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**Department for Environment, Food, and Rural Affairs**

**Air Quality: Draft Clean Air Strategy 2018**

**Consultation Response from:**

***British Vehicle Rental and Leasing Association***

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### Consultation Questions

#### Question 1

What do you think about the actions put forward in this chapter (see summary below)? Please provide evidence in support of your answer if possible.

- *We are investing £10m in improving our modelling, data and analytical tools to give a more precise picture of current air quality and the impact of policies on it in future.*
- *We will increase transparency by bringing local and national monitoring data together into a single accessible portal for information on air quality monitoring and modelling, catalysing public engagement through citizen science.*

The BVRLA supports the above actions. In particular, we recommend that ahead of any further changes to the Government's air quality proposals, a study is carried out to confirm what percentage of UK vehicles (particularly fleet-operated) are Euro 6/VI, and what this percentage is likely to be when the first stage of Clean Air Zones is implemented.

#### Question 2

How can we improve the accessibility of evidence on air quality, so that it meets the wide-ranging needs of the public, the science community, and other interested parties?

It is of vital importance that drivers (both individual and fleet) are aware of the emissions standards of their respective vehicles. One reason why this is still an issue is that the emissions standard is not included on vehicle registration certificates, a point which we believe central Government must address. In the meantime, we recommend that an easy-to-access website is developed alongside the DVLA that allows people to check what emissions standard their vehicles adhere to. This has already been carried out in London by Transport for London, and is working successfully: <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/check-your-vehicle>

#### Question 3

What do you think of the package of actions put forward in this chapter (see summary of proposed actions below)? Please provide evidence in support of your answer if possible.

- *We will progressively cut public exposure to particulate matter pollution as suggested by the World Health Organisation. We will halve the population living in areas with concentrations of fine particulate matter above WHO guideline levels (10 µg/m<sup>3</sup>) by 2025.*
- *We will provide a personal air quality messaging system to inform the public, particularly those who are vulnerable to air pollution, about the air quality forecast, providing clearer information on air pollution episodes and accessible health advice.*
- *We will work with media outlets to improve public access to the air quality forecast.*

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- *We will work to improve air quality by helping individuals and organisations understand how they could reduce their contribution to air pollution, showing how this can help them protect their families, colleagues and neighbours.*
- *We will publish updated appraisal tools and accompanying guidance this summer to enable the health impacts of air pollution to be considered in every relevant policy decision that is made.*

The BVRLA supports the Government's strategy to reduce transport-derived emissions to improve air quality in towns and cities.

### Question 4

**How can we improve the way we communicate with the public about poor air quality and what people can do?**

The Government must improve the quality and regularity of its engagement with business on steps currently being implemented, and those it may consider in the future. According to figures compiled by YouGov for the BVRLA, 4 out of every 10 small- to medium-sized businesses are still unaware that Clean Air Zones will be implemented from next year. Over a third are also unaware that Clean Air Zones will probably entail a charge for diesel vehicles below the Euro 6/VI standard entering the Zone. The BVRLA recommends that the Government carry out an advertising and engagement campaign, emphasising to business (particularly SMEs) that CAZs are due to come into force from next year, and for these businesses to look at how they will address these changes.

In addition, further engagement and consultation with business is required from both central and local government ahead of any amendments to current policy. This is particularly important for those businesses which operate large fleets – as we have highlighted in previous submissions, many fleet managers will carry out purchasing decisions on the basis that commercial vehicles (HGVs and LCVs) will be operated for the next 9 years (for some particularly large HGVs, this can be up to 12 years), so expecting them to change and upgrade these fleet vehicles within this timeframe is not commercially practical. For this reason, Government (both central and local) should therefore involve, engage with and support fleet operators as much as possible, if the goal is to achieve maximum improvement in air quality.

