

Response ID ANON-TWTA-YFW-D

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

Submitted on **2017-06-15 23:47:27**

Introduction

1 What is your name?

Name:

Cllr Jack Scott

2 What is your email address?

Email:

Jack.Scott@sheffield.gov.uk

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:

Sheffield City Council

Local authority

Other type of organisation:

N/A

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:

Summary:

We are entirely dissatisfied with the woefully inadequate proposed measures put forward and believe that these will fail to address the scale of the challenge that Britain is facing.

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However, Sheffield City Council welcomes the recognition of the important role that Local Authorities can play in meeting the annual and hourly EU limit values for NO₂ in the shortest possible time.

We firmly believe however, that the Government could, and should, do significantly more at a national level.

Local Authorities are best suited to identify areas of exceedance in their areas and develop appropriate action plan measures.

However, our letter to the DEFRA Minister dated 03 February, clearly states the barriers Sheffield face, both financially and in terms of a lack of national policy and strategy levers, when trying to improve Air Quality in our local area.

Sheffield City Council is committed to ensuring clean air across the city and improving the health and lives of its residents. We believe that Sheffield, and other major cities, have a critical role in not only reducing climate impact but in creating and shaping a sustainable global economy that connects people to the opportunities and proceeds of growth while harnessing the inherent innovation and creativity that cities have to protect and enable environmentally sustainable growth.

Sustainable growth and the changes we need to make to create a more sustainable city and global economy provide an opportunity for Sheffield and one which plays to the city's strengths. Sheffield is known for its innovation and its ability to create and shape the future of industries. It is a City of Makers and the Outdoor City, uniquely combining major city economic and cultural opportunities with spectacular National Park.

A growing and thriving City needs a transport network that is fully integrated, which connects different modes of travel to encourage people to use public transport, cycle and walk, and that meets the future demands of Sheffield. A transport system which supports economic growth and considers environmental sustainability. A city which benefits from low emission vehicles and technology.

It is very disappointing therefore, that the revised Draft National Air Quality Plan again focuses predominantly upon potential Local Authority actions, rather than considering how Government could take the more pro-active role that is clearly required.

Consequently, we believe that a balanced approach has not been presented. The most effective measures would surely be those that could tackle the problems nationally, providing economies of scale, national leadership, and - not only improving air quality where exceedances exist - but also improving air quality across all areas (even where there is a public health impact below EU limit values).

Whilst concentrating on exceedance areas may bring forward compliance, consistent national action, based upon strong Government policy, would avoid the unwanted side-effect of potentially moving the problem from one area to another i.e. from a designated Clean Air Zone to a non-designated area.

We note that the final UK Air Quality Plan for tackling nitrogen dioxide, to be published in July 2017, will confirm the Local Authorities which will formally and legally be required to develop and implement comprehensive CAZs, with any charging element to be determined locally. Further, that these Local Authorities will be given clear legal duties to develop and implement these plans in a way that works for their local area, but that the Government only intends to support those efforts through national measures.

It is very clear from the consultation however, that 'charging CAZs have the greatest impact by bringing the majority of zones into compliance by 2021' (though not 2020 or "within the shortest possible time") so it is surprising and disappointing, given the scale and complexity of the challenge facing the UK as a whole, that Government are suggesting that these should all be 'developed' locally as required rather than through implementation of a clear national policy, which is centrally governed, resourced and led. SCC does not support this piece-meal approach to such a vital issue.

The need to challenge vehicle manufacturers on real-life emissions levels

As road transport emission EURO standards at national and EU level have historically failed to deliver required air quality improvements for certain vehicle types, we feel that this should have been more strongly addressed in the revised Draft National Air Quality Plan, including holding vehicle manufacturers to account regarding diesel emissions (including 'fines' which could contribute to a National Clean Air Fund).

The need for government action on taxation, scrappage schemes and retrofitting schemes

There is no clear Government commitment to potential national interventions with respect to vehicle taxation, fuel taxation rates or a diesel scrappage scheme, which is a significant omission within the consultation documentation.

