



Department
for Environment
Food & Rural Affairs



Department
for Transport

Supplement to the UK plan for tackling roadside nitrogen dioxide concentrations

Summary of responses to the consultation

October 2018



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Introduction

1. Air quality has improved significantly over recent decades and will continue to improve thanks to the action we have already taken. The most immediate air quality challenge is nitrogen dioxide (NO₂) concentrations around roads, the only statutory air quality limit that the UK is currently failing to meet. Since 2010, emissions of toxic nitrogen oxides have fallen by almost 27% and are at their lowest level since records began. In July 2017, we published the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations supported by a £3.5 billion investment into air quality and cleaner transport, setting out how we will achieve compliance in the shortest possible time in the five cities named in the previous 2015 Plan plus a further 23 local authorities¹.
2. On 23 March 2018 we directed an additional 33 local authorities with shorter-term NO₂ problems (“third wave local authorities”) to carry out and submit studies to the government by 31 July 2018, setting out measures (where they exist) which will achieve compliance in the shortest possible time. Local authorities could also consider measures which have been implemented since 2015 (and which are therefore not reflected in the baseline national modelling), and assess whether these may already have brought forward their compliance with NO₂ legal limits. The studies will be used to develop a supplement to the NO₂ plan, which will be published alongside this summary of responses.
3. On 29 May 2018 we launched a consultation inviting stakeholders to provide comments and, where possible, evidence on some of the potential measures that the third wave local authorities could take to reduce NO₂ pollution in their areas to within legal limits in the shortest time possible. We provided local authorities with consultation responses as we received them to enhance the development of their feasibility studies. These studies have, in turn, informed the supplement to the plan, which sets out the actions that are being taken in the 33 local authority areas.
4. The UK government and the devolved administrations have policy responsibility for air quality in England, Scotland, Wales and Northern Ireland respectively. This consultation applied to England only.

Government response

5. This consultation has informed the supplement to the UK plan for tackling roadside nitrogen dioxide concentrations and the two documents have been published in

¹ <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

parallel. The supplement to the UK plan for tackling roadside nitrogen dioxide concentrations forms the government response to this consultation.

Summary of responses

6. The consultation on the supplement to the UK plan for tackling roadside nitrogen dioxide concentrations ran from 29 May to 26 June 2018. There were 33 respondents to the consultation - 21 from organisations. A list of organisations that responded to the consultation is set out in Annex A.
7. There was a broad range of views and comments in response to the consultation. Key themes were:
 - There was widespread support for electric vehicles and the associated infrastructure.
 - There was widespread support for the implementation of cycling and walking infrastructure.
 - It was suggested that the government should provide more funding and national-level leadership through technical support for local authorities and business and national level communications campaigns.
 - Several respondents thought that local authorities should introduce targeted road closures during peak hours around town centres and schools.
 - Respondents wished to see business and local authorities upgrade their grey fleet (vehicles that do not belong to the business or local authority but which are used for business travel) through the provision of car sharing clubs, supported by central government.
 - There was general support for optimising traffic flow: many thought that improving the flow of vehicles through the road links with NO₂ exceedances would reduce fuel consumption and therefore emissions. Others believed that improving traffic flow would stimulate demand to use the road link and thereby exacerbate the problem.
 - There were mixed views on the effectiveness of local communications campaigns.

Responses by question

Q1. Are there other measures not set out in the consultation document that should be considered in order to help achieve compliance with legal limits for NO₂ in the shortest possible time in any of the roads in exceedance in the third wave local authority areas? Please provide any appropriate evidence to support your proposal. Any proposals should take into account the assessment criteria set out in the consultation document.

8. Respondents were largely supportive of the measures set out in the consultation document to achieve compliance with legal limits for NO₂ in the shortest possible time. We asked for evidence in support of other proposals that would also do this. Respondents proposed various measures but the evidence around their likely impact on NO₂ compliance or air quality more generally was extremely limited. Examples of the potential measures that the third wave local authorities could explore that were set out in the consultation are listed below²:

- Encouraging use of public transport, cycling, walking, park and ride schemes and car clubs, including via communications campaigns;
- Delivering measures to optimise traffic flow (e.g. via changes to traffic signalling); and
- Working with local businesses and accessing clean technology.

9. Respondents to this question set out a range of suggestions including:

- Support for Ultra Low Emission Vehicles (ULEVs): encouragement of greater uptake of ULEV through additional investment in electric vehicle charging infrastructure, funding and making uptake of ULEV more convenient by granting them priority access to bus lanes and off-street parking.
- Vehicle scrappage: a scrappage scheme for the most polluting vehicles³.

² Further information about these measures can be found in the UK Plan for tackling roadside nitrogen dioxide concentrations (<https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>) and the Clean Air Zone Framework (<https://www.gov.uk/government/publications/air-quality-clean-air-zone-framework-for-england>).

³ We set out the challenges of scrappage in the Clean Air Fund consultation: <https://www.gov.uk/government/consultations/air-quality-additional-measures-to-support-individuals-and-businesses-affected-by-local-no2-plans>. Respondents did not provide

- Road restrictions: targeted road closures at peak hours around town centres and schools. Several respondents cited the success of Edinburgh’s ‘School Streets’ scheme⁴ and similar schemes in Camden⁵ and Hackney⁶, which reduced the traffic on streets around primary schools at the beginning and end of the school day.

