



Joint Air Quality Unit
Department for Environment, Food and Rural Affairs
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9 December 2016

Dear Sir/Madam,

Consultation on the Implementation of Clean Air Zones in England

We are writing in response to the above consultation. The Air Quality Committee of Environmental Protection UK has considered the consultation document and welcomes the opportunity to comment. These comments represent an overview of the Committee, but do not necessarily reflect the views and opinions of individual Environmental Protection UK members.

About Environmental Protection UK

Environmental Protection UK is a national charity that provides expert policy analysis and advice on air quality, land quality, waste and noise and their effects on people and communities in terms of a wide range of issues including public health, planning, transport, energy and climate.

We offer clear and critical analysis of UK government and European Union policy proposals through a range of high-quality publications and expert-led events, as well as up-to-date regulatory information through our comprehensive guide to UK and EU environment legislation.

Environmental Protection UK works with UK national and devolved governments, local authorities, business, academics and the general public, and with relevant EU institutions and NGOs.

Response to Consultation

Summary

- The current CAZ plans are inadequate. They have to go further, with more cities, more ambition and faster implementation, to protect human health and ensure that compliance is not just possible, but likely.
- Air quality causes major public health impacts and is estimated to cost £20 billion a year in the UK. There is a clear need for large-scale and ambitious actions to deal with the NO₂ problem and these need to extend beyond EU limit value compliance to health protection.

- There is still a need for real joined up thinking. Why does this plan still not take advantage of the other Government initiatives which affect air quality? These could be optimized to improve air quality, by targeting areas of high pollution, and addressing and relocating work with negative impacts. This includes planning and transport planning work, energy efficiency and renewable energy programmes, and ultra low emission vehicle schemes.
- There should be a hierarchy of measures, so the most appropriate and effective measures are used in individual situations. This should require local authorities to use (or at least actively consider) the non-LEZ measures, then non-charging LEZ measures (e.g. electric buses), then charging LEZ.
- At present, there is very little to incentivise or support the use of Clean Air Zones, other than where the charging element is mandated. This risks damaging air quality and public health in non-mandated areas.
- We welcome the addition of wider air quality actions than just charging Low Emission Zones.
- Where actions are based on bringing forward Euro standards, there must be measures in place to ensure these deliver the required emission reductions. This must include real world and in service testing as well as work at a European level.
- A true national framework for CAZ, particularly the LEZ element, would require central government databases and systems, freely available to LAs, to make it easier and cheaper for LAs to implement.
- It is misleading to imply that a clean air zone will provide an income to the local authority. A charging zone will have substantial set up and running costs, and is designed to get people to comply rather than pay the charge. If enough people pay the non-compliance or penalty charge to make it financially viable, it will have failed its main aim to improve air quality.
- A CAZ is an expensive and resource intensive system to set up. There is often political resistance. Even the non-charging CAZ require adequate expert staff and money to implement. More commitment is needed for government funding and support for local authorities, in both the mandated areas and elsewhere. The government also needs to ensure that clean air is a political priority at all levels of government.

Implications of High Court ruling on the National Plan

As highlighted in the recent High Court judgement which declared the Plan unlawful, and our response to the National Plan consultation¹, the measures currently proposed are inadequate to meet the limit values as soon as possible and to protect public health.

However, the Clean Air Zone framework could play a role in a more stringent National Plan, provided it is amended to go further, with more cities, more ambition and faster implementation, and is heavily supported by central government both politically and financially. It will also need substantial action by government to provide the technical support for implementation.

Further incentives could also be used to encourage non-mandated Clean Air Zones, which would address many of the other areas of poor air quality, regional pollution and public health. Introducing

¹ http://www.environmental-protection.org.uk/wp-content/uploads/2016/02/EPUK-response-to-National-Plan_final-6Nov15.pdf

CAZ in more areas will lead to a greater improvement in the UK vehicle parc (and e.g. non-road mobile machinery), as it discourages the problem from moving elsewhere.

There is still a need for direct central government action on air pollution. There are a wide range of other Government initiatives which affect air quality. These must be optimized to improve air quality, by targeting areas of high pollution, and addressing and relocating work with negative impacts. This includes planning and transport planning work, energy efficiency and renewable energy programmes, and ultra-low emission vehicle schemes.

