



Department
for Environment
Food & Rural Affairs



Department
for Transport

Summary of responses to the government's consultation on the implementation of Clean Air Zones in England

May 2017



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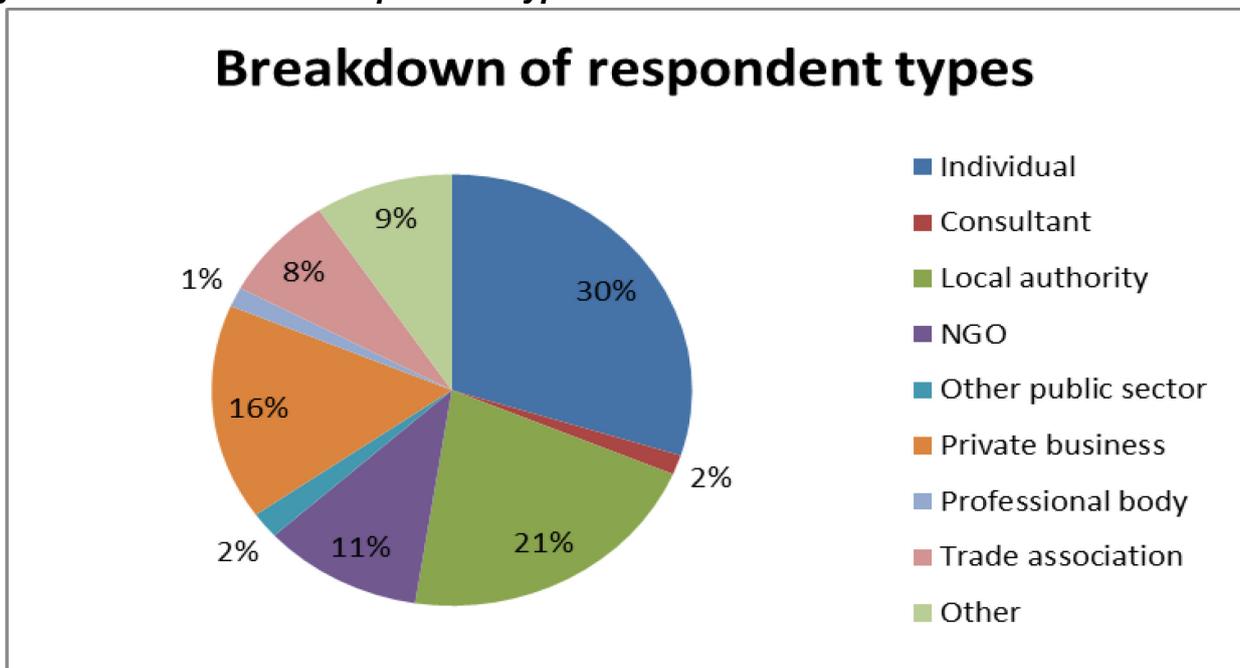
1. Introduction

1. This document provides a summary of responses to the government’s consultation on the draft Clean Air Zone Framework, which sets out how Clean Air Zones should be implemented, the draft secondary legislation mandating the implementation of Clean Air Zones and the associated Impact Assessment. The consultation ran from 13 October to 9 December 2016 and applied to England only.
2. The aim of this document is to provide a summary of the responses received. It does not offer a detailed opinion on the comments received.

1.1 Number of responses

3. In total 204 responses to the consultation were received. These were made up of:
 - 169 responses through the Citizen Space online portal responding directly to the questions;
 - 35 responses by email or post.
4. For the email or postal responses, where respondents answered the specific consultation questions these have been included in the analysis statistics throughout this document. Where they provided more general comments the views have been picked up in the broader analysis and in picking out key themes from all of the comments. A breakdown of the type of respondents can be found in figure 1.

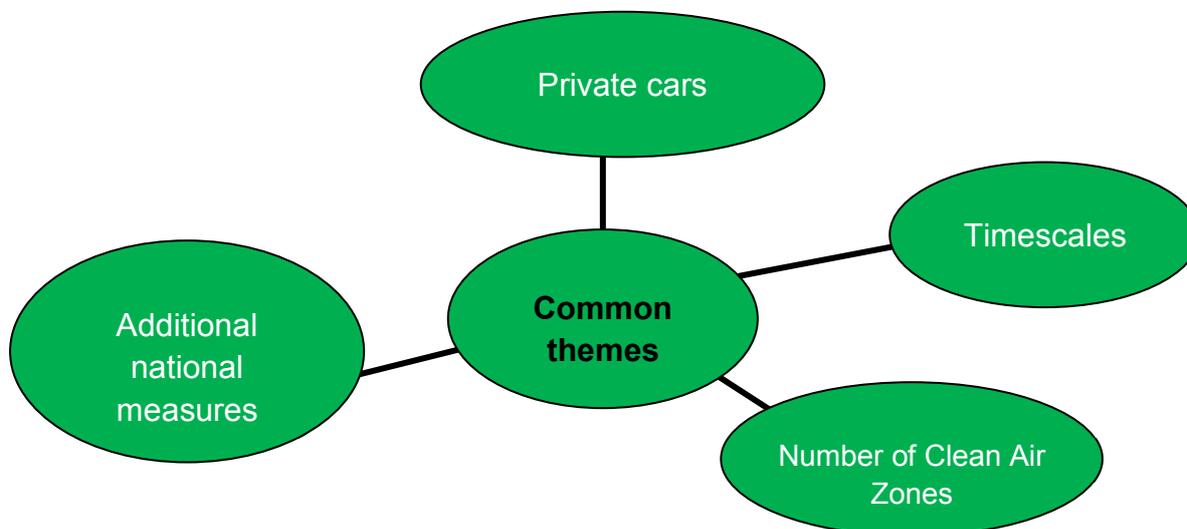
Figure 1: Breakdown of respondent types



1.2 Common themes

5. Common themes that came out of the responses are summarised in figure 2. **Figure**

2: Common themes



6. A number of respondents referenced the approach to the inclusion of cars in the Framework in their responses to every consultation question. Respondents across a broad range of categories commented on timescales for introducing zones in response to several of the consultation questions, either on the challenges associated with the implementation of Clean Air Zones or alternatively calling for earlier implementation. A number of respondents commented on wider policy issues as part of their responses to several consultation questions, in particular, on the number of Clean Air Zones and additional national measures.