Further, the consultation documentation indicates that the impact of the proposed retrofit scheme would be limited due to market capacity constraints, such that only circa 6% of taxis, 0.4% of HGVs and 19% of buses could practically be retrofitted nationally over a three-year period. A further concern is that the retrofit scheme when in place (late 2017 / early 2018) would be via competitive bidding, with an expectation that Local Authorities and vehicle owners consider how they can self-finance retrofit equipment as the market grows and develops. This will not lead to consistent action or a quick enough timescale.

* The need for a National Communications Strategy *

Shockingly, there is no mention whatsoever of a National Communications Strategy for England within the consultation documentation, something which needs to be addressed urgently.

Our on-going DEFRA funded AirAware campaign, which aims to encourage everyone across Sheffield to do their bit to help reduce pollution and protect themselves from the health risks (<https://www.sheffield.gov.uk/environment/air-quality/air-aware-sheffield.html>) could potentially be rolled-out nationally as an example of best practice. National campaigns exist with respect to healthy eating and smoking, whereas national awareness of the harm to health associated with diesel is still relatively poor.

* Addressing taxi emissions *

A further worrying omission is the lack of any indication that the Government intends to address Taxi emissions standards through national Licensing policy.

The Government's Taxi Licensing White Paper could be used to incentivise the take up of low emission vehicles and regulate Taxi Licensing across authorities. It could recommend for example, that 'Green Taxi Ranks' should be set-up at train stations or other priority locations and / or offer discounts on Taxi License fees for low emission vehicles.

This may require the setting up of suitable central government funding e.g. a 'Green Taxi Fund' and the creation of 'National Taxi Emission Standards'. Whilst powers exist at a Local Authority level, the very real potential for taxis to become licensed in an area with less stringent licensing standards means that local action alone will not deliver the outcomes required and a coordinated, national approach is required.

Whilst we welcome the Government's continued funding of measures designed to reduce emissions (OLEV, CBTF etc.) such funding streams do not currently provide anywhere near a sufficient level of resource in order to enable compliance across all areas.

Indeed, whilst Local Authorities have been identified as essential for the Government to meet the EU Limit values, no additional funding of sufficient scales or

clear mechanisms by which Councils can implement all the necessary changes within exceptionally tight time-scales have been identified. Competitive bidding processes are also very onerous and resource intensive for Local Authorities, with often significant levels of match funding required.

This is not a practical or sensible approach to a problem of this scale.

* Addressing emissions from diesel trains *

There is scant reference to tackling pollution from diesel trains, which is a significant problem in Sheffield. Government should therefore, note that continual delays to the Electrification of the Midland Mainline, seriously limits Sheffield's ability to become compliant within 'the shortest possible time'.

Government commitment to a delivery of MML electrification in the shortest possible time is essential and the future roll out of electrification of rail services across the north would be of significant environmental and operational benefit.

However, MML electrification doesn't deal with the problem of diesel trains along the Hope Valley line, east to Doncaster or north to Barnsley and Leeds.

The Government should also be seeking to incentivise, at a national and local level, the movement of a greater proportion of heavy goods by rail or water.

* Addressing motorway emissions *

The Council continues to work closely with Highways England, who recently implemented Smart Motorway All Lane Running on the M1, in order to ensure that outstanding air quality issues in Sheffield, particularly in the Tinsley area, are resolved.

The scheme is already implementing a maximum mandatory 60mph speed limit between Junctions 28 to 35a (weekday peak periods only) to mitigate air quality impacts (notably the only potential measure mentioned in the revised Draft Air Quality Plan for the SRN).

Notwithstanding, Highways England are only seeking to mitigate the air quality impacts arising from the implementation of the scheme i.e. not to bring this long-standing area of exceedance into compliance per se, which is a significant cause for concern and again seriously limits our ability to become compliant within 'the shortest possible time'.

* Making traffic flow more smoothly by adjusting signal timings or the removal of road humps *

Sheffield (like all other major cities) experiences congestion and queueing at times of peak demand on the road network. The Council already tries to manage, insofar as is reasonably possible, conflicting demands on the network by using sophisticated Urban Traffic Control (UTC) systems, which adjust signal timings in order to regulate flow and reduce queueing.

