



Low Emission
Strategies

Building on Good Practice

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5 August 2011

Dear Ekoere

Consultation Response on: Air Quality Plans for the achievement of EU air quality limit values for NO₂

Please find enclosed a consultation response from the Low Emission Strategies Partnership Board relating to the Air Quality Plans for the achievement of EU air quality limit values for nitrogen dioxide (NO₂).

The Low Emission Strategies Partnership (www.lowemissionstrategies.org) was established in 2007 to disseminate good practice in reducing transport emissions of toxic air pollutants and greenhouse gases. The Partnership Board includes representatives from London Borough of Greenwich, Sefton Metropolitan Borough Council, London Borough of Hillingdon, Wigan Metropolitan Borough Council, Mid-Devon District Council, Leeds City Council and Lewes District Council.

If you require further information, please don't hesitate to contact me.

Yours sincerely,

Gary Mahoney

Vice Chair of the LES Partnership Board

Low Emission Strategies Partnership Board: Response to Air Quality Plans for the achievement of EU air quality limit values for nitrogen dioxide



5 August 2011

1 Introduction

- 1.1 The Low Emission Strategies (LES) Partnership welcomes the opportunity to provide a submission to the Department for Environment, Food and Rural Affairs on the Air Quality Plans for the achievement of EU air quality limit values for nitrogen dioxide (NO₂).
- 1.2 The LES Partnership (www.lowemissionstrategies.org) is a group of local authorities working to reduce transport emissions of air pollutants and greenhouse gases. The Partnership was established in 2007. It runs a practical programme of work, supporting local authorities to adopt and implement low emission policies, strategies and measures. The Partnership Board includes representatives from London Borough of Greenwich, Sefton Metropolitan Borough Council, London Borough of Hillingdon, Wigan Metropolitan Borough Council, Mid-Devon District Council, Leeds City Council and Sussex Air Quality Partnership.

2 Consultation Response

- 2.1 The LES Partnership recognises the importance of compliance with European NO₂ limit values, and is strongly supportive of efforts to reduce transport emissions. At the same time, there is a risk that the urgency to achieve the legal standards may divert attention from bigger picture issues of: (i) addressing health and environmental impacts, and (ii) linking to carbon reduction. The LES Partnership urges Defra to take the opportunity of the focus provided by European compliance, to support and drive strong local action using an emissions-based approach.
- 2.2 The key measure identified by Defra to achieve NO₂ compliance is the establishment of Low Emission Zones (LEZ) specifically for NO₂, across metropolitan areas. LEZs are an attractive intervention for modelling impacts using the national scale Marginal Abatement Cost Curve (MACC) and the accompanying Pollution Climate Mapping (PCM) model. However, the extent to which LEZs can bring about the required emission reductions is not clear. There are significant implementation challenges for local authorities: financial, political, logistics, timeframes. There are also widely reported technical uncertainties regarding real-life emission factors for Euro Standards.
- 2.3 The LES Partnership promotes a broader, more flexible approach. 'Low Emission Strategies' are packages of measures (that can include LEZs), which are built up and implemented together. The packages can be tailored to suit local circumstances and ambition. They also take account of sustainable transport and demand management measures to reduce trips and shift modes, as well as improve emissions performance. In the form modelled by Defra for NO₂ compliance, LEZs seek only to improve emissions from the existing transport fleet, without affecting any wider changes in the fleet composition or journeys travelled.
- 2.4 The LES approach can deliver significant emission reductions if applied in a strategic way across a local area. This has been quantified in a report for the LES Partnership and Local Government Regulation¹, based on evidence from 100 case studies. It is a high level study and uses a developmental method. Nevertheless, it illustrates how emission benefits from packages of local measures may be quantified, and that ambitious local action can achieve significant emission

¹ LES Partnership and LG Regulation (2011) **Low Emission Strategies for Local Transport - Building the Case for Action**. Available online: lowemissionstrategies.org/downloads/Discussion%20Papers/LES_Case_for_Action_Final%20Report.pdf. For appendices, go to: http://lowemissionstrategies.org/tools_and_resources.html... 'Discussion papers'

reductions. (The LES Partnership has applied to Defra for funding through the 2011 Air Quality Grant to extend this analysis to assess the concentration impacts of such local interventions.)

- 2.5 Key questions in developing LEZs as well as LES packages relate to the scale and certainty of outcome, and to the demonstration of benefits. Emission-based assessment provides practical solutions for both of these issues. The LES Partnership places great emphasis on action and on using emission-based methods/metrics to assess and demonstrate progress. To facilitate this, the Partnership has developed a 'Low Emission Toolkit'², intended to provide a platform for local authorities to quantify measures and to develop and implement packages to manage local transport emissions.
- 2.6 Traditional Local Air Quality Management is centred on concentration based analysis. This is time consuming and costly, and the results are often uncertain and inconclusive. By focussing on emission reductions as the driver for action, local authorities can directly consider impacts on other (potentially more harmful) pollutants such as particulate matter. An emission focus would also assist with any future action on local exposure-reduction targets, which are directly related to health impacts across the whole population, not only in specific hot-spots.
- 2.7 The 'language' of emissions also links directly to the climate change agenda. Emission reduction measures can be assessed for air quality benefits alongside carbon reduction potential. This would help in identifying win-wins and negotiating trade-offs. It would also aid the communication of air quality issues to a wider audience, without the need to describe complex chemistry or air dispersion.

3 Recommendations

- 3.1 Within the Plan document, include reference to low emission strategies as a complimentary method by which local authorities can deliver emission reductions, citing the work of the LES Partnership and the use of emission-based tools and metrics.
- 3.2 In implementing the Plan, use the driver of compliance with NO₂ limit values, not just to review options for LEZs, but as an opportunity to support and drive the adoption of broader low emission strategies by local authorities. In doing so, realign the focus of local air quality management towards emission-based methods/metrics. This will lead to local delivery that is action-focussed and measureable. It will also encourage adoption of more flexible measures and consideration of wider emissions impacts (particulates and greenhouse gases as well as NO_x).

² Information on the Low Emission Toolkit is available online at: lowemissionstrategies.org/les_toolkit.html