The Need for National Action

The National Plans lack actual national government action. As the National Plans are a whole government plan, they need to harness the opportunities for air quality improvements for departments other than Defra. If these initiatives and programmes were optimised to deliver air quality benefits too (and focused on non-compliant areas), there would be major environmental and health benefits. At the very least, all government initiatives which could also influence air pollution or its sources should be properly assessed for air quality impacts. It is disappointing to note that this opportunity was not included in the National Plan.

These initiatives include (but are not limited to):

- DECC – energy and heat efficiency programmes (including insulation), renewable energy generation and associated STOR plants, future zero and low carbon homes initiatives, the Energy Saving Opportunity Scheme;
- DCLG – planning guidance and planning decisions (air quality needs to be more than a material consideration when limit values are/may be breached, development planners have a legal duty with respect to limit values that isn't currently being delivered); a stronger emphasis is needed on the National Planning Policy Framework (NPPF) and the appropriate paragraphs that point to the importance of planning policies in helping to deliver cleaner air (para 124 and 35 for sustainable transport); Building Regulations could be used to address air quality more effectively, measures which could be included are that all boilers should be low-NOx and all houses should have a vehicle electric charging point; the EPUK/IAQM planning guidance outlines best practice planning policies;
- DfT (& Highways England) – OLEV low emission vehicle schemes; Highways England motorway and major road schemes, especially urban roads (it is good to see Highways England finally identifying air quality money in their plans, but as yet few extra measures have been proposed); Local Transport Plans and their associated guidance need to have air quality as a major priority;
- HMT – diesel needs to be de incentivised immediately (the incentives to encourage dieselisation of the road transport fleet to reduce CO2 have contributed significantly to worsening air quality), low emissions vehicles (both air pollution and climate change) need to be incentivised; many of the other air quality measures need Treasury support to make them as effective as possible;
- DoH (&PHE) – air quality needs to be given a high priority for public health work, and directly for Directors of Public Health; limited public advice has been published or is given regularly to the public; notification systems such as AirText and airAlert have not been supported or promoted; these could be better linked to help people take action to improve both the health impacts and the local air quality;
- Others include regional authorities and county council programmes which influence transport, active travel or stationary sources, for example, local industrial boilers and residential gas heaters.

It must be made clear that development and transport planners are expected to play an important role in air quality action, especially where upper-tier authorities exist, and the legislation and guidance must set out this requirement.

In addition to the measures expected to be taken by local authorities, it is hoped that innovative solutions to improve air quality on the UK's motorway and trunk road network will be developed by Highways England as traffic on these roads plays no small part in contributing to the emissions and pollutant concentrations found in many city centres.

Existing EU Directives aimed at protecting the environment have played a major role in cleaning up the air we all have to breathe, either through the Air Quality Directives themselves or through others like IPPC and Euro VI emission standards that have better controlled releases. There is still more to be done but Brexit must not be used as an excuse to relax standards.

Question 1: Are the right measures set out in Section 2?

Question 2: Are there additional measures that should be highlighted under each theme? Please give evidence of impact if possible.

Question 3: 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?

We have answered these three questions in one, as the High Court decision has altered the context for the Clean Air Zones, and we therefore wanted to consider the wider picture as well as the details.

Approach to Clean Air Zones

We welcome the addition of wider air quality actions than just Charging Clean Air Zones/Low Emission Zones. This allows local authorities to identify the most appropriate and effective measure for their area. This can build on Local Air Quality Management work, but central government must provide the political narrative and support and the financial backing to enable local authorities take sufficiently ambitious and effective action.

We strongly recommend that a robust hierarchy is used to reduce air pollution and its damage to health.

1. Non-LEZ measures - to reduce traffic, promote cleaner vehicles, use planning policies and development control to reduce emissions and exposure to pollution, business and community engagement and action, etc.. These measures should be implemented, or at least actively considered with good reasons if not taken forward.
2. Emission controls on vehicles, including taxis and buses, and voluntary LEZ adopted by e.g. local businesses.
3. Charging LEZ

This hierarchy gives all local authorities the opportunity to identify cost effective action on air quality, engaging with local businesses and communities, finding easier ways to address vehicle fleets under local authority control, and putting measures in place which can help facilitate more aggressive actions such as a charging zone, which are very expensive and historically seen as politically undesirable.

Working through this hierarchy also gives local authorities the opportunity to identify how far up the hierarchy they need to proceed to solve their air quality problems.

