

UK Government Consultation: Tackling nitrogen dioxide in our towns and cities

West Sussex County Council response, June 2017

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 satisfied

Satisfied

Neither satisfied nor dissatisfied

Dissatisfied

Very dissatisfied

Don't know – "don't know"

We note that there is a disconnect between the national air quality estimation system used for determining UK compliance with air pollution standards for the 43 reporting zones defined nationally, and the Local Air Quality Management monitoring (which is a legal responsibility for local authorities at the local level). Although there are 10 Air Quality Management Areas within West Sussex, this has resulted in none of the local authorities covering these areas being explicitly listed as being authorities with one or more roads forecast to persistently exceed NO₂ legal limits. As such, none of these authorities are being directed by DEFRA to implement a Clean Air Zone.

We believe that the air quality problems in West Sussex are not of the extent or scale of other parts of the UK (such as major conurbations and large cities) and, as such, that they do not warrant implementation of Clean Air Zones. However, the Government's emphasis on the non-compliant areas (which exclude West Sussex local authorities) is likely to see resources (grants and other money) directed towards the local authorities named in the consultation documents at the expense of other authorities with AQMAs. Accordingly, this will leave many authorities with AQMAs with the conundrum of how to fund meaningful measures to tackle air pollution hot-spots/AQMAs. It may also lead to the 'down-grading' of the importance of AQMAs outside of the non-compliance areas identified in the consultation.

Although the interventions suggested for CAZs align with local measures that have been undertaken in West Sussex, the Government's Air Quality Plan should be realistic about the challenges faced by many local authorities in tackling AQMA issues and recognise that, in many places, there are no easy solutions to the problems.

Within West Sussex we have explored a number of direct measures such as restricting traffic from certain roads, enforcing Low Emission Zones for the most polluting vehicles or gating traffic to control traffic flow. However, these measures are extremely difficult to implement or enforce due to the wider impacts that they would have on the community and local businesses, driver compliance and road safety issues, and because of impacts in dispersing traffic to other inappropriate routes.

Softer measures such as promoting low emission vehicles and electric vehicle charging, improved walking and cycling infrastructure, and travel behaviour change are other measures that we continue to explore in West Sussex, for example through our West Sussex Walking and Cycling Strategy 2016-2026. These measures have the potential to contribute to tackling a number of policy issues including congestion, public health issues (through the promotion of active travel), and also air pollution

issues. We also continue to explore opportunities to work with bus companies to improve their vehicle fleets which operate through our AQMAs. Furthermore, in terms of raising awareness of the air pollution impacts on public health, we are building closer working relationships across public health and transport planning, for example through raising awareness of the airAlert (www.airalert.info) service in West Sussex.

However, in terms of solving AQMA issues it has to be recognised that without very significant levels of investment which is likely to be disproportionate to the scale of the problems, these softer measures are unlikely to be able to resolve the problems alone.

We believe that the most effective way to address the air pollution problems resulting from vehicle traffic is a national approach to cleaning up the vehicle fleet. We are, therefore, supportive of Government endeavours at the national level to do this, including the overhaul of the real-world vehicle emissions testing and supporting industry to improve technology for low emission vehicles.

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?

It is right that local authorities should have the flexibility to decide measures would be most successful and should apply within their local areas. We do not have any specific comments about Clean Air Zones.

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?

Tackling the problems associated with local AQMAs is a big challenge because at a time of public policy focus on economic growth, it is difficult to effectively make the case for investment in measures that improve air quality but may also have a negative impact on the local economy by increasing costs to businesses.

With limited resources to invest in measures to address air quality, in particular at a time of reduced resources for local authorities, it is important that DEFRA and the Department for Transport continue to support local authorities with funding opportunities to tackle these issues. In particular, transport investment funding opportunities could give greater funding emphasis to tackling air quality issues to incentivise local authorities.

In terms of diesel scrappage schemes, we are concerned that where these schemes are not geographically widespread, the old Euro Class diesel vehicles displaced from the priority CAZ areas might impact on the air quality in locations not subject to CAZs.

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.

As highlighted in the response to question one above, tackling air quality management area problems in non-metropolitan areas is very challenging. Any evidence from highway authorities where measures have successfully tackled air quality problems in smaller cities and rural towns and villages would be helpful to inform the future design of measures within West Sussex.

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.

We do not have any specific comments to make about this issue.

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

We do not have any specific comments to make about this issue.

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

As noted in response to question 3, transport investment funding opportunities giving greater funding emphasis to tackling air quality issues, could help to incentivise local authorities.

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

There appears to be very little detail within the Plan about securing air quality mitigation contributions from local developments, other than the brief reference to the planning system in Annex J. There have been challenges for local planning authorities in West Sussex securing meaningful funding from developers to deliver effective mitigation in line with air quality action plans. In particular this relates to the fact that developers state that air quality mitigation contributions have already been accounted for within transport improvements and travel plans. Some form of national level effective developer mitigation contribution guidance would assist local authorities in dealing with this issue.