

Clean Air Strategy consultation
Air Quality and Industrial Emissions Team, Defra
Ground Floor, Seacole Building
2 Marsham Street
London, SW1P 4DF

please reply to:
70 Dynevor Road
Stoke Newington
London
N16 0DX

cleanair.consultations@defra.gsi.gov.uk

roger.blake@railfuture.org.uk

Date 2018-08-14

Dear Sir/Madam,

Air quality: draft Clean Air Strategy 2018

Railfuture is the leading national independent voluntary organisation campaigning for a better railway across a bigger network for passenger and freight users in order to support economic growth, environmental improvement and better-connected communities.

For the specific purposes of your requested response to this consultation, our primary concern in relation to clean air is health, the environment and the economy. As a national organisation, with 14 regional/national branches, our membership of individuals and affiliated organisations is based in both rural and urban areas. We do not wish this response to remain confidential. As you have anticipated, we are not responding to all the questions, mainly those which are of particular relevance to us. We rehearse the proposed actions for ease of reference.

1. Understanding the problem

Q1. What do you think about the actions put forward in this chapter? Please provide evidence in support of your answer if possible.

We strongly support the two proposed actions:

- ~ We are investing £10m in improving our modelling, data and analytical tools to give a more precise picture of current air quality and the impact of policies on it in future.
- ~ We will increase transparency by bringing local and national monitoring data together into a single accessible portal for information on air quality monitoring and modelling, catalysing public engagement through citizen science.

2. Protecting the nation's health

Q3. What do you think of the package of actions put forward in this chapter? Please provide evidence in support of your answer if possible.

We strongly support the five proposed actions:

- ~ We will progressively cut public exposure to particulate matter pollution as suggested by the World Health Organisation. We will halve the population living in areas with concentrations of fine particulate matter above WHO guideline levels ($10 \mu\text{g}/\text{m}^3$) by 2025.

www.railfuture.org.uk www.railfuturescotland.org.uk www.railfuturewales.org.uk
www.railwatch.org.uk

- ~ We will provide a personal air quality messaging system to inform the public, particularly those who are vulnerable to air pollution, about the air quality forecast, providing clearer information on air pollution episodes and accessible health advice.
- ~ We will work with media outlets to improve public access to the air quality forecast.
- ~ We will work to improve air quality by helping individuals and organisations understand how they could reduce their contribution to air pollution, showing how this can help them protect their families, colleagues and neighbours.
- ~ We will publish updated appraisal tools and accompanying guidance this summer to enable the health impacts of air pollution to be considered in every relevant policy decision that is made.

3. Protecting the environment

Q5. What do you think of the actions put forward in this chapter? Please provide evidence in support of your answer if possible.

We strongly support the two proposed actions:

- ~ We will monitor the impacts of air pollution on natural habitats and report annually so that we can chart progress as we reduce the harm air pollution does to the environment.
- ~ Later this year we will provide guidance for local authorities explaining how cumulative impacts of nitrogen deposition on natural habitats should be mitigated and assessed through the planning system.

4. Securing clean growth and driving innovation

Q.7. What do you think of the package of actions put forward in this chapter? Please provide evidence in support of your answer if possible.

We strongly support the seven proposed actions:

- ~ In partnership with UK Research and Innovation, we will seek ways to support further investment in Clean Air innovation to enable the development of novel technologies and solutions that tackle emissions from industry, vehicles, products, combustion and agriculture and support both improvements in air quality and decarbonisation.
- ~ We will make the UK a world leader in goods and services focused on tackling air pollution.
- ~ Future energy, heat and industrial policies will together improve air quality and tackle climate change. Phasing out coal-fired power stations, improving energy efficiency, and shifting to cleaner power sources will reduce emissions of air pollution as well as carbon. As we phase out oil and coal heating, we will ensure this transition improves air quality wherever possible and cost effective to do so. In addition, the government will conduct a cross-departmental review into the role of biomass in future policy for low carbon electricity and heat, focusing on the air quality impacts. The proposed way forward will be set out in the final Clean Air Strategy.
- ~ We will minimise the air quality impacts of the Renewable Heat Incentive Scheme, for example by tackling non-compliance and consulting on excluding biomass from the RHI if installed in urban areas which are on the gas grid. We will work across central and local government to put a plan in place. In addition, we will consult on making coal to biomass conversions ineligible for future allocation rounds of the contracts for difference scheme.
- ~ We are seeking evidence on the uses of non-road diesel, mainly in urban areas, considering the air quality impacts and the potential for market distortion. The Treasury has also announced it will review how alternative fuel rates line up with rates of petrol and diesel ahead of Budget 2018.

