

Appendix 2

North Tyneside Council response to consultation on the Government's draft Clean Air Strategy

August 2018

Introduction

This is the response of North Tyneside Council ("the Authority") to the consultation on the Government's draft Clean Air Strategy, which is being undertaken by the Department for Environment, Food and Rural Affairs (Defra).

[Note. North Tyneside's Cabinet Member delegated decision to submit a response to the consultation was taken on 9 August 2018. Since such decisions may be subject to a 'call-in' process, this response should be treated formally as a draft until confirmation is received in due course.]

Initial remarks

The Authority welcomes the Government's publication for consultation of the draft Clean Air Strategy.

Chapter 1 – Understanding the Problem

Q1. What do you think about the actions put forward in the understanding the problem chapter?

We welcome the Government's commitment to invest further in improving modelling, data and analytical tools, and we hope these will enable Government policy to be informed by accurate data on concentrations of air pollutants at a local level.

Q2. How can we improve the accessibility of evidence on air quality, so that it meets the wide-ranging needs of the public and other interested parties?

Making data publicly available, in a timely manner and in an accessible format, is the fundamental means to ensure that it meets the needs of the public and other interested parties. We would expect that this would make use of currently available data sources where possible and that any additional data reporting requirements on local authorities would be proportionate.

Chapter 2 – Protecting the nation's health

Q3. What do you think of the package of actions put forward in this chapter (see drop down menu of proposed actions above for a summary)? Please provide evidence in support of your answer if possible

- i. **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 µg/m³) by 2025.**

There is a very clear set of metrics and timescales to achieve the above action, however there appears to be an absence of detail of the actual actions that will be put in place in order to achieve this. For example, the strategy states: *'we will back*

these targets up with a comprehensive set of new powers designed to enable targeted local action in areas with an air pollution problem'. We would wish to see detail of what these powers would look like and how they would be enforced.

There is also a lack of detail on what are the effective local interventions that would result in a 50% reduction in the population living in areas with concentrations of fine particulate matter above WHO guideline levels.

- ii. 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.**

A personalised messaging service appears to be a good idea; however, thought will need to be given to the following:

1. How do individuals sign up and what 'health' information would they need to disclose to meet the definition of a person vulnerable to poor air quality?
2. The practical measures or advice given – what is the purpose of these messages? Could an unintended consequence be an increased use of health care by the worried well?
3. The need to take care so as not to cause more harm – e.g. COPD is exacerbated by anxiety and warning an individual that the air quality is poor may increase levels of anxiety – what will the mitigating advice be?
4. How will the impact of this approach be measured?
5. Could this approach potentially widen health inequalities, in that those who have greater levels of health literacy and IT literacy are more likely to register, whereas we know that health outcomes are worse for those in deprived areas who are less likely to engage in similar healthcare initiatives?
6. The desirability of ensuring that this is effectively targeted at people who will benefit, and that there is an effective use of social marketing.

- iii. We will work with media outlets to improve public access to the air quality forecast.**

There appears to be no detail of how this will be achieved, or of evidence that improving public access to air quality forecasts prevents harms to health and/or improves air quality. Providing more information is a positive step as long as this is not the only approach and that the format of the information is acceptable to the intended audience.

- iv. 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.**

Helping the wider system to understand the actions that can be taken is a good initiative; however, relying on individuals and organisations to do the right thing is not enough. This needs to be reinforced by the actions that the Government can take in

improving active travel and proactively reducing vehicle usage as well as working with industry on reducing emissions – this would imply a need for significant investment in public transport as well as infrastructure that enables more cycling and walking.

- v. **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.**

The current Public Health England (PHE) tool on air quality and health costs is easy to use, however the data definitions (or lack thereof) make it rather cumbersome to translate the results into practice; also, the information on what this means and what can be done to reduce poor air quality is fragmented and dispersed across a number of policies and guidance. It would be preferable for there to be an identified ‘go to’ place relating to air quality.

Q4. How can we improve the way we communicate with the public about poor air quality and what people can do?