As we have a constrained network so the volume of traffic is an issue. In this context, the removal of road humps and street infrastructure as a possible measure to optimise traffic flow is not necessarily helpful. It is likely that road humps increase emissions from vehicles accelerating and decelerating but if the humps are removed, the potential for increased traffic, creation of rat runs and also emissions on such roads increases. In addition, it could detract from "quiet routes" for walking and cycling and from these activities, road safety will become compromised.

Like much of the rest of the document, this proposed solution is woefully inadequate in scope, ambition and scale to address the challenge that Britain faces.

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:

Summary:

Sheffield City Council welcomes the concept of Clean Air Zones, though these need to be properly thought through and funded to ensure that they are effective at improving air quality and that they do not have detrimental impacts on the economy.

- Sheffield is in a strong position to move quickly if the correct funding is provided by Government and we are allowed to use our current DEFRA-funded Low Emission Zone Feasibility Study evidence base with minimal updates
- Government funding should be provided without the need for competitive bidding, which is resource- and time-intensive for local authorities and carries the risk that

Clean Air Zones will not receive sufficient funding to reduce air pollution within the shortest possible time.

Detailed response:

In general terms, Sheffield City Council welcomes the concept of CAZs and the development of a consistent and reliable national framework of emission standards which will help to reduce uncertainty for the public and businesses travelling through and between mandated areas.

However, there is potential for unintended or undesirable consequences such as the geographic movement of air quality problems from inside to outside the boundary of a CAZ, as a result of traffic re-routing or choosing alternative destinations and fleet operators (buses / taxis / goods vehicles) prioritising environmentally friendly vehicles for use in those areas mandated, potentially relocating 'cleaner' vehicles to the dis-benefit of areas outside of CAZ's.

Further, the Government has previously indicated that, 'the capital has shown that action to create cleaner air, including the introduction of the Low Emission Zone, can go hand-in-hand with continuing economic success.' However, London has a significantly different economic status to most Local Authorities, which is incomparable to elsewhere, particularly in those cities located in the North such as Sheffield.

We understand that the Government has already provided funding for CAZ Feasibility Studies to all currently mandated Cities, plus Local Authorities in Manchester, Bristol and South Gloucestershire. However, the NAQP does not confirm the approval of funding for any newly mandated areas and this is a significant cause for concern.

Nonetheless, we very much look forward to working further with you to undertake a comprehensive Feasibility Study, which will determine the scale and scope of any potential Sheffield CAZ, together with associated Economic and Equality and Health impact assessments. Our Council have previously undertaken a significant factual evidence based DEFRA funded Low Emission Zone Feasibility Study (<https://www.sheffield.gov.uk/home/pollution-nuisance/low-emission-zone>) so we expect to be in a strong position to move to delivery very quickly if funding is provided by the Government and we are allowed to use this evidence base with proportionate updates that reflect our current economic and housing growth plans.

Of particular concern is the likely greater financial implications for lower income groups if older diesel vehicles are targeted through a charging CAZ (noting that there are likely to be more of these in Sheffield than the national average), as these people are less likely to be able to afford to: upgrade their vehicle; pay the charge; pay increase fares on buses and taxis (as a result of fleet upgrade costs) upon which they rely more so than affluent residents.

The most obvious overall barrier, in general terms, to implementation of a CAZ (whether this is charging or non-charging) is, resources:

- We understand that the Government has already provided funding for CAZ Feasibility Studies to all currently mandated Cities, plus Local Authorities in Manchester, Bristol and South Gloucestershire.
- Most Local Authorities are already struggling to deal with continuing budget constraints and competing calls on public finances, so will find it difficult if not impossible to justify diverting Capital and Revenue funds from other schemes and services in order to implement the required air quality management interventions.
- Significant revenue and capital funds will clearly be required for the proposed local CAZ feasibility studies, scheme implementation and management (including staffing and ongoing monitoring etc.).

Consequently, we would welcome formal confirmation that the Feasibility Study and any CAZ Infrastructure etc. required to deliver compliance in the shortest possible time will be fully funded by the Government. This funding should be allocated based on merit and need and not allocated through expensive and lengthy competitive processes.

