



RAC Response to DEFRA consultation on the Draft Clean Air Zone framework

This response has been written by Nicholas Lyes, RAC Public Affairs Manager, on behalf of RAC Motoring Services

About the RAC

With more than eight million members, the RAC is the oldest and one of the UK's most progressive motoring organisations, providing services for both private and business motorists. As such, it is committed to making driving easier, safer, more affordable and more enjoyable for all road users.

The RAC, which employs more than 1,500 patrols, provides roadside assistance across the entire UK road network and as a result has significant insight into how the country's road networks are managed and maintained.

The RAC is separate from the RAC Foundation which is a transport policy and research organisation which explores the economic, mobility, safety and environmental issues relating to roads and their users.

The RAC website can be found at www.rac.co.uk.

In September 2016, the RAC published its latest [Report on Motoring](#).

RAC Response

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

The RAC supports the Government's long term aim for all new vehicles to be zero emission by 2040, and for all vehicles on the road to be zero emission by 2050. We have separately given our thoughts in the consultation on the Modern Transport Bill on how the Government should proceed on upgrading EV infrastructure to help support these targets and will continue to work with the Government once the Bill is published. We would also urge the Government to work closely with vehicle manufacturers to set realistic targets in between now and 2050 to make sure that motorists can have confidence that the vehicles they are driving conform to appropriate emissions standards and are delivering real-world benefits on emissions and fuel economy.

On other specific measures set out in Section 2, please see our response to the most relevant sections below:

Raising awareness and understanding: The RAC supports efforts to engage communities on this issue as ultimately these communities will be affected by poor local air quality and any subsequent impacts of the charging zones. The 2016 RAC Report on Motoring found that 34% of motorists had concerns about air quality where they lived, so raising awareness of how they can contribute to improving air quality is important. The RAC believes that electronic signage which highlight when air quality in an area is particularly poor can help raise awareness of the problem and may also encourage drivers who may be making short journeys to seek alternative methods of transport or alternative routes.

Publicising the zone: It is important that local authorities are able to raise public awareness of the zone as widely as possible as soon as possible. Whilst we understand that measures such as charging or access restrictions applied to the zones are unlikely to apply to private cars, local businesses may be impacted and will need advance warning so they are able to either budget for additional charges or to adapt their fleet prior to implementation.

Optimising traffic management: The RAC accepts that congestion and idling engines can play a role in unnecessarily increasing emissions. Clearly we would welcome better road design and junction layouts, and we also believe there may be opportunities to further optimise traffic light sequencing. More sophisticated control technology will continue to play a significant role in optimising traffic light performance for varying traffic levels on routes subject to changing traffic patterns at different times of the day.

Actively supporting and facilitating the use of ULEVs: Whilst the Government makes a number of recommendations to local authorities on how they can support the use and take-up of ULEVs, this is against the background of changes to the VED rates from 2017 will reduce incentives to purchase and run plug-in hybrid vehicles, which are the most practical ULEV for most users. We urge the Government to reconsider some of the changes to 2017 VED rates, which at present do not differentiate between a conventional, less economical vehicle and a plug-in hybrid. Within its VED bands, the Treasury should continue to differentiate between pure electric vehicles, ultra-low emission vehicles and less economical vehicles after the first year of registration.

Providing incentives and benefits for the use of ULEVs: The RAC welcomes proposals to encourage the take-up of ULEVs. For example, allocating specific parking bays and giving ULEVs access to bus lanes at certain times are relatively straightforward and could be easy to implement. However, the RAC has a number of concerns about some of the other proposals mentioned. For example, we don't understand how it would be possible to give priority to ULEVs at traffic lights when roads are busy. We also believe that giving ULEVs exemptions for restrictions on one-way systems may also be a recipe for chaos and confusion.

Ensuring infrastructure supports Clean Air Zone standards: The RAC welcomes encouragement for local authorities to increase the provision of infrastructure to support Clean Air Zone standards. The RAC has separately responded to a consultation on infrastructure proposals to be included in the Modern Transport Bill.

Within this, we make the point that whilst some motorists who own either pure electric or plug-in hybrid vehicles will charge their vehicles at home overnight off-road, those owners who park their vehicles on residential roads, have few, if any charging points available to them. Local authorities may need to be prepared for a 'tipping point' in a similar vein as to that when broadband networks were rolled out and plan for provision of frequent charging points on residential roads.

