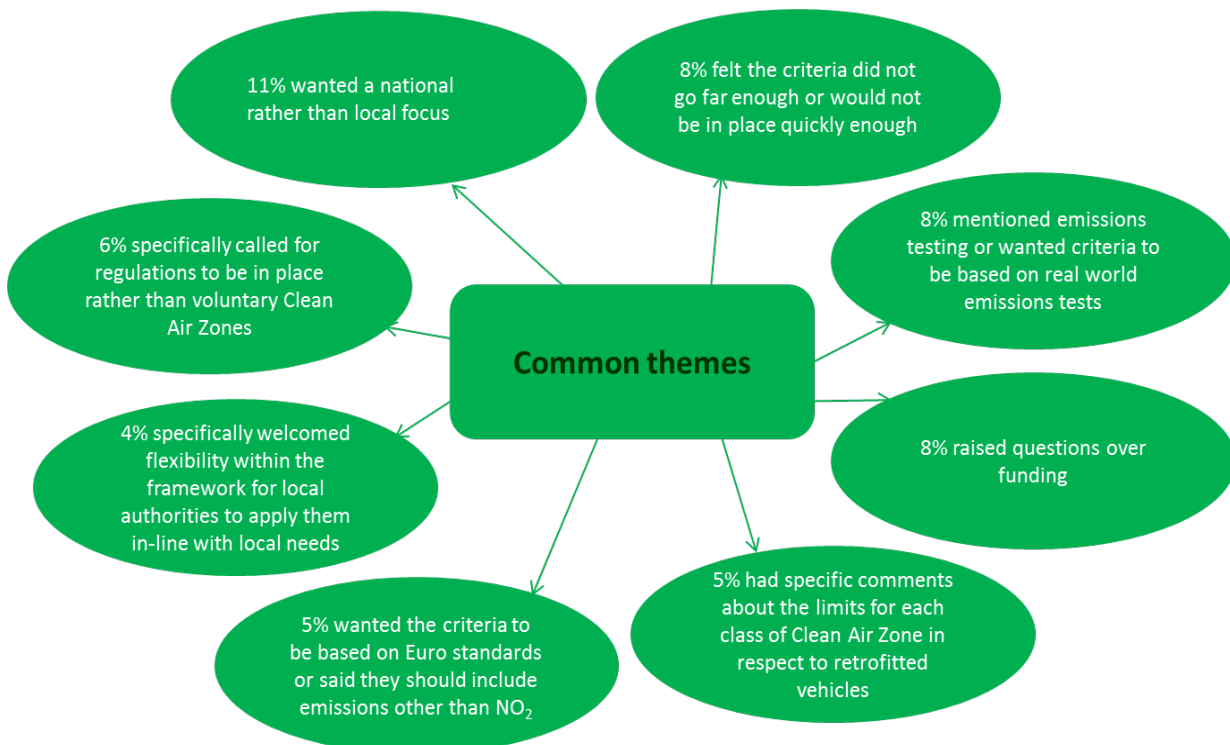
Figure 7: Breakdown of answers to the question “do you agree that a consistent framework for Clean Air Zones, outlined in section 4.3.6 of the draft UK overview document, is necessary?”



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

15. 306 respondents provided further comments. There was generally support for a common framework and some calls for guidance to be provided. Common themes are shown in figure 8.