### Question 5

**What do you think of the actions put forward in this chapter (see summary below)? Please provide evidence in support of your answer if possible.**

- *We will monitor the impacts of air pollution on natural habitats and report annually so that we can chart progress as we reduce the harm air pollution does to the environment.*
- *Later this year we will provide guidance for local authorities explaining how cumulative impacts of nitrogen deposition on natural habitats should be mitigated and assessed through the planning system.*

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The BVRLA agrees with the proposed actions. We also recommend regular measurement of air quality "hotspots" to monitor progress, particularly in areas where Clean Air Zones have been implemented.

### Question 6

**What further action do you think can be taken to reduce the impact of air pollution on the natural environment? Where possible, please include evidence of the potential effectiveness of suggestions.**

NO COMMENT

### Question 7

**What do you think of the package of actions put forward in this chapter (see summary below)? Please provide evidence in support of your answer if possible.**

- *In partnership with UK Research and Innovation, we will seek ways to support further investment in Clean Air innovation to enable the development of novel technologies and solutions that tackle emissions from industry, vehicles, products, combustion and agriculture and support both improvements in air quality and decarbonisation.*
- *We will make the UK a world leader in goods and services focused on tackling air pollution.*
- *Future energy, heat and industrial policies will together improve air quality and tackle climate change. Phasing out coal-fired power stations, improving energy efficiency, and shifting to cleaner power sources will reduce emissions of air pollution as well as carbon. As we phase out oil and coal heating, we will ensure this transition improves air quality wherever possible and cost effective to do so. In addition, the government will conduct a cross-departmental review into the role of biomass in future policy for low carbon electricity and heat, focusing on the air quality impacts. The proposed way forward will be set out in the final Clean Air Strategy.*
- *We will minimise the air quality impacts of the Renewable Heat Incentive Scheme, for example by tackling non-compliance and consulting on excluding biomass from the RHI if installed in urban areas which are on the gas grid. We will work across central and local government to put a plan in place. In addition, we will consult on making coal to biomass conversions ineligible for future allocation rounds of the contracts for difference scheme.*
- *We are seeking evidence on the uses of non-road diesel, mainly in urban areas, considering the air quality impacts and the potential for market distortion. The Treasury has also announced it will review how alternative fuel rates line up with rates of petrol and diesel ahead of Budget 2018.*
- *We will cut emissions from non-road mobile machinery and give local authorities tough new powers to control the use of such machinery where it is causing an air pollution problem.*
- *Green Great Britain Week, starting in autumn 2018, will engage the public on air quality, alongside climate change, and highlight the economic opportunities it offers for the UK.*

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The BVRLA supports the above package of actions. However, we would also urge the Government not to assume that retrofitting vehicles is a panacea to all vehicles – at present, this is currently only practical for buses, coaches and certain other larger vehicles. The technology is not currently suitable for cars, vans or HGVs.

### **Question 8**

#### **In what areas of the air quality industry is there potential for UK leadership?**

Science, research and understanding of air pollution and its impacts  
Low or zero emissions technology

Given the strength and interest in low and ultra-low emission vehicles in the UK, the Government has an excellent opportunity to grow this industry into one in which the UK can take an economic advantage. However, in order for this to happen, there needs to be as much support for the technology throughout the supply (and demand) chain, and the lifetime of the vehicles.

### **Question 9**

#### **In your view, what are the barriers to the take-up of existing technologies which can help tackle air pollution?**

Lack of confidence in the residual value of second-hand ULEVs.

#### **How can these barriers be overcome?**

The BVRLA believes that the Government must do more to stimulate both the first- and second-hand markets in ultra-low emission vehicles. While fiscal incentives, such as the plug-in car and van grants, via the Office of Low Emission Vehicles, have helped stimulate take-up of Electric Vehicles, the BVRLA believes that other incentives – not necessarily financial – are required to encourage this market. Such incentives should not be limited to the first person owning an ultra-low emission vehicle but be supported as an incentive throughout the lifespan of that vehicle (provided the vehicle still conforms to the required standard). We propose initiatives such as green lanes in areas of high congestion and/or low air quality, in which only vehicles conforming to the highest emissions standard would be permitted to drive; and/or subsidised or free parking for low or ultra-low emission vehicles. While the BVRLA appreciates that the above proposals would require discussions with regional government, we believe that these would prove a strong incentive for drivers considering purchasing a low emission vehicle.

