

## Department for Environment, Food and Rural Affairs (Defra)

### AQF 6/06

#### Initial summary of responses to the Air Quality Strategy Review Consultation Document

1. 151 responses have been submitted to Defra and the devolved administrations. The table below gives a statistical breakdown of responses.

Sector	Total UK	England	Scotland	Wales	NI
1. Industry	13	9	3	1	
2. Transport	6	6			
3. Local government	51	39	8	3	1
4. Health organisations	8	4	2	1	1
5. Environmental organisations	2	1		1	
6. Consultants	7	7			
7. Conservation bodies	7	4	2	1	
8. Government agencies	4	2	1		1
9. Non departmental public bodies	3	3			
10. Individuals and resident groups	27	27			
11. Professional institutions or trade associations*	18	16	2		
12. Research bodies	4	4			
13. Member of the European Parliament	1	1			
Totals	151	123	18	7	3

\* Includes industry, transport, energy, planning, etc institutions and associations

\*\* In a few cases identical comments were sent to Defra and one or more of the devolved administrations. For the purposes of this table, those responses have been included under the England column for the purpose of this table.

## 2. General

- There is general support for measures to improvements in air quality, health benefits and protect ecosystems. Some feel that assessments of certain measures proposed are flawed and do not stack up; others wanted to see more on soft measures, aviation and agriculture.

- There is a general feeling that the document does not offer a sufficient strategic overview or make links to other policy areas, such as climate change, and that this should be rectified in the final Strategy.
- A large number of respondents are concerned that the role and work by local authorities has not been sufficiently recognised in the consultation document and should be rectified in the final Strategy.
- Industry generally does not wish to see proposals implemented which go beyond the European Union obligations.

### **3. Methodologies and Assessments**

- Some questioned the methodologies and modelling used and considered that Net Present Value is not the most effective way of highlighting impact of the proposed measures. There is some disagreement that ex-ante and ex-post costs usually differ significantly.
- Several sectors criticise the Government's recent decision to withdraw the transport grants programmes as being too premature and that it will reduce the effectiveness of some of the proposed measures, such as encouraging retrofit of particle traps on goods vehicles.
- A few claim the assessment of health benefits is too crude and produces a skewed cost and benefit analysis and that a more robust method of evaluating health effects is needed. There are calls for further work on the relative toxicity of particulates.
- Many consider the assessments should have taken account of more factors, in particular, regulatory requirements, quality of life, impact on emissions from agriculture, timing, practicability, geographical scale of effect (e.g. hotspots or general).
- A number point out that more up to date emission/energy projection data should be used and more clarity provided on the uncertainty ranges and their origins.

### **4. Measures**

- There are mixed views on some of the new measures being proposed to take forward. Quite a number consider more assessment work is needed on Measure C (incentivise early uptake of new Euro standards) to ensure no negative impact on nitrogen dioxide (NO<sub>2</sub>) and ozone (O<sub>3</sub>) and on Measure H (incentivise retrofit diesel particulate filters to heavy duty vehicles (HDVs) in view of recent research on the effect of diesel filters on emissions of NO<sub>2</sub>).
- A few consider Measure K (selective catalytic reduction on power stations) impracticable in the timescale and that the cost and benefit analysis should take account of the impact of EU emission trading

scheme, and that the measure would only influence secondary particulates with minimal impact on health.

- Some felt that the assessment of the shipping measure is unclear and benefits are greatly overestimated; several are not convinced that the small combustion plant measure is feasible.
- A large number are concerned that the red assessment given to low emission zones measure and, to a lesser extent, the measure to retrofit of heavy duty vehicles, gives the wrong signal as both are considered as having potential benefits at local levels.
- There is strong support from some sectors, particularly local authorities, for more work on soft measures, speed limits and road pricing. There are quite a number of suggestions for further measures to consider, such as pay as you drive, fiscal incentives for fleet transformation, energy efficiencies, greater promotion of biomass and encouraging demand management, behavioural change and also more measures to tackle aviation emissions.

## **5. Current and new objectives**

- Apart from industrial sectors, most agree that the present set of objectives should be retained. There are some suggestions for adding further objectives for other air pollutants, such as dioxins, furans and pesticides, but others questioned why objectives, which were being met, were still needed.
- Industry sector generally considers that the UK should not have stricter targets than EU obligations, in particular the current SO<sub>2</sub> 15 minute objective and PAH objective, and would either like to see these removed from the Strategy or full regulatory impact assessment undertaken.
- Several respondents' call for more commitment on protecting ecosystems and action to cut agricultural emissions. A significant number would like to see an objective set for ammonia and early action on critical loads, although industry feel it is too soon. There are calls for further discussions with the agriculture industry before any ammonia objective is set. Industry sector generally feels the aspirational targets for SO<sub>2</sub> and NO<sub>x</sub> for habitat sites are over-regulatory and inappropriate.
- The ozone objective is generally welcome but it was suggested the measurements period of May – July should be start from April.

## **6. Exposure Reduction and particles**

- Exposure reduction approach is generally supported.

- Several wish to retain the PM<sub>10</sub> objective as well as introducing a PM<sub>2.5</sub> target and many feel an ambitious binding PM<sub>2.5</sub> target is needed if it is to be effective, and might be set at the same level as WHO guidelines. But there are some concerns about moving away from tackling hot spots; several call for more monitoring of PM<sub>2.5</sub> and PM<sub>1</sub>.
- About equal support for the UK to introduce an exposure reduction and PM<sub>2.5</sub> target now and to do nothing ahead of Europe. There are also differing views on the level of implementation of the exposure reduction approach at UK wide, devolved administrations or local authority level. Some local authorities would like to have a role in the system. The Mayor would like single exposure reduction target set for London.