Figure 8: Common themes from the comments to question 4

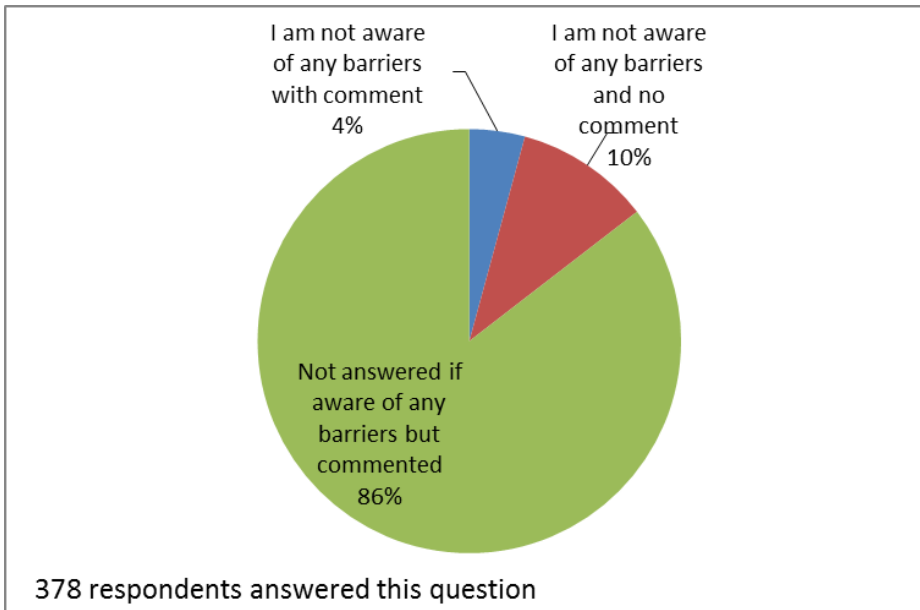


Q5. What do you consider to be the barriers that need to be overcome for local authorities to take up the measures set out in section 4 of the UK overview document?

a. How might these be overcome?

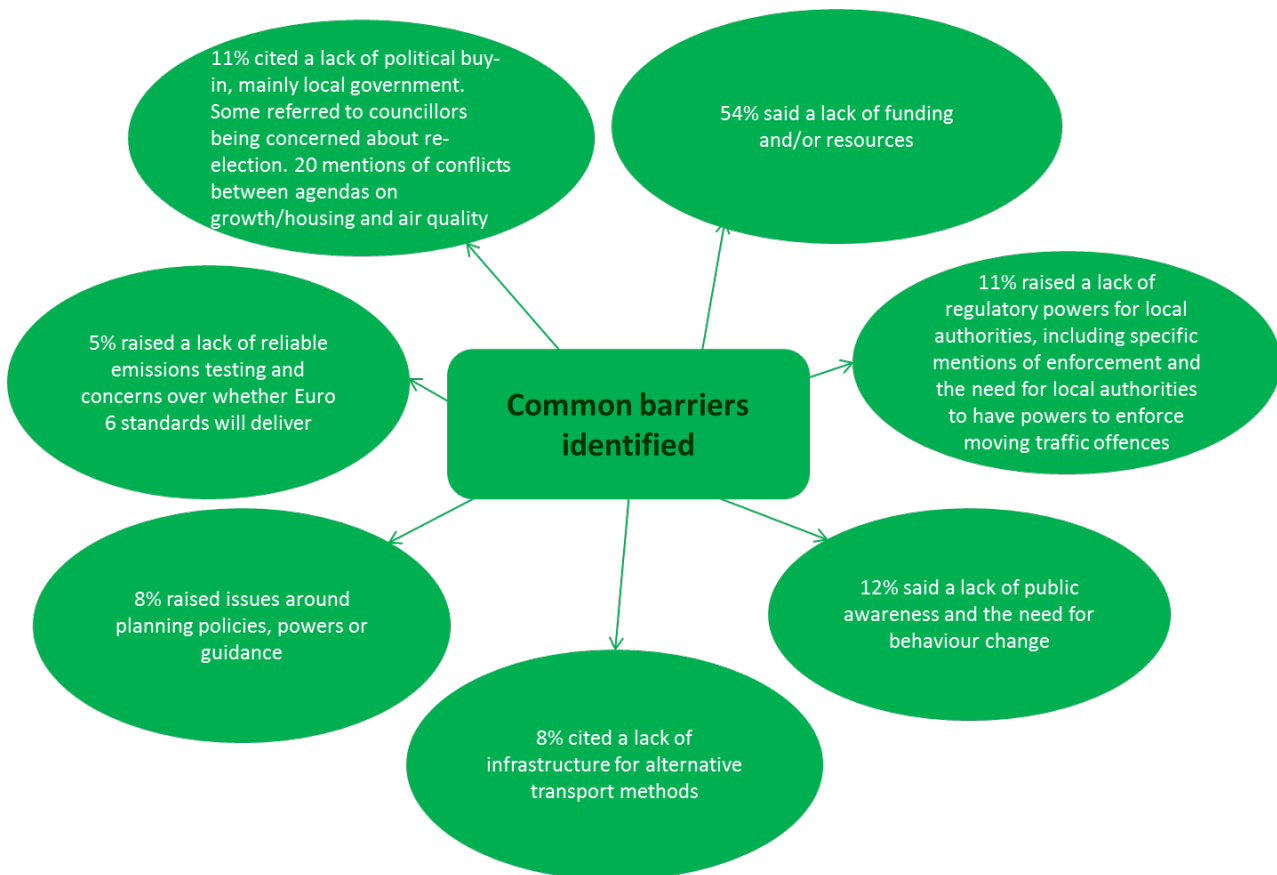
b. Are there alternative measures which avoid these barriers?