Communicating effectively with the public on air quality implies identifying the target audience and using the most effective medium to target them (e.g. broadcast media, social media etc.). Consideration should be given to how communication can prompt behaviour change so as to set change in motion among substantial numbers of people – when dealing with complex multi-factorial issues, there is considerable evidence that communication and providing information alone does not result in behaviour change at scale.

We would expect any communication strategy to recognise the health benefits of regular exercise such as cycling and walking: communications which advise of air pollution issues should be carefully worded so that they encourage people to continue to take appropriate forms of exercise.

Chapter 3 – Protecting the environment

Q5. What do you think of the actions put forward in the environment chapter?

We welcome the proposed monitoring and research into the impact of air pollution on natural habitats, which will give better understanding of correlation between air quality and ecology. It is positive that guidance is to be provided on how farming can minimise nitrogen deposits, and to developers and planners on cumulative assessment for nitrogen deposits and mitigation measures.

We welcome the commitment in section 3.6 of the report that guidance will be provided later this year for local authorities, explaining how cumulative impacts of nitrogen deposition on natural habitats should be mitigated and assessed through the planning system. We look forward to the publication of this guidance, which will assist the Authority in ensuring the protection of important natural habitats through the planning process.

Chapter 4 – Securing clean growth and driving innovation

Q7. What do you think of the package of actions put forward in the clean growth and innovation chapter?

The further investment in innovation funding to develop novel clean air technologies is welcomed, however we would suggest that the priorities within the Innovate UK competitions could be targeted more towards clean air projects and made easier to access for small businesses.

In relation to Non-Road Mobile Machinery (NRMM), we would wish for the regulatory and tax framework to incentivise the use of lower emission technologies (please see also our response to Q12).

Q8. In what areas of the air quality industry is there potential for UK leadership?

We have no comments in relation to this question.

Q9. In your view, what are the barriers to the take-up of existing technologies which can help tackle air pollution? How can these barriers be overcome?

We have no comments in relation to this question.

Q10. In your view, are the priorities identified for innovation funding the right ones?

In broad terms we would concur that the priorities identified are the right ones, however we would note that this has not been particularly evident in Innovate UK grant competitions to date. It would be beneficial for more clean air-related competitions to be opened up: those which have been available are overly specific to a particular region or technology. Consideration should also be given to enabling a generic clean air competition which could be available alongside the open competition.

Chapter 5 – Action to reduce emissions from transport

Q11. What do you think of the package of actions put forward in the transport chapter?

- i. **In 2018, we will set out our ambitious plans to drive down emissions from shipping and aviation.**

We welcome the Government's intention to set out plans to decrease emissions from shipping and aviation. It is appropriate for this process to be led by Government as it relates to sectors for which emissions reduction can most effectively be pursued at national level. Please see also our responses to vi) and vii) below.

- ii. **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.**

North Tyneside Council is one of 28 local authorities in England which is subject to the original Government direction to develop local plans to address roadside NO₂ concentrations. The North Tyneside Transport Strategy also makes clear that the Authority is committed to improving environmental sustainability and local air quality, through initiatives such as continuous monitoring, more effective traffic flow management and supporting greater use of low emission vehicles.

We wish to see greater take-up of zero exhaust emissions vehicles and, in the interim, the cleanest conventional vehicles. We welcome the recent publication of [Road to Zero](#), the Government's strategy for reducing exhaust emissions from road vehicles, and note that this is outside the scope of the present consultation.

Freight transport is a significant contributor to local air pollution. We welcome the Government's commitment to support industry research into cost-effective options for shifting more freight from road to rail, including low emission rail freight for delivery into urban areas with zero emission last mile deliveries

It would be useful if the final strategy could also refer to freight industry initiatives such as the Fleet Operator Recognition Scheme (FORS), which promote best practice which can reduce the freight sector's impact. National benchmarking data from FORS Silver and Gold operators shows year-on-year success in improving fuel efficiency, resulting in a substantial reduction in local air pollutant emissions (NO_x, PM, HC and CO) between 2016 and 2017 of around 9.4% per vehicle.