It is noted that the CAZ Framework suggests that any revenues (from a charging zone) collected by Local Authorities will be re-invested to support local transport policies, which could cover public health projects of better town and city planning, promoting cleaner air. Yet, the NAQP implies that Local Authorities should only charge as a last resort.

We would also welcome confirmation that the Government will seek to provide funding 'over and above' the CAZ Study costs to any City mandated in order to help bring forward necessary Air Quality improvements in the shortest possible time, without the need to bid competitively to OLEV etc. (which is onerous and resource intensive for Local Authorities).

Lack of a guaranteed funding stream, makes it difficult for Local Authorities to effectively deliver a long term vision / strategy for emissions reduction and for local transport operators, including public transport, taxis and goods vehicles to commit to long term fleet investment.

What factors should local authorities consider when assessing impacts on businesses?

As a CAZ is an area where targeted action is taken to improve air quality as well as being prioritised and coordinated in a way that delivers improved health benefits and supports economic growth, Government needs to ensure that care is taken to minimise charges being passed on to business, such as bus operators, taxis, heavy goods vehicles companies, to reduce the risk of fare and price increases to users and customers.

Whilst CAZ charging regimes may generate income over the short term, they will not provide the necessary income source in the longer term, something that would be required to deliver the sustainable transport networks needed to ensure lasting long term benefit.

In order to support the long term sustainable growth ambitions in Sheffield, longer term funding commitments from Government are needed in order to develop and deliver the sustainable transport infrastructure required to support our ambitions. Charging however, may enable change in vehicle fleets and in the longer term vehicle technology improvement will make vehicles emissions compliant.

A notable part of the uncertainty relating to the evidence base underpinning the revised Draft National Air Quality Plan is driven by the local circumstances in each area.

In order to improve this, Government are suggesting that locally led reviews to develop more specific modelling and measures will be undertaken and that these results will then be used to inform the national evidence base.

The detail of this process depend on the makeup of the final Plan, but Government anticipate that 'a high level of evidence and resource will be required because air quality is high profile and the policies are expected to have wide-ranging environmental, economic, and social impacts'.

It is also noted that, as data collection by Local Authorities with CAZs along with appropriate data about other national policies will be integral to assessing the success of different interventions to control air quality, 'consideration will be given as to whether sufficient value will be obtained from commissioning an

evaluation contractor to collect primary data and conduct a more in-depth review'.

Reference our earlier comments set-out above, we would welcome formal confirmation that the Feasibility Study (and any CAZ Infrastructure etc. as required) will be fully funded by the Government.

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:

Policies and strategies which aim to promote (and deliver infrastructure) for walking, cycling and public transport, and awareness raising are also key elements of our Air Quality Action Plan, as these not only reduce congestion, but also improve air quality and health. Funding to support such policies and strategies should be made less onerous to secure.

We are pleased therefore, to have had confirmation that Sheffield City Region (SCR) has been awarded the full £7.5m Sustainable Transport Access Fund that we recently bid for from the Government which will be shared across the four South Yorkshire authorities and will deliver a programme of revenue projects, initiatives and training that supports sustainable transport, in particular there will be a focus on cycling and walking related activity (which will ensure sustained improvements in sustainable transport and the benefits this has to air quality and our economy).

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.

We welcome the commitment of Government to provide appropriate funding support where necessary. Retrofitting of buses and LPG conversions of existing black cabs represent value for money and would have a direct and rapid impact on air quality. The recommendations from the DEFRA funded 2013 Sheffield Low Emission Zone Feasibility Study (<https://www.sheffield.gov.uk/home/pollution-nuisance/low-emission-zone>) indicated that in the short term, diesel vehicles (particularly Buses, Taxis and Goods Vehicles) need to be retrofitted or be a minimum Euro VI / 6 standard and in the longer term, we need a shift away from diesel fuel to alternative low emission fuels (electric, gas / biogas, hybrid, hydrogen).

Reference our earlier comments set-out above, there is no mention whatsoever of a National Communications Strategy for England, within this Consultation document – something which needs to be addressed urgently.