Figure 9: Breakdown of answers to the initial part of the question “are you aware of any barriers?”



16. 340 respondents provided comments. The most common barriers identified were financial and political and are shown in figure 10.

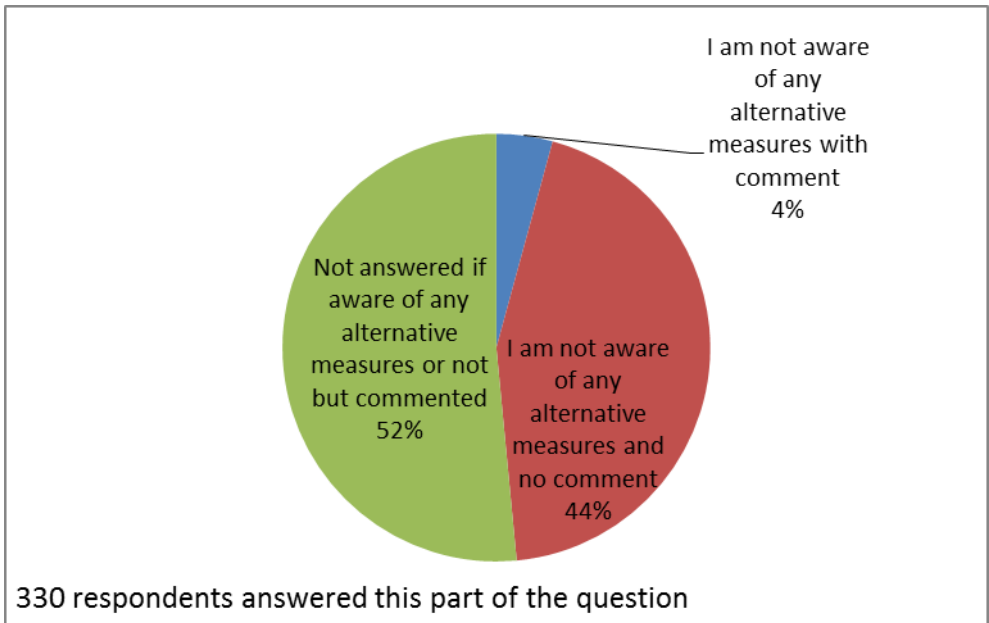
Figure 10: Common barriers from the responses to question 5



17. Other comments included:

- There were some mentions of the difficulties securing private sector sign up to grant schemes, for example for retrofitting buses, and requests for longer term funding through such schemes;
- Specific barriers to the take up of ultra-low emission vehicles mentioned were cost and a lack of available electrical charging infrastructure;
- How quickly Clean Air Zones would be brought in (lead in times) and that if they were brought in immediately there would be few fleets that would comply with the criteria;
- A few respondents felt that policies to build new roads conflicted with air quality improvements;
- A lack of join up and coordination across both national and local government was raised as a barrier, particularly in two-tiered local authorities where the district council holds the lead on certain policies.

