1. Introduction

1.1 The Liverpool City Region (LCR) Mayoral Combined Authority is grateful for the opportunity to submit evidence to the joint Select Committee inquiry on air quality. The Authority considers that air pollution remains the largest environmental risk to public health in the UK. Poor air quality also affects quality of life, productivity and the natural environment. Indeed the Royal College of Physicians estimates that air pollution is responsible for 40,000 excess deaths per year in the UK. The Authority is therefore anxious to see the implementation of an effective strategy to clean up air quality by joining up national, sub-regional and local approaches.

1.2 By way of context, the Mayoral Combined Authority was established in May 2017, following the election of Steve Rotheram as the LCR’s first directly elected Metro Mayor. The Mayoral Combined Authority draws on new powers and funds that were made available through the Liverpool City Region’s 2015 Devolution Deal and follow-on deal in 2016. These powers include: strategic transport planning across the city region, economic development and regeneration, housing and spatial planning, employment and skills. It now exercises powers over a devolved and consolidated multi-year funding package.

1.3 The Mayoral Combined Authority covers the local authority districts of Halton, Knowsley, Liverpool, St Helens, Sefton and Wirral with a collective population of over 1.5 million but with a much bigger economic hinterland of close to 2.5 million extending into North East Wales, Wales, Cheshire and West Lancashire.

1.4 Through the Local Air Quality Management (LAQM) regime, local authorities have a statutory requirement to assess air quality in their area by the standards set out by Government, for example the Air Quality Regulations 2000.

1.5 There are objectives for the following pollutants which, local authorities must report on annually;

- Nitrogen dioxide
- Particulate matter
- Sulphur dioxide

1.6 Local authorities must declare and designate an Air Quality Management Area (AQMA) where objectives are not being achieved and produce an Action Plan. There are 11 AQMA’s within LCR, including the entirety of the City of Liverpool, which serves to illustrate the air quality challenge for LCR.
2. **How effectively do Government policies take into account the health and environmental impacts of poor air quality?**

2.1 In 37 of the 42 Air Quality Zones into which the UK is divided, annual limits for nitrogen dioxide pollution are exceeded. The vast majority of these polluted zones are in cities, and nearly 80% of the nitrogen dioxide pollution responsible for breached legal limits is caused by emissions from road transport, especially cars and vans.

2.2 The environmental impacts of road transport are severe, especially in congested urban areas and pollution from diesel vehicles in particular is now the most significant air quality threat to human health in the UK.

2.3 Particulate matter (microscopic particles in the air that can enter the lungs) is also a source of air pollution: diesel engines, braking and wear on tyres and roads all contribute to particulate pollution. It is understood that the impact of fine Particulate Matter (PM2.5) on the health of the population is greater than Nitrogen Dioxide (NO2). More people suffer from ill health due to exposure to PM2.5 than NO2. Despite this, it appears that government only considers the value of health improvements due to a reduction of NO2 and currently intends to make no attempt to quantify benefits from reductions of PM2.5. Not only does this undervalue the potential overall benefit actions will have to health, it also suggests that Government are at risk of failing to develop a robust coherent and holistic approach to improving air quality that addresses wider responsibilities to improve other pollutants. This is of concern, as it is apparent that there is a strategic opportunity to ensure that multiple problems are addressed now, rather than dealing with issues separately, with a risk that unintended consequences arise.

2.4 Although government acknowledgement of the crisis in air quality, particularly in urban areas, is welcome, the scale of the challenge is not matched by tangible, determined or joined-up action.

2.5 Instead the approach is characterised by fragmentation between different parts of central government and a lack of shared purpose between central and local government. For example, the government lacks a coherent national freight strategy, which could be used as a vehicle to address air quality.

2.6 In respect of Highways England specifically, it is of concern to note the exclusion of the Company from the action planning for improving air quality. There is an urgent need for the Company’s role, remit and engagement in the process of improving poor air quality to be strengthened very significantly.

2.7 A very significant onus is exerted on local authorities and the shared responsibility between central and local government and the private sector is underplayed. The plan also exerts a significant onus on local authorities at a time that revenue funding, in particular, is under major pressure. This is addressed further below.

2.8 A further weakness rests in the government’s emphasis on the role of technology on reducing emissions from polluting vehicles, rather than seeking to tackle the
root cause of the problem through effective land use and transport planning in reducing vehicle flows and promoting more sustainable alternatives to private transport (i.e. walking, cycling and public transport) where possible. Whilst technology has an unquestionable role to play, it must form part of a suite of policy measures to address the problem. At a very specific level, references to removing traffic calming measures because of their likely effect on vehicle emissions are both unhelpful and short sighted. This is an example of the government’s narrow focus on technological, vehicle and infrastructure solutions and failure to address the myriad of inputs that will be needed across society.

3. **Do these plans set out effective and proportionate measures to achieve necessary emissions reductions as quickly as possible?**

3.1 The plans lack the necessary milestones/timescales and this has been a long-standing issue. Having the aim of reducing fossil-fuelled cars by 2040 is laudable but does not deal with more immediate priorities or how to achieve them. There is a lack of cross-government working with key decisions delayed and significant parts of the public sector not recruited to play their part.

3.2 It is difficult to argue that the measures are likely to be effective or proportionate when they are based on relatively coarse information that is often inconsistent with local authority data.

3.3 The Liverpool City Region Combined Authority would therefore endorse calls for a new Clean Air Act to create an enforceable statutory duty and to establish an inalienable entitlement to clean air.

4. **Are other nations or cities taking more effective action that the UK can learn from?**

   http://cyclelogistics.eu/ This a useful best practice site on cargo bikes.

   http://freightinthecity.com/ This is a useful website on urban freight best practice.

5. **Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?**

5.1 The government’s response to the air quality crisis is lacking in its recognition of the importance of co-ordinated, cross-departmental and multi-agency working on measures to tackle poor quality air, rather than it being seen as solely a “transport” solution. As an example, education policy and aspects such as the location of schools, their operating hours, catchments and associated parental choice and pupil travel policies are significant determinants of travel choice and in turn, are significant issues that have a bearing on air quality.
5.2 There has been a lack of cohesion within and between national Government (e.g. DEFRA, DfT, ULEV, BEIS and CLG) and local areas with insufficient sense of common purpose, consistent policy and sharing of information and good practice. Tackling air quality problems effectively requires a joint endeavour between national and local government with national Government providing a clear framework which includes specific plans and strategies for those areas which are clearly the responsibility of national Government.

6. How can those charged with delivering national plans at local level be best supported and challenged?

6.1 Central government should provide leadership whilst allowing local authorities to take the right local decisions without fearing a de facto veto from Whitehall. A new Clean Air Act should be used to establish the appropriate framework.

6.2 Local travel planning to reduce the impact of congestion is an example of an activity that it is appropriate for local authorities to carry out but which is under great pressure due to local government grant reductions.

6.3 Nonetheless, there remain areas where it is essential that central government exerts clear leadership. This includes areas including, but not limited to:

- taxation and incentives on road vehicles;
- the future funding regime for greening bus and rail fleets;
- the funding national Government would make available to affected areas; and
- the measures that Highways England will be taking on their network in affected urban areas

6.4 As referenced previously, local authorities then require the autonomy and funding they need to deliver effective local air quality plans.

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