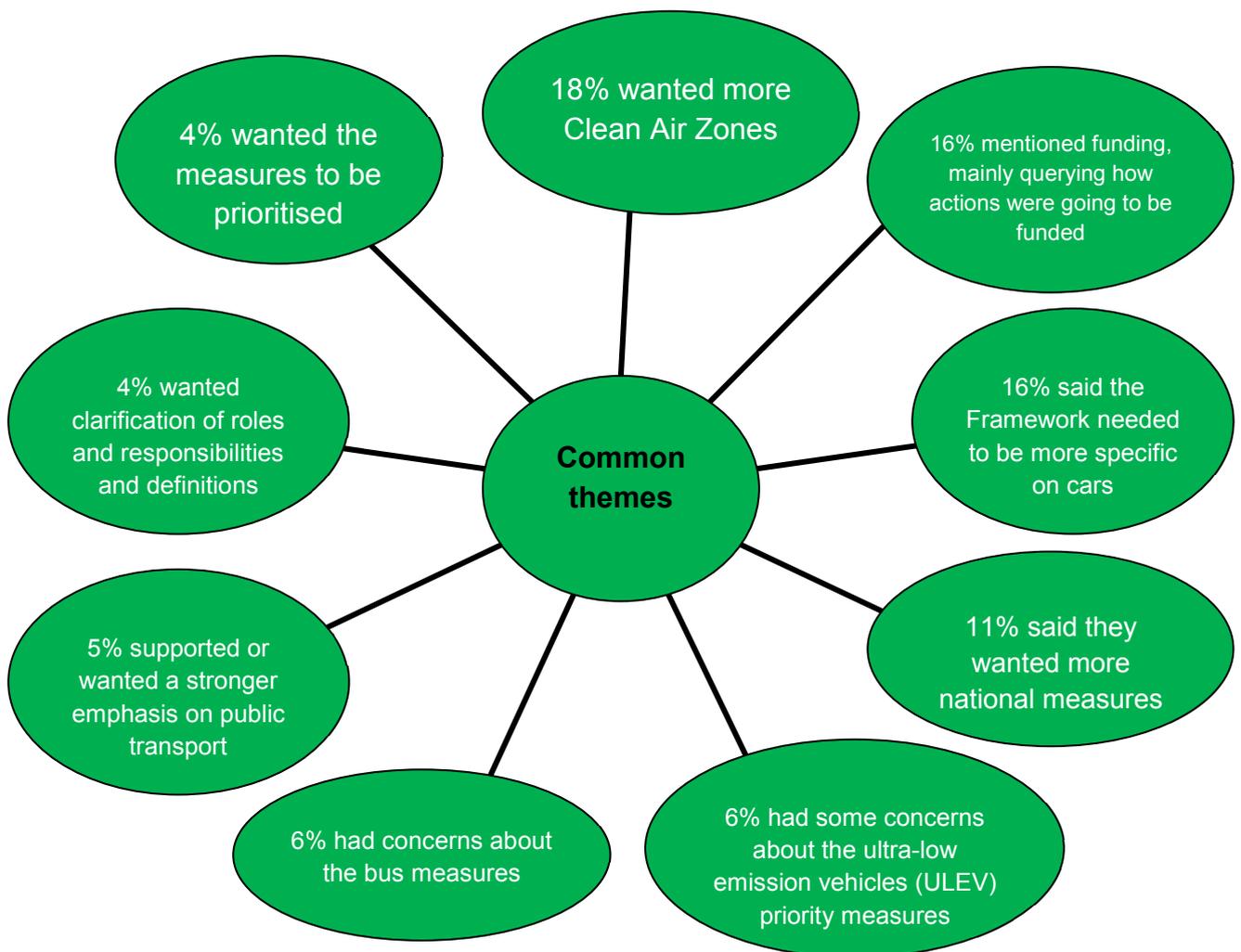
2. Responses by question

Clean Air Zone Framework

Q1. Are the right measures set out in Section 2?

7. 78% (159) of respondents commented on this question. Figure 3 shows the common themes from those responses.

Figure 3: Common themes from the comments to question 1.



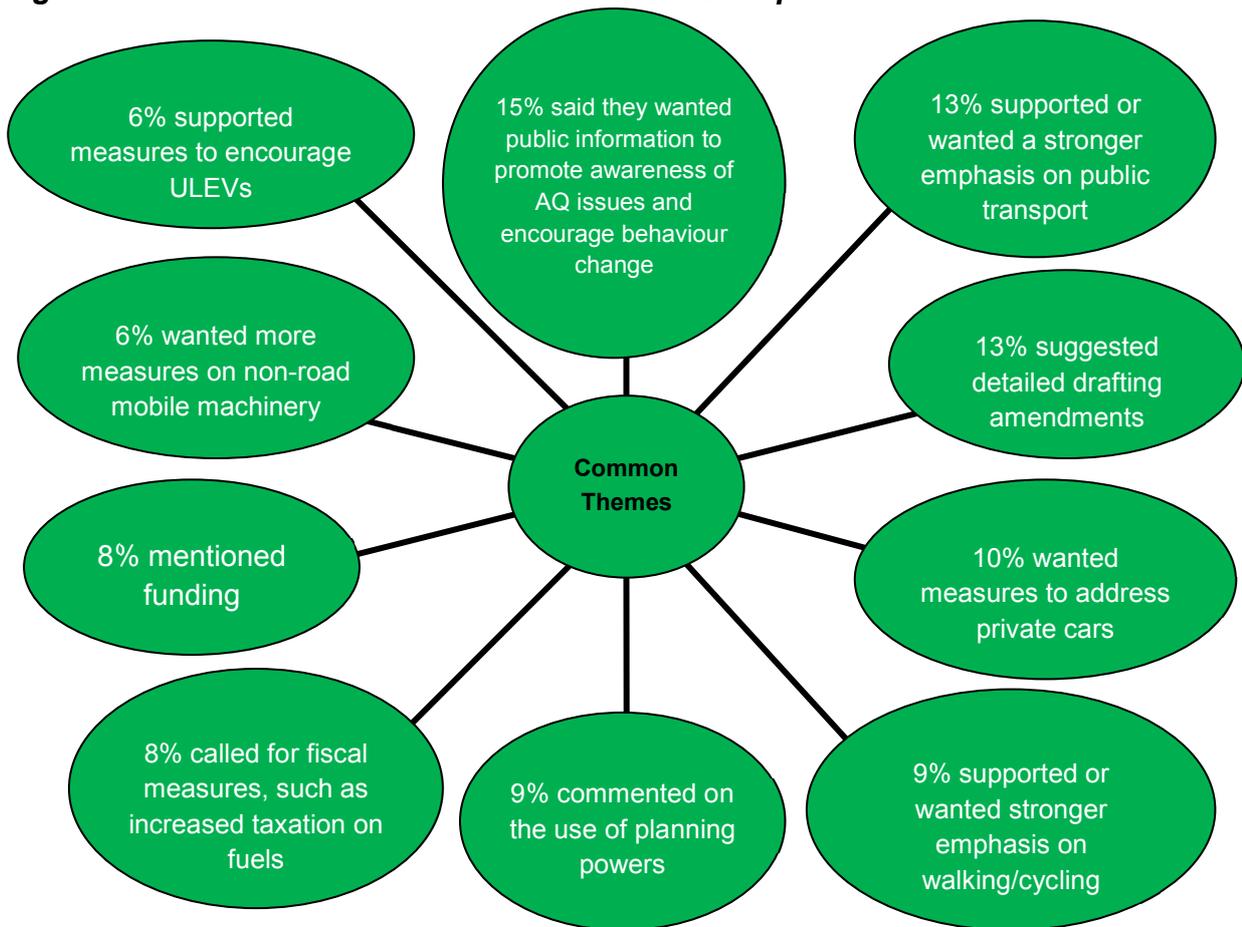
8. The majority of respondents (57%) were broadly supportive of the basic principles set out in the Framework. Many of the respondents who agreed also commented on particular aspects which they supported or thought should be highlighted, such as encouraging walking and cycling, public transport and ultra-low emission vehicles. Where respondents said no, they generally did not disagree with the content of the Framework but took the opportunity to raise wider points of policy. This was generally to support or to highlight similar aspects as those respondents who said yes, in particular the need to be more specific on the inclusion of cars in the Framework and for a stronger emphasis on walking/cycling and public transport.
9. Other points raised in responses were: issues around planning policies possibly conflicting with the need for air quality improvements; enforcement and monitoring (of zones and vehicle emission standards); support for alternative fuels; and issues around the displacement of older, more polluting vehicles.
10. A number of respondents also commented on the High Court ruling on the national air quality plan for nitrogen dioxide. Since these comments are not directly relevant to the

Clean Air Zone Framework, they have not been included in this analysis. Respondents will have the opportunity to comment on the modified air quality plan later this year.