While the framework does state that non-charging measures will be used in tandem with a charging zone, there is very little information or requirements on what this must entail. We recommend that ambitious minimum standards are set for these non-charging measures, with a requirement that local authorities demonstrate they have actively considered them if not taken forward.

It is worth considering the London LAQM methodology, which uses a prioritisation system for a wide range of measures.

This hierarchy has been based on experience of local authorities in the LAQM system. For example, some local authorities have found that, after carrying out Low Emission Zone feasibility studies, that other options were more effective for this local area. For example, York found that converting city centre buses to pure electric had a larger impact than a charging LEZ.

There is a need for further evidence for the effectiveness of measures. This was highlighted in the recent NICE work on air quality. It is important to quantify measures within a CAZ as far as possible, to ensure these are effective, improve them where necessary, and share best practice with other local authorities, to help refine future actions.

It should be requirement for those receiving government funding to produce a dissemination report, with methodology, results and quantification, for other local authorities.

It is essential that air quality monitoring is used to assess local air quality, not just modelling, which includes assumptions which could affect the results of the assessment and excludes local factors.

Non-mandated Clean Air Zones

There needs to be a stronger narrative around CAZ. As currently presented, this is being perceived as just a measure for mandated cities. But there is far more that can be done to improve local and regional air quality by action elsewhere too. Introducing CAZ in more areas will lead to a greater improvement in the UK vehicle parc (and e.g. non-road mobile machinery), as it discourages the problem from moving elsewhere.

The current narrative also increases the risk that air quality will be dismissed as an issue in areas where a CAZ is not mandated. There are early indications that this is already happening. Local political support has reduced in previously active local authorities and fleet operators in the region are talking about reallocating their vehicles to the mandated zones. There need to be more support and incentives for CAZ, and a clearer narrative for areas which are not mandated but still have air pollution problems.

An effective CAZ framework has the potential for ambitious real world improvements. There is an opportunity for CAZ work to build on LAQM knowledge and experience. However, the lack of political will, adequate funding, and weak links between the environmental health teams and the control over key sources, such as transport and land use, has meant that many LAQM actions are weak and ineffective. CAZ has the potential to improve this, if combined with resources and political support.

It was disappointing to see that, given the focus on local action, the Local Air Quality Management system was not given a larger role and additional support. This system help Local authorities deliver air quality benefits but needs more support through a higher political priority to ensure adequate

staff, resources and influence are available at local authority level and enforcement of responsibilities at local authority, county (and unitary authority transport and planning departments), Highways England, Public Health England and others.

Resourcing the CAZ

The government must ensure Local Authorities have adequate expertise, staff and financial resources, training and other support. Understanding the issues and expert professional judgement will be a key factor in the effectiveness of a local CAZ, and many local authorities have experienced a massive reduction in relevant skills over the last few years due to financial pressures.

We would like the government to consider including a requirement for accredited staff to work on CAZ and air quality management, similar to the need for a 'competent person' in waste management.

Designing and implementing the CAZ measures effectively (both non-charging and charging) requires a good understanding of complex technical issues. Over recent years there has been some loss of expertise in some local authorities. Further government funding training for local authorities on key issues will help deliver effective measures. (EPUK has previously provided training for Local authorities on Local Air Quality Management, on behalf of Defra, and would be willing to discuss options for supporting CAZ.)

Many local authorities have air pollution problems, as indicated by the extensive lists of AQMAs. These areas, and even local areas which identified as compliant, have a lot to gain from action. Recent studies (REVIHAPP & WHO) have identified the potential for substantial health benefits even below the standards. Air quality causes major public health impacts and is estimated to cost £20 billion a year in the UK. Addressing just 6 cities, or even 16, will not solve this problem.

One particular issue is whether local authorities would be supported where a CAZ would cover a number of local authority areas, for practical implementation reasons, but the area of non-compliance is confined to a small area of only one authority.

The extra credit given for local authority funding applications where air quality is a consideration is a useful start, however without information on how much extra credit and which funds have air quality as a consideration (and without both of these being significant), this is probably too little to influence local authority decisions.

It is misleading to imply that a clean air zone will provide an income to the local authority. A charging zone will have substantial set up and running costs, and is designed to get people to comply rather than pay the charge. If enough people pay the non-compliance or penalty charge to make it financially viable, it will have failed its main aim to improve air quality.

