

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?

The draft plan devolves the majority of the responsibility for delivering reductions in Nitrogen Dioxide to local authorities and there appears to be limited acceptance that the Government has a significant enabling role. For example, better integrated policy for transport, health, housing and planning; a clear policy on private car emissions; commitments on infrastructure investments around ultra low electric vehicles (ULEVs) to support local delivery and campaigns; national communications and developments of industrial strategies to support technology and skills in the area of low emissions vehicles, monitoring and retrofitting.

Local authorities are restricted by both financial resources and skills to deliver the likely proposals needed to tackle the issue fully. There has been no firm commitment from the Government on the amount of funding available. Without this commitment, local authorities are unable to begin scoping their feasibility studies or procuring the right skill sets to move forward with the work.

Given other local authorities experiences in carrying out feasibility studies, scheme design etc and the time and resource it is taking to deliver (approximately 4 years), the plan does not give those local authorities that have been more recently named as exceeding the limits sufficient time to deliver.

The fact that two different systems are being used to determine the pollution levels is not helpful. Local authorities have accurate monitoring for their areas to determine exceedances and have based their interventions on this data. The modelling undertaken by DEFRA has identified different geographical areas that need mitigation. The two sets of data should be combined to ensure a comprehensive assessment of the areas currently exceeding air pollution limits. If DEFRA's new modelling information is going to be used, work needs to be undertaken collaboratively for local authorities to understand it. This will enable modelling of the reductions likely to be made from specific interventions to be more effective.

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?

Local authorities already have experience of determining arrangements and measures which should apply in areas of exceedances through their Air Quality Management Areas and action plans. The arrangements and measures for a CAZ should be seen as complimentary and if correctly resourced will allow a more targeted approach to tackling NO₂ reduction. As detailed in the plan, it would be essential to carry out feasibility studies, so that the most effective and expedient measures that could apply are fully considered. For this to work, local authorities have to understand/have access to DEFRA's modelling information and an indication of future policies that are likely to affect decision making around the feasibility.

What factors should local authorities consider when assessing impacts on businesses?

Experiences from other local authorities working with businesses indicate that they want to play a part in improving air quality, but this needs to be balanced against some economic benefit. Consideration needs to be given to what national incentives are going to be offered by the government to businesses to move them towards ULEVs. This will feed into any feasibility which the local authority conducts. Thought also needs to be given to local risks around chargeable schemes which result in businesses seeking to relocate or their customers going, for example, to the another town to avoid any chargeable scheme.

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?

The competitive element to grant funding needs to be considered more carefully, given local authority resource limitations and the need to move forward with the work. Significant consideration needs to be given to the immediate funding of the feasibility work that local authorities need to undertake. Consideration also needs to be given to the following:

- National procurement to reduce individual local authority costs.
- Provide national planning guidance to ensure consistency for developers in scheme design and mitigation.
- Provide a national model around taxi/public vehicle emissions which will reduce cross boundary pollution issues (displacement).
- National campaign for modal shift.
- Improve safety and accessibility for public transport, walking and cycling and investing in local infrastructure to provide attractive alternatives to the private car.
- Approved retrofitting companies with certification - without this cannot be insured/ MOT.

The criteria which needs to be considered includes:

- Those proposal that deliver the greatest impact
- That have the quickest impact on levels and
- are in areas that show the measures will bring below the objectives in the quickest time possible

When supporting measures DEFRA should take into account areas that local authorities have identified as a priority as these in some instances differ to those identified by DEFRA modelling. Assessments on the local scale have used real time data and taken place over a number of years. To ensure measures implemented to tackle the NO2 exceedances the feasibility studies should complement the modelling projecting levels into 2020. Measures that tackle both areas should get more support.

If DEFRA were to review the outcomes to all the feasibility studies it is likely there would be a common theme in the measures required to improve air quality and this could be rolled out with targeted support and guidance.

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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.

