



Mobility • Safety • Economy • Environment

## **RAC Foundation's Response to the Department for Environment, Food & Rural Affairs and Department for Transport's consultation - Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities.**

**June 2017**

The RAC Foundation is an independent transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and motoring. The Foundation carries out independent and authoritative research with which it promotes informed debate and advocates policy in the interests of responsible road users.

The Foundation is supportive of the development of electric vehicles (EV) and other alternatively fuelled vehicles that help improve air quality and reduce greenhouse gas emissions.

We have only sought to offer views on questions where we think we have something to add.

### **Response to questions**

#### **7. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?**

Due to a lack of detail in the consultation documents, it is difficult to be able to make any reasonable assessment about the effectiveness of the proposed measures in the round. So much depends on the development of local plans.

In particular, it is not clear exactly where the proposed additional CAZs will be, what areas they will need to cover in order to achieve compliance and whether they will be charging or non-charging zones, which is being portrayed as a local, last-resort decision.

It is also unclear how the proposed non-charging CAZs will differ from the AQMAs currently in place, which have not thus far proven themselves sufficiently effective in improving air quality.

Additional data collection should be conducted and evidence brought forward to support the introduction of variable speed limits for air quality benefits – is the benefit derived from the smoothing of traffic flow? If it relates to the relative appeal of a stretch of road the design of the scheme would have to encompass the means by which road users would be

made aware – sufficiently in advance – of the lowered speed, otherwise there is little scope for them to change their travel decisions.

**8. 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?**

Although we can see the rationale for the design of Clean Air Zones to be local guided, we are concerned that, given the enhanced coverage implied by the revised plan, more will need to be done to establish a national framework that may leave less to local discretion than is currently envisaged. The scope for public confusion is considerable.

The signing and road markings for CAZs must be developed to be nationally consistent and understandable, making it clear whether a CAZ is a charging or non-charging CAZ and what vehicles are affected by the CAZ. It should follow the established principles of the Traffic Sign Regulations and General Directions.

A communications program informing consumers of the introduction, locations and policies surrounding the CAZs should commence as soon as plans are sufficiently far advanced to ensure consumers have the maximum opportunity to make the necessary adjustments – change vehicle or consider other routes and modes of transport – for the journeys they regularly take. This is not the time for Cabinet Office budgetary constraints to constrain national, or nationally funded, communications campaigns.

We are also concerned about the proliferation of different zone types - classes A, B, C and D for charging CAZs, non-charging CAZs, the proposed Scottish LEZs, the London LEZ and ULEZ, as well as several other LEZs currently in operation. We think consideration should be given to simplifying the range, perhaps even to something as stark as charging zones that include cars and charging zones that do not.

In considering the impact on small businesses and the self-employed using a vehicle for business within a CAZ, we think consideration should be given to granting derogations, exemptions and discounts for these vehicles where the options to upgrade to a cleaner/ultra-low emission vehicle are limited and expensive. These may include a condition being placed on the vehicle owner to replace the vehicle within a certain time period or to replace the vehicle once there is improved availability of cleaner/ultra-low emission alternatives. This might best be established as a national scheme that applies with standard rules to defined areas to avoid a postcode lottery between CAZs.

**9. 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?**

The RAC Foundation has previously published two papers relating to diesel scrappage schemes (<http://www.racfoundation.org/research/environment/diesel-scrappage-scheme-research>; <http://www.racfoundation.org/research/environment/would-a-targeted-diesel-scrappage-scheme-work>). The first of these papers, published in April 2016, highlighted the enormity of the costs that would be involved for such a scheme to make a significant impact on reducing nitrogen oxide emissions. The second paper goes further to consider how a scheme could best be targeted in order to have the most positive impact on air quality within areas of high exposure. It discusses the use of ANPR to identify vehicles regularly entering and moving in a defined space, rather than simply relying on the address of the registered keeper of a vehicle as the latter could be a poor indicator of where that vehicle is actually driven. The easiest vehicles to target for scrappage within these spaces will be those vehicles owned or licensed directly by the local authority – including buses and taxis. Vans will be more difficult to target, but through the use of ANPR those regularly entering and doing high mileages within the zone can be identified and owners can be contacted to offer a scrappage option.