~ We will cut emissions from non-road mobile machinery and give local authorities tough new powers to control the use of such machinery where it is causing an air pollution problem.

~ Green Great Britain Week, starting in autumn 2018, will engage the public on air quality, alongside climate change, and highlight the economic opportunities it offers for the UK.

5. Action to reduce emissions from transport

Q11. What do you think of the package of actions put forward in this chapter? Please provide evidence in support of your answer if possible.

We strongly support the eight proposed actions, and in particular the fifth below:

~ In 2018 we will set out our ambitious plans to drive down emissions from shipping and aviation.

~ We will end the sale of new conventional petrol and diesel cars and vans by 2040. We will position the UK as the best place in the world to develop, manufacture and use zero exhaust emissions vehicles and, during the transition, we will ensure that the cleanest conventional vehicles are driven on our roads.

~ We will work with international partners to research and develop new standards for tyres and brakes to enable us to address toxic non-exhaust emissions of microplastics from vehicles which can pollute air and water.

~ New legislation will enable the Transport Secretary to compel manufacturers to recall vehicles and machinery for any failures in their emissions control system, and environmental nonconformity or failure, and make tampering with an emissions control system a legal offence.

~ We will reduce emissions from rail and reduce passenger and worker exposure to air pollution. By the autumn, the rail industry will produce plans to phase out diesel-only trains by 2040.

~ All major English ports should produce air quality strategies setting out their plans to reduce emissions. These plans will be reviewed periodically to establish if the measures are effective or whether government action is required.

~ We will review policy on aviation-related air quality to improve air quality.

~ In addition, we are also considering a number of actions and options in relation to non-road mobile machinery.

In relation to the fifth proposed action, we refer to our Briefing Document “Airborne Pollution by Diesel Engines on Railways in Britain” here: <https://www.railfuture.org.uk/display1802>

Q12. Do you feel that the approaches proposed for reducing emissions from non-road mobile machinery are appropriate or not?

We would observe that NRMM associated with maintaining and renewing the railway, by Network Rail and its contractors, is not cited as an example and should not be over-looked.

9. Leadership at all levels

Q25. What do you think of the package of actions put forward in this chapter? Please provide evidence in support of your answer if possible.

We strongly support the four proposed actions:

- ~ We are consulting on a new, independent statutory body to hold government to account on environmental commitments following EU exit. Ensuring that there is transparency and accountability in how we achieve our clean air ambitions will be a priority in this work.
- ~ We will bring forward new clean air legislation at the earliest opportunity. This will bring long-standing frameworks for local and national action on air pollution into the 21st century with stronger powers and clearer accountability.
- ~ To ensure that local action to reduce air pollution remains robust and relevant, we will transform existing structures to increase transparency and back this up with stronger statutory powers to tackle local air pollution.
- ~ The UK government will work in partnership with the governments of Scotland, Wales and Northern Ireland to develop a detailed National Air Pollution Control Programme as required under the National Emissions Ceilings Directive for publication in 2019.

Q28. What are the benefits and risks of making changes to the balance of responsibility for clean local air between lower and upper tier authorities? [This question refers to the balance of responsibility for LAQM between two tier local authorities i.e. lower tier (District Councils) and upper tier (County Councils); it currently sits mainly with the district councils.]

Benefits: Upper tier authorities are more likely to be able to command the resources necessary to drive and maintain a consistent and strategic approach across the longer term.

Risks: Upper tier authorities may lack and lose the local knowledge of their lower tier authorities, who may as a result feel less invested in the process over time.

10. Progress against our clean air goals

Q30. What do you think of the package of actions in the strategy as a whole?

Actions will as always speak louder than words, and so sustaining commitment to the finally-agreed programme of actions at all levels and into the long term will be their real test.

Consultee feedback on the online survey

Overall, how satisfied are you with our online consultation tool?

Satisfied.

Yours faithfully

Roger Blake
Railfuture
Director for Infrastructure & Networks
Vice-Chair, London & South East regional branch