It will be important that a holistic approach is taken to improving local air quality which must include significant investment in sustainable transport alternatives to the private car. We have a comprehensive strategy in Reading to deliver substantial improvements in public transport, walking and cycling infrastructure to reduce congestion and improve air quality, while at the same time accommodating sustainable economic growth and enabling housing delivery. Examples of measures which would help to achieve these objectives include investment in park & ride facilities, Mass Rapid Transit bus priority routes on the main transport corridors, and infrastructure enhancements to local walking and cycling networks. These measures would represent value for money and would have a direct impact on air quality by encouraging use of sustainable transport and active travel and therefore reducing emissions from private cars, particularly if combined with complementary measures such as a Clean Air Zone and/or Workplace Parking Levy which cannot be viewed in isolation.

The implementation of these measures will require the provision of capital funding from central Government specifically targeted at improving air quality. Existing devolved funding sources will not be sufficient as they have a greater focus on economic growth, and there are many competing demands for capital funding raised locally including for instance much needed investment in schools.

Targeted capital investment in local infrastructure projects including electric charging, hydrogen fuel, LPG and Autogas would help to establish a range of infrastructure to support a local ULEV strategy.

Investment in the railway infrastructure, including rolling stock would also help deliver local air quality improvements, associated with both the idling of diesel trains in the depot and the station. There is currently no clear commitment on the percentage of diesel stock reduction to be made or timescales for completion of the electrification project.

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.

- Encourage business collaboration to develop consolidation centres to reduce numbers of light and heavy vehicles operating in town centres.
- Further fund its low emission bus grants to help companies to continue to develop their fleet.
- Develop a targeted taxi scheme which would cover private hire and hackney carriages which benefited all areas, not just initially targeted at London.
- Support local transport investment scheme to help control pinch points and congestion.
- Incentivise low emission vehicle take up, through the development of sustainable infrastructure e.g. solar powered electric infrastructure.

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- Retrofitting initiatives which extend beyond public transport to vehicles for personal use or car clubs.
- Charging points? Funding to deliver a network including points at private businesses?

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?

- Accreditation of retrofitters to ensure that they deliver claims.
 - National schemes which can be delivered at scale rather than local which need significant investment to set up.
- 4. How best can governments work with local communities to monitor local interventions and evaluate their impact?**

The government needs a clear set of standards from which to evaluate the reductions in NO₂. An evidence based approach such as the annual status report should be considered to ensure that there is no extra burden on LA's. Projects should have inbuilt monitoring where possible so effectiveness can be measured. Monitoring does take a long time to be able to accurately determine trends, so this is not always possible. Seasonal variation and annual variance all play a part.

5. Which vehicles should be prioritised for government-funded retrofit schemes?

Without conducting the feasibility study, it is impossible to say which vehicles need to be prioritised within the local area, however the draft plan does identify the relevant vehicles which need to be part of a funded retrofit scheme. Consideration needs to also be given to supporting local authorities with the relevant infrastructure.

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

Real life on road emissions, amount of tax of the vehicle, actual monthly cost of a vehicle depending on use - town or long distance/both. If there are charging schemes across the country people need to know if this vehicle will comply with these schemes. National database of charging schemes/ compliance would be essential. As far as possible future proof the purchase so 5 year cost plan.

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

Consideration needs to be given to the skills economy nationally and locally to ensure that businesses and the general public have access to local companies who can undertake accredited retrofitting work and carry out repairs. Support for businesses and local authorities needs to be provided to pay for testing innovative solutions to determine real world performance.

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

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- Poor air quality does not have boundaries and national policies need to support local implementation.
- Collaborative working across administrative boundaries needs to be considered. Local authorities need to work together and not against each other where the issue crosses boundaries.
- The impact of infrastructure controlled by Highways England needs to be given greater consideration. Delays and blockages associated with the M4 for example lead to high volumes of traffic passing through the town.
- Delays to electrification of the railways needs to be included in DEFRA's assessments, as old polluting diesels continue to idle and run through the local authority area.
- Whilst the government have been challenged on the Directive in relation to reducing NO₂, there is an opportunity to also manage particulate matter which is the cause of more deaths than NO₂.

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