### **Next Steps**

8. Analysis of comments received to the consultation is underway to take into account in development of the final Strategy. Copies of the responses have been deposited in Defra's Library Information Resource Centre, Ergon House, 17 Smith Square, London SW1P 3JR (telephone 020 7238 6712) and available on request. Copies are also available from the devolved administrations.

9. Electronic versions of responses may be obtained by contacting the Forum's secretariat via [air.quality@defra.gsi.gov.uk](mailto:air.quality@defra.gsi.gov.uk)

Defra/DAs  
August 2006

## **List of respondents**

AA Motoring Trust  
Aberdeen City Council  
Air Pollution Research in London (APRIL) 1  
Air Pollution Research in London (APRIL) 2  
Air Quality Expert Group (AQEG)  
Association of Chief Police Officers in Scotland  
Association of Electricity Producers  
Association of London Government  
Asthma UK - England  
Asthma UK - Scotland  
Asthma UK - Northern Ireland  
Asthma UK - Cymru  
Bedfordshire County Council  
Belgravia Residents Association 1  
Belgravia Residents Association 2  
Bristol City Council  
British Airports Authority  
British Glass  
British Thoracic Society  
British Vehicle Rental Leasing Association  
Brompton Association  
Bureau Veritas  
Cambridge and Peterborough Public Health Network  
Cambridgeshire Local Authorities Air Quality Sub Group  
Castle Point Borough Council  
Central London Air Quality Cluster Group  
Centre for Ecology & Hydrology - NERC - Edinburgh  
Centre for Ecology & Hydrology - NERC - Bangor  
Centre of Excellence for Low Carbon & Fuel Cell Technology - Cenex  
Chartered Institution of Water & Environmental Management  
Chemical Industries Association  
Cheyne Walk Trust  
Chief Environmental Health Officers Group Northern Ireland  
Confederation of British Industry  
Confederation of Passenger Transport  
Countryside Council for Wales  
Cornwall County Council  
Corporation of London  
Corus Group plc  
Covent Garden Community Association  
DAPPLE Dr R Colville  
Devon County Council  
Drax Power Ltd  
Dumfries & Galloway Council  
East Ayrshire Council  
East Dunbartonshire Council  
Edinburgh City Council  
EDF Energy  
Energy Advisory Associates  
Energy Institute

Energy Saving Trust  
Environment Agency  
Environmental Industries Commission  
Enviros Consulting Ltd  
E-On UK  
Flintshire County Council  
Forestry Commission  
Gateshead Council  
Glasgow City Council  
Gloucester County Council  
Hanson Building Products  
Heard & Dean Street Residents association  
Herefordshire & Worcestershire Pollution Group  
INEOS Manufacturing Scotland Ltd  
Isle of Anglesey County Council  
Highways Agency  
Historic Scotland  
Hyde Park Estate Association  
Institute of Air Quality Management  
Institute of Directors  
Jean Lambert MEP  
Johnson Matthey plc  
Joint Nature Conservation Committee  
Kensington & Chelsea Environment Round Table  
Kensington Society  
Knightsbridge Association 1  
Knightsbridge Association 2  
Lancashire Pollution Officers Group  
Lancaster City Council  
Local Authorities Coordinators of Regulatory Services LACORS  
Leeds City Council  
Liquid Petroleum Gas Association  
London Borough Barnet  
London Borough Camden  
London Borough Enfield  
London Borough Hammersmith & Fulham  
London Borough Hillingdon  
London Borough Hounslow  
London Borough Southwark  
London Borough Tower Hamlets  
Lord Simon Clanmorris - Brazzi TWS Ltd 1  
Lord Simon Clanmorris - Brazzi TWS Ltd 2  
Mayfair & St James Residents Association  
Mayor of London  
Meat Promotion - Wales  
Met Office  
Mr D Cairns  
Mr J Payne  
Mr J Ratcliff  
Mr S Plowden  
National Grid

National Farmers Union - England & Wales  
National Farmers Union - Scotland  
National Society for Clean & Environmental Protection  
Neath Port Talbot County Borough Council  
Non- Ferrous Alliance  
North Ayrshire Council  
Oakley Street Residents Association  
Paddington Waterways & Maida Vale Society  
Peak District National Park Authority  
Peter Brett Associates  
Quarry Products Association  
Queen's Park Estate Society  
Renewable Energy Association  
Road Services - Northern Ireland  
Royal Borough of Kensington & Chelsea  
Royal Environmental Health Institute Scotland  
Royal Town Planning Institute - South East Branch  
RWE npower  
Sadler Consultants  
Scottish Environment Protection Agency  
Scottish Natural Heritage  
Scottish & Southern Energy plc  
Scottish Power Energy Wholesale  
Sheffield City Council  
Society of Motor Manufacturers & Traders  
Soho Society  
South East Bayswater Residents Association  
South Yorkshire Local Transport Plan Partnership  
St John's Wood Society  
Suffolk Air Quality Management Group  
Sussex Air Quality Steering Group  
Tees Valley Environmental Protection Group  
The Marylebone Association  
The St Marylebone Society  
The Thorney Island Society  
The Westminster Society  
The Wildlife Trust  
Tonbridge & Malling Borough Council  
Transport Research Laboratory  
UK Petroleum Industry Association Ltd (UKPIA)  
UK Public Health Association  
University of West England  
Wakefield Council  
Wandsworth Council officer  
Welsh Groups Network  
West Dunbartonshire Council  
West Midlands Air Quality Monitoring Officers Group  
West Sussex County Council  
Westbourne Park Villas Residents Association  
Westminster City Council  
Wiltshire County Council

Wiltshire Pollution Group