Figure 11: Breakdown of answers to the part of the question “Are there alternative measures that avoid these barriers?”



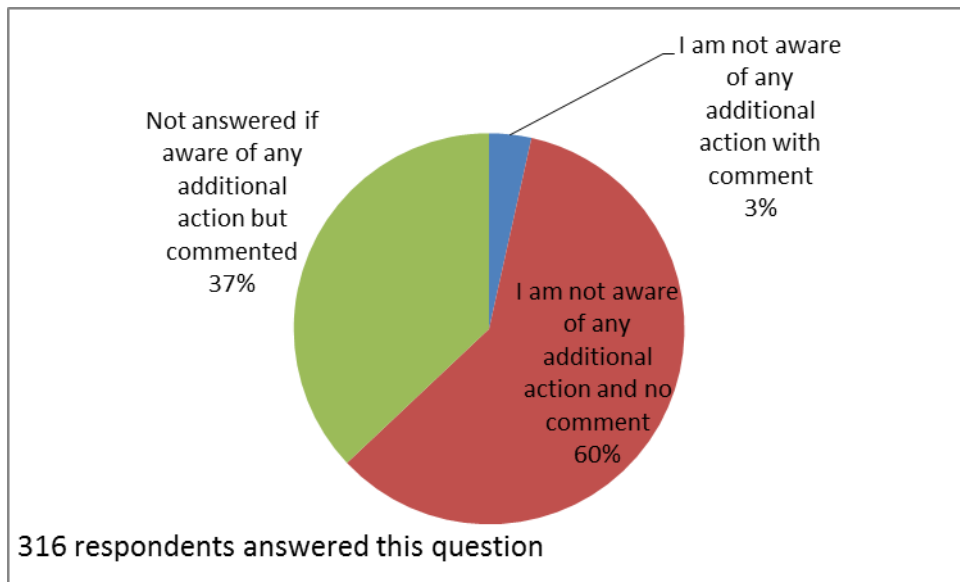
18. Suggestions to overcome barriers included those described in figure 12.

Figure 12: Common ways given to overcome barriers in the responses to question 5



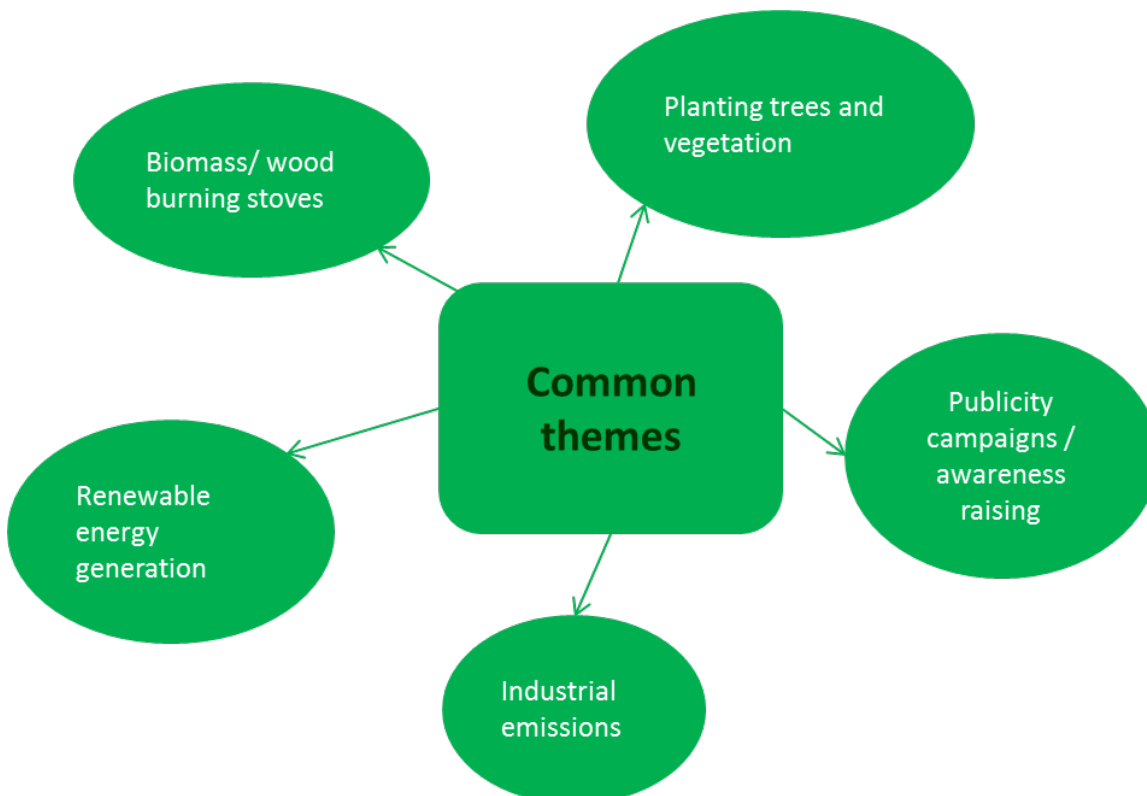
Q6. Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plan?

