



Response to the Defra Clean Air Strategy

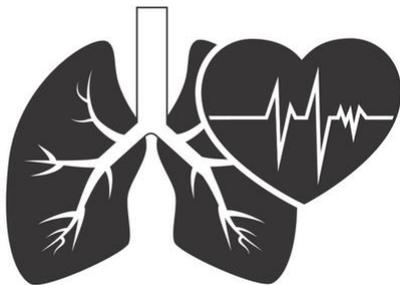


What our Communities said about the Clean Air Strategy

Cleaner Air 4 Communities actively engaged with communities at a series of events during 2016-2018, and specifically for the purpose of this consultation, LSx organised a major event held at the Crystal in London on the 1st August 2018 where we focussed the discussion on 5 of the areas outlined in the Clean Air Strategy 2018:

- Chapter 2 : Protecting the nation's health
- Chapter 4: Clean Growth and driving innovation
- Chapter 5: Action to reduce emissions from transport
- Chapter 6: Action to reduce emissions at home
- Chapter 9: Leadership at all levels

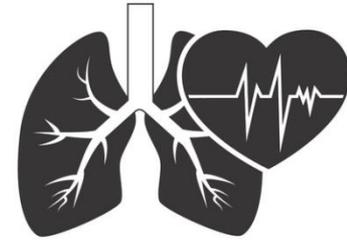
Our communities strongly support the role the strategy plays in facilitating good growth and opportunities to help the country promote a greener cleaner environment.



What our Communities said about the Clean Air Strategy

These communities have made the following overarching comments:

- The Strategy needs to be enhanced with a fully operational **timetable** with **clear targets** and clarity for all parties to collaborate effectively.
- The proposed **independent statutory body** would need a **broad remit** to **establish and aid delivery** of ambitious standards, objectives, targets and have the authority to **hold** the government, industry and people **to account**. The body should work with all sectors including the government, local authorities, science, industries, businesses, the charitable sector and people to **set the regulatory framework**
- There is a **mismatch between costs and benefits**. Whilst the NHS would be a major beneficiary from pollution reduction, the burden of investment and cost have to be met by innovators and local authorities – who struggle to realise a return of investment. **This market failure must be addressed**
 - In order for people to engage with the ambitious programme, it would be essential for a **fully segmented behaviour change programme** identifying behaviours, exemplars, and incentives for industry and consumers to support and realise the vision of the strategy.
 - **Pledges need to be supported with a fully funded suite of programmes** to ensure local authorities can meet aspirations.



Chapter 2 : Protecting the Nation's Health

Overall, we feel that the goals outlined in the chapter **do not offer the clarity that would be required for appropriate action**; they are **vague** and **too distant**, or unnecessarily focused:

- The goal *“to halve the number of people living in locations where concentrations of particulate matter are above 10 µg/m³ by 2025”* is **too far away**, unclear on what will actually happen to people in those locations and no clarity **on action** and needs clarification **how this will be achieved**.
- Communicating and promoting **behavioral change** through institutions, such as schools, hospitals and doctor's surgeries or social media marketing with relevant information by **target- or risk group** on pollution avoidance or on developing resilience:
 - We support messaging systems such as AirText for vulnerable people but it should provide specific local and practical advice, and be coupled with medical practitioner support on a national level.
 - The NHS (GP practices in particular) should be funded to provide more information, especially to those vulnerable to the impacts of pollution and should do more to encourage active lifestyles.
 - Effective behaviour change requires investment in proper social marketing campaigns with segmentation targeting specific behaviours.



Chapter 4: Clean Growth and Driving Innovation

The package of actions is targeted towards quite specific industries but should be broader across the entire business landscape such as the manufacturing, agricultural and service industries.