Q2. Are there additional measures that should be highlighted under each theme?

11.77% (157) of respondents commented on this question. Figure 4 shows the common themes from those responses.

Figure 4: Common themes from the comments to question 2.

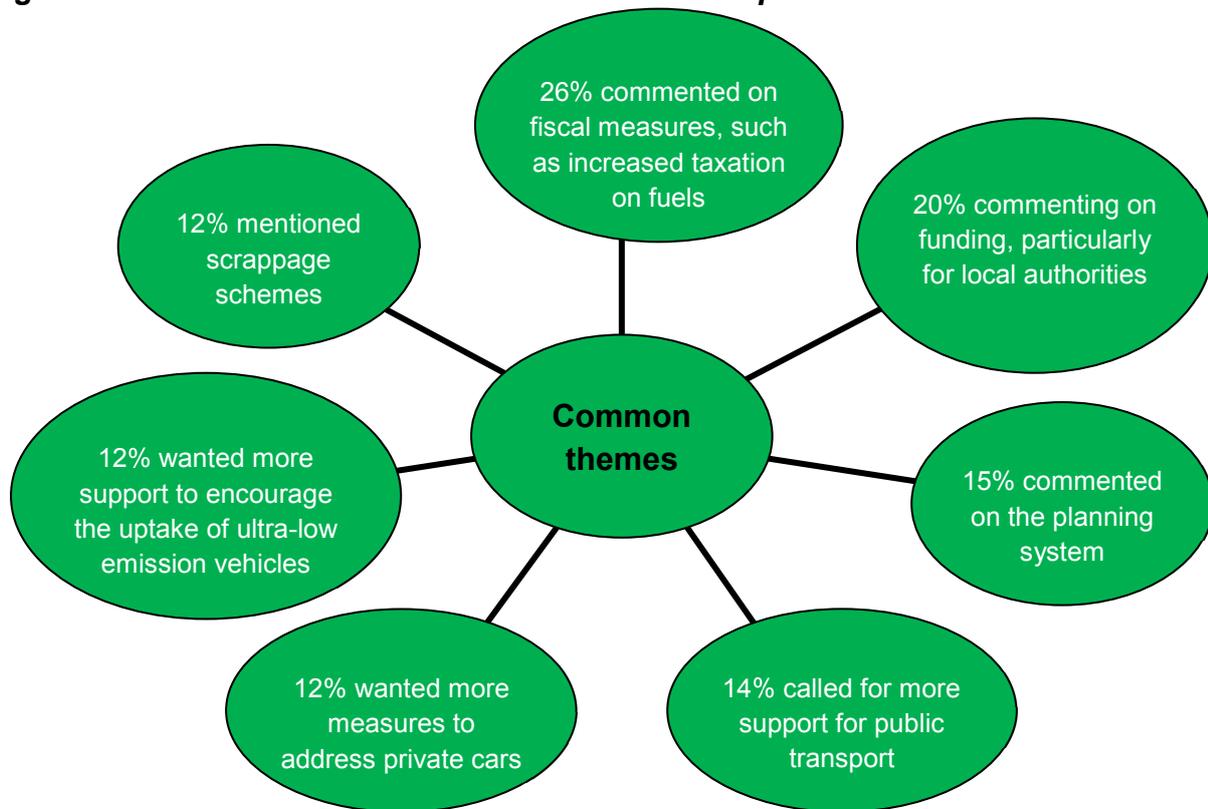


12.77% of respondents said yes that there are additional measures that should be highlighted under each theme in the Framework and went on to identify a broad range of issues, summarised above: in addition to these, other points raised in responses included requests for measures to support the use of alternative fuels, measures to address non-transport sources of pollution, and the use of clear signage to differentiate between charging and non-charging Clean Air Zones.

Q3. In addition to the draft Framework, are there other positive measures that (a) local or (b) central government could introduce to encourage and support clean air in our cities?

13. 93% (190) of respondents commented on this question. Figure 5 shows the common themes from those responses.

Figure 5: Common themes from the comments to question 3.

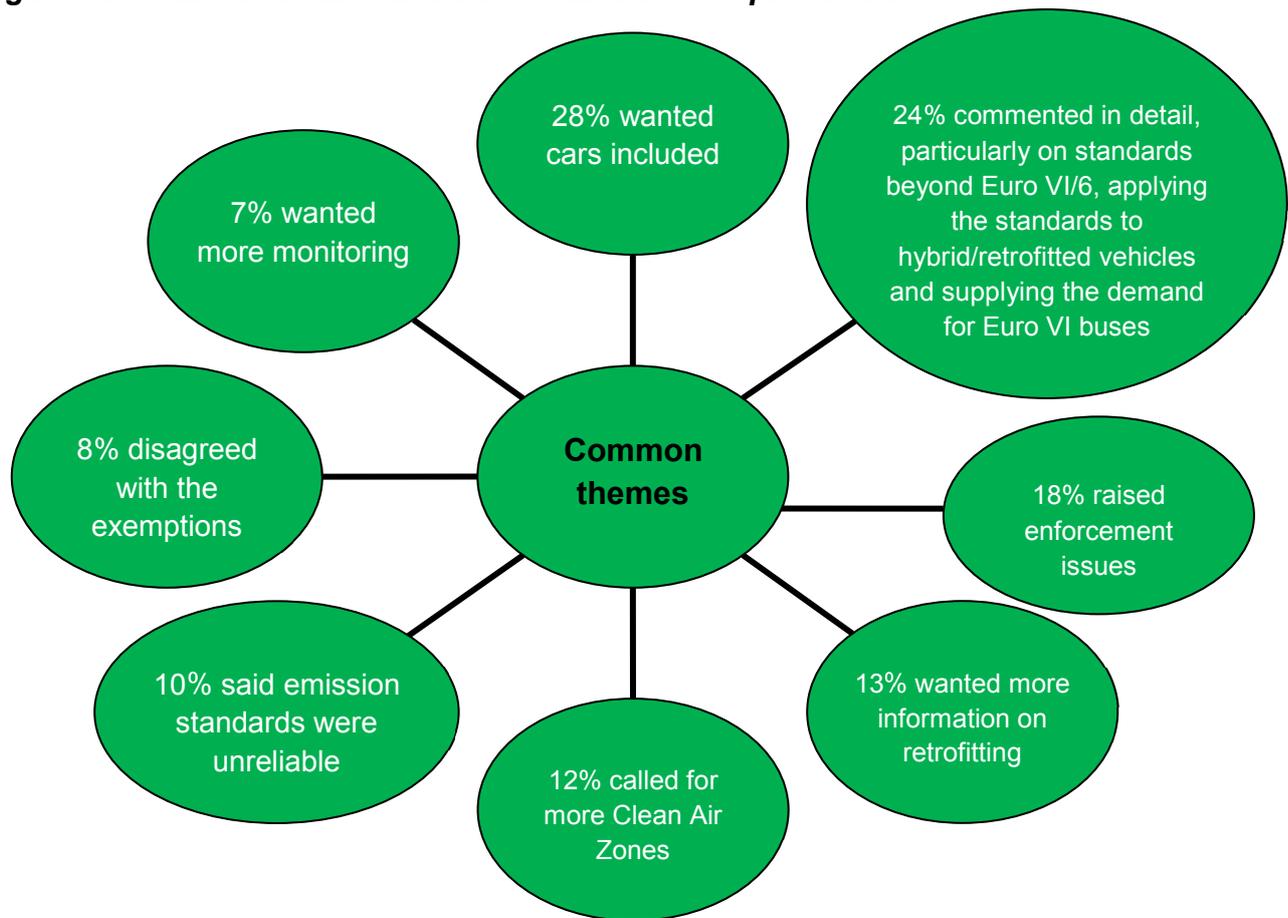


14. Many of the respondents who commented on this question focused on national measures such as fiscal measures and support to encourage modal shift. Those respondents who commented on local measures had a wide range of suggestions, including: changes to delivery times, addressing school journeys, cycle purchase grants, increasing green spaces and traffic free days.

