

## **Chartered Institution of Highways & Transportation response to the Draft Clean Air Strategy**

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*CIHT is a charity, learned society and membership body with over 14,000 members spread across 12 UK regions and four international groups. We represent and qualify professionals who plan, design, build, manage and operate transport and infrastructure networks. Part of our vision is to demonstrate transport infrastructure's contribution to a prosperous economy and a healthy and inclusive society. Our values are to be Professional, Inclusive, Collaborative and Progressive.*

**Q11. What do you think of the package of actions put forward in the transport chapter? Please provide evidence in support of your answer if possible.**

### **5.1 Transport's importance for clean air**

1. CIHT strongly welcomes the recognition paid to the role of transport in improving air quality and public health, in particular when it comes to streets and urban environments. Although road transport is responsible for only 34% of national nitrogen oxide emissions it is responsible for 80% on the roadside and therefore poses a risk to vulnerable individuals greater than it first seems.<sup>1</sup>
2. Increasing amounts of evidence shows that air pollution reduces life expectancy, and increases risk of cancer, asthma, heart conditions and dementia. This ill health can lead to reduced quality of life, social inequality and lower economic output yet in 2017 the Royal College of Physicians found 44 out of 51 major urban areas studied in the UK exceeded regulatory limits.<sup>2</sup>
3. CIHT would urge a holistic approach be taken to tackling the problems in addition to considering transport by mode and to treat the transport network and users of the network in an integrated manner. This approach would require taking a wide view of what causes unwanted emissions; and considering the full range of options in prevention, adaptation and innovation to remedy the situation.
4. CIHT has consistently called for a more joined-up and strategic view to how government policy is developed. The UK needs to take a coordinated approach to transport infrastructure to encourage innovation, deliver economic growth, social and environmental benefits. Infrastructure has been identified as one of the pillars of the current Industrial Strategy and we believe that the introduction of a UK Transport Strategy is now more important than ever.
5. For further information about the importance of transport planning in creating clean air please see CIHT's response to the draft [National Planning Policy Framework](#), [the RIS2 Consultation](#) and the [National Infrastructure Consultation](#).

### **5.2 Setting strategic direction for transport**

6. CIHT considers that the actions outlined are good in isolation but do not amount to an integrated solution to the problems it is designed to solve and are highly dependent on future plans being delivered when current decisions in road building, airport expansion and shipping are limiting the scope for future action.

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<sup>1</sup> House of Commons Transport Committee, '[Improving Air Quality: Summary](#)', 2018

<sup>2</sup> Royal College of Physicians, 'Lancet Countdown 2017 Report: Briefing for UK Policymakers', 2017

7. The individual schemes are important, but it is difficult to assess the overall effect of these changes and whether they are providing value for money. This is made more difficult as projects are being run independently by DfT, Defra and BEIS and do not have a single reporting structure. This strategic plan is a major opportunity to bring together siloed approaches into a truly comprehensive government strategy
8. Given that the Governments proposed Air Quality Strategies have been rejected three times as being in breach of its obligations with the High Court describing the Government's plans as "seriously flawed" and obliging the government to "aim to achieve compliance by the soonest date possible"<sup>3</sup> CIHT would encourage action be taken at a quicker pace.
9. The strategy does not articulate a strong overarching view of its vision for transport and how that ties into lowering transport related pollution. It also does not sufficiently address the strategic balance between objectives that will be necessary to achieve real change.
10. CIHT supports the ambitions of the Clean Growth Strategy (2017) and the Draft Clean Air Strategy (2018) to decouple growth in transport from emissions as well as new legislation to compel manufacturers to recall vehicles and machinery for any failures in their emissions control system and make tampering with an emissions control system a legal offence.
11. CIHT also supports replacing the existing patchwork of laws with single coherent legislative framework for local authorities to tackle air quality and bring the law up to date with the evolution of structures at sub-national level so that accountability for air quality sits in the right place

### **5.3 Road Transport**

12. This area of the plan is extremely limited, mainly outlining two other plans: "*The UK Plan for tackling Roadside Nitrogen Concentrations*" and "*The Road to Zero*" as the actual strategies, with minor mentions of the RIS2 dedicated funds and specific legislation against devices designed to fool or remove emissions control technology, that has already been laid before parliament. Therefore, it is difficult to identify what this section is adding to the agenda.
13. CIHT notes that a fuller plan to reduce emissions by road transport will need to address: emissions from the current fleet; accelerating road vehicle fleet turnover to more modern vehicles; encouraging public transport use; encouraging active travel; improving land use; infrastructure planning and more. However ultimately the best way to tackle air pollution would be to achieve fewer vehicle kilometres travelled.
14. This will require planning for walking, cycling and public transport as the preferred mode of transport for short journeys. CIHT's guidelines on using transport planning and urban design to achieve this can be found [at this link](#).
15. CIHT argues that there remains a need for better testing and understanding of emissions to understand the risk profile presented by these vehicles in actual operation, especially in towns and cities. In general, energy consumption and tailpipe emissions per kilometre are higher at lower speeds and that therefore network management needs to be part of the strategy. This is an important issue as analysis has shown that even the updated RDE (Real Driving Emissions) tests designed to

