

Tackling nitrogen dioxide in our towns and cities, a consultation, May 2017

This consultation response has been submitted on behalf of the Leaders of Hillingdon, Richmond, Wandsworth and the Royal Borough of Windsor and Maidenhead.

Questions for consultation

- 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 consultation is flawed in terms of its evidence-base as it is based upon preliminary modelling. This does not allow for this question to be answered in a fully informed manner. In addition there are no individual Zone plans to comment upon, neither the full modelling nor the Zone plans will be available until July when the Final Plan will be published. This is a totally unacceptable approach and the Boroughs reserve the right to fully respond when all the appropriate information is available.

The Plan appears to attempt to devolve the Government's responsibility to achieve the air quality limits to local authorities, who are tasked with bringing about local solutions to achieve air quality limit values as soon as possible. In regards to London and the GLA zone, the Plan simply re-states measures which are already identified and being implemented by the Mayor of London. No account is taken of "localised" problems which are brought about by sources which are outside the direct control of either local or regional authorities. This is discussed below.

Strategic road network

For west London boroughs and those into the Thames Valley, the operation of the M4 contributes to unlawful levels of pollution in the nearby communities. The GLA has identified the M4 corridor as an Air Quality Focus Area "subject to full environmental management scheme by Highway England". As a borough with residents detrimentally impacted by the operation of the M4, Hillingdon has attempted to discharge its local air quality management duties and has sought engagement with the Highways England (HE) for an action plan to improve air quality and protect the local communities as soon as possible. This has not been successful, the HE has confirmed they have no action plan they can share with Hillingdon.

Heathrow airport

The operation of Heathrow airport is a substantial source of pollution emissions in the west London area and the Thames Valley; with some of the associated pollution impacting away from the direct locality of the airport to the surrounding road network. The draft Plan predictions are all based upon the operation of the airport as it is currently configured and constrained i.e. two runways with a limit on car parking spaces and a cap on the number of flights. This is the same situation as the package of measures being implemented by the Mayor of London. Neither the local authority in which Heathrow is situated, nor the Mayor of London, has direct control over the operation of Heathrow Airport. If the aim of the Government to meet air quality limits as soon as possible is to be achieved, the final Plan should include a measure to review the current operational restrictions on the airport and secure air quality reductions by further reducing the car parking numbers and/or the

numbers of flights. Without this, this draft Plan takes the communities living near the airport no further forward in terms of improving air quality as soon as possible.

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

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?*

- *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?*

4. 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.

An evidence-based approach to policy delivery is supported. It is hoped that this is a serious commitment given that the Government's track record on evaluating the impact of schemes such as Heathrow expansion, in terms of air quality, is poor. The previous Government in October 2016, supported expansion at Heathrow Airport in the full knowledge that the air quality assessments (on which their decision had been based), were flawed and that their approach to achieving compliance with the AQ directive was legally flawed.

5. *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.

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

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

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

The draft Plan makes no reference at all to the support of the previous Government for expansion of Heathrow Airport. No reference is made to the very recent consultation on the draft Airports NPS. This is a serious omission. By supporting expansion at Heathrow the Government would effectively be supporting the addition, in London, of the equivalent of another airport the size of Gatwick. However, Heathrow expansion is not considered in the draft air quality plan.

The Airports NPS consultation identified that expanding at Heathrow Airport will further compromise the health of over 121,000 people by increasing levels of pollution, and that expansion at Heathrow could compromise the compliance status of the GLA zone. The draft Airports NPS documentation referred to the Government's work on producing a modified Air Quality Plan, with an aim to publish a final Plan by July 2017. This current consultation is the modified Air Quality Plan referred to yet there are no measures identified within this Plan to address Heathrow expansion. It remains the case that there has been no demonstration either in the draft Airports NPS ,or now in the draft Air Quality Plan, that Heathrow expansion can be taken forward and air quality limits be lawfully met.

The Government states in this draft Plan consultation that "tackling poor air quality in all its form is a priority for government". To achieve this, the final Air Quality Plan must include a commitment to safeguard public health and to cancel the support for expansion at Heathrow.