Figure 13: Answers to the question “Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plan?”



19. 128 respondents provided comments on this question, the common themes are shown in figure 14.

Figure 14: Common themes from the comments in response to question 6



3. Themes from the stakeholder event feedback

20. Two stakeholder events were held as part of the consultation on the draft air quality plan, as well as detailed discussions on the local issues facing those cities with the most challenging air quality issues.
21. On 9 October 2015 an event was held with local authority representatives and on 13 October 2015 an event was held with organisations covering a broad range of interests from environmental groups to technology providers.
22. Common key messages from across both events:
 - A call for leadership from central Government and national initiatives/strategies for consistency. Some local authorities requested a **mandate from central Government** to secure Council buy-in.
 - The need for **joined up communications** (including health implications, transport, the environment and actions). A mixture of central Government communications and local more tailored communications.
 - Including areas that are not in the top six cities in engagement and action, e.g. including an expectation of a **Low Emissions Strategy (LES) in all areas**.
 - A broad message that **incentives** will work better than sanctions.
 - Addressing the **planning system** and targeting developers, e.g. introducing planning requirements for charging points for electric vehicles in all new developments. Local authorities had had mixed success with providing supplementary planning guidance on air quality.
 - Improving infrastructure and incentives for **electric vehicle** use.
 - A need for accurate **real time data** and a central repository for sharing.

4. Government response

23. This section is laid out in the order of the UK overview document (from this point onward, referred to as “the plan”) published on 17 December 2015 for ease of reference. The most significant changes made to the draft document published for consultation on 12 September are explained in the context of the consultation responses.

4.1. Changes in “Section 2: The challenge”

4.1.1. Raising awareness

24. Some respondents called for the Government to invest in public awareness raising through campaigns. Section 2.5 (page 6) of the plan explains what Defra does to make up-to-date information on air quality available for the public, particularly when there are episodes of high pollution. We use social and other media to communicate and highlight episodes of high or forecast high air pollution and we have highlighted in the

plan that health Non-Governmental Organisations have agreed to use their networks and media channels to help reach vulnerable groups and individuals during episodes.

4.1.2. Real world emissions testing

25. Several respondents raised the issue of emissions testing and their concern over the use of so called 'defeat devices'. The final plan emphasises the importance the Government places on ensuring real driving conditions are reflected in emissions testing. The UK has been pushing strongly for action to ensure that emissions testing works in practice for light duty vehicles. Section 2.6.2 (page 13) of the plan explains the progress we have made and that generally the improved real world performance of vehicles in complying with EU emissions standards will provide additional benefits to the measures the UK is taking to achieve compliance and in many zones may bring compliance forward.

