

Response ID ANON-TWTA-YWBE-Q

Submitted to **Improving air quality: national plan for tackling nitrogen dioxide in our towns and cities**

Submitted on **2017-06-12 14:52:25**

Introduction

1 What is your name?

Name:

Hilary Newport

2 What is your email address?

Email:

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3 Are you responding as an individual or an organisation?

Organisation

4 If you are responding as an organisation please provide the name and nature of your organisation.

Name of organisation:

CPRE Kent

None of the above (please specify below)

Other type of organisation:

Environmental Campaigning charity

5 Which region are you based in?

Location:

England

6 Would you like your response to be confidential?

No

If you answered YES to this question, please give your reason:

N/A

7 How satisfied are you that the proposed measures set out in this consultation will address the problem of nitrogen dioxide as quickly as possible?

Very dissatisfied

Please provide comments to explain your answer:

CPRE Kent (the Kent branch of the Campaign to protect Rural England) is pleased at the opportunity to comment on Defra's proposals for reducing nitrogen dioxide in towns and cities. One of our overriding campaign themes is the promotion of genuinely sustainable development through integrated planning policies, and this is the context within which we raise our concerns.

We do not accept that the principle of devolution of responsibility for air quality to local planning authorities is an appropriate way forward. It is our experience that local authorities lack the resources, capacity and expertise to shoulder the responsibility of implementing the rapid improvement that is mandated by the Supreme Court – a national imperative which is being side-stepped by national government.

We are concerned at the potential for each local planning authority to act in isolation in determining its actions with regard to air quality. The government is committed to delivering 1 million new homes by 2020, and it is clear that the adverse air quality impacts of increased traffic movements, and consequent increased congestion and air pollution in pinch-points, will be experienced across more than one planning authority area and we are aware of no overarching strategy that can address this.

Within Kent, we are particularly concerned at the conflict between the requirement for air quality improvement and international, national and county-wide policies and decisions on transport. Kent's channel corridors provide for the movement of some 60% by weight of freight between the UK and mainland Europe, principally via driver-accompanied HGVs. Kent County Council has recently consulted on its Freight Action Plan for Kent, which in the main seeks to facilitate increased traffic through the county, rather than engage in sustainable freight movement strategies which reduce the nation's reliance on a corridor with already poor resilience.

The Port of Dover has plans for significant expansion, which will have concomitant impact on the highways network further afield, not least at the existing Dartford Crossings.

It is because of the congestion, delays and exceedance of air quality limit values that already exist at Dartford that DfT recently announced a third Thames Crossing to be sited east of Gravesend. However, Highways England have acknowledged that the construction of this crossing would be expected to divert only 14% of the traffic using Dartford to the new crossing at Gravesend; it will not resolve the existing problems at Dartford, but it will create new problems at Gravesend. It is hard to know how either local planning authority could be expected to deliver the required improvements in air quality through the implementation of a CAZ in the light of such decisions being taken elsewhere.

For all of these reasons, and many more, we find it implausible that a national air quality strategy which focuses on simply forcing responsibility, but not capability, to deliver air quality improvements can possibly achieve the outcomes required by the Supreme Court.

8 What do you consider to be the most appropriate way for local authorities in England to determine the arrangements for a Clean Air Zone, and the measures that should apply within it? What factors should local authorities consider when assessing impacts on businesses?

Please provide your views:

9 How can government best target any funding to support local communities to cut air pollution? What options should the Government consider further, and what criteria should it use to assess them? Are there other measures which could be implemented at a local level, represent value for money, and that could have a direct and rapid impact on air quality? Examples could include targeted investment in local infrastructure projects. How can government best target any funding to mitigate the impact of certain measures to improve air quality, on local businesses, residents and those travelling into towns and cities to work? Examples could include targeted scrappage schemes, for both cars and vans, as well as support for retrofitting initiatives. How could mitigation schemes be designed in order to maximise value for money, target support where it is most needed, reduce complexity and minimise scope for fraud?

Please provide your views:

10 How best can governments work with local communities to monitor local interventions and evaluate their impact?

Please provide your views:

11 Which vehicles should be prioritised for government-funded retrofit schemes?

Please provide your views:

12 What type of environmental and other information should be made available to help consumers choose which cars to buy?

Please provide your views:

13 How could the Government further support innovative technological solutions and localised measures to improve air quality?

Please provide your views:

14 Do you have any other comments on the draft UK Air Quality Plan for tackling nitrogen dioxide?

Please provide your comments:

Consultee Feedback on the Online Survey

15 Overall, how satisfied are you with our online consultation tool?

Neither satisfied Nor dissatisfied

Please give us any comments you have on the tool, including suggestions on how we could improve it. :

Minor (but irritating) glitch on the confidentiality question, requiring me to give an answer even though I had ticked 'no'.