Local authorities are under huge budget constraints so any charging Clean Air Zone would have to be fully funded by central government.

Non-charging Clean Air Zone

A non-charging CAZ could produce substantial improvements in air quality and public health, building on LAQM work. But it needs support from central government.

At present section 2 could be mistaken a list of measures for consideration under LAQM. It would be useful to consider why LAQM has not delivered all we hoped it would (such as lack of expert staff and funding, lack of political support, lack of support from those controlling sources, such as transport and planning teams). This points can be addressed through the CAZ framework to deliver real improvements. .

The London LAQM sets a method for prioritisation for the various options, this may be useful here.

Measures which could be considered under a Non-charging Clean Air Zone include the following.

- Different vehicle types can be controlled in different ways. For example buses and taxis are both operated under contract or licence to the local authority, and therefore emission standards can be enforced through licensing checks without need for external infrastructure such as on-street cameras.
- A CAZ should also address dust and emissions from construction and demolition sites, including non-road mobile machinery (NRMM), as these can have a significant impact on air quality both within and around the site. The London 'Planning Practice Guidance on the Control of Dust and Emissions from Construction and Demolition' includes best practice and emission standards for NRMM, and could be adopted as part of the CAZ.
- The EPUK/IAQM guidance 'Land-Use Planning and Development Control: Planning for Air Quality', 2015, could also be used as an element of the CAZ framework. This sets out best practice for planning policy and in ensuring planning applications have adequately addressed air quality and exposure.
- A CAZ could also usefully address small scale energy generation in urban areas, this includes biomass boilers and Short Term Operating Reserves (STOR) plants. These are hard to address or manage through the planning process and can significantly increase local NOx emissions.
- The Low Emission Neighbourhood concept, as developed by Transport for London, contains some useful ideas for the non-LEZ transport elements of a CAZ. This is an area-based scheme that includes a package of measures focused on reducing emissions (and promoting sustainable living more generally).
- Financial 'incentives' can play an important role. For example, Islington have imposed a significant surcharge for diesels when residents apply for a parking permit. This was initially unpopular, but following additional communication on the air quality benefits, this reaction appears reduced.
- The LowCVP's recently published guide on Local Measures for Encouraging the Uptake of Low Emission Vehicles could assist Local authorities develop measures and incentives to encourage uptake of cleaner vehicles.

Charging Clean Air Zone

We agree that it makes sense to have a national framework for CAZ and LEZ, to make it easier for Local Authorities to implement and to allow vehicle operators to manage their fleets. . There are currently 208 'Low Emission Zone' schemes operating in Europe. In every other country with more than one LEZ there is a national LEZ framework, e.g. Germany, Denmark and Sweden.

The government needs to consider and recommend the implementation mechanisms, including identifying adequate funding and providing the necessary data, infrastructure and support.

Any LEZ should also take into account other pollutants, especially particulates, primary nitrogen dioxide and ideally carbon dioxide. To exclude these will compromise cost effectiveness in the longer term, and decrease the health benefits.

A low emission zone can be an effective way to reduce emissions and improve air quality and public health, but it must be suitable and tailored to local conditions. A framework to balance consistency for operators and ease of implementation for local authorities (by using an off the shelf product with the necessary data, infrastructure and support), must be balanced by the need to choose the most appropriate approach for the local situation.

We are also keen that a national framework does not stop local authorities from going further and implementing more stringent targets where necessary. For example, the London Ultra Low Emission Zone requires all new taxis to be zero emission capable from 2018.

There is no indication of how large a CAZ needs to be, this type of approach will have very different impacts and issues for implementations depending on its geographical size, ranging from a few roads and junctions to entire metropolitan areas. There is some evidence to indicate that small CAZ just displace the problem rather than solve it.

However, it is not clear why non-mandated Local Authorities would implement a LEZ now, when most have not done so during the last decade, despite support for feasibility studies and Low Emissions Zones being implemented in other European locations. Even when LEZ have been implemented (such as Oxford, Norwich and York), with the exception of London, these have been very restricted either in vehicle types (focussed exclusively on buses) or very small (one or two roads). LEZ are often seen as politically unacceptable.