4.2. Changes in “Section 3: National action to improve air quality”

4.2.1. National action and provision of powers

26. The plan includes a commitment from the Government to legislate to require the implementation of Clean Air Zones in five cities (Birmingham, Leeds, Nottingham, Southampton and Derby). The Government will work with the Driver and Vehicle Licensing Agency and others to ensure that the necessary vehicle databases containing all the information required by local authorities for the operation of a zone are available. This approach is supported by the consultation responses where many asked for central Government to provide direction and the powers for local authorities to take action. A strong message also came out of the local authority stakeholder event that many local authorities would like a central mandate to enable them to influence within their organisations and to facilitate action as a priority. Some respondents felt that Clean Air Zones would not materialise without regulation and powers for enforcement.
27. Section 3.8 of the plan, where the Government states a minimum expectation for all areas currently exceeding the required limit levels to consider putting in place a Low Emissions Strategy, supports the feedback that action should not only be focussed on the 6 cities.

4.2.2. Clean Air Zones

28. The different types of Clean Air Zone are being defined based on the existing Euro standards, rather than the NO_x limits given in the draft plan. This is to ensure vehicles entering the zones are encouraged to minimise all types of pollution not just NO₂. Similarly to ensure retrofitted vehicles meet the required standards we will develop a national accreditation scheme to operate alongside the standards and to be incorporated into the vehicle database. This avoids the potential for perverse consequences raised by a number of respondents of not taking this approach, for example where vehicles could meet the NO_x standards, but emit high levels of particulate matter.

29. The majority of respondents supported a common framework for the Clean Air Zones. It will mean a consistent network of zones is developed across England allowing businesses and individuals to purchase vehicles which they can be confident will be able to enter any zone. This and the possibility of voluntary zones should also support those local authorities who commented on issues around competitiveness with neighbouring areas.
30. Some respondents requested that more detailed information be included within the framework on specific vehicle types to be included or exempted. This level of detail was not considered appropriate for the plan but will be included in the framework which will be developed and consulted on separately in 2016. The plan commits to Government funded scoping studies for the mandated Clean Air Zones, these will consider local issues and needs as raised by some respondents before finalising the class and area of zones.

4.2.3. Voluntary Clean Air Zones

31. Some respondents called for voluntary Clean Air Zones and there was considerable support for action beyond the 6 cities. We have introduced the concept of voluntary Clean Air Zones in the published plan. These would have signs along the access routes to clearly delineate the Zone but no charges for vehicles that did not meet the standards. These could be rapidly implemented and would raise public awareness of air quality where it is an issue and act as a focus for targeting additional action.
32. The plan explains the benefits of a phased approach of implementing a voluntary Clean Air Zone prior to a charging one to send a clear market signal allowing individuals and businesses to consider air quality as a factor in purchasing decisions over time.
33. The plan also makes it clear that air quality needs to be a consideration in all regions by introducing the minimum expectation that all local authorities with areas currently exceeding the required levels to consider putting in place a Low Emission Strategy. This ties in with feedback from a number of respondents who felt the plan should have a broader reach.

4.2.4. Taxation policy

34. There were several calls for changes to the taxation policy, particularly for Vehicle Excise Duty (VED) on diesel cars. The Government announced at Summer Budget 2015 reform of VED for cars first registered from April 2017. The reforms update and strengthen environmental signals in VED to support uptake and manufacture of the very cleanest zero emissions cars. The Government also announced at Autumn Statement 2015 that it is retaining the 3 percentage point diesel supplement in Company Car Tax until 2021, in line with the new EU timetable for diesel cars to meet expected Euro 6 air quality standards even under strict real world driving conditions. Retaining this higher rate for diesel cars will support transition in the UK from diesel cars to cleaner zero and ultra-low emissions cars.