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<sup>3</sup> High Court of Justice, ClientEarth v Secretary of State for the Environment Food and Rural Affairs, EWHC 2740 (Admin), 2016, para 95.i

avoid past scandals “still excludes a significant portion of real-world driving conditions” and therefore may not accurately reflect vehicle performance on the UK’s roads.<sup>4</sup>

16. As part of this Non-Exhaust emissions must be better understood as they are a key element of improving the air quality in urban environments, with both brake pads and tyres producing potentially dangerous particulate matter. The production of these particulates has been linked with the size and weight of vehicles which should be considered in any review of the issue, as both electric vehicles, hybrid vehicles, and a trend to larger vehicles may exacerbate the issue. CIHT welcomes the recent announcement of a call for evidence on this issue and looks forward to the Transport Energy Model being updated.
17. CIHT note the slow progress in setting up Clean Air Zones (CAZ) in local authorities with illegal levels of nitrogen oxides. Given DEFRA analysis has identified CAZ’s as the most effective method of quickly improving air quality challenge.<sup>5</sup> The key element of the strategy is to reduce emissions of nitrogen oxides in the areas where concentrations of these harmful gases currently exceed legal limits in the quickest time period. The strategy should outline what is blocking them from coming to fruition and what can be done about it, our response to the earlier consultation on the implementation of Clean Air Zones in England sets out our views and can be found [here](#).
18. CIHT encourages the Department to work together with the Department of Transport to ensure that there is no interruption in the supply of biofuels to the UK fleet after exiting the EU. Over 47 per cent of biofuel source feedstock used in the UK during 2015/16 originated in the EU and this supply should be ensured.<sup>6</sup>
19. CIHT encourages strategy to look the services operated on national infrastructure, as well as the infrastructure itself. The England outside of London has seen an almost continuous fall in bus passenger usage over the last thirty years.<sup>7</sup> The emissions per head are significantly lower via public transport and any effective strategy must have a dimension that addresses public transport usage to effectively reduce emissions. CIHT’s guidelines on [Buses in Urban Developments](#) provide more information about how we can successfully integrate public transport into new developments.
20. The strategy emphasises the activities of local government and industry when it comes to reducing emissions, but it remains necessary for national leadership to continue applying pressure and to make it clear where the lines of responsibility and accountability lie. For example, where the local authority is not also the highway authority (as in two tier areas or with the strategic road network), there will be conflict in trying to deliver outcomes without the necessary joined up governance.
21. Given the clear legal responsibility of the Secretary of State to deliver on legislated air quality commitments, it is unclear from the CAZ framework what the future course of action will be if local authorities fail to take sufficiently radical actions to address local air quality problems (through CAZ’s and/or other means).
22. Central government must take account of the funding resources required by local authorities if they are to be responsible for delivering air quality improvements locally. Many local authorities are currently cutting back on air quality monitoring and

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<sup>4</sup> The International Council on Clean Transportation, ‘REAL-DRIVING EMISSIONS TEST PROCEDURE FOR EXHAUST GAS POLLUTANT EMISSIONS OF CARS AND LIGHT COMMERCIAL VEHICLES IN EUROPE’, 2017, Pp 8

<sup>5</sup> DEFRA/DfT, ‘Draft UK Air Quality Plan for tackling nitrogen dioxide’, 2017, Figure 10.1, pp 185

<sup>6</sup> DfT, ‘Volume of biofuels by country of source feedstock: April 2015 to April 2016, Table TSG0312 (ENV0502)

<sup>7</sup> DfT, ‘Annual Bus Statistics: England 2016/17’, Chart 2, pp 4

management services in response to budget constraints and competing calls on public finances.

23. Local authorities will find it difficult to justify diverting capital and revenue funds from other statutory schemes and services to implement the required air quality management interventions. Capital funds will be required for the proposed local feasibility studies and scheme implementation. Revenue funding will be required to facilitate staffing, ongoing monitoring, and scheme management (for example to design, implement, and operate a Clean Air Zone).

