

Friends of the Earth (England, Wales and Northern Ireland) response to "Consultation on additional measures to support individuals and businesses affected by local NO₂ plans"

Dec 2017

1. About us

Friends of the Earth campaigns for solutions to environmental problems.ⁱ We're a member of Friends of the Earth Internationalⁱⁱ a federation of groups in more than 75 countries, including Scotland.ⁱⁱⁱ Friend of the Earth has a network of more than 200 local voluntary groups in England, Wales and Northern Ireland.^{iv}

Friends of the Earth has been campaigning on air pollution for several decades. We have consistently cautioned against incentivised diesel use due to the known health impacts, and have campaigned against unnecessary airport and road expansion because of the harm done to people and the planet, while advocating more sustainable alternatives and solutions.

2. Scrappage scheme

Friends of the Earth believes a carefully-designed, government-coordinated scrappage scheme is essential to support drivers shifting away from polluting vehicles. Drivers must be helped in to cleaner alternatives - particularly drivers of diesel vehicles, as many will have bought their diesel in good faith following the advice of multiple governments.

There is no such thing as a clean car, or vehicle – even if there are no exhaust emissions, brake and tyre wear and road abrasion contribute to PM air pollution. As Professor Frank Kelly of Kings College London says "our cities need fewer cars, not just cleaner cars".^v

Manufacturer-led scrappage schemes currently encourage the replacement of old cars with newer cars, but do nothing to facilitate a reduction in car use.^{vi}

We believe a government-coordinated scrappage scheme should provide the highest incentives for those people scrapping existing vehicles in favour of mobility tokens that could be used for car club membership, rail season tickets, e-bikes, and other measures.

Beyond this, incentives should be structured to support a transition to electric vehicles, then hybrids, then second-hand petrol vehicles for those most in need.

A scrappage scheme could be phased to prioritise the most polluting vehicles and would use real-world emissions as its standard metric. Smart ANPR technology could be used to identify the most polluting vehicles driven in problem areas, and help get them off the roads as a priority.

Furthermore, the burden of cost for such a scheme need not fall entirely on the tax payer. Car manufacturers, who have played such a significant part in the illegal NO₂ problem, should help pay for such a scheme through a 'diesel-gate levy'.

3. Public transport and charging infrastructure

In addition to a scrappage scheme, cheaper, affordable and accessible public transport must be available consistently across the country. We particularly note with concern that funding for buses across England and Wales has been cut by 33% since 2010.^{vii}

A network of properly funded, mandated Clean Air Zones that restrict vehicles are the most effective way of driving down illegal levels of pollution – adequate funding must be

given to their implementation.^{viii} Electric vehicles are part of the solution too. Driving an electric vehicle must be made viable across the country to promote uptake. Friends of the Earth welcomes increased funding support for electric vehicle charging points and infrastructure across the country.

4. Notes and references

This submission has been prepared by Aaron Kiely (aaron.kiely@foe.co.uk), Air Pollution Campaigner at Friends of the Earth.

ⁱ <https://www.foe.co.uk/who-we-are>

ⁱⁱ <http://www.foei.org/>

ⁱⁱⁱ <https://foe.scot/>

^{iv} https://www.foe.co.uk/get_involved/act_local_index

^v <https://www.theguardian.com/environment/2017/aug/04/london-should-lead-in-showing-electric-cars-will-not-tackle-air-pollution>

^{vi} <https://www.whatcar.com/news/scrappage-schemes/>

^{vii} <http://www.bettertransport.org.uk/buses-crisis-2017>

^{viii}

https://cdn.foe.co.uk/sites/default/files/downloads/A%20Clean%20Air%20Budget%202017_2.pdf