Engine idling: We believe that the most important action required is to raise public awareness of how reducing idling engines can contribute to improving air quality, particularly in areas where traffic congestion is at its worst. Owners whose vehicles are fitted with stop/start technology should be discouraged from disabling this. However, any initiative by local authorities to target punitive enforcement measures at those allowing their engines to idle when stationary should be seen as a last resort. However there is clearly a case for drivers of vehicles which are parked with the engine running, be counselled by local officers and advised to switch off their engine

unless there is a valid reason for doing so (for example to run refrigeration equipment on a vehicle delivering frozen goods).

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

The Government may wish to look at taxation incentives for ULEVs within the VED system. At a local level, local authorities may consider discounts to Residential Parking Schemes for owners of ULEVs. A similar approach might be applied to workplace parking levies where such schemes apply.

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?

Please see our response to Question 2.

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

The RAC broadly welcomes the proposals in the section dealing with operational standards and requirements as we feel these plans are evidence-based and target the most polluting vehicles. We also welcome proposals that local authorities will not be allowed to select individual vehicle types with a 'mix and match' approach within each class of zone. It is essential that the framework is applied consistently across the country in the towns and cities where clean air zones are created so that road users visiting towns and cities where such zones exist know what to expect and are not confused by widely differing and contradictory charging structures or restrictions.

With regards to Annex A, the RAC believes that what is outlined in each class zone is suitable for initially targeting the worst polluting vehicles. Class C includes LGVs and LCVs, many of which are used by smaller businesses so the Government may wish to consider any knock on impacts on consumers and small businesses. LCVs are a growing sector, with vehicle mileage from this type of vehicle growing by 21% in just 10 years.¹

We welcome the fact that the Government's proposals do not target private cars. In most cities, cars contribute a relatively small proportion of Nitrogen Dioxide emissions and it is appropriate to focus on those vehicles that contribute the greatest share of nitrogen dioxide emissions. At the same time however, it is appropriate for central Government to continue to encourage car owners to switch to ULCVs through tax incentives and an extended Plug-in Grant scheme.

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

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/567098/prov-road-traffic-estimates-oct-2015-to-sep-2016.pdf

The RAC is not best placed to respond to this question. However, intuitively, it is difficult to justify applying different measures to two sectors that from a user perspective perform much the same role.

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

Yes. It makes sense to review the standards periodically, at regular intervals, however changes to these standards must be based upon an impact assessment so that any changes are evidence-based. Stricter limits or extending restrictions or charges to additional vehicle types should only be considered if current proposed standards are failing to reduce pollution levels as expected. It is important that when such changes are proposed, vehicle owners and fleet operators should be given a sufficient notice period to allow them to change their vehicles. Ideally this lead time should be 3 years but should be a minimum of 2 years

The RAC's 2016 Report on Motoring shows that a majority of motorists are supportive (57% approval) of introducing charges for the most polluting vehicles to enter areas with the poorest air quality, however this approval drops to 42% when asked if they would support charges for all diesels entering areas with the worst air pollution.

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?

Yes. The RAC feels this is a reasonable time-frame to test whether the existing proposed framework is delivering the anticipated benefits. However, given the High Court's ruling in early November on the Government's air quality plans, we would not oppose the Government bringing the minimum vehicle standards review forward by maybe one year to 2024.

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

Yes. The RAC believes proposals to give Blue Badge holders an exemption are fair and would help vulnerable road users.

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

The RAC would prefer to see a set fee for each clean air zone class (as opposed to an upper and lower limit), which would provide greater clarity and consistency for those on inter-city journeys entering different clean air zones. However we understand that circumstances will vary for each local authority.

We would expect to see these charges published as soon as possible.

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

No.

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

Yes.

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

Yes. We believe the steps taken strike the right balance between focusing on the most polluting vehicles and not penalising car drivers.

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

The 2016 Report on Motoring provides some useful insight on motorists' views on clean air zones and restricting access for certain vehicles in areas with the poorest air quality. These are set out [here](#) in Chapter 4.

Please address any comments or further contact to:

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