We would also like to see increased investment in and access to charging points for electric vehicles, and for more support in raising and promoting the benefits of ultra-low emission vehicles. In terms of taxation, this could include allowing businesses to claim enhanced Capital Allowances when they choose a Euro VI commercial vehicle, whether they lease or purchase outright. We would also like to see reduced business rates for firms operating fleets made up primarily or entirely of ultra-low emission vehicles.

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### Question 10

**In your view, are the priorities identified for innovation funding the right ones (see drop down box below for the priorities)?**

The BVRLA agrees that supporting innovation in the zero and ultra-low emissions HGVs, as well as reducing particulate emissions from tyre, brake, and road wear will make a considerable difference in addressing road vehicle-derived emissions.

### Question 11

**What do you think of the package of actions put forward in this chapter (see summary below)? Please provide evidence in support of your answer if possible.**

- *We will end the sale of new conventional petrol and diesel cars and vans by 2040. We will position the UK as the best place in the world to develop, manufacture and use zero exhaust emissions vehicles and, during the transition, we will ensure that the cleanest conventional vehicles are driven on our roads.*
- *We will work with international partners to research and develop new standards for tyres and brakes to enable us to address toxic non-exhaust emissions of microplastics from vehicles which can pollute air and water.*
- *New legislation will enable the Transport Secretary to compel manufacturers to recall vehicles and machinery for any failures in their emissions control system, and environmental nonconformity or failure, and make tampering with an emissions control system a legal offence.*

The BVRLA supports the above package of proposals aimed at driving down emissions. The Government's pledge to end the sale of new conventional petrol and diesel vans and cars by 2040 is an ambitious one and must therefore be supported by incentivising alternative forms of transport, particularly those of plug-in vehicles.

On behalf of the rental and leasing sector, the BVRLA has recently announced a pledge to register 300,000 new plug-in vehicles per annum by 2025. This will mean that the total BVRLA member plug-in fleet will increase from 50,000 in 2017 to 720,000 in 2025. The majority of this fleet will be company cars, which will account for 200,000 annual registrations by 2025, with a total fleet of 430,000 plug-in company cars. The remaining 100,000 annual new plug-in vehicle registrations in 2025 will be a combination of rental and personal lease/Motability cars, and vans. This portion of the BVRLA membership will have 290,000 plug-in vehicles on fleet by 2025.

In order to achieve these figures, action is required on the part of Government to create a supportive and sustaining environment for fleets to rapidly take up such plug-in vehicles. This action should include bringing forward the reduction to 2% from the current 9% company car tax for ultra-low emission vehicles (and bypass the rise to 16% planned ahead of this reduction, which will only serve to disincentivise employees from choosing a ULEV, at least before the planned tax reduction). Bringing down company car tax to 2% would not only provide a valuable

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incentive to employees taking a company car but would also signal the Government's intention to support the growth in the plug-in vehicle market.

We would also like to see the Government confirm and publish the tax rates on ultra-low emission vehicles for the next five years. This has been carried out in other forms of taxation (notably corporation tax) and has provided much-needed certainty and stability to the corresponding markets as a result. A similar commitment for the plug-in vehicle market would be invaluable, particularly ahead of the anticipated impact on the automotive sector caused by Brexit.

### Question 12

**Do you feel that the approaches proposed for reducing emissions from non-road mobile machinery are appropriate or not?**

Neither yes/no

The BVRLA does not represent companies based in the non-road mobile machinery sector, and therefore has no position on this.