4.2.5. Non-road mobile machinery

35. The plan commits the Government to identifying how relevant emission limits could be applied to Non-Road Mobile Machinery, particularly construction equipment, mobile generators and short term operating reserve generators to ensure only the cleanest equipment can be used within a Clean Air Zone. The Government agrees with the

requests by a number of consultees to address this source of emissions, but recognises it is a difficult area to address and will therefore require further work to find a suitable policy solution.

4.2.6. Beyond transport

36. As 80% of the roadside contribution is from transport, we have focused the plans on transport measures. There are already a number of measures in place to address emissions from other sources, which are continuing to reduce wider emissions in a cost-effective and sustainable way. The published plan also states that we will consider how to further reduce emissions of NO_x, for example by encouraging the use of low NO_x boilers both in domestic and commercial premises. This was requested by several respondents who asked that we do not only focus on transport emissions.

4.2.7. Planning³

37. There were a number of references to planning in the responses. The Government agrees this is an area where air quality must be given appropriate consideration and in Section 3.8.4 of the plan we have highlighted some key aspects where air quality is considered as an important part of the planning process. The planning guidance that supports the National Planning Policy Framework is very clear that concerns could arise if the development is likely to generate air quality impact in an area where air quality is known to be poor. The majority of comments in relation to planning in response to the consultation are already covered by this existing guidance. In addition the final plan explains that we will be updating the guidance to include reference to the plan and to reflect the introduction of Clean Air Zones.

4.2.8. Support for local authorities

38. The need for funding for measures to improve air quality was raised by many respondents. The Government has committed funding to a wide range of measures to ensure the necessary action is taken forward. Specifically for the Clean Air Zones, the Government has committed to support the local authorities being mandated to implement zones, to support the implementation of additional measures where necessary and meet new burdens associated with implementing the zones.

39. The Government will of course continue to work closely together with the cities of London, Birmingham, Leeds, Nottingham, Derby and Southampton, and other local authorities as necessary, through the implementation phase. For other cities, the final plan introduced cheaper to implement non-charging voluntary Clean Air Zones, an alternative approach which may help local authorities to take effective action while committing fewer resources, and highlighted a number of funding sources that could help support their implementation, for example the Plug-in Car Grant scheme and the Green Bus fund.

³ A number of respondents mentioned airport expansion in their responses. However, no decision has been taken on which of the three options identified by the Airports Commission should be pursued. The Government's position at time of publication can be found here: <https://www.gov.uk/government/news/government-confirms-support-for-airport-expansion-in-the-south-east>

4.2.9. Road construction

40. Some respondents raised the construction of new roads as an issue, feeling that the money spent on new roads should be diverted to green transport methods to encourage their use rather than potentially encouraging more traffic. The Government is investing significantly into alternative transport measures, but also regards road building in some areas as important to ease congestion and aid traffic flow, for example as described in section 5.2.2. of the plan. Local experts are best placed to make those decisions.

4.2.10. More support for local greener transport initiatives

41. There were large numbers of requests for more action to support local transport initiatives and to increase cycling, walking and the use of public transport. The plan addresses this and explains how the UK Government is supporting local authorities, public transport providers and others to introduce local transport initiatives to help tackle pollution, reduce NO_x emissions, and create local growth. The Government has committed £580 million for a new 'Access' fund for sustainable travel over 2015 to 2020, building on the legacy of the Local Sustainable Transport Fund and supporting growth in cycling and walking.

4.3. Changes in “Section 4: Impact of measures”

42. Some respondents felt the draft plan was not ambitious enough in terms of measures or the timescales involved. After careful consideration and analysis of different options, the Government believes the published plan sets out action across a range of measures, including the mandation of Clean Air Zones, that will help us to deliver our air quality ambitions as well as meeting our legal and environmental obligations.

