



Hampshire  
County Council

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The Rt Hon Michael Gove MP  
Secretary of State for Environment,  
Food and Rural Affairs  
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**Councillor Roy Perry**

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Dear Secretary of State

**Response of Hampshire County Council to the consultation on the revised draft air quality plan for tackling air pollution from nitrogen dioxide (NO<sub>2</sub>)**

The County Council welcomes the opportunity to comment on the Government's consultation, "Tackling nitrogen dioxide in our towns and cities", as we recognise the widespread health impacts for local communities.

Hampshire County Council is the Highway and Public Health Authority for Hampshire and works in close collaboration with District Councils and other stakeholders. Together we engage in significant activity with the aim of reducing nitrogen dioxide levels across the County. Such activity takes the form of raising awareness with work we do in schools to capital investment in schemes such as park and ride sites designed to address air quality issues. The ability of the County Council to respond to national policy on air quality at a local level is directly linked to the available funding, both in terms of capital allocations through the Local Transport Plan and in terms of revenue, for example to support local bus services.

Whilst local interventions are proving to have some impact, this is in the face of rising traffic levels meaning we are just about holding the line using the resources and powers available to us. Publication of a national plan is needed in order to bring about further change.

I hope our comments are of interest to you.

Yours sincerely,

Councillor Roy Perry  
Leader of the Council  
Hampshire County Council

## **Response of Hampshire County Council to the consultation on the revised draft air quality plan for tackling air pollution from nitrogen dioxide (NO<sub>2</sub>)**

This response is intended for submission using the Citizen Space consultation system, as requested in the Consultation:

<https://consult.defra.gov.uk/airquality/air-quality-plan-for-tackling-nitrogen-dioxide>

### **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?**

#### **General**

The recalibration of the national air quality model following the 'real world' testing of diesel engines has resulted in the inclusion of three areas in Hampshire being designated as Clean Air Zone (CAZ). We understand these need to achieve compliance by 2020.

As the recalibration has happened fairly recently we have had little engagement with DEFRA to discuss what measures could and should be implemented. All three zones in Hampshire exhibit very different problems and challenges and suggest that a standard menu of tools is not necessarily applicable. For example one of the areas designated is the A331 in Farnborough/Surrey. This is a bypass intended to take traffic away from residential areas. In such circumstances it is difficult to see how the measures proposed in the consultation could help. The answer to the problem would appear to lie in less use of diesel vehicles generally. This is something more easily influenced through the national application of financial incentives or levy's.

Paragraph 63 states, "The Government will require Local Authorities to implement measures that will achieve statutory limits in the shortest possible time". By concentrating on the short term legal obligations to address exceedances predicted by the national model, the focus has fallen on implementing short term measures on specific roads in specific local authority areas. An exercise that simply focusses on addressing the legal requirement in this way is unlikely to significantly improve the health outcomes for most people in Hampshire. A longer term approach would in our view have better health outcomes.

It is now too late to implement **new** capital schemes to address the CAZ designations as there is insufficient time to undertake feasibility and design work leading to delivery in time. Where we can we will promote revenue activities such as awareness raising and behaviour change. Unfortunately some of our recent bids to the Department for Transport Access Fund were unsuccessful, notably a joint bid from Surrey and Hampshire focusing around the area to be designated as a CAZ on the A331. We would welcome new funding opportunities that would allow us to re-submit such bids but even now those opportunities will need to come forward quickly in order to allow us to put in place plans to reach compliance. This point also illustrates a need for greater collaboration between Government Departments in coordinating investment strategies and plans.

The report needs to reflect modelled analysis of the potential impact of scrappage and retrofitting interventions on NO<sub>2</sub> exceedances in order to be evidence based and proven to offer value for money

### **Clean Air Zones (CAZ) and charging**

The consultation proposes CAZ as the quickest means to achieving compliance and considered that in some cases the use of charging of diesel vehicles may be needed. Where charging is deemed necessary we do not believe this will be quick to implement.

Significant technical work will be needed to evaluate the impact. Quick decisions about charging could have significant adverse implications of the local economy, unintended consequences of diverting traffic and increasing the costs of public transport such as taxis and buses. The latter has seen operating costs and real terms price increases rise more than any other form of transport.

Whilst the designation of Clean Air Zones will focus attention on local areas of concern the problem is generated by the use of diesel vehicles originating from wider areas. As such it might be quicker and certainly more effective to implement national fiscal stimulus impacting on diesel vehicle ownership rather than developing local charging schemes.

### **Retrofitting**

Retrofitting required retrofitting industry capacity to deliver the changes to eligible vehicles quickly. Retrofitting public sector (Local Authority) vehicles requires significant Government funding in order to have immediate impact and there remains an assumption these vehicle are not already compliant with limits. Public sector fleets are a small proportion of vehicles on the road in affected areas so the impact here would be minimal. Local Authorities commission a number of services from private contractors. These contracts would need to be reviewed or retendered in order to add vehicle retrofitting clauses and this could take many years.