Q4. Are the operational standards and requirements set out in Section 3 of the Framework acceptable?

15. 74% (151) of respondents commented on this question. Figure 6 shows the common themes from those responses.

Figure 6: Common themes from the comments to question 4.

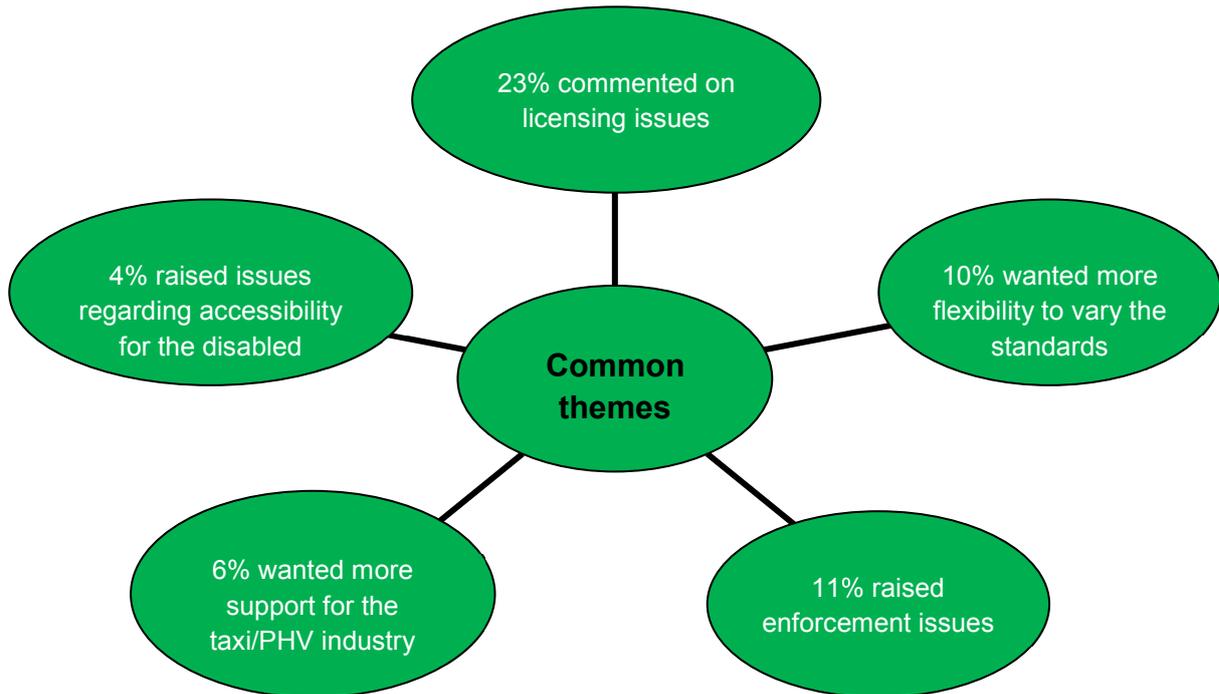


16. The majority of respondents (53%) supported the basic principles set out in Section 3 of the Framework. A few respondents suggested the inclusion of standards for other vehicles such as trains, increasing incentives for the uptake of ultra-low emission vehicles and more support for alternative fuels. A small number of respondents had suggestions for the revenue raised from charging Clean Air Zones.

Q5. Do you agree that the requirements in Clean Air Zones for taxis and for private hire vehicles should be equivalent?

17. 61% (124) of respondents commented on this question. Figure 7 shows the common themes from those responses.

Figure 7: Common themes from the comments to question 5.



18. The majority of respondents to this question (90%) agreed that the requirements in the Framework for taxis and private hire vehicles should be equivalent. Those respondents who disagreed preferred flexibility to vary the standards. Other comments included concerns about passing on charges to customers, displacement of older vehicles, support for conversion to alternative fuels and some support for only electric taxis being allowed into Clean Air Zones.

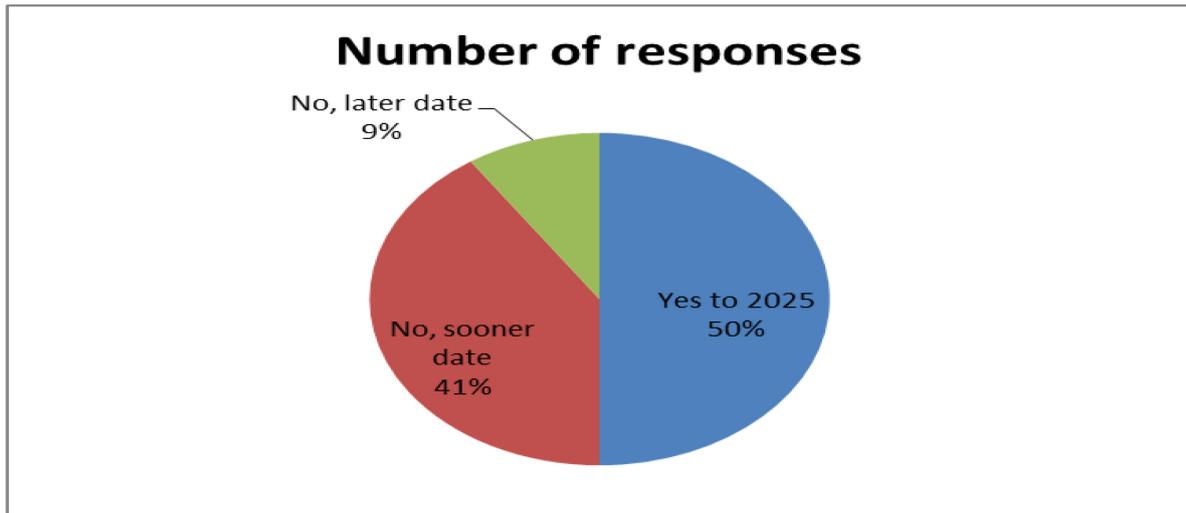
Q6. Do you agree the standards should be updated periodically?

19. 66% (134) of respondents answered this question. 96% of those respondents agreed that the standards should be updated periodically and 4% disagreed. Those who disagreed generally said that businesses needed stability and consistency and sufficient time to adapt.

Q7. If yes, do you agree that the minimum vehicle standards set out in the Framework should remain in place until at least 2025?

20. 72% (148) of respondents commented on this question. Figure 8 shows the breakdown of responses to question 7.

Figure 8: Breakdown of responses to question 7.