Our on-going DEFRA funded AirAware campaign, which aims to encourage everyone to do their bit to help reduce pollution and protect themselves from the health risks (<https://www.sheffield.gov.uk/environment/air-quality/air-aware-sheffield.html>), could potentially be rolled-out nationally as an example of best practice.

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?

Reference our earlier comments set-out above, there is no clear commitment to potential national interventions with respect to vehicle taxation, fuel taxation rates or a diesel scrappage scheme.

Further, the consultation document indicates that the impact of the proposed retrofit scheme would be limited due to market capacity constraints, such that only circa 6% of taxis, 0.4% of HGVs and 19% of buses could be retrofitted nationally over a three-year period.

A further concern is that the retrofit scheme when in place (late 2017 / early 2018) would be via competitive bidding, with an expectation that Local Authorities and vehicle owners consider how they can self-finance retrofit equipment as the market grows and develops.

Of particular concern is the likely greater financial implications for lower income groups if older diesel vehicles are targeted through a charging CAZ (noting that there are likely to be more of these in Sheffield than the national average), as these people are less likely to be able to afford to: upgrade their vehicle; pay the charge; pay increase fares on buses and taxis (as a result of fleet upgrade costs). upon which they rely more so than affluent residents.

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?

Value for money is about cost of mitigation compared to the monetised benefits arising, but also the scale of impact needs to be considered and timeliness of the outcome being achieved and deliverability.

Given the complexity of this issue, only a clear Government position on national change will have large scale impact. Targeted mitigation requires a good local evidence base, funding for feasibility studies and the ability to accurately forecast outcomes.

As road transport emission EURO standards at national and EU level have historically failed to deliver required air quality improvements for certain vehicle types, we feel that this 'fraud' should have been more strongly addressed in the revised Draft National Air Quality Plan, including holding vehicle manufacturers to account regarding diesel emissions (including 'fines' which could contribute to a National Clean Air Fund).

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

Please provide your views:

Sheffield City Council oversees the running of the Community Diffusion Tube Project, which enables people to have a diffusion tube in their home, office or school to get a reading of local air quality and gives communities the tools and data they need to raise awareness of this issue, and on occasions challenge planning decisions.

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

Please provide your views:

The recommendations from the DEFRA funded 2013 Sheffield Low Emission Zone Feasibility Study (<https://www.sheffield.gov.uk/home/pollution-nuisance/low-emission-zone>) indicated that in the short term, diesel vehicles (particularly Buses, Taxis and Goods Vehicles) need to be retrofitted or be a minimum Euro VI / 6 standard and in the longer term, we need a shift away from diesel fuel to alternative low emission fuels (electric, gas / biogas, hybrid, hydrogen).

Funding is an issue however (the Council's £10m Go Ultra Low City bid was unsuccessful for example) and much more Government resource is needed to tackle the air quality problems that Sheffield and other large urban areas face.

LPG conversions of existing Hackney carriages may prove to be the only realistic option for improving emissions earlier in Sheffield and at a lower cost than switching to electric, which would be a longer-term aspiration, alongside hydrogen. We await with interest the results of Birmingham's work on their LPG conversions and we would be very keen to work with OLEV / DEFRA to see whether there may be an opportunity to develop a similar project in Sheffield.

Our ULEV Low Emission Bus Scheme bid application resulted in an award of £1.32m for 44 Hybrid Buses on Sheffield 1 / 1a route. Prior to that our DfT Clean Bus Technology Fund (CBTF) bid application resulted in an award of £500k for Sheffield Bus Routes 51 & 52. However, much more needs to be done to encourage local operators to invest in low emission alternatives to diesel i.e. electric, gas / biogas, hybrid, hydrogen when their market share continues to decline, as is demonstrated by falling bus patronage across our region.

We were successful in bidding for £234k under the Fuel Cell Electric Vehicles (FCEV) Support Scheme to support the deployment of 5 Renault Symbio hydrogen vans into our Council Transport Services fleet. These will be fuelled at ITM Power, the energy storage and clean fuel company, which launched its first public access hydrogen refuelling station (<http://www.itm-power.com/project/wind-hydrogen-development-platform>), M1 Wind Hydrogen Refuelling station, at the Advanced Manufacturing Park, just off the M1, Junction 33 in South Yorkshire, funded by Innovate UK.

