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Dear Sir/Madam

Consultation: Improving air quality in the UK: tackling nitrogen dioxide in our towns and cities

Following the issue of the Defra's draft UK air quality plan for tackling nitrogen dioxide, Enfield Council would like to comment on the contents of the document and our observations are set-out below.

Having considered the document, the overall impression is disappointing; the plan has proposed little action that will lead to a reduction in nitrogen dioxide levels. The main issue is the sheer volume of road traffic, especially from major roads, which are beyond the control of local government and indeed any of the agencies responsible for trunk roads.

It is clear that decisive action at a national level is required, which means a strong plan of action from Central Government. The consultation document firmly lays virtually all actions at the doorstep of local authorities, Highways England and the Mayor of London.

The only measures that central government are proposing are to provide a fund to accelerate the uptake of hydrogen vehicles and the role out of more infrastructure, proposing new emissions requirements for vehicles, changes to the tax regime for diesel vehicles, funding the uptake of electric taxis and a call for evidence on a road user levy for HGVs. These proposals will have

almost no effect, in the short term, on emissions of nitrogen dioxide and unless there is a modal shift to alternative fuelled vehicles, no improvement in the long term, other than the natural improvement cycle as older vehicles are replaced with conventional vehicles.

Paragraph 72 of the consultation document states 'it is for local authorities to develop innovative local plans that will achieve statutory NO₂ limit values within the shortest time possible'. Action to improve air quality should not all be deferred to local authorities, as experience has shown that it is difficult to take significant action at a local level. Local authorities can undertake educational projects, for instance anti-idling, working with schools, cycle training; however, traffic reduction requires action at a national level and the actions listed for Central Government do not detail any proposals for this.

The consultation document puts great emphasis on the use of Clean Air Zones. This measure will have some effect in cities which introduce them, provided Class D is chosen. I would point out that Central Government has placed a focus on using the non-charging element, which in reality, is no different to an Air Quality Management Area. Clean Air Zones are likely to be focused in city centres and are unlikely to affect emissions from arterial routes entering cities, therefore not reducing exposure of residents who live in close proximity to these roads. In essence there will be little actual effect and the number of zones in the UK exceeding the nitrogen dioxide objectives is likely to remain the same.

The use of Clean Air Zones will be of no benefit to London which already has a Low Emission Zone (LEZ) and in parts it is proposed that there will be an Ultra Low Emission Zone (ULEZ). The consultation document, although high-level, does not provide any alternatives for London, or any other city, to reduce nitrogen dioxide emissions.

If the Government wishes to see local authorities develop innovative local plans this will clearly need appropriate financial support. The current Defra air quality grant scheme, which is available to all local authorities, has provided only £11 million since 2011, this simply isn't sufficient to fund air quality initiatives that will have effect. Given the size of the problem this is an extraordinarily small sum. Following-on from this the fund of £23 million, to be used for the uptake of hydrogen vehicles and the role-out of infrastructure is also insufficient to make a significant difference to the current state of affairs.

The draft air quality plan is disappointing and lacks real measures that will significantly improve air quality. If the government truly desires change and a real improvement in air quality, it must take responsibility and lead by example, rather than choosing to delegate to other authorities and agencies. Adequate funding must also be available for the creation and implementation of improvement measures.

Yours sincerely

Councillor Daniel Anderson
Cabinet Member for Environment

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