

Draft responses to the consultation questions

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

Southwark considers that the proposed plans set out in the overview document do not strike the right balance between the national and local roles.

The UK Government is not proposing to fulfil their responsibilities in connection with improving air quality nationally. The document states that the Government is pressing for the European Commission to introduce 'real world' testing of vehicles, but, it has been reported by the European Commission that the UK are currently taking actions to block legislation which would force member states to establish national testing regimes, to ensure that policies and measures are effective in delivering emission reductions under real operating conditions.

This Authority has in the past participated in several Defra Air Quality Grant projects involving the remote sensing of vehicle exhaust, the results of the measurements highlighted that vehicle emissions are significantly higher than the official test results. It has been calculated that 50% of traffic pollution is caused by the top 10% polluting vehicles of the fleet. The last project found that there is a significant variation of vehicle emissions amongst the same class of vehicle with an identical Euro class but a different manufacturer. The report of the study has been suppressed by Defra due to the sensitivity of the results. There appears to be a slow response from the Department for Transport in respect of the engine testing fixing scandal highlighted by VW and there is a significant risk that other manufactures could be carrying out the same or similar procedures which are designed to 'beat the test'.

The UK Government has delayed the introduction of NO₂ certification of vehicles which was promised in the last air quality plan to assist authorities to introduce Low Emission Zones with restrictions of certain classes of vehicles based on their NO₂ certificate. The GLA has devised a Low Emission Zone and is proposing an Ultra Low Emission Zone (ULEZ) using the best available tools. The Government is now suggesting that the local authorities in the 2020 non-compliant areas introduce Clean Air Zones using the same criteria that are proposed for the GLA's ULEZ.

The action plan could also include the following actions: -

- To lobby the EU to create an Urban Clean Air Fund for European cities.
- To encourage and promote the cleanest vehicles through further financial incentives incorporating both carbon and air pollutant emission standards.
- A commitment that the OLEV grants will be available for at least the next ten years.
- For the Department of Energy and Climate Change to prioritise reducing building emissions and to include consideration of the impact on air quality when considering a reduction in carbon dioxide emissions.

- That all Government departments ensure that an integrated policy approach to air quality is taken so that all environmental advantages and disadvantages are considered, for example the incentivising the use of diesel vehicles on carbon reduction grounds only resulted in the dash to diesel and hence poor air quality in urban areas. The government should be ensuring that all relevant national policy areas (air quality, climate change, planning, transportation, economic development, industrial and construction emissions, etc.) are cohesive and complimentary to permit local and regional authorities the tools to achieve success in meeting air quality standards locally.
- The Vehicle Excise Duty could be changed to reflect the all environmental impact of vehicles are taken into account, not just the carbon impact.
- A review of the Company Tax legislation to ensure that the environmental impact of company vehicles are taken into account.
- The introduction of a national scrappage scheme for polluting vehicles.
- Ensure that all aspects of the environmental impact of nationally important infrastructure projects are taken in the surrounding area, just not the boundary of the operational site.
- The upper tier of local authorities in England are given a duty to report to local authorities annually on what it is doing to improve air quality in their areas.
- The Government needs to adequately resource air quality work within local authorities

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 as far as you are able

- a) What the additional actions are;**
- b) The zones(s) in which they are being taken: and**
- c) What the impact of those actions might be (quantified impacts would be particularly useful)**

Within the London air quality action plan the GLA have highlighted that the emission of non-road mobile machinery be controlled but the UK Government does not appear to introducing any regulation or policy nationally to introduce a measure to control NO₂ emissions from this source. It has been calculated that nationally 10% of NO_x emissions are being produced by this source. The GLA could work to control this source using a planning tool. This Authority has suggested in the past that the control of emissions from construction sites could be introduced nationally by amending the requirements for controlling noise to include air pollution through amendment of the Control of Pollution Act 1974 and / or the Clean Air Act 1993 to enable local authorities deal with current known polluting sources more effectively.

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. Is there any evidence for the impact of these types of measures?

This Authority has been unable to quantify the impact of the measures in our Air Quality Action Plan, further national advice on realistic emission impact factors could be produced during the revision of the Local Air Quality Management framework.

Question 4 Do you agree that a consistent framework for Clean Air Zones, outlined in section 4.3.6 of the UK overview document, is necessary? If so, do you think the criteria set out are appropriate?

This Authority agrees that the framework for Clean Air Zones outlined in section 4.3.6 is required, but note that this has been proposed before under the UK Air Quality Action Plan and is not a new concept.

The Government is very reliant on the performance of the Pollution Climate Model (PCM). The technical details of this modelling have not been released with the consultation documentation so the Authority is unable to comment on the accuracy of the input data for this Borough. The PCM has produced maps in the past that have shown over optimistic outcomes with the reduction in pollution concentrations shown by the modelling (and the emission factors used therein) not corresponding to the 'real-world' by some margin. The PCM is a strategic model and has not produced results that can be observed at air quality monitoring locations, it is hoped that this can be improved or adjustment factors introduced.

Transport for London has conducted tests of Euro 6 vehicles using test cycles which replicate London urban driving conditions with the broad range of vehicle types currently in service in London. (Transport for London – In-service emissions performance of Euro 6/VI vehicles. A summary of testing using London drive cycles (September 2015). The results show that the NO_x emissions are substantially reduced at Euro 6 when compared with Euro 4. In the case of petrol cars, the measured emissions of NO_x are lower than those shown by the COPERT 4 functions, but for diesel cars the real world NO_x emissions are consistently higher than the COPERT 4 functions.

This authority considers that the national Air Quality Action Plan, as proposed, will not ensure that the UK zones and agglomerations will be compliant with the NO₂ limit values in 2020 (or 2025 for London).

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? Are there alternative measures which avoid these barriers?

The main barrier to take up the measures as set out in section 4 of the UK overview document is resources and the many competing and conflicting requirements for the limited, and reducing, resources available locally.

This Authority is also limited to dealing with a minority of sources as the GLA are the highway authority in control of the most busy and congested roads in the borough. This authority has no control over the specification of buses and taxis in London, both of which are major contributors to local emissions levels. We also have no control over the HGV emissions permitted by the London-wide Low Emission Zone.

The relaxation of the planning process is enabling residential buildings to be converted from commercial properties in inappropriate locations. The deregulation of

planning and degradation of planning guidance is not helpful to achieving a strategic approach that will improve air quality locally.

The restriction, to not permit funds to be used towards revenue costs, within the Defra air quality grant scheme provides a barrier to this authority effectively doing all it can to improve local air quality as our options for action are significantly limited by this restriction.

Question 6 Are you aware of any additional action on non-transport sources to improve air quality that should be included in the plans?

The action plan could also include, amongst many others, the following actions: -

- Planning requirements that will assist the delivery of improved air quality.
- Within the Red Tape Challenge ensure the environmental impact of the legislation being reviewed is taken into fully account.
- Lower permitted emission tests levels for industrial process.
- Effective national regulation of Non-Road Mobile Machinery.