



44 Grand Parade, Brighton BN2 9QA
Phone – 01273 878770
Email – admin@environmental-protection.org.uk

LTP Consultation
Department for Transport
Great Minster House
Zone 3/14 76 Marsham Street
London SW1P 4DR

9th April 2009

Emailed to LT.PLANNS@dft.gsi.gov.uk

Consultation on Local Transport Plan 3 Guidance - A Response From Environmental Protection UK

We are writing in response to the above consultation. Environmental Protection UK has considered the consultation documents and welcomes the opportunity to comment on the proposals.

1 - About Environmental Protection UK

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Environmental Protection UK's air quality and noise policy committees have been involved in the development of this response. The committees bring together policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry, interested NGOs as well as members from Environmental Protection UK's regional divisions.

2 – Summary of Our Views

Transport has a strong impact on environmental quality and local transport in particular has an enormous effect on the environmental quality of the towns and cities in which we live. As a charity working for better local environmental quality we would like to see the environmental effects of local transport reduced as far as practicable, and for local public transport to be developed as an attractive and sustainable alternative to the private car.

Whilst it is encouraging to see the issue of climate change strongly featured in the draft guidance, we feel that the local environmental impacts of local transport receive insufficient attention. Local journeys have the strongest effect on local environmental quality due to their proximity to homes, schools and offices.

On **Air Quality** we feel that there needs to be greater recognition of the need to comply with EU limit values for key pollutants; these limit values will be coming into effect over the course of the LTP3 period. This should be implemented by tying air quality together with climate change as far as possible – there are sound technical and policy reasons for doing this, as essentially CO₂ and local air pollutants are the joint products of the combustion process in vehicle engines and are emitted from the same exhaust pipes.

On **Noise** the delivery of a LTP3 in first round agglomerations, as designated by the Environmental Noise Regulations 2006, will need to be joined up with the emerging guidance on noise action planning and protection of quiet areas that is being drafted by DEFRA to comply with the Environmental Noise Directive. We are therefore pleased that, quality of life goals 13, and 19 acknowledge this, and also that consideration of the 'emerging' national noise strategy to is acknowledged at 8.

Overall, considerations that will reduce the impact of transport noise (and air quality), improve quality of life (and health) should be compatible with climate change goals. They must be considered in parallel with climate change concerns and we would suggest inserting a section on consideration of these local environmental impacts in section 3 – The Strategic Policy Framework for LTPs.

3 – Detailed Comments - Air Quality

Air quality in many areas of the UK continues to exceed legally binding health based European limit values. 'Crunch time' for compliance with these limits will arrive during the period covered by LTP3, assuming that the UK is successful in gaining deadline extensions for both pollutants. If the UK fails to meet the limit values the European Commission will take legal action against the UK, and valuable public health benefits will be missed.

In LTP2 air quality was one of four-shared priorities, and local authorities were encouraged to incorporate Air Quality Action plans into their Local Transport Plans where transport was the main source of breaches of air quality standards. While it is good to see air quality featured in the 'challenges matrix', the general feeling is that the importance of air quality has been watered down when compared to LTP2.

The issue of responsibility for compliance with limit values is a thorny one, whilst legal responsibility lies with the Secretary of State for Environment there is little hope of meeting limit values everywhere without strong concerted local action, transport still being responsible for the great majority of air quality breaches. We therefore feel that the language of compliance needs to be featured strongly in the text to ensure that transport planners attach sufficient weight to the issue where necessary.

Climate change and air quality have strong policy and technical links – as previously mentioned both CO₂ and local air pollutants are the joint products of the combustion process in vehicle engines and are emitted from the same exhaust pipes. Tackling both issues together can produce significant cost savings, whilst conversely tackling the issues separately can inadvertently lead to costly 'win-loose' measures being prioritised. The Air Quality Experts Group report 'Air Quality and Climate Change: A UK Perspective' explored these issues in detail¹.

¹ <http://www.defra.gov.uk/environment/airquality/publications/airqual-climatechange/>

The illustrative options given for meeting the various goals on pages 28-30 of the draft guidance do not acknowledge these strong links and the measures suggested under goal 2 should acknowledge the air quality benefits they could also achieve, and vice-versa with air quality measures under goal 4.

Finally where there are potential trade offs between tackling the two areas, the carbon pathway analysis undertaken by DfT last year provides some assistance. The analysis suggests that longer journeys (over 5 miles) are responsible for the majority on CO₂ emissions (81%), whilst the shorter journeys that have more of an effect of air quality are responsible for a much smaller amount (19%). Priority for CO₂ reduction should therefore be given to transport covering medium-long distance journeys, and, where air quality issues exist, air quality should be prioritised on measures targeted at short distance trips.

Recommendations

- The importance of local transport in complying with EU air quality limit values needs to be stressed, and the strong links with climate change established. The best way of doing this would be to incorporate these issues in section 3.4, i.e. state the appropriate legislation and strategies, and mention the benefits of tackling both areas together
- Illustrative measures on pages 28-30 should mention the co-benefits of measures to tackle climate change on air quality and vice-versa (where appropriate)

3 – Detailed Comments - Noise

The delivery of a LTP3 will need to be joined up with the emerging guidance on noise action planning that is being drafted by DEFRA to comply with the Environmental Noise Directive. We are therefore pleased that quality of life goals 13, and 19 acknowledge this, and also that consideration of the 'emerging' national noise strategy to is acknowledged at 8.

There is increasing evidence emerging that noise affects public health², and can affect the learning of children³, as well as quality of life, and therefore has a significant social and economic cost. Although we realise that this is not a consultation on the challenges matrix itself, it is worth flagging up that noise could also comfortably sit within the 'contribute to better safety, security and health' column.

The inclusion of noise within the challenges matrix is, however, not followed up in the main text of the document. By the time LTP3 comes into operation, we should have at least draft noise action plans and requirements for protection of quiet areas. Although these currently only cover a proportion of local authorities that sit in agglomerations, with the second round noise mapping scheduled for 2012 that proportion will increase. Noise Action Plans, under the Environmental Noise Directive, should therefore be included in the related plans and duties under 4.13. We are pleased to see noise included in example goal 4, however would reiterate that transport noise is a health, as well as a quality of life issue.

Actions that will reduce the impact of transport noise and improve quality of life (and health) should also, on the whole, be compatible with climate change and air quality

² Effects of Noise on Physical Health Risks in London – Berry et al 2008

³ Children's Environment and Health Strategy for the United Kingdom, Health Protection Agency 2009

goals, and again these linkages and win-win measures should be explored further in the text.

Recommendations:

- A paragraph on Local Environmental Impacts should be added to the Strategic Policy Framework, to include noise action planning and the protection of quiet areas
- Noise Action Plans, under the Environmental Noise Directive should be included in the related plans and duties under 4.13.
- Acknowledgement that noise impacts on health as well as quality of life.

6 - Contact Us

If you require any further information on the views expressed in this response please contact:

Ed Dearnley 01273 878771

ed.dearnley@environmental-protection.org.uk

Address

Environmental Protection UK
44 Grand Parade
Brighton
BN2 9QA