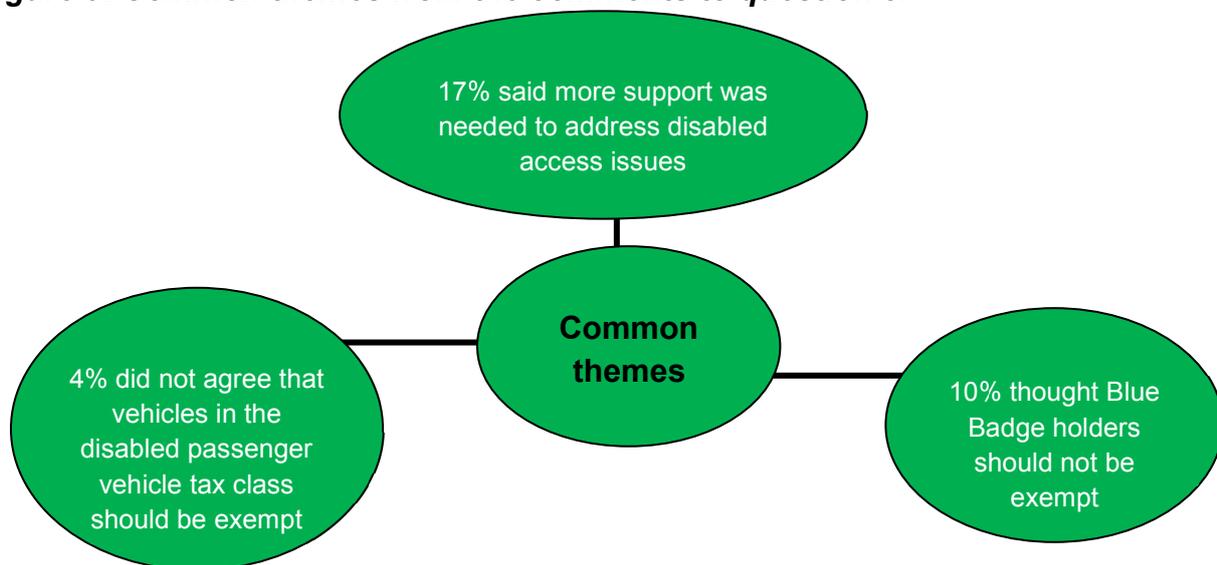


21. A small number of respondents suggested alternative dates to 2025 but there was no clear consensus on a sooner or later date. 2021, 2022, 2024 and 2030 were all suggested as alternatives to 2025. Instead of a specific date, a small number of respondents suggested the standards be reviewed every 2, 3 or 5 years.

Q8. Do you agree with the approach to Blue Badge holders?

22. 56% (114) of respondents commented on this question. Figure 9 shows the common themes from those responses.

Figure 9: Common themes from the comments to question 8.

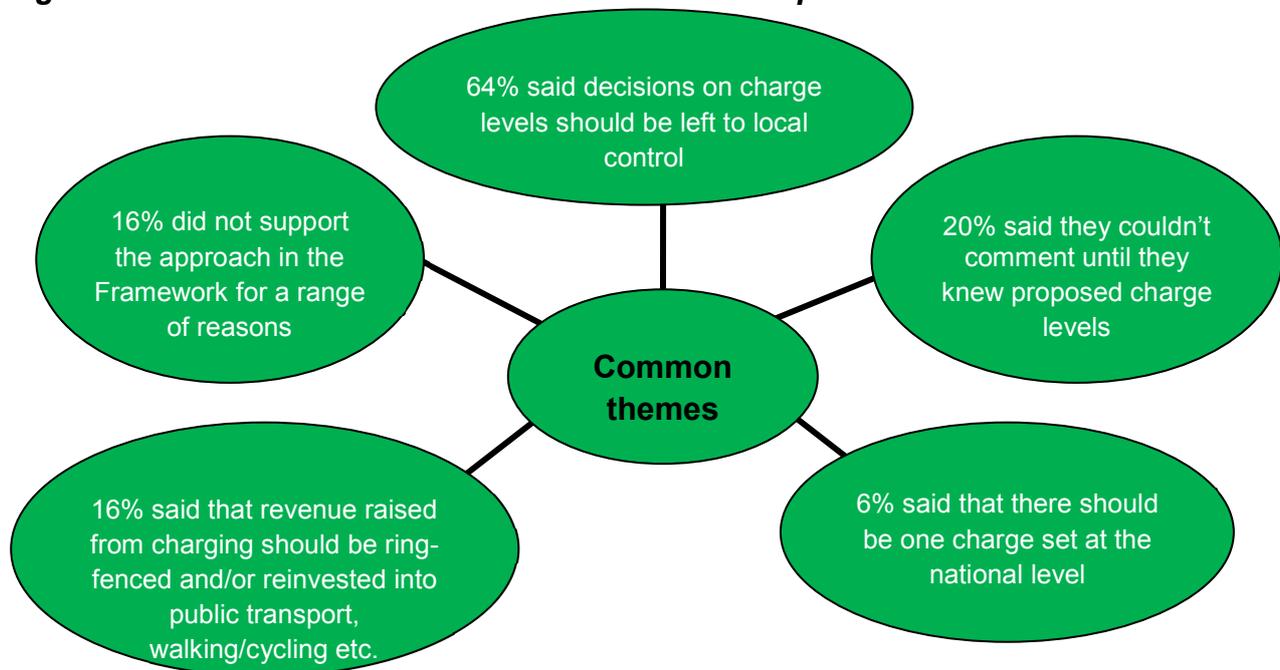


23. The majority of respondents (76%) agreed with the approach to Blue Badge holders set out in the Framework. A number of respondents commented more broadly on disability access issues and called for more support to ensure disabled people are not disadvantaged disproportionately.

Q9. Is the approach set out suitable to ensure charges are set at an appropriate level?

24.69% (140) of respondents commented on this question. Figure 10 shows the common themes from those responses.

Figure 10: Common themes from the comments to question 9.



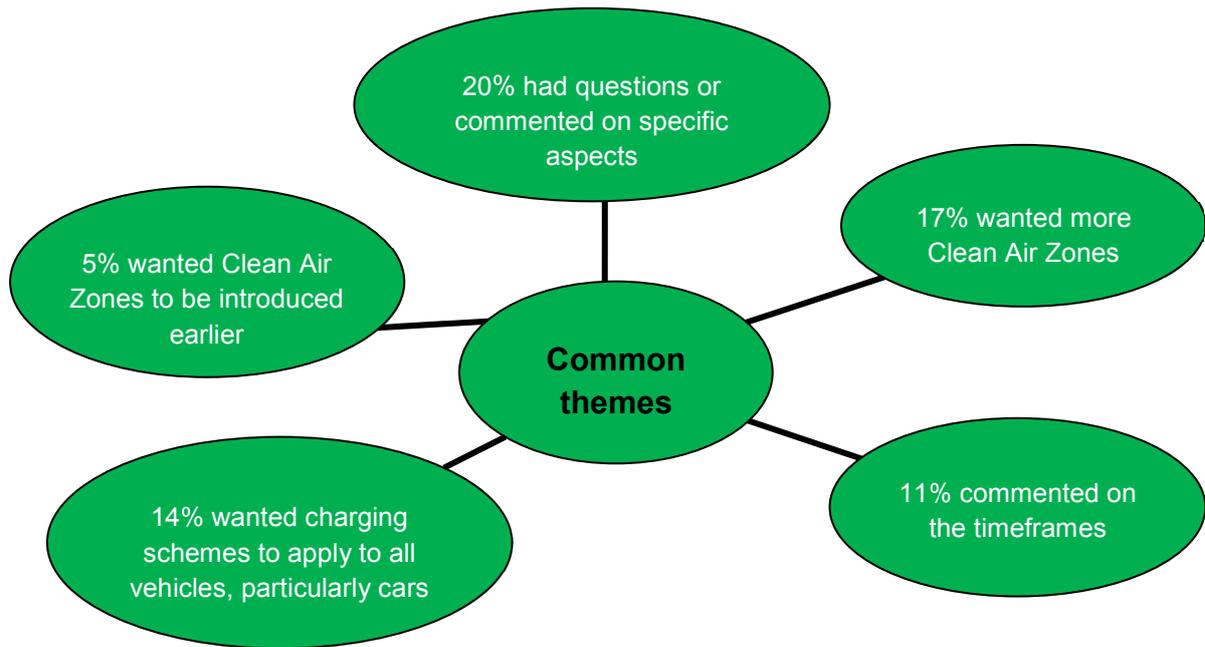
25. The majority of respondents supported local authorities setting the level of charge for vehicles entering a zone and taking local circumstances into consideration. Those respondents who did not agree with the approach set out in the Framework did so for a range of reasons, including: they supported charges being set at a high level to encourage behaviour change, some thought local authorities should be able to generate revenue from charging, a small number thought local authorities would set the charge artificially high to generate extra revenue, and some wanted to see more detail on charging levels.