4.4. Changes in “Section 5: Detailed measures”

4.4.1. Ultra low emission vehicles

43. A large number of the responses called for more support for ultra low emission vehicles (ULEV). The plan has been updated to reflect the 2015 spending review settlement which announced that the Government would spend more than £600m between 2015 and 2020 to support ultra low emission vehicles in the UK.
44. Some respondents called for further incentivisation for ULEVs for example through scrappage schemes. The Government has considered the use of scrappage schemes both linked to ULEV purchase or more generally. It was determined that there is no proportionate way to appropriately target such a measure to the areas where it would be most needed and it would be prohibitively expensive, as well as an ineffective use of resource to offer a scheme indiscriminately. The use of Clean Air Zones is a more targeted and proportionate approach to tackle the emissions.

4.4.2. Innovation and alternative fuels

45. Several respondents supported greater use of alternative fuels such as liquefied petroleum gas. The plan more clearly sets out Government's support for the use of

cleaner fuels and its desire to see this use develop more widely to tackle air pollution. Government is supporting developments in vehicle technologies and refuelling infrastructure. To help drive innovation that will reduce emissions and benefit the UK economy, at the Spending Review we reaffirmed our £500m commitment, matched by industry, to the Advanced Propulsion Centre⁴. This £1bn will help transform Britain into a world leader in the development and production of low emission propulsion technology. The plan also details trials in place for the use of alternative fuels in heavy goods vehicle fleets.

4.4.3. Ports and shipping

46. Some respondents raised the emissions from ships during their stay at ports. A separate EU Directive, and national planning policy requirements, address the connection of ships at ports to on shore electricity supply to reduce their emissions. In addition, the plan continues to encourage ports and shipping companies to examine the opportunities available for on shore electricity connection, particularly in areas identified as having poor air quality.

4.4.4. Retrofitted vehicles accreditation schemes

47. A lot of respondents mentioned the retrofitting of vehicles to reduce emissions. The Government accepts the contribution such measures can make to reducing emissions and in particular the need for a way to evaluate the emissions from these vehicles so they can be treated appropriately within the Clean Air Zone framework. Work on accreditation schemes for retrofitted vehicles and alternatively fuelled vehicles is already underway and described in section 7.4.1 of the plan.

4.4.5. Wood burning stoves

48. Some respondents asked for the emissions from wood burning stoves to be addressed as a source of air pollution. The Government agrees that this is an area not to be ignored and explains in the plan the industry led initiatives already underway to address this issue. For example the Stove Industry Alliance is developing an industry led voluntary scheme that would see its members committing to producing only Ecodesign compliant wood burning stoves by 2020 (two years ahead of legal requirements coming into force).

4.4.6. Alternative energy sources

49. There were calls from some respondents for the Government to encourage renewable energy sources, particularly when pushing the electrification of vehicle fleets. The Government is working towards sourcing at least 15% of our energy from renewable sources by 2020 and this is highlighted in the plan.

4.4.7. Zone plans

50. Some updates to individual zone plans were suggested by local authority respondents. These have been picked up in the published plans.

⁴ <http://www.apcuk.co.uk/>

5. Next steps

51. The Government's plan to improve air quality in the UK by reducing nitrogen dioxide emissions in our towns and cities was published and submitted to the European Commission on 17 December 2015.
52. Specifically on Clean Air Zones: we will be consulting on the detail of the framework and draft legislation in 2016. We will be going through the regulatory process to introduce legislation to mandate Clean Air Zones in Birmingham, Leeds, Southampton, Nottingham and Derby. This will include developing an impact assessment quantifying the costs and benefits of the policy.
53. The Government will be providing funding for these five local authorities to carry out scoping studies and the councils will consult on the detail of the Clean Air Zone for their cities.
54. Whilst it will be for local experts in the local authorities to take forward action in each area and to implement Clean Air Zones in line with the new legislation, central Government will be providing support and guidance. In particular this will entail close liaison with the six cities projected to exceed limits in 2020 without further intervention.