Any eligible vehicle retrofitting offer by Government would need to be offered universally to owners of eligible vehicles, administered centrally and be sufficient that diesel vehicle drivers are genuinely incentivised to retrofit their vehicle, that is 100% of the cost is covered by Government.

### **Scrappage**

Any incentive scheme to 'scrap' an eligible vehicle would need to be offered universally to owners of eligible vehicles, administered centrally and be sufficient that relevant diesel vehicle drivers are genuinely incentivised to scrap their vehicle. ULEV's

A scheme to encourage drivers to replace their existing high emission vehicle to ULEV's would need to be offered universally to owners of eligible vehicles, administered centrally and be sufficient such motorists are genuinely incentivised to consider the benefits of a ULEV. This should run in tandem with the Governments proposed ongoing promotion of ULEV's.

### **Background levels**

The schemes referred to above should be universally offered in order to afford opportunity to reduce emissions in background levels and in affected areas. To offer the schemes referred to above only to eligible vehicle drivers resident in affected areas would miss commuting vehicles that contribute to the pollution of affected areas.

Equally, the proposals do not consider the implications for those Local Authorities with an emerging (but not current or immediately forecast) exceedance of the

nitrogen dioxide limits. It would be appropriate to prevent nitrogen dioxide levels rising to exceed limits and affect populations rather than wait for levels to be in excess before seeking to apply remedial and mitigation measures. The proposals do not indicate the Government support available to Local Authorities in pursuing proactive preventative measures.

### **Traffic Calming**

Further evidence should be provided on the removal of road features (such as speed bumps) in order to reduce emissions from vehicle idling, stop/start movement and congestion as without an evidential basis such measures may either not be viable or publically supported or have subsequent impact, for example on road safety.

## **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?**

See above comments above on CAZ and charging.

In considering the design of CAZs additional issues to consider are:

1. Impact on business and productivity including an understanding of the impact on operating costs for public transport and logistics which typically use the most polluting vehicles but which as an industries have very low margins and may not be able to bear higher operating costs
2. Impact on mobility
3. Impact on equalities for which we would anticipate a need to consider the socially excluded, families and mobility impaired all of whom may be disproportionately disadvantaged by charging
4. CAZ charges, eligibility criteria and charges for parking permits in CAZ's will also have a likely impact those on low incomes and so could widen inequalities
5. Impact on health and the health economy
6. Alternative measures and options may need to have been tested to avoid legal challenge.
- 7.

Measuring the business impact will require a common approach to scheme appraisal across all CAZ to be identified. It may be that the DfT's webtag appraisal tool can be utilised for this.

### **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?**

Schemes described in the consultation (retrofitting, scrappage etc) need to be offered universally to owners of eligible vehicles, administered centrally and be sufficient such motorists are genuinely incentivised to consider these alternatives.

Criteria for funding should have regard to:

- Evidence base,
- Feasibility,
- Speed of diffusion/implementation,
- Acceptability,
- Sustainability,
- Low level of adverse effects/uncertainties,
- Equity: for example, addresses vulnerable populations, not widening inequalities,
- Cost effectiveness set against 'opportunity costs'
- Need to become, eventually, self-funded
- Linkage to other allied strategies and policies

Schemes should be presented as part of a hierarchy of interventions; while priority may be given to programmes that achieve a quick impact in acutely affected areas (with highest nitrogen dioxide levels) there should be regard to how a combination of interventions will be applied as part of a cross-boundary multi-agency approach to finding permanent remedy.

**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.**

The main measures likely to have a quick impact are those targeted at diesel vehicle usage. They would need to make the comparative costs (fiscal or otherwise) of using or owning a diesel vehicle higher compared to using other models of transport or other fuels for powered vehicles.

Those that also represent value for money or are affordable include:

- Eligibility criteria for parking permits
- Fiscal penalties applied to applications for parking permits and tariffs for diesel vehicles

It should be noted however that these are not generally very popular particularly when implemented quickly and without transition or phasing.

Examples of programmes of work to which funding could be targeted if made available include:

- Evidence based public awareness campaigns to change local drivers behaviour in targeted communities
- Targeted subsidy of travel on public transport for journeys taken through acutely affected areas (assuming

- Promoting (including providing the logistical infrastructure for) community lead car-share schemes, employer car-share and car-pool schemes
- Improving connectivity between employment hubs and residential areas
- Programmes of work that promote physical activity and active transport such as further promoting existing and establishing new safe cycle-ways, bicycle parking and greater Government investment in loan/grant schemes to purchase bicycles
- Increasing availability of and access to electric vehicle charging stations
- Establishing out of town parking locations supported by bus routes – this does not necessarily mean large scale ‘park & ride’ operations which require infrastructure changes, resident and business support

This assumes that affected locations have not already been subject to combination of these interventions. This assumes funding is provided by Government for these programmes. This is not an exhaustive list.