National Action to support Local Measures

In addition to the national action discussed on page 3, additional action is required to support CAZ. A CAZ will take a lot of money and expert staff to implement. Government can reduce some of the back office burden by providing national off the shelf databases and software systems to local authorities.

This includes:

- a national database on vehicles and their emission standards which would need to be freely available to local authorities,
- a national accreditation scheme for retrofitted emissions abatement technologies, so Local authorities can be confident that vehicles are compliant and operators can be confident that their vehicles meet the requirements of all schemes,
- a national agreement on which vehicles should be exempt and associated database;
- guidance on infrastructure requirements, such as camera numbers and placement; and
- a common system (which could be run by the local authorities, or centrally, with monies being passed to the local authorities) for registering and paying a daily charge for entering the zone (or whatever approach is agreed for occasional users).

The accreditation schemes should be run by an independent expert organisation, rather than the Joint Air Quality Unit.

There is an outstanding question from this framework over how any CAZ will be evaluated and enforced, to ensure it is effective and fit for purpose. This is essential, especially where public funding is used.

There have been several issues identified which have reduced the efficacy of existing LEZ, which if addressed will help ensure that any new system is more effective.

For example, there have been cases of parts of the emission controls being removed or deactivated when not in the zone, or even just after initial approval has been given. This loophole must be addressed, either by regular checks by experts or reliable data on in-use performance. An example of this was used for SCR on London taxis, which included software to monitor the use of reagent, so it could be easily checked that the vehicle was never run without reagent and an active emission control system.

In order for retrofitted emissions abatement equipment to be effective, the vehicle must be in reasonable condition. In older and poorly maintained vehicles, an emission abatement device may not work. This would need to be addressed, if a CAZ affects a large number of vehicles.

In addition, any emissions abatement device, whether retrofitted or OEM, will need additional maintenance to ensure it performs adequately. Whether this maintenance had been carried out would need to be checked during a vehicle service, MOT or a focussed compliance regimes for CAZs (this would need central government directive, as well as guidance for local policing priorities).

In parallel to this technical work, there needs to be more information provided to the public, to raise awareness of the risks of air pollution, and the options available. This should also extend to discouraging people from buying new diesel cars.

EPUK are considering running a Clean Air Action Week in 2017, if we can get funding. This would build on our successful work over the last decade on our Noise Action Week. We would be happy to discuss this further with you.

Question 4: Are the operational standards and requirements set out in Section 3 and Annex A of the Framework acceptable?

There are issues which must be addressed if a CAZ and LEZ is to be effective, such as the Euro standards and their true relationship to real world emissions. The government should push for robust standards and vehicle approval to control real world emission factors (by arguing for low compliance factors and stringent controls on the loopholes, e.g. thermal windows).

We support the use of Euro VI for HDVs, as these have significantly lower real world emissions compared to older vehicles. There is much less benefit in using earlier standards.

As the CAZ framework must be more ambitious, it needs to include a standard for light duty vehicles, including cars. Euro 6 has been used as the emission standard for light duty vehicles, including cars. However only 6c tests for real world emissions. If Euro 6c delivers its emission standards under real world urban conditions, this could be used as the basis for CAZ.

The effectiveness of Euro 6 standards for cars and vans must be monitored their real world performance. Upgrading the standard to Euro 6c and beyond when available would ensure that a CAZ remained ambitious.

Research by Helen ApSimon's team at Imperial College, with Emissions Analytics, has identified a wide variety of emissions from Euro 6 cars under real world conditions, ranging from compliance to exceeding the emission standard by a factor of 22 under real world conditions. A key point is that removing the worst 10% of Euro 6 cars tested (the super-polluters) would reduce the total NOx emissions by half.

This data is available to regulators and consumers (through Emissions Analytics' EQUA index <http://equaindex.com/>), and could be used to discourage these cars from urban environments. The framework should enable local authorities to take real world emissions into account, and where possible exclude the super-polluters.

This could also be used to provide information at the point-of-sale, for example alongside or as part of the car energy label.

We know from experience that assuming emission factors are correct and that the Euro standards will deliver under real world conditions can lead to major air pollution problems and associated deaths. Decisions on air quality policies in the 1990s and 2000s were based on projections that vehicle emission standards would lead to the Air Quality Directive being met, so little further action was taken, despite early indications that these emission factors did not reflect real world emissions. Thousands of people have died because of this. We cannot afford to make the same mistake again, especially in light of the new evidence arising in the current alleged VW diesel emissions scandal.