The growth in numbers of vans (light goods vehicles or LGVs) and the generally slower fleet replacement rate by small and medium-sized enterprises (SMEs) should be addressed, especially given the potential for longer retention of vehicles in this sector.

We note that there is no coverage of scrappage (for freight vehicles or more widely) in the strategy: it would be useful if the final version of the strategy could give consideration to the available evidence on scrappage schemes and the types of vehicle and circumstances in which they might have potential to contribute to local air quality.

- iii. **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 micro plastics from vehicles which can pollute air and water.**

We would wish to see Government standards for tyres and brakes which effectively address toxic non-exhaust emissions.

This emphasises the fact that a shift to vehicles with zero tailpipe emissions, although desirable, would not remove all air pollution from cars and vans. We would like to see the strategy refer more strongly to the desirability of modal shift from cars and vans to cycling and walking, which should be matched by investment, both in capital-based measures to improve cycling and walking infrastructure, and revenue-based initiatives to promote modal shift to cycling and walking.

- iv. **New legislation will enable the Transport Secretary to compel manufacturers to recall vehicles and machinery for any failures in their emissions control system, and make tampering with an emissions control system a legal offence.**

We are supportive in principle of Government moves to ensure that manufacturers meet their obligations in terms of emissions for both vehicles and machinery. If any of the proposals place additional responsibilities or requirements on local authorities, these should be subject to appropriate specific consultation.

- v. **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.**

Whilst we welcome the long-term commitments to phase out diesel trains by 2040 and explore the use of alternative fuels, we would urge the Government to seek the renewal of existing rolling stock at an earlier stage (such as rolling stock transferred from other regions to the North East to meet Northern Rail franchise commitments), in the context of the 2040 commitment. The Government should also encourage the rail industry to explore new forms of fuel sources, while seeking to continue the process of rail line electrification.

There are also more immediate measures which the Government could initiate, working with the rail industry, such as ensuring no long-term engine idling when diesel trains are standing in stations. Rail industry commitments should include all relevant forms of pollution, including particulates and NO₂. We note that the rail industry taskforce is due to report in Autumn 2018 on reducing emissions from the rail sector and we would urge the Government to give timely consideration to this report.

- vi. **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.**

North Tyneside, and the adjoining borough of South Tyneside, are the location of the Port of Tyne, a deep-sea port which handles containers and bulk goods as well as thousands of cruise and ferry passengers each year.

We welcome the Government's intention to develop the first UK Clean Maritime Plan. We note the Government's intention that all major English ports should produce air quality strategies setting out their plans to reduce emissions: we consider that these local strategies would make a positive contribution, and suggest that the process should allow for innovative measures to be suggested by industry to reduce emissions.

- vii. **We will review policy on aviation-related emissions to improve air quality.**

It is appropriate for this to be reviewed by Government as it relates to a sector for which emissions reduction can most effectively be pursued at national level.

As the document notes, airports generate significant numbers of land journeys and we concur that there are potential gains if accessibility to airports by more sustainable modes of transport is improved. The commitments to explore improved surface access to airports by more sustainable modes are therefore welcome and these should also be included within the final Aviation Strategy.

- **Comments on the package of transport actions as a whole**

Additional government support would be necessary in order to improve the efficiency of highway infrastructure, on major local roads as well as on the national Strategic Road Network. This would assist in delivering the outcomes of the local roadside nitrogen dioxide reduction plan which the Authority, in common with numerous other authorities across England, has been directed to develop.

We note the opportunities to work with the freight industry around reducing emissions while ensuring that the sector is not adversely affected by requirements for change.

We would wish to see firm further financial commitments to support initiatives which support modal shift to cycling and walking and encourage public transport use.

Q12. Do you feel that the approaches proposed for reducing emissions from Non-Road Mobile Machinery [NRMM] are appropriate or not? Why?

We note the proposals in the strategy to grant powers to local authorities to impose minimum emission standards where required to tackle serious air pollution problems, and to establish of a register of NRMM to enable local enforcement. While we welcome in principle the grant of these additional powers, it is important that this is done so in a way which does not create a burden on local authorities and that any new registering or other requirements should be adequately resourced.

