Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities (DEFRA) - Consultation Response Fareham Borough Council

- Q. How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?
- 1. Not satisfied, the proposals only really place the emphasis on local authorities and aren't supported by national schemes e.g. National Scrappage Schemes, financial incentives, pressure on car manufacturers etc.
 - Q. 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?

2. Local Authorities' are not defined within the document, there should be clear distinction between the responsibilities of unitary, County and District Authorities. There should also be clear differentiation between Authorities with Highway responsibility and those that do not, the responsibility for air quality should sit with the Highways Authority this should also include Highways England. The responsibility to implement Clean Air Zones should not rest with District councils, who are not responsible for the road network. The expertise should be at county/unitary level otherwise the resource requirements would be multiplied ten times over in Hampshire alone. However, should District Councils or anyone else be required to consider CAZ's this should be supported with appropriate funding and expertise.

In respect of businesses, many small businesses rely on often very old diesel LGV's. Any scheme which involves them no longer being able to use these or being charged a premium to do so could have a negative effect on local economies and therefore such schemes should be carefully thought through.

Q. 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 behaviour changes required make a difference on travel choices need to be driven down from Government by changes to government policy/legislation. Whether this be vehicle subsidies, financial incentives for petrol vehicles, road tax based on mileage as well as engine efficiency, improved buses and rail services etc.

Local scrappage and retro-fitting schemes at local level would require resources at local level which do not currently exist to administer the schemes. There isn't a single practical solution to the air quality problem, within each area the solution will be unique in each area. Therefore government should listen to what each Council is saying would reduce pollution and direct fund those individual infrastructure projects which will make a difference e.g. By-passes, Busways.

In respect of our own area, Fareham, there is currently a major bypass planned (Stubbington bypass) which will alleviate the air quality hotspots within the Borough. This project is reliant on funding being released from the DfT, therefore if the funding could come through more quickly the scheme could commence earlier and not only improve air quality earlier but also have a positive effect on economic growth and housing locally.

Q. How best can governments work with local communities to monitor local interventions and evaluate their impact?

4. Move away from computer modelling for air quality and put in place more real passive monitoring at a local level, this should be a duty for district councils. However, where passive monitoring indicates the need for an AQMA, this should be a duty placed on unitary/county councils who have the Highway responsibility.

The roads problem cannot continue to be dealt with separately to the Environment Act duties currently placed on District Councils. We could see the situation where the UK complies with the Air Quality Standards Regulations 2010 by 2020 but still has hundreds of AQMA's over the country. In addition the current responsibility for reporting to DEFRA placed on local Authorities is an annual requirement, often the schemes that will improve air quality are infrastructure projects that take years to complete, once completed they need to operate for at least a year before any resultant improvement's in air quality can be assessed. The current reporting regimes are excessive and resource intensive and often of little benefit.

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

5. As a district council we have no expertise in this area, other than to say the most polluting Diesel engines

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

6. There is a consumer confidence issue in this area as car manufacturers have mislead consumers in the past over emissions data. In addition, buying habits are not determined on environmental data. At present the most environmentally friendly cars are the most expensive, rather than data, further financial incentives attached to the least polluting cars would have more effect.

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

7. As far as innovative technology solutions, we have no expertise in this area. To support localised measures, provide funding for infrastructure and transport related projects.

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

8. It seems that this very complex area is being considered in a hurried manner, there is no account of the Environment Act duties and there has been no review of where the responsibility for the various suggestions (and existing duties) should sit and there is no definition of local authority within the document.