The UK Health Alliance on Climate Change’s Response to Defra’s Open Consultation on the Implementation of Clean Air Zones in England

About the UK Health Alliance on Climate Change

The UK Health Alliance on Climate Change was launched in 2016 to encourage better approaches to tackling climate change that protect and promote public health, whilst also reducing the burden on health services. The Alliance represents some 600,000 health professionals across the UK in advocating for stronger solutions to climate change and to help realise the public health benefits that this will bring.

The Alliance’s members include the British Medical Association (BMA), the British Medical Journal (BMJ), the Climate and Health Council, the Faculty of Sexual & Reproductive Healthcare (FSRH), the Faculty of Public Health, the Lancet, the Royal College of General Practitioners (RCGP), the Royal College of Nursing (RCN), the Royal College of Anaesthetists (RCOA), the Royal College of Obstetricians & Gynaecologists (RCOG), the Royal College of Paediatrics and Child Health (RCPCH), the Royal College of Psychiatrists (RCPSYCH), the Royal College of Physicians (RCP), the Royal Society of Medicine (RSM) and the Royal College of Emergency Medicine (RCEM).

Health professionals witness the negative impacts of poor air quality and of climate change first hand, in the wellbeing of their patients. Just as we did with tobacco and HIV, we are committed to driving an accelerated response to climate change, and encouraging solutions which simultaneously improve air quality.

Introduction

The UK Health Alliance on Climate Change welcomes this opportunity to respond to Defra’s open consultation on the draft Clean Air Zones framework. The Alliance’s recent report, ‘A Breath of Fresh Air’ laid out the health imperatives for enhanced action to tackle air pollution and climate change by implementing cost-effective policies such as the expansion of clean air zones to urban centres beyond London.

Every year in the UK, air pollution is attributable to 40,000 deaths from non-communicable diseases such as stroke, heart attack, and chronic lung disorders. This analysis, conducted by the Royal College of Physicians and the Royal College of Paediatrics and Child Health, sounded the alarm, drawing our attention to the health impacts of air pollution throughout the life-course. In particular, the report highlighted air pollution as an issue of health inequality, with the most vulnerable groups – namely people living in deprived areas, children, the elderly and people living with chronic long-term conditions – suffering the most harm.
The RCP/RCPCH report also emphasised that apart from death and acute exposures, most of the damaging effects of pollution occurred across the life course and beings at conception. Early exposure to air pollution can damage the lungs, and increase the risk of lung infections that may be fatal.

Whilst a number of sectors contribute to the UK’s poor air quality, road transport (and particularly diesel combustion) is responsible for the majority of the burden of disease. From the perspective of health and climate change, a variety of strategies are required to decrease the size of the transport fleet, as well as the air pollutants and greenhouse gases emitted from the sector as a whole. Regulation in the form of continually strengthened Clean Air Zones is one of a range of important approaches to be taken in achieving this.

Two categories of health benefits are immediately obvious: those which result from improved air quality, hence reducing rates of stroke, heart disease, and chronic lung disease; and reductions in obesity-related diseases which result from increased physical activity associated with a modal shift towards cycling and walking. Therefore, any expansion of Clean Air Zones beyond London should aim to increase active travel, and encourage a transition away from diesel cars towards an electrified fleet.

General remarks about the consultation document

The UK Health Alliance supports Defra’s consultation as part of a broader effort to improve air quality and accelerate a transition to a low-carbon economy. We also acknowledge Defra’s efforts to deliver a national framework for Clean Air Zones and to include local authorities throughout the consultation and implementation stages. However, as it is currently presented, the framework is too modest, and insufficient to deliver the rapid and substantial improvements required over the coming decade. Smarter and stronger approaches are needed to make a lasting difference to the health effects of air pollution in the UK.

In addition to the establishment of stronger and broader charging zones, the draft framework for Clean Air Zones also focuses on non-charging measures (such as investment in charging stations and active transport infrastructure) which local authorities could deliver, without providing reassurance of adequate funding for their implementation. Lack of financial resource is a key barrier in preventing local authorities from implementing Defra’s Clean Air Zone recommendations. Without consistent funding, local authorities will not be in a position to deliver the policies laid out in the consultation document. In the UK, air pollution costs to individuals and society more than £20 billion every year. Additional funding and resources from central government are critically needed to support local authorities realise the vision set out in the draft framework and cut pollution in the shortest possible time.