Secondary Legislation

Q10. Do you have any comments on the secondary legislation as drafted?

26.37% (75) of respondents commented on this question. Figure 11 shows the common themes from those responses.

Figure 11: Common themes from the comments to question 10.



27. A number of respondents queried or commented on specific aspects of the draft legislation, including: the interaction of Clean Air Zones with other current and future road user charging schemes and schemes such as the workplace parking levy, a small number wanted to impose additional duties on local authorities, a small number queried the requirement for Secretary of State approval of draft schemes and one respondent had detailed comments on the legislative references to London. The majority of respondents who commented on timing said that the timeframes for implementing Clean Air Zones were challenging but a number of respondents also said Clean Air Zones should be introduced earlier than 2020.

Impact Assessment

Q11. Do you agree with the approach undertaken in the impact assessment?

28. 51% (104) of respondents commented on this question. Figure 12 shows the breakdown of responses. Figure 13 shows the common themes from those responses.

Figure 12: Breakdown of responses to question 11.

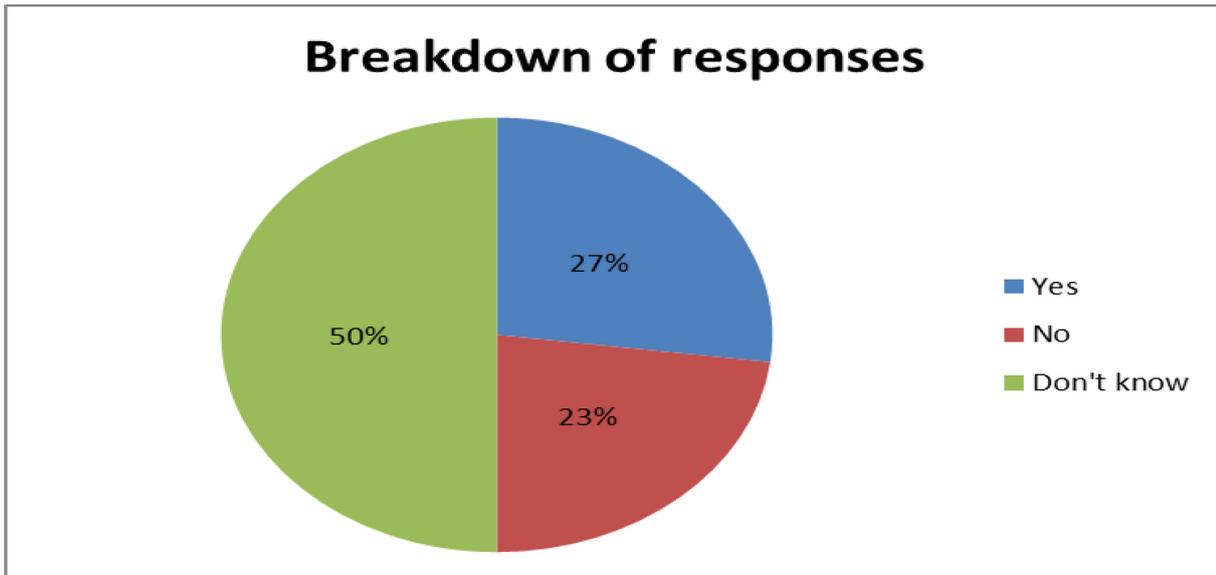
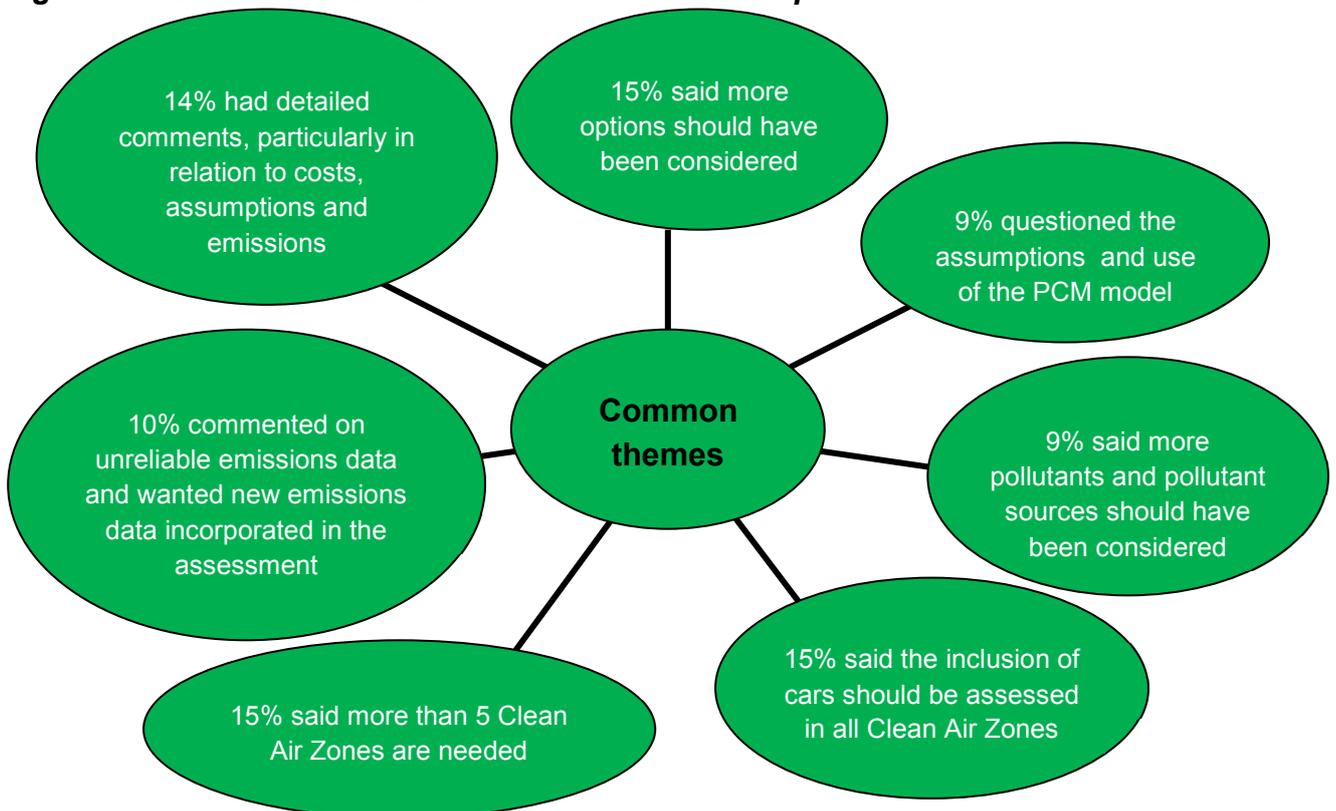


Figure 13: Common themes from the comments to question 11.