## 6. Action to reduce emissions at home

NO COMMENT FOR THIS SECTION

## 7. Action to reduce emissions from farming

NO COMMENT FOR THIS SECTION

## 8. Action to reduce emissions from industry

- *We will maintain our longstanding policy of continuous improvement in relation to industrial emissions, building on existing good practice to deliver a stable and predictable regulatory environment for business as part of a world-leading clean green economy.*
- *We will work with industrial sectors to review improvements to date, and to explore opportunities to go further through a series of sector roadmaps that set ambitious standards – moving beyond a focus on minimum standards to make UK industry world leaders in clean technology and secure further emissions reductions between.*
- *We will close the regulatory gap between the current Ecodesign and medium combustion plant regulations to tackle emissions from plants in the 500kW to 1MW thermal input range. As legislation on medium combustion plants and generators comes into force, we will consider the case for tighter emissions standards on this*

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*source of emissions. We will exempt generators used for research and development purposes from emission controls.*

### **Question 19**

**What do you think of the package of actions put forward in this chapter (see summary above)? Please provide evidence in support of your answer if possible.**

NO COMMENT

### **Question 20**

**We have committed to applying Best Available Techniques to drive continuous improvement in reducing emissions from industrial sites. What other actions would be effective in promoting industrial emission reductions?**

NO COMMENT

### **Question 21**

**Is there scope to strengthen the current regulatory framework in a proportionate manner for smaller industrial sites to further reduce emissions? If so, how?**

NO COMMENT

### **Question 22**

**What further action, if any, should government take to tackle emissions from medium combustion plants and generators? Please provide evidence in support of your suggestions where possible.**

NO COMMENT

### **Question 23**

**How should we tackle emissions from combustion plants in the 500kW-1MW thermal input range? Please provide evidence you might have to support your proposals if possible. Ideas for 500kW-1MW combustion plants**

NO COMMENT

### **Question 24**

**Do you agree or disagree with the proposal to exempt generators used for research and development from emission controls? Please provide evidence where possible.**

Neither yes/no



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### 9. Leadership at all levels

- *We are consulting on a new, independent statutory body to hold government to account on environmental commitments following EU exit. Ensuring that there is transparency and accountability in how we achieve our clean air ambitions will be a priority in this work.*
- *We will bring forward new clean air legislation at the earliest opportunity. This will bring long-standing frameworks for local and national action on air pollution into the 21st century with stronger powers and clearer accountability.*
- *To ensure that local action to reduce air pollution remains robust and relevant, we will transform existing structures to increase transparency and back this up with stronger statutory powers to tackle local air pollution.*
- *The UK government will work in partnership with the governments of Scotland, Wales and Northern Ireland to develop a detailed National Air Pollution Control Programme as required under the National Emissions Ceilings Directive for publication in 2019.*

#### Question 25

**What do you think of the package of actions put forward in this chapter (see summary above)? Please provide evidence in support of your answer if possible.**

The BVRLA supports the above proposed actions, though would also add that the independent statutory body must be mandated to consult regularly with industry representatives. This will ensure that any recommendations made to Government are business friendly and informed by practical experience, as well being targeted at the causes of poor air quality.

#### Question 26

**What are your views on the England-wide legislative package set out in section 9.2.2 of the draft strategy? (See below summary) Please explain, with evidence where possible.**

- *New clean air legislation will enable the Transport Secretary to compel manufacturers to recall vehicles and machinery for any failures in their emissions control system and make tampering with an emissions control system a legal offence.*
- *It will also replace the existing patchwork with single coherent legislative framework for local authorities to tackle air quality and bring the law up to date with the evolution of structures at sub-national level so that accountability for air quality sits in the right place.*
- *It will update outmoded legislation on 'dark smoke' from chimneys and underused provisions on Smoke Control Areas to bring them into the 21st century with more flexible, proportionate enforcement powers.*
- *Finally, it will create a new statutory framework for Clean Air Zones (CAZ) to simplify current overlapping frameworks of CAZ, AQMA and Smoke Control Areas to create a single approach covering all sources of air pollution.*
- *In addition, we will legislate to ensure that major sources of air pollution are subject to proportionate controls that reflect the risk they pose to public health and the environment. This will strengthen powers at both national and local level.*