We are also very pleased that OLEV decided to award £1.73m from the Freight Emissions fund to two Sheffield Companies (Magnomatics and MagTec) for Hybrid Electric and Electric trials respectively.

Reference our earlier comments set-out above, the consultation document indicates that the impact of the proposed retrofit scheme would be limited due to market capacity constraints, such that only circa 6% of taxis, 0.4% of HGVs and 19% of buses could be retrofitted nationally over a three-year period.

A further concern is that the retrofit scheme when in place (late 2017 / early 2018) would be via competitive bidding, with an expectation that Local Authorities and vehicle owners consider how they can self-finance retrofit equipment as the market grows and develops.

Again, we would welcome confirmation that the Government will seek to provide funding 'over and above' the CAZ Study costs to any City mandated in order to help bring forward necessary Air Quality improvements in the shortest possible time, without the need to bid competitively (which is onerous and resource intensive for Local Authorities).

In terms of passenger and freight rail services, diesel trains contribute to poor air quality and Government should therefore influence local service provision (electric / gas) through its Franchising policy, for example or by retrofitting with Continuously Regenerating Traps. This would complement the air quality benefits expected from the planned electrification of the Midland Mainline, which should be brought forward in the soonest possible time.

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

Please provide your views:

The car-buying public should be made fully aware of the differences in the level of emissions between petrol, diesel and 'new technology' cars, the importance of the Euro-rating system, and the effects of those emissions on health. In particular, that the World Health Organisation declared in 2012 that diesel emissions are a Class 1 carcinogen i.e. can cause cancer.

The Government should consider labelling vehicles (both conventional and low emission) with Total Cost of Ownership figures to highlight the longer-term costs and benefits of different vehicle choices. For ULEVs, this information could help offset the high upfront costs in the minds of consumers.

Notably, the current EU test cycle for vehicles to establish the CO2/km does not reflect real on-road testing of petrol and diesel engine vehicles, so it is crucial that Government is confident in these figures prior to offering drivers any incentives based upon them. A scheme to assess this would be of benefit.

The Government needs to ensure that Emissions Factors are correct by funding more research into real-life road-side emissions and the impact on health.

The Government should take the lead in a UK-wide campaign (please see our earlier comments regarding our DEFRA funded AirAware campaign being rolled out nationally) and provide strong supporting policy measures to reduce the proportion of diesel (and older) petrol cars used in urban environments.

National campaigns exist with respect to healthy eating and smoking, whereas national awareness of the harm to health associated with diesel is still relatively poor. Diesel, like smoking will become 'socially unacceptable' and the Government needs to take strong and immediate action to bring about the changes needed in the shortest possible time.

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

Please provide your views:

With regard to CNG, we do not believe that central grants for vehicles or infrastructure should be relied upon on a long term basis, as this can delay purchasing decisions and can artificially hike prices from OEMs and associated costs. Using the 10 year fuel duty differential freeze is the best mechanism to develop the CNG / bio-methane market.

However, to further support and accelerate the roll out of gas vehicles we would like to see a 100% first year capital allowance for any additional vehicle costs or for the infrastructure hardware costs then the market will take off rapidly. We believe investment will now be planned due to the 10 year guarantee, as investors are able to understand and have confidence in better returns.

With regard to Hydrogen, we would like to see Government maintain zero taxation on hydrogen until 2030 and use incremental levels of purchase tax on new petrol / diesel vehicles to 2030. Once the Electric Vehicle and Fuel Cell Electric Vehicle alternatives are widely available, in order to speed up passage to a low emission transport future there needs to be joined-up management of the increasing amounts of renewables in the power system, for example, with the generation of green hydrogen for the transport system, so electrolyser-HRS (Hydrogen Refuelling Station) can be deployed and operated.

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

Please provide your comments:

We strongly believe that the UK Air Quality Plan should be strengthened to match the ambitions of cities such as Sheffield in delivering clean air and delivering our growth ambitions.

At present, it is entirely inadequate for this process.

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. :