1 RCP RCPH, Every breath we take: the lifelong impact of air pollution, 2016
With respect to the coverage of the Clean Air Zones, the Alliance is concerned that Defra does not intend to include private cars, motorcycles, and mopeds for the five additional urban centres. In doing so, the policy fails to capture many of the more substantive health benefits that could be achieved through a private modal shift, which would result in increased rates of physical activity. As four major cities just committed to ban diesel cars and trucks by 2025 to curb pollution it is urgent to take bolder action to discourage the use of diesel cars in city centres.

With respect to the scope of the proposed policy, whilst a focus on Birmingham, Derby, Leeds, Nottingham and Southampton is a sensible start, Clean Air Zones should be expanded to other urban centres. Indeed, many cities exceed the EU limits for nitrogen dioxide and other air pollutants. For instance, Stanford-le-Hope, Scunthorpe, Eastbourne and Oxford regularly breach EU air quality standards for PM$_{10}$ and other particulates. Greater ambition is clearly required to ensure healthier air for populations across the whole of England as well as in Scotland, Wales and Northern Ireland.

We are concerned that the draft framework does not contain any provisions for monitoring the implementation of the Clean Air Zones and ensuring their targets are achieved in the shortest possible time. Effective monitoring and evaluation is clearly required in order to adjust and strengthen the scope and coverage of the Clean Air Zones, to ensure compliance within the five cities, by 2020.

Lastly, whilst the implementation of Clean Air Zones is a necessary first step in cleaning up our polluted air, it must not be the only step that Defra takes to improve our air quality. A suite of complementary measures is required to address this multifactorial issue, and deliver significant and rapid improvements. Implemented alone, Low Emissions Zones have been shown to alter the composition of the urban fleet rather than substantially alter its size.² To this end, they improve air quality, but do not access the potential health benefits available from encouraging physical activity. Hence it is important that to the extent that these Clean Air Zones encourage a shift away from diesel engines, they are accompanied with other interventions which support the electrification of the fleet, and those which make active transport cheaper and more appealing for the public.

---

Recommendations from the UK Health Alliance on Climate Change

- Extend charging Clean Air Zones to private cars and vans
- Introduce Clean Air Zones in other cities
- Increase funding available to local authorities to invest in active transport
- Implement a centralised monitoring and assessment system for Clean Air Zones
- Develop a comprehensive cross-government strategy to tackle air pollution

Consultation Questions

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

The consultation includes a wide range of measures and initiatives that all have the potential to improve air quality. However, local authorities are placed with a large amount of responsibility and the burden for implementation, without adequate locally-targeted funding for the non-charging strategies. The proposed framework needs to be accompanied by adequate and additional financial resource, so that local authorities can provide the infrastructure required to implement its recommendations. Examples of important interventions to be delivered include: encouraging Ultra Low Emission Vehicle (ULEV) use within Clean Air Zones; incentivising drivers affected by Clean Air Zones to purchase ULEVs; supporting parking and recharging of Clean Air Zone compliant vehicles; and increasing public transport, cycling and walking accessibility. It is clear that regulation in the form of Clean Air Zones must also be accompanied with adequate investment to ensure an optimal outcome for health.

The consultation places the responsibility for developing and implementing the Clean Air Zones on local authorities, without also ensuring they will be provided with adequate support to do so. The Alliance is concerned that without the legal power, or financial resource required to implement Defra’s recommendations, local authorities will be unfairly blamed for failing to tackle air pollution. Without appropriate funding, local authorities will be forced to focus on meeting the minimum standards necessary to ensure compliance. This misses out on the opportunity to transform urban environments and improve health and air quality, whilst also meeting our climate change targets. At the broader level, national leadership is required in order to complement the actions of local authorities in urban centres.

Q2: Are there additional measures that should be highlighted under each theme? Please give evidence of impact if possible.