29. Most respondents who commented broadly supported the approach undertaken in the Impact Assessment and the preferred option for mandatory Clean Air Zones. A number of respondents raised broader policy issues, referencing the High Court ruling on the national air quality plan for nitrogen dioxide, to question the modelling approach and the perceived unreliability of emissions data. A small number of respondents thought more options should have been considered and in particular wanted a more detailed

analysis of the do nothing option and more national measures in addition to Clean Air Zones.

Q12. Do you agree with the conclusions of the impact assessment?

30.48% (99) of respondents commented on this question. Figure 14 shows the breakdown of responses. Most of the themes identified for question 11, in particular the inclusion of cars, the need for more Clean Air Zones and emissions data, are equally relevant to question 12. Figure 15 shows the additional themes identified from responses to question 12.

Figure 14: Breakdown of responses to question 12.

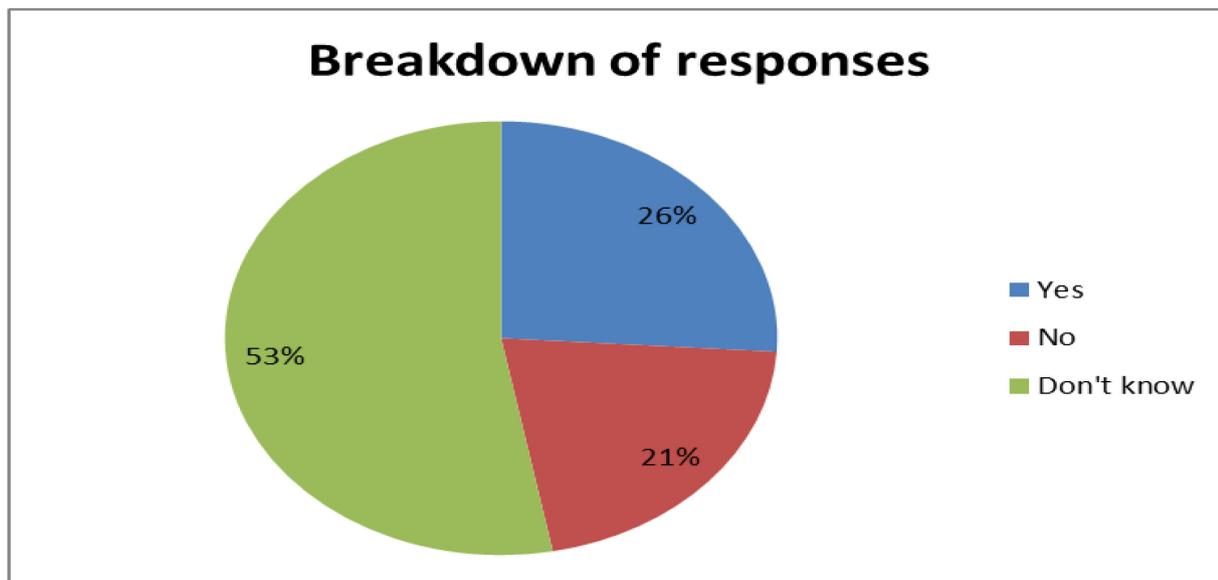
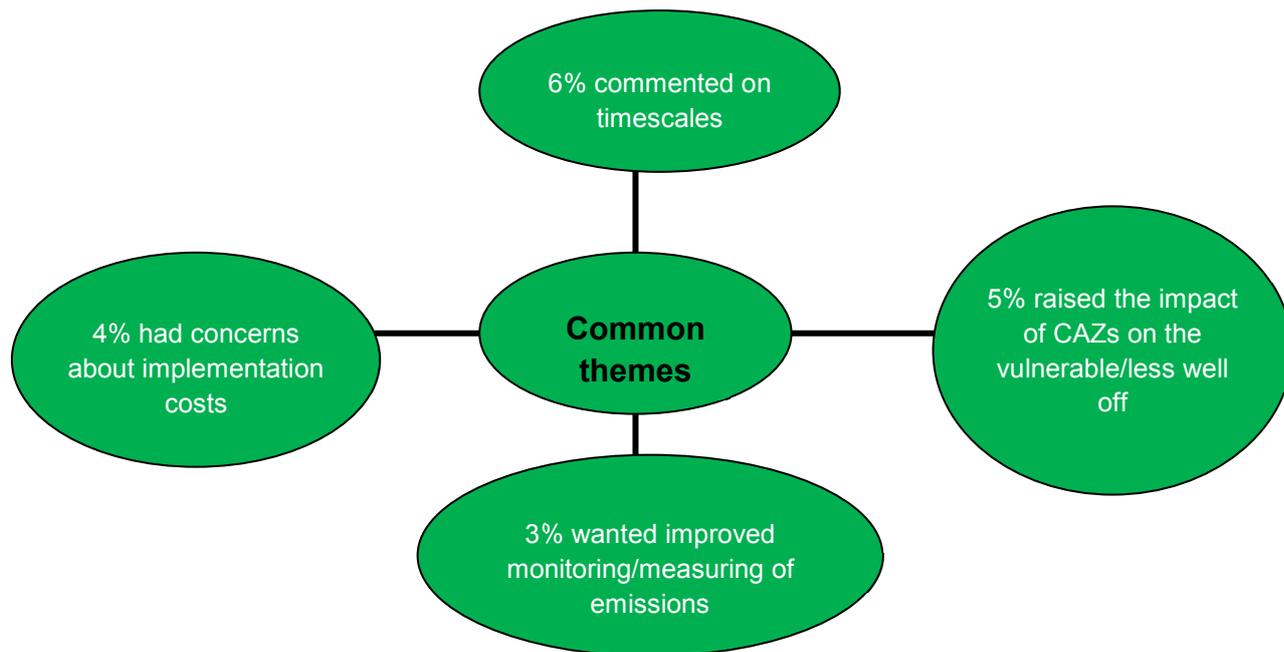


Figure 15: Common themes from the comments to question 12.



31. Respondents who commented on timescales and implementation costs said upgrading commercial fleets to Euro 6 in time to meet envisaged timescales for Clean Air Zones would be challenging and a few respondents thought the costs of upgrading had been under-estimated but limited evidence was provided in support of these comments. A few respondents wanted improvements to monitoring/measuring vehicle emissions and enforcement to assess compliance with limit values.

Q13. Are you aware of any additional data that could inform the impact assessment?