- There is a strong focus on transport (EVs), but there needs to be more focus on other areas such as alternative low emission forms of travelling, innovation into removing VOCs from products, innovation into construction materials and building design etc.
- The UK prides itself on being a hub for finance and insurance, the package of actions needs to involve these sectors
- **Clean growth** needs to be embedded across the entirety of the economy and business processes, not distinguished from it. In order for the UK to be leaders in this area, there must be **strong direction** with **strong targets** and a **strict timetable** to provide focus to government & business coalitions, with clear **incentives for businesses**. Cross regional collaboration and linking entrepreneurs with government, business and industry –through LEPs and Innovate UK would be essential.
- **Consistent investment from government is required with publicity over what funding is available to incentivise innovative entrepreneurship and behavioural change.**



Chapter 4: Clean Growth and Driving Innovation

There is a mismatch between cost & benefit. Whilst the NHS would benefit from pollution reduction, the short term cost would need to be met by innovators and local authorities, who struggle to realise their investment. **Short term investment from government is required to address this market failure with publicity over what funding is available.**

Barriers identified include:

- **Uncertainty** and **risk** around innovation and new technologies
- **Lack of clear information** and strong incentives, or **conflicting incentives** such as biomass heating
- **Little regulation and guidance** – no universal accreditation for air quality
- **Lack of consistency** across businesses and industries
- **Lack of monitoring**

- The five priorities are important, but there are key areas missing such as:
 - **Business engagement** beyond manufacturing.
 - **Innovation in monitoring** in order to assure that changes are effective.
 - **Cross collaboration** across industries that can learn from each other.
 - **Lack of education** and awareness at all levels to ensure that there is demand for innovation
 - Clarity on how the Government plans to address **the skills gap**, particularly in the short term
 - **Lack of funding and resources for councils** so they can enforce and deal with the issues.
 - Universal air quality accreditation across all sectors



Chapter 5: Action to Reduce Emissions from Transport

The package is not specific and is based on unambitious timescales

- It needs **step by step targets** with short term solutions and actions rather than **distant major milestones** that may not be met in full at the desired dates.
 - For example: **annual targets on fuel use reduction for corporations**
- India have more ambitious targets planning to move to 100% electric cars by 2030
- There are **no contingency plans if pollution worsens** or if the established targets do not deliver the desired pollution reduction
- It should include targets for military and emergency vehicles
- There should be **significant incentives / disincentives (taxes, rebates or grants) to change purchase and usage behaviour – not only cleaner cars but also fewer cars**
- Incentivise shift from car ownership with large discounts on car sharing for public transport pass holders
- Make electric car ownership more viable with large discounts on occasional rental of larger cars or petrol cars to cover for long trips (beyond electric car reach or fast re-fuelling need) or high load trips (so smaller, less polluting cars can be purchased)
- Increase taxes on polluting car purchase and usage (fuel duty) to fund rebates on electric car purchase, the charging point infrastructure and public transport (paradoxically, since 2011 fuel duty is frozen but average change of rail fares increased by more than 20% since then)
- **Public transport is more expensive than car use** especially for groups of people (i.e. families)
- “Red diesel” should be taxed at the same rate as regular deisel



Chapter 5: Action to Reduce Emissions from Transport

Lack of funding and investment

- The proposed level of investment in reduction of transport emissions is a fraction of the road building budget
- The existing public transport infrastructure and capacity (both urban and rural) needs additional funding beyond the private investment
- Active travel (cycling / walking) needs to have an integral part of any road planning

Undertake clear impact planning on the effects of proposed actions

- Significant increase of electricity requirements but no estimate on the quantities and its delivery in an environmentally friendly way
- Plans to be '*at the forefront of the design and manufacturing of zero emission vehicles*' (see *Road to Zero*) with no clear plan on how to achieve this
 - Relying on Japanese manufactures to produce their zero emission vehicles in the UK holding all licenses and patents does not really count as a UK ambition
 - There is also no plan on electric car supply if manufacturers do not deliver

Significant increase of public transport needs

- Current rail and urban transport network will no longer be able to cope with increased passenger demands – it is already close to full capacity in many places and struggling to deliver acceptable levels of service
- Light rail network in UK cities is minimal compared to the other EU leading economies
- Public transport network outside of cities is exceptionally poor with little alternative to car use



Chapter 6: Action to Reduce Emissions at Home

There is a need for stricter, clearer regulation

Current actions proposed are voluntary and too vague. More **strictly enforceable components** would be required if a reduction in indoor pollution were to be achieved

- Prioritising intervention before the fuels get to a customer through regulating and educating craftsman and retailers
- Introducing local schemes to improve enforceability such as creating a clean air hotline to report illegal fires, supermarkets selling inappropriate fuel to burn or a neighbourhood watch scheme
- Public awareness must be improved nationally and therefore a national social marketing campaign would be required to deliver this rather than leaving it up to local authorities