We recognise that many people bought diesel vehicles thinking they were the better environmental choice because of the generally better fuel economy they offer. It is hugely regrettable that the real-world performance of diesel vehicles has proven to be so much worse than laboratory testing suggested. Aside from achieving an air quality outcome, we can see a case for some support to be provided to people who could thus find themselves out of pocket and unable to afford a vehicle that would avoid them being faced with charges.

Government should continue to support the setup of electric vehicle charging infrastructure networks in towns and cities to facilitate the move towards ULEVs, to allow the use of cleaner vehicles and support the strategy to encourage the take up of vehicles capable of running with zero emissions in CAZ and other areas.

It may also be worthwhile to work with large employers based within the CAZs, or who have significant numbers of employees whose travel will be impacted by a CAZ, to develop incentive schemes for travel planning of commuting and other trips. We would urge that care be taken not to over-complicate any such scheme.

#### **10. 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**

It is clear from responses to this consultation already published by respondents that confusion continues to abound over the monitoring of air quality – by whom, where, and to what effect? Government needs to work more effectively with local authorities to clarify the local air quality monitoring framework. Failing to do so will undermine public confidence in the strategy, for example where local air quality monitoring networks identify ‘hotspots’ not revealed by national air quality modelling.

Government should also support local authorities in collecting and processing air quality data to ensure its timely release, under an open data licence, for external research and review.

#### **11. 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**

Any schemes aimed at improving air quality should target vehicles doing high mileages in urban areas where exposure is high.

For retrofit schemes, given the available technology, it should be targeted at buses, coaches and HGVs. Alternatives to retrofit, such as the conversion to cleaner fuels, should also be considered for other high mileage vehicle types i.e. taxis and vans.

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

As a matter of urgency, a trustworthy real-world emissions test needs to be put in place.

In the current situation, consumers will need reassurance that the vehicle they purchase will be compliant with any CAZ restrictions, but they will also need to know about any other related policies that might affect their movements (whether they are trips made regularly or infrequently) i.e. parking policies (as previously mentioned, this is a reason behind why nationally consistent policies is important).

Information about CAZ compliance could be incorporated into car labelling. Given that CAZ standards are due to be reviewed and updated at a later date it would be useful to include a date with this information, for example “CAZ compliant as at 2017” or “Guaranteed CAZ compliant to 2030”.

Car labelling is well established for new vehicles, but not in the used car market, but the establishment of CAZs which restrict or charge for car access means this needs to change – consumers need to be able to access a reliable, trustworthy database to inform their purchasing choices.

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

Government should take a lead in modelling what a successful streetscape might be like, where traffic flow will continue to be important for local social and economic activity to thrive. Might Government also launch a 'grand challenge' competition to tackle the apparently unachievable retrofitting of the existing car and light van fleet?

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

Government must be conscious of the impacts of demonizing diesel. It is clear that improvements in diesel emissions have not kept pace with petrol. And that 'real world' emissions far exceed lab test numbers for many (but not all) models. But vast sums have been invested by the automotive industry in producing viable 'clean' diesel models, and independent monitoring suggests this is possible, and, indeed, already available on the UK market and in showrooms. Given the performance characteristics of the diesel engine and its suitability for hauling heavy loads, Government must recognise the emerging dissonance between the rhetoric on diesel as being in all respects 'dirty' and the industrial strategy that applies to much of the UK's domestic automotive sector and the nature of driving trips that people in the UK need to make. We do not believe that diesel is, in all respects and in all places, an inappropriate choice.

Any revenues raised from charging vehicles through policies relating to air quality should be appropriately reinvested not just in subsidising alternatives such as mass transit solutions, but also in building the infrastructure to continue moving towards a cleaner and lower carbon fleet – electric vehicle charging infrastructure provision etc – and road surface maintenance and road management that will smooth traffic flow and ease traffic problems.

RAC Foundation

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