32. 45% (91) of respondents commented on this question. 25% of those who responded said they were aware of additional data and 12% of those respondents referenced specific evidence. Some respondents referred to the outputs of detailed feasibility studies yet to be carried out by the five cities. A few respondents referenced data produced by Defra and/or the Department for Transport and its agencies. A small number of respondents referenced additional data not already known and/or utilised by Defra and/or the Department for Transport.

3. Themes from the stakeholder events feedback

33. Three stakeholder events were held as part of the consultation on the draft Clean Air Zone Framework. On 4 November 2016 an event was held with local authority representatives and on 11 November an event was held with organisations covering a broad range of interests, including environmental groups, transport companies and technology providers. On 29 November an event was held in Leeds for local authorities and regional stakeholders.

34. Common key messages from across all events:

- General support for the principles set out in the Framework.
- Behaviour change - need for more joined up communications to raise awareness of air quality issues and links to public health messaging at a national and local level.
- Local authorities wanted measures to be prioritised and more evidence provided on the effectiveness of each measure.
- Funding issues – local authorities wanted more information about potential funding sources and guidance on how to apply successfully. Some concerns raised about the disjointed nature of various funding sources and the application processes. Other funding issues included calls for the Air Quality Grant Fund to be increased, more support for ULEV infrastructure and bus retrofit programmes and broad calls for more incentives to encourage the uptake of ULEVs.
- Support for joint working between local authorities and local businesses.

- Emission standards – some concerns raised about the reliability of the data.
- Calls for more information on retrofit accreditation schemes.
- Broad calls for the Framework to consider other pollutants and for more measures on non-transport pollution sources.

4. Next steps

35. After consideration of the consultation responses, and further policy developments, we have amended the Clean Air Zone Framework. The final version of the Framework is being published alongside this document.
36. The following key changes made to the draft Framework are explained in the context of the consultation responses:
- A number of respondents queried and commented on the approach to private cars in the draft Framework. The draft Framework did include standards for private cars, we have made some changes to the Framework to make this clearer.
 - Some respondents asked for clarification on roles and responsibilities and definitions. The sections on “Joining up Clean Air Zones and Local Air Quality Management” and “Improving collaboration and joining up approaches” have been amended to provide additional clarification.
 - A number of respondents requested additional information on retrofit schemes. We have amended the section on “Retrofitted vehicles and accreditation” to include more information on the Clean Vehicle Retrofit Accreditation Scheme that is being developed and removed the annex on approved retrofit schemes from the draft Framework.
 - Some respondents called for additional monitoring and assessment of the impact of Clean Air Zones. We have amended the draft Framework to clarify that local authorities will need to undertake appropriate monitoring and assessment of air quality levels to evaluate the effectiveness of measures implemented.
 - Some respondents commented broadly on the proposed exemptions from charging. Some minor changes have been made to the section on “Exemptions and discounts” to clarify the approach to exemptions, particularly in relation to Blue Badge holders. The approach to emergency service vehicles has been set out.
37. We will go through the Parliamentary process to introduce the legislation to mandate Clean Air Zones in Birmingham, Derby, Leeds, Nottingham and Southampton as soon as possible.
38. A number of respondents commented on wider issues than the content of the draft Clean Air Zone Framework, particularly in relation to last year’s High Court judgment

on the national air quality plan for nitrogen dioxide. Since these comments were for the most part not directly relevant to the Clean Air Zone Framework, they have not been included in this analysis. The government has already announced that we will set out further measures and consult on a modified air quality plan.

Annex A: List of respondents¹

Adveco Ltd
Arriva Midlands Ltd
Association of Directors of Public Health
Asthma UK
Autogas Ltd
BAE Systems Power and Propulsion Solutions
Basingstoke and Deane Borough Council
Bath and North East Somerset Council
Birmingham City Council
Birmingham Friends of the Earth
Bradford Council
Brake
Bristol City Council
British Lung Foundation
British Vehicle Rental and Leasing Association
Builders Merchants Federation
Bureau Veritas UK Ltd
BYD UK Ltd
Calor
Campaign for Better Transport
Cardiff Friends of the Earth
CEMEX UK
Certas Energy UK Ltd
Chartered Institution of Highways and Transportation (CIHT)
Cherwell District Council
Cheshire East Borough Council
Cheshire West and Chester Council - Environmental Protection
Chiltern District Council & South Bucks District Council
City of Bradford Metropolitan District Council, Public Health Department
City of York Council
CLARS Platform
Clean Air Southampton
ClientEarth
Climate Conversations
Confederation of Paper Industries
Confederation of Passenger Transport (UK)
Core Cities Group
Cornwall Council
Cycling UK
Cycling UK/Milton Keynes CTC
Dartford Borough Council
Daventry District Council

¹ List excludes the names of individuals as per Defra consultation guidance.

Dearman
Derby & South Derbyshire Friends of the Earth
Derby City Council
Doncaster Metropolitan Borough Council
Doosan Babcock
DP World Southampton
East Dorset Friends of the Earth
Eminox Ltd
Energy Technology Centre
Energy UK
Engie
Environmental Industries Commission
Environmental Protection UK
Eurocabs
Faculty of Public Health
Federation of British Historic Vehicle Clubs
FirstGroup plc UK Bus Division
Freight Transport Association
Friends of the Earth (England, Wales and Northern Ireland)
General Motors UK & Ireland
Greater London Authority/Transport for London
Green Urban
Greenpeace
Hager Environmental and Atmospheric Technologies
Hertfordshire County Council
Hull City Council
Hull Friends of the Earth
Huntingdonshire District Council
Institute of Air Quality Management
ITS United Kingdom
Jacobs
Leeds City Council
Leeds Friends of the Earth
Leicester Friends of the Earth
Liverpool City Council
Living Streets
Local Government Association
London Borough of Hounslow
London Sustainability Exchange
Low Carbon Vehicle Partnership
Manchester Friends of the Earth
Mineral Products Association
National Express Ltd (UK Coach)
National Express West Midlands
National Farmers' Union
Natural Gas Vehicle Network

Newark & Sherwood District Council
North Hertfordshire Friends of the Earth
North Staffs Friends of the Earth
Nottingham City Council
Nottingham City Transport
Nottingham Friends of the Earth
Nottinghamshire County Council
Off Grid Energy Ltd
Oxfordshire County Council
Oxy-Gen Combustion Limited
Poole Borough Council
Push Bikes, Birmingham's Cycle Campaign
RAC Foundation
RAC Motoring Services Reading
Friends of the Earth Robert
Bosch Ltd.
Rushcliffe Borough Council
Sandwell MBC
Sevenoaks District Council
Shell
Slough Borough Council
Society of Motor Manufacturers and Traders
South Cambridgeshire District Council
Southampton City Council
Southampton City Council
Sustrans
Tantalum Corporation
The Automobile Association
The Fuel Experts Association
The London Taxi Company
The Royal Mail
The Sustainable Development Unit for the Health and Social Care System
Thurrock Council
Transdev Blazefield Ltd
Transport for Greater Manchester on behalf of the GM Combined Authority
Transport for West Midlands - West Midlands Combined Authority
Trentbarton
Uber
UK Health Alliance on Climate Change (UKHACC)
UK Hydrogen and Fuel Cell Association
UKLPG
Unite the Union - Cab Sector
UPS
Volvo Group UK Ltd
Wakefield Metropolitan District Council
West Midlands Campaign for Better Transport

West Midlands Fire and Rescue Authority

West Midlands Police

West Yorkshire Combined Authority

Worcestershire County Council and Worcestershire Regulatory Services
(WRS)

Yorkshire Ambulance Service