Strong preference for the national labelling scheme and information online. The national agency need to provide strict guidance and work with manufactures to reduce NMVOCs. **Products that have excess amounts should be banned outright**

Our communities support a wide range of actions including:

- **Mandatory assessments for construction projects through the planning process**
- **Incentivising cleaner stoves and burners coupled with energy efficiency projects.**
- Defra should consider **taxing non-compliant fuels and appliances.** The cleanest fuel should be the most convenient and accessible



Chapter 9: Leadership at all Levels

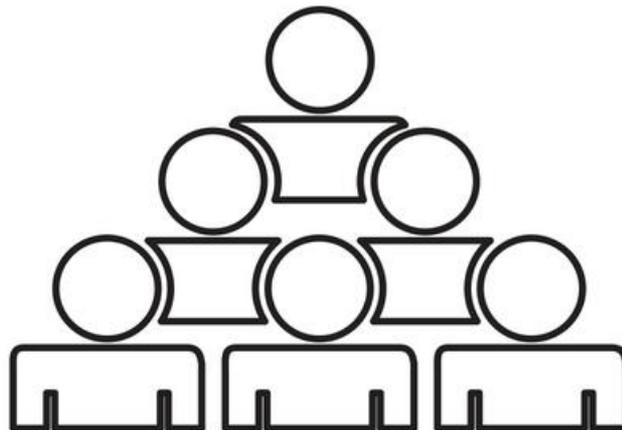
The legislative package should provide greater clarity, a tighter framework, clear standards and targets and methodology on sharing best practises:

- How will the emissions standards be met?
- What limits will be set for certain pollutants, such as ammonia?
- We support the strengthening of powers but it is not clear how they will be implemented.
- It is not yet apparent how local authorities will be able to carry out the new powers unless they are given the appropriate support and funding
- The national agency needs to have a role in not only providing guidance to local authorities but also to put pressure on manufacturers of cars, tyres and brakes
- Establish **clear framework and guidance about how to set up and foster local collaborations to share good practise** between multiple sectors / central and local authorities / industries rather than leaving it up to local authorities
- More emphasis on allowing local groups to be involved in the air quality management of their area utilising local knowledge and identifying key pollution hot-spots and issues.
- More detail is needed how the **Clean Air Zone** roll-out will be **funded** and what support is available to local authorities particularly since they require improvement to the public transport network and reduction in fares to really incentivise shift away from cars (This is strikingly apparent in some of five proposed CAZ cities)
- A national full cost-benefit analysis needs to be conducted to address the mismatch and market failure identified in the innovation section so that local authorities are funded and health authorities benefit fully.

Chapter 9: Leadership at all Levels

Significant explanation of how the environmental standards will change post-Brexit:

- How will **WHO air pollution standards** be taken up?
- If **scrutiny mechanisms** that are provided by the EU commission no longer exist more explanation of what steps are being taken to police the new 'enhanced standards' need to be detailed.
- Significant information on the **independent statutory body**. The method of **policing** the new "**stricter controls**" is a particular concern
- A useful inclusion following the Brexit section may be to analyse highly successful schemes targeting air quality that other countries are utilising (i.e. China, Norway and Germany)





London Sustainability Exchange

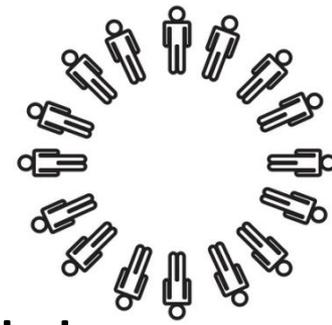
About LSx

London Sustainability Exchange (LSx) (www.lsx.org.uk) is a “think and do” charity which creates collaborations that address the complex barriers to sustainability. Our projects provide action-based community development and research to develop, and in turn share the lessons from our work and, most importantly, influence policies for a sustainable future.

Contact us

For more information contact **Alice Vodden** on 0207 234 9400 or email A.Vodden@LSx.org.uk





The organisations who participated in our consultation response include:

Brixton Society

Campaign for Better Transport

CIWEM

Cycling UK

Investec

Local Pollution Group - Sensus

Project Earth Rock

Siemens

Sustainable Merton

British Heart Foundation

Centre for London

Coin Street Community Builders

Hubbub

Kingston Council

MACE

Queen Mary University

St John's Wood Society

Wandsworth Environment Forum