Chapter 6 – Action to reduce emissions at home

Q13. What do you think of the package of actions put forward to reduce the impact of domestic combustion?

We are supportive of the package of measures to help reduce the impacts of domestic combustion, however we would urge the Government to give further consideration to the use of statutory rather than voluntary means for removing the sale of most polluting fuel used in open fires within smoke control areas.

The labelling of fuels and emissions should also be available at the point of sale as a statutory requirement. Combined with positive marketing by those in the sector supply chain, this should ensure that the end consumer is well informed of the best choice of product and fuel source.

Industry standards are key in ensuring that the market leads in the supply of high quality fuels and appliances. We would suggest that the deadline for removing the more polluting appliances from sale should be earlier than 2022. The review of statutory powers and legislation should also include arrangements for the control of domestic bonfires.

The Defra guidance for householders on domestic burning of solid fuels forms a simple and visual aid which complements the range of communications produced by the sector.

Q14. Which of the following measures to provide information on a product's non-methane volatile organic compound content would you find most helpful for informing your choice of household and personal care products, and please would you briefly explain your answer?

- **“A B C” label on product packaging (a categorised product rating for relevant domestic products, similar to other labels such as food traffic light labels)**
- **information on manufacturer website**
- **leaflet at the point of sale**
- **inclusion in advertising campaigns**
- **other option**

We welcome any messaging from manufacturers which helps to inform individuals to make choices which can reduce the impacts of indoor pollutants. We recognise that the ABC labelling is something which is now commonly utilised for a wide range of consumer products to illustrate various levels of efficiency. This method provides a simple visual assessment of a product's performance and can also assist people who may have sight impairments, as well as those who have low literacy levels.

Of the options listed, we are least supportive of leaflets at point of sale as this form of communication may not be taken up by customers and will ultimately end up in the waste stream.

Q15. What further actions do you think can be taken to reduce human exposure from indoor air pollution?

We have no comments in relation to this question.

Chapter 7 – Action to reduce emissions from farming

We have no comments in relation to this chapter.

Chapter 8 – Action to reduce emissions from industry

Q19. What do you think of the package of actions put forward in the industry chapter?

We would support the proposed actions to tackle emissions from industry, which imply continuous improvements in industrial emissions through the use of Best Available Techniques.

Q20. We have committed to applying Best Available Techniques to drive continuous improve in reducing emissions from industrial sites. What other actions would be effective in promoting industrial emission reductions?

It is considered that the most appropriate way to continue to promote reduction in industrial emissions is through the use of Best Available Techniques. Measures implemented should be reasonable, effective, proportionate and affordable to industry, in order to promote reductions in emissions while supporting economic growth.

Q21. Is there scope to strengthen the current regulatory framework in a proportionate manner for small industrial sites to further reduce emissions? If so, how?

We concur that existing legislation addresses the majority of polluting industries via permitting regulations. We would suggest that the Government should consider encompassing smaller polluting industrial uses, such as smaller car-respraying premises, which fall below the threshold for regulation but will have a cumulative impact on air quality emissions.

Q22. What further action, if any, should Government take to tackle emissions from medium combustion plants and generators?

We concur with the proposed measures already taken to tackle emissions from medium combustion plants and generators, which include a phased approach to the permitting of new and existing plant.

Q23. How should we tackle emission from combustion plants in the 500kW-1MW thermal input range?

Emissions from the smaller combustion plants in the range of 500kW-1MW need to be considered to determine the extent to which these emissions impact on local air quality. It is suggested that the Government should undertake further research to understand the plant numbers, to estimate the potential air quality impacts and to determine whether this particular source is a major contributor to air pollutants which could imply the introduction of further controls.

Q24. Do you agree or disagree with the proposal to exempt generators used for research and development from emission controls?

It is considered reasonable that generators used for research and development should be exempted from the emission controls, however consideration should be given to potentially limiting the timescale that the generators are to be used.