Primary NO₂ emissions from diesels must also be taken into account, as these are crucially important for roadside concentrations.

The mandated CAZ are based on the national modelling. The national PCM model is necessarily less detailed than the Review and Assessment process undertaken by local authorities, which also considers long term exposure. This has resulted in a discrepancy in areas identified as failing to achieve air quality objectives between the two methods. There is a risk that some areas identified as polluted in local but not national modelling, may be excluded from action and support at the expense of areas identified by the national model as non-compliant where there may be little or no risk of long-term public exposure.

Implementing a LEZ (or CAZ) takes a lot of time and resource. We have major concerns that any CAZ that are implemented would not be operational by 2020, taking into account the need for local assessment, development of a specific scheme, legal adoption, stakeholder and community engagement, and lead in time to allow vehicle operators to take measures to comply.

Question 5: Do you agree that the requirements in Clean Air Zones for taxis and for private hire vehicles should be equivalent?

Yes.

Where taxis and private hire have different licensing conditions which affect the vehicle type, these can be taken into account when setting limits. This is the case in London, where only a limited number of vehicles meet the licensing requirements. However this limited fleet has allowed London to work with the vehicle manufacturers and push for higher standards among London black cabs, with all new taxis zero emission capable (ZEC) from 2018.

Question 6: Do you agree the standards should be updated periodically?

Yes.

Question 7: If yes, do you agree that the minimum vehicle standards set out in the Framework should remain in place until at least 2025?

No, this commitment would be counterproductive if the emission standards proved to be ineffective or new evidence or options became available.

The High Court ordered the government to ensure compliance with limit values by the earliest possible date, which entails that the efficacy of the measure (e.g. a CAZ) is the determining consideration, with only a very limited scope for consideration of cost.

While it is helpful to reduce uncertainty for fleet operators and vehicle owners through long term planning, this must be balanced against the effectiveness of measures, and the likelihood of new information becoming available to improve this effectiveness.

Almost all vehicles would be compliant due to natural wastage without a CAZ by 2025, so this type of CAZ could be largely irrelevant but still costly to run.

2016 is a time of extreme uncertainty, and the impact of Brexit and other global factors, the likely change in air pollution, the data on real world emissions of Euro 6, particularly from cars and vans, and the difference between 6a, b, c and beyond, and the change in conformity factors over time, could all influence the efficacy of CAZ.

It would therefore be remiss to commit central government and local authority spending without the opportunity to adapt and improve the CAZ over time (while balanced with sufficient warning to allow operators to adapt).

Question 8: Do you agree with the approach to Blue Badge holders?

Yes, wherever physically possible vehicles should comply with the limits or pay the charge. However it should be noted that many disabled people are under financial pressure due to austerity measures, and therefore these vulnerable users should get additional government assistance to improve their vehicles.

Similarly residents should also comply wherever possible, with a minimal sunset period. If too many vehicles are exempt from the CAZ, this risks undermining its effectiveness.

Question 9: Is the approach set out suitable to ensure charges are set at an appropriate level?

It is difficult to comment without the level defined.

The level should be set sufficiently high so that it makes economic sense to meet the emission standards rather than pay if you travel into the zone more than 2-3 times. If it is too low drivers will pay rather than comply. The aim of a charging CAZ is not to raise money, but to encourage compliance of the standards.

Question 10: Do you have any comments on the secondary legislation as drafted?

The legislation has very lax timetables and targets, such as 2018 for mandated local authorities and no date for the Secretary of State to respond. Given the uncertainty around Brexit, more robust targets and timescales should be included.

Question 11: Do you agree with the approach undertaken in the impact assessment? If no, please provide supporting evidence.

The impact assessment should include the measures highlighted in this response.

The impact assessment used overly optimistic data. In light of the High Court judgement it should be redone with the best available data, more realistic emission factors and taking into account real world performance.

Question 12: Do you agree with the conclusions of the impact assessment? If no, please provide supporting evidence.


The impact assessment should include the measures highlighted in this response, and use more realistic data, to produce a better evidence base for this programme.

Question 13: Are you aware of any additional data that could inform the impact assessment? If yes, please give details.

See above.

Please do not hesitate to contact us if you would any further information on any of these points. We would be very happy to discuss this further.

Yours sincerely



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