Q2. Are there other secondary objectives that should be taken into account when choosing between proposals which deliver compliance in the third wave local authority areas in the shortest possible time?

10. Some respondents believed that greater consideration needs to be taken of proposed local plans and developments to ensure the NO₂ exceedances are not dispersed elsewhere. Others advocated broadening the scope of the exercise to include a reduction in Particulate Matter and an improvement in public health through more active travel as secondary objectives. It was also suggested that third wave local authorities should take any measures available to reduce exposure in the run up to achieving compliance, even where those measures do not themselves bring forward the date of compliance in order to discharge the legal tests set out in by the High Court.

Q3. Could encouraging the use of public transport, cycling, walking, park and ride schemes and/or car clubs help achieve compliance with legal limits for NO₂ in the shortest possible time on the roads in exceedance in any of the third wave local authority areas? We welcome views from stakeholders on how government can support the local authorities in implementing such measures.

11. Respondents had mixed views on whether this measure would help achieve compliance with legal limits for NO₂ in the shortest possible time. The prevailing view amongst respondents, however, was that that government ought to invest more in public transport and the associated infrastructure to support implementation.

evidence in the consultation for the supplement to the UK plan for tackling roadside nitrogen dioxide concentrations to address these challenges.

⁴ http://www.edinburgh.gov.uk/streetsahead/info/35/school_travel/87/school_streets

⁵ <https://www.camden.gov.uk/ccm/content/transport-and-streets/traffic-management/road-safety-in-camden/road-safety-for-children/healthy-school-streets/>

⁶ <https://www.hackney.gov.uk/school-streets>

Q4. How can any of the third wave local authorities encourage local people to choose less polluting forms of transport?

12. Responses highlighted the importance of active travel, such as walking and cycling, and public transport, with respondents commonly identifying a need to make public transport more accessible and cheaper. Another prevailing theme was the need to incentivise electric vehicle use through the building of infrastructure. Respondents also suggested that it was necessary to provide equivalent convenience to existing transport solutions to encourage people to choose less polluting forms of transport. Other measures suggested by respondents included:

- (Additional) national subsidies for electric cars.
- Local authorities to offer personalised travel planning and car club incentives, such as car club spaces.
- Prioritising road space for less polluting forms of transport.
- Communications campaigns to raise awareness about the health impacts of air pollution.

13. A couple of respondents also noted here that they did not think banning existing polluting forms of transport was a measure government should consider.

Q5. Could measures to optimise traffic flow help achieve compliance with legal limits for NO₂ in the shortest possible time in any of the roads with an exceedance in the third wave local authority areas? We welcome views on how government can support local authorities in implementing such measures.

14. On the whole, respondents were supportive of optimising traffic flow as a measure to help achieve compliance with legal limits for NO₂ in the shortest possible time. Those in favour of the measure suggested that improving the flow of vehicles through road links with NO₂ exceedances would improve vehicles' fuel consumption and thereby reduce vehicle NO₂ emissions. Measures suggested to optimise traffic flow included:

- Removal of road humps.
- Improve pedestrian crossings (though clarification was lacking on how this should be achieved).
- Traffic light optimisation to reduce waiting time for vehicles at traffic lights.
- Government to provide access to funds for traffic surveys and flow modelling.

15. Those who were opposed to optimising traffic flow believed that doing so has the potential to stimulate the volume of traffic using the road links with NO₂ exceedances and thereby would exacerbate the issue.

Q6. Could working with local businesses and accessing clean technology help achieve compliance with legal limits for NO₂ in the shortest possible time in any of the roads with an exceedance in the third wave local authority areas? We welcome views on how government can support local authorities to work with business to reduce pollution.

16. A range of views were aired in response to this question. Key suggestions identified in the responses included:

- Business take-up of retrofitting pollution-reducing technology for all types of vehicle.
- Business and public sector bodies to switch from the grey fleet through the provision of a daily rental or car club service for employees.
- Use of cargo bikes in deliveries. It was suggested that this could be implemented through local authorities working with local business to create travel hubs outside of town centres where the last mile of delivery could be done by cargo bikes.
- Some respondents were also keen to utilise business expertise to run campaigns to help reduce NO₂ emissions, identifying road links in exceedance with particular focus given to targeting schools and children.
- Others were more hesitant and thought businesses should only be considered if given advice on how to cut emissions.

17. Those who were reluctant to involve local businesses commented that it was for the government to build infrastructure and that research and development can be a lengthy process and therefore would not likely help achieve compliance in the shortest possible time.

Annex A: List of respondents from organisations:

Autogas Ltd

British Heart Foundation

British Parking Association

Builders Merchants Federation

Campaign for Better Transport

Canal and River Trust

ClientEarth

Enterprise Holdings

Gfleet Services Ltd

HJS Emission Technology

Office of the Green MEPs

Penn Engineered Solutions Ltd

Plan-EL Neighbourhood Planning Group

RAC Foundation

RingGo/Parkmobile Group

The Society of Motor Manufacturers and Traders

South Hertfordshire CTC

Sustrans

UKLPG

XLR Group Ltd

Zenith Intelligent Vehicle Solutions