#### **5.4 Maritime**

24. CIHT welcomes the government's commitment to driving down emissions from shipping and reducing the impact of emissions from the maritime sector and recognizes the actions that have been taken at the international level. Again, this strategy rests on the publication of the first UK Clean Maritime Plan rather than anything contained within this Draft Clean Air Strategy.
25. CIHT supports the key actions as stated under 5.4.2, on domestic regulations, emissions control areas, individual port air quality strategies and a Clean Maritime Council and looks forward to learning more about them as they are developed.
26. CIHT would encourage that the proposed 'port air quality strategies' include an assessment of the surface transport as well as the 'on water' aspects. As designing or upgrading ports to make better use of Rail Freight instead of Road Freight may be more successful at reducing overall emissions than actions taken within the port itself. This is also true for passenger transport, given that cruise ship terminals deliver large quantities of people at predictable times. An integrated plan could also look at options for integrating potential Clean Air Zones with Emissions Control Areas in Local Authorities.

#### **5.5 Rail**

27. CIHT acknowledges the government is sponsoring air quality assessments at a number of stations and would encourage that the process looks at the surface access to stations as a key element. Many stations have been developed in ways that are inaccessible by cycling or walking or have limited bus services. This encourages the usage of motor vehicles to arrive at stations rather than active travel or public transport which would provide benefits to air quality.
28. To achieve the scale of improvement necessary there should be an effort to examine the economic and regulatory incentives behind developing parking as South Western Railways plans to add 1,500 car park spaces<sup>8</sup> over three years and Greater Anglia plan to add 1,782 spaces<sup>9</sup> in a wider upgrade scheme. Equally new schemes such as High-Speed Rail 2 and the Milton Keynes-Oxford-Cambridge where park and ride stations are planned must be developed in the context of the need to reduce emissions through sustainable transport.
29. The impact of these sector decisions can only be tackled by looking at transport holistically and not through the lens of individual modes.

#### **5.6 Aviation**

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<sup>8</sup> South Western Railway '[Franchise Delivery Plan](#)', pp 25, accessed 2018

<sup>9</sup> Greater Anglia '[Factsheet](#)', pp2, 2017

30. CIHT looks forward to the consultation on a new Aviation Strategy later this year and is pleased to note that the industry is taking steps to improve public transport links to airports which generate fewer emissions per capita.
31. The aviation industry faces a very significant challenge in delivering growth while making its contribution to government efforts to reduce emissions. Airlines and airports will have to compensate for growth, for example through fleet modernisation and the embracing new technologies. A clear understanding of surface transport should be a part of this.
32. Airport expansion will be an important generator of new particulate matter and CIHT strongly supports the commitment that “the expansion of Heathrow will not lead to an overall increase in Heathrow related traffic volumes compared to today (2017)”.<sup>10</sup> However the current availability of parking is a large draw to air passengers, with a total of over 60,500 parking spaces at Heathrow alone (and under the terms of T5 inquiry Heathrow has the right to increase this by several thousand)<sup>11</sup>.
33. This is a significant revenue stream, generating over £100 million a year, and expected to increase.<sup>12</sup> The Aviation Strategy should recognise the relationship between the availability of parking and driving to work and therefore managing availability of parking should be considered a key part of the overall Surface Transport Strategy.
34. CIHT recommend transparency as to the levels of parking occupancy airports are seeking and analysis of the impacts on traffic. It may not be possible to meet both revenue targets for parking spaces and modal shift targets to public transport at the same time. There needs to be a coherent and comprehensive local transport strategy that tackles this situation.
35. CIHT would encourage greater innovation to encourage efficient usage of the space. This could include cheaper pricing for emission free vehicles, (subsidised) electric vehicle charging points, or vehicles with multiple occupants, and enhanced efforts to consolidate parking facilities and reduce road usage
36. CIHT welcomes Heathrow’s ambition to “Create a public transport focused airport” which aims to increase arrivals at the airport by public transport to 50 per cent by 2030 and 55 per cent by 2040 will be difficult to achieve. From 1990 to 2016 the percentage of passengers arriving by public transport only rose from 36 per cent to 39 per cent, despite the opening of the Heathrow Express, Oyster Card introduction and Heathrow Connect. It would require an unprecedented increase in public transport usage but there is minimal explanation as to how that would be achieved and funded.
37. The future aviation strategy will be limited in its effectiveness by decisions that are being made now over road and rail investment and will potentially make it more difficult, and costly, to reduce emissions in future.

**Q12. Do you feel that the approaches proposed for reducing emissions from Non-Road Mobile Machinery are appropriate or not? Why?**

38. CIHT supports new powers for local government to control the use of diesel powered machinery where it is causing an air pollution problem and reviewing existing fuel duty rates for alternatives to petrol and diesel are appropriate.

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<sup>10</sup> Heathrow, ‘[Our approach to developing a surface access strategy](#)’, pp 52, 2018

<sup>11</sup> Heathrow, ‘[Our Emerging Plans](#)’, Pp. 87, 2018

<sup>12</sup> Steer Davies Gleave ‘[Heathrow Airport – Review of commercial revenues](#)’, pp. 54, 2017