Increasing the uptake of ULEVs requires investment from local businesses and end-users to upgrade their vehicles which may best be supported with locally-targeted funding for low-emission vehicle retrofits or scrappage schemes. Such incentives should be included in the list of measures that local authorities will consider when implementing the Clean Air Zones. To this end, Defra and other Government departments should consider the implementation of a national diesel scrappage scheme and the possibility of rolling out local schemes to targeted hot-spots.
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?

Clean Air Zones need to be complemented by interventions at the national level to halt and reverse the ‘dieselisation’ of the UK’s vehicle fleet. Such a response requires a cross-departmental approach, bringing together different bodies including the Department of Health (DH), the Department for Business, Energy and Industrial Strategy (BEIS), the Department of Environment, Food and Rural Affairs (Defra), the Department for Transport (DfT) and the Department for Communities and Local Government (DCLG). It will also require effective working between governmental departments within each part of the UK to develop a comprehensive air pollution strategy across the whole of the UK.

To the extent that the Department for Transport does not take into account the public health consequences of the use of the road infrastructure, there is currently an important gap in the responsibility for the health impacts of road transport. This gap is best filled by ensuring a joined-up approach to tackling air quality and engaging directly with DH. Advice and support from Treasury is also required to consider the broader fiscal aspects of decarbonising the transport system.

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

The implementation of robust Clean Air Zones should be extended to include private vehicles. An increase in motorised road transport, combined with policies to encourage diesel engines, has led to dramatic rises in air pollution across the country. The UK has one of the most dieselized fleets in the world with diesel engines accounting for 40% of air pollution in urban centres. Whilst this was initially incentivised with the intention of lowering the carbon emissions of the transport sector, recent technological advances mean that these carbon reductions are often negligibly modest or non-existent.

However, only phasing out the most polluting vehicles will not be sufficient to tackle the scale of the problem. It is also important to note that the minimum emission standards set by Defra are reliant on EURO 6 delivering significant NOx reductions in real-world driving despite the fact that there are often significant differences between vehicle test and real-world driving conditions. As a consequence, Defra’s modelling may be too optimistic and will not help deliver the expected positive outcomes outlined in the draft framework. Therefore, the UK Health Alliance on Climate Change asks Defra to clarify how these limitations have been taken into account when defining the standards for the Clean Air Zones.

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

N/A
Q6: Do you agree the standards should be updated periodically?

The emissions standards used by Defra rely on EURO 6, despite the fact that vehicles produced under this guidance have been shown to produce higher levels of air pollution on the road, as compared to testing under laboratory conditions. To this end, Defra should make explicit the ways in which unreliable emissions testing have impacted its modelling and what measures it will take to avoid this in the future and ensure it remains evidence-based.

It also remains unclear on what basis Defra will update the standards and whether local authorities will have the opportunity to comment on the proposed changes. Such a timescale and proposed strategy for reviewing and strengthening the standards should be made clear, going forward.

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

There is the potential for concern in that Defra’s framework relies on EURO 6 standards for the implementation of the Clean Air Zones. The Chair of the Transport Committee Louise Ellman MP has described the vehicle testing and certification system as ‘notoriously opaque’.³ In light of this, Defra should consider updating its standards as soon as new testing regimes that better reflect actual driving conditions become available.

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

As it is critical to balance the benefits of supporting health against the negative effects of transport emissions, we recommend protecting the rights and current accessibility of Blue Badge holders within new schemes.

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

N/A

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

The legislation only requires five cities to prepare a charging scheme, and places no additional requirements on several other cities which regularly breach legal limits of NO₂. The secondary legislation provides the Secretary of State with the power to require any urban centre to implement a Clean Air Zone, in the future. This is an important step forward, and the UK Health Alliance would implore the Secretary of State to make use of this power for any city which breaches legal air quality limits. Local measures should come into place at the earliest opportunity in the 38 out of 43 geographical zones in the UK that exceed the limit for NOₓ.

In order to ensure maximal gains for public health, Clean Air Zones should apply to all vehicles – private and commercial.

Q11: Do you agree with the approach undertaken in the impact assessment? If no, please provide supporting evidence.

N/A

Q12: Do you agree with the conclusions of the impact assessment? If no, please provide supporting evidence.

N/A

Q13: Are you aware of any additional data that could inform the impact assessment? If yes, please give details.

N/A