However, there is recognition of the need for consistent and co-ordinated planning direction. This should be supported by ‘Local Plans’, local ‘Supplementary Planning Documents’, ‘Public Health Position Statements (etc) and informed by Public Health intelligence etc) in Local Authorities, supported by internal departments, applied across boundaries, and understood by Statutory Consultees. While a matter of local impact so that Government funding could be directed to some elements of this, changes in planning direction would need to be driven nationally by Government. This is particularly relevant to transport infrastructure and new housing developments, employment hubs and neighbourhood regeneration programmes.

**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?**

### **Retrofitting**

Retrofitting required retrofitting industry capacity to deliver the changes to eligible vehicles quickly. Any eligible vehicle retrofitting offer by Government would need to be offered universally to owners of eligible vehicles, administered centrally and be sufficient that diesel vehicle drivers are genuinely incentivised to retrofit their vehicle, that is 100% of the cost is covered by Government.

### **Scrappage**

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

Impact will ultimately be measured in a sustained reduction in emissions below the specified limits. Evaluation of interventions will be unique to each intervention type, for example: a self-reported change in behaviour, decrease in number of car journeys, increase in demand for schemes/alternative vehicles)

Air quality monitoring is essentially a revenue based activity for local authorities. Additional monitoring arising from the National Air Quality Plan and formation of CAZ's will place a further burden upon the local authorities affected. As such, Government must support this activity through direct funding associated with the declaration of each zone.

#### **5. Which vehicles should be prioritised for government-funded retrofit schemes? We currently anticipate that this funding could support modifications to buses, coaches, HGVs, vans and black cabs.**

Hampshire County Council has had a very fruitful relationship with local bus operators through direct and indirect partnerships that has already helped to make very significant improvements to the quality of the bus fleet operated in Hampshire, through both retrofitting and vehicle replacement. As such, measures to support a similar approach for taxis and delivery lorries could have the potential to reduce the level of emissions from these classes of vehicles.

Ideally, in addition to the vehicles the Government already anticipates reserving funding for the scheme should allow for retrofitting eligible cars, including privately owned cars (charging CAZ class D). Cars remain the greatest in number of road vehicles with eligible diesel cars forming a proportion of those. It is the combination of Governments anticipated eligible vehicles and certain eligible diesel cars that will bring both the quickest and long term reduction in nitrogen dioxide levels. Eligible vehicles should be those which need to match the consistent CAZ minimum emission standard for their vehicle type, prioritising those with greatest nitrogen dioxide emissions first.

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

Hampshire County Council would suggest a simple Environmental and Health Impact information rating similar to ratings used by manufactures of household white goods. This would display the health impact or emission level, set against a scale, of certain vehicle emissions, including nitrogen dioxide. This scale could be displayed as an infographic adjacent to the CAZ non/exempt symbol (see below). This could be supported by economic incentives through enduring tax breaks for low polluting vehicles.

Assuming that all Clean Air Zones (CAZ) will apply the same thresholds, then a clear symbol that indicates the potential vehicle purchase is CAZ exempt should be clearly displayed in marketing information. Supplementary explanation of the CAZ schemes, their penalty & any 'savings', the number of CAZ's in operation, and a web-link to a CAZ directory/listing should provide further information so that consumers can

determine how likely they are to encounter a CAZ in order to inform their buying choice.

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

It would be for central Government, its departments, the motor manufacturing industry, emission management technology manufacturers and research partners to identify innovative technological solutions to improving air quality. Through Government funding the subsequently identified effective technologies can be produced, made affordable and made accessible to the relevant markets and promoted for application locally.

Innovative national measures, such as incentives, could include tax benefits, rebates, and interest free loans for consumers or workforces. Innovation credit and innovation grants may serve to facilitate research into new and emerging technological solutions.

The emphasis here is on a Government led & funded programme of innovation generation, the outcomes of which can then be made available for application where individual local circumstances permit.

Hampshire County Council would support the evidence based use of innovative technologies through the use of real time smart phone apps or street displays to inform road users of the air quality in specific areas. This may support behaviour change initiatives, where the informed motorist may change their driving routes accordingly. This would require sufficient revenue resources to meet the ongoing costs of such measures.

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

The County Council welcomes the opportunity to comment on the Government's consultation, "Tackling nitrogen dioxide in our towns and cities", as we recognise the widespread health impacts for local communities.

Hampshire County Council is the Highway and Public Health Authority for Hampshire and works in close collaboration with District Councils and other stakeholders. Together we engage in significant activity with the aim of reducing nitrogen dioxide levels across the County. Such activity takes the form of raising awareness with work we do in schools to capital investment in schemes like park and rides designed to address such air quality issues. The ability of the County Council to respond to national policy on air quality at a local level is directly linked to the available funding, both in terms of capital allocations through the Local Transport Plan and in terms of revenue, for example to support local bus services.

Whilst local level interventions are proving to have some impact this is in the face of rising traffic levels meaning we are just about holding the line using the resources and powers available to us. Publication of a national plan is needed in order to bring about further change.



In addition to funding for air quality monitoring of newly declared zones, funding would be needed for robust wider evaluation of the impact/ effectiveness of new interventions.