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We will take England-wide action to:

- *prohibit the sale of polluting fuels and inefficient stoves for domestic use -limit emissions of ammonia from farming*
- *consider the case for setting tighter emission controls for biomass installations to reduce PM pollution from energy generation*
- *close regulatory gap to apply limits to medium combustion plants between 500kw - 1MW and consider the case for increasing stringency of limits for plants above 1MW*
- *drive up emissions standards for diesel-powered non-road mobile machinery before and after sale*

The BVRLA agrees with the recommended legislative package, and we particularly welcome the proposed statutory framework for Clean Air Zones. We believe that this framework must ensure the maximum possible consistency between CAZs in terms of signage, charges and system operations, in order to reduce disruption and confusion on the part of fleet operators.

Similarly, consistent methods of charging between CAZ cities would be extremely welcome by industry and ensure consistency between CAZ cities. We would also recommend the development of a single site or portal that would allow commercial fleets to pay for any non-compliant vehicles entering several CAZ zones in one day all at the same time.

We would like to see a guarantee that CAZ standards will remain in place and will not be changed for a fixed period of time. This will give the fleet sector confidence to upgrade vehicles safe in the knowledge that new standards will not later emerge which would make such new vehicles non-compliant, and subject to new charges.

### **Question 27**

**Are there gaps in the powers available to local government for tackling local air problems?**

Yes

**If yes, what are they?**

The BVRLA would welcome greater powers on the part of City Councils to allow for the installation of electric vehicle charging points and similar infrastructure. This can benefit both fleet operators in improving take-up of such plug-in vehicles on a swifter timescale, and the city in terms of the reduced vehicle emissions as a consequence. Currently, many commercial fleets are constrained by grid restrictions as to the number of charging points they can install, which in turn affects the number of plug-in vehicles they can purchase and operate. Similarly, for operators who lease their premises, and require registered landlord consent to make changes such as EV charging point installation. These are both issues which assistance from the Council can make a big difference in overcoming regulatory obstacles.

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### Question 28

**What are the benefits and risks of making changes to the balance of responsibility for clean local air between lower and upper tier authorities?**

NO COMMENT

### Question 29

**What improvements should be made to the Local Air Quality Management [LAQM] system?**

The BVRLA recommends regular air quality measurement in "hotspot" areas, with results made readily available to stakeholders.

## 10. Progress against our clean air goals

*Analysis shows that the actions set out in this draft strategy can meet our ambitious emissions reduction targets, if they are implemented with the necessary pace and determination.*

*This draft strategy developed by the UK government, on which we are consulting, sets out how we will work towards meeting these ambitious reductions in England. The consultation period for this strategy runs until 14 August 2018. We look forward to input from a wide range of partners on the measures set out here and what more is possible.*

### Question 30

**What do you think of the package of actions in the strategy as a whole?**

The BVRLA supports the proposed package of actions detailed in this document.

### Question 31

**Do you have any specific suggestions for additional or alternative actions that you think should be considered to achieve our objectives? Please outline briefly, providing evidence of potential effectiveness where possible.**

In addition to the proposed actions on the part of the Government, and the various recommendations provided previously in this submission, the BVRLA also recommends the provision of a "sunset" clause for fleets to upgrade existing diesel vehicles which will comply with the Euro 6/VI standard, and thus CAZ-compliant. A model which the Council may wish to consider is that being proposed in Leeds – companies will have a set time to upgrade their vehicles, during which a non-compliance bill is added up on the fleet vehicle. If the vehicle is upgraded within the timeframe, this bill is automatically cancelled. If not, the bill is payable by the operator.

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