



Department  
for Environment  
Food & Rural Affairs



Department  
for Transport

# Consultation on additional measures to support individuals and businesses affected by local NO<sub>2</sub> plans

November 2017



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# 1. Introduction and purpose of consultation

1. Clean air is one of the most basic requirements of a healthy environment for us all to live, work, and bring up families. Air quality has improved significantly in recent decades. Since 1970 sulphur dioxide emissions have decreased by 95%, particulate matter by 73%, and nitrogen oxides by 69%. Total UK emissions of nitrogen oxides fell by 19% between 2010 and 2015. Whilst air quality has improved significantly, and will continue to improve thanks to the action we have already taken, there are some parts of our country where there are still unacceptable levels of air pollution as a direct result of the failure of the European regulatory system to deliver expected improvements in vehicle emissions. Standards on vehicle engines (known as “Euro Standards”), which should have led to major reductions in emissions of nitrogen dioxide (NO<sub>2</sub>) from vehicles, failed to do so, particularly for diesel vehicles, whose “real world” emissions have proven to be many times higher than laboratory tests.
2. The government has already taken significant action to improve air quality by putting in place a £3 billion plan to date. The government has announced an end to the sale of all new conventional petrol and diesel cars and vans by 2040. The shift to ultra-low and zero emission vehicles is well under way, and will continue to gather pace over the coming years as we move towards 2040. The UK is already a leader in Europe in terms of electric vehicle manufacture and uptake. In 2016 UK manufactured Nissan Leafs accounted for almost 20% of battery electric car sales across Europe and the UK had the highest sales of battery electric vehicles and plug-in hybrids in the EU.
3. In July 2017, the government published the UK plan for tackling roadside nitrogen dioxide concentrations<sup>1</sup> (subsequently referred to as ‘the NO<sub>2</sub> Plan’). The NO<sub>2</sub> Plan set out actions to bring nitrogen dioxide (NO<sub>2</sub>) air pollution within statutory limits in the shortest possible time.
4. Unlike greenhouse gases, the risk from NO<sub>2</sub> is highly localised: it is the build-up of pollution in a particular area that increases the concentration in the air and the associated risks. So intervention needs to be targeted to problem areas with high levels of pollution and to the sources that contribute to the problem. Road vehicles contribute about 80% of NO<sub>2</sub> pollution at the roadside; the growth in the number of diesel cars has exacerbated this problem.
5. The NO<sub>2</sub> Plan requires a number of local authorities to develop and implement local plans to tackle pollution in their area. In developing their local plans, local authorities should consider a wide range of innovative options, exploring new technologies and seeking to support the government’s industrial strategy so that they can deliver reduced emissions in a way that best meets the needs of their communities and local businesses. Their plans could include a wide range of measures such as: changing road layouts at congestion and air pollution pinch points; encouraging public and private uptake of ultra low emissions vehicles; using innovative retrofitting technologies and new fuels; and, encouraging the use of public transport. Where there are no other viable options to reduce air pollution to legally-permissible levels in the shortest possible time, some local authorities may

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<sup>1</sup> <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

decide to introduce access restrictions on vehicles, such as charging zones or other measures to prevent certain vehicles using particular roads at particular times. However, local authorities should bear in mind such access restrictions would only be necessary for a limited period and should be lifted once legal compliance is achieved and there is no risk of legal limits being breached again. Government has committed direct financial support to help local authorities implement their local plans through a £255m Implementation Fund. Further information is set out in the NO<sub>2</sub> Plan.

6. The government announced in the NO<sub>2</sub> Plan it would consult further in autumn 2017 on options to support individuals and businesses affected by local NO<sub>2</sub> plans: in particular, private car drivers on lower incomes or other vehicle owners with limited travel alternatives.
7. We also set out in the NO<sub>2</sub> Plan that we will be establishing a Clean Air Fund. The Autumn Budget announced a £220m Clean Air Fund, a funding pot which local authorities with the most challenging pollution problems can bid into. The Clean Air Fund will provide an opportunity for local authorities to implement additional measures tailored to their area which minimise the potential impact of local air quality plans - either by enabling the local authority to implement local plans that collectively impact on fewer people, or by providing direct support to those impacted. As set out in the NO<sub>2</sub> Plan, this could include community-wide measures such as electric vehicle charge points, changes to cycling infrastructure; or measures aimed directly at supporting individuals or businesses such as local travel discounts. Whilst it is for local authorities to determine the local action needed, it is the government's strong expectation that local authorities will use the Clean Air Fund funding to support these individuals and families.
8. This consultation invites stakeholders to submit evidence on some of the potential measures that could be supported through the Clean Air Fund to directly support individuals. Note that these measures do not have the primary objective of tackling poor air quality - those policies are set out in the NO<sub>2</sub> Plan. Instead the key objective for these measures would be to support people and businesses impacted by local air quality measures.
9. Whilst local authorities will be delivering these measures, there could be areas where central government could provide further support e.g. by providing specific guidance on key measures, or establishing systems and frameworks that could allow local authorities to implement measures more efficiently and with greater consistency. Similarly, it is possible that industry could help drive forward certain solutions, such as the recently announced manufacturer led scrappage schemes, and investment in electric vehicles charging infrastructure. The government will use the evidence gathered in this consultation to inform further development of the Clean Air Fund. All proposals considered for government support would need to demonstrate that support can be targeted to those who need it most and that any scheme could be delivered effectively with minimal risk of fraud or abuse. Proposals must not have a negative impact on our ability to reduce NO<sub>2</sub> emissions and meet legal compliance in the shortest possible time. Finally, proposals would need to be fair to the taxpayers who would fund any measures and demonstrate that they offer clear value for money.

## 2. Summary of potential additional measures

10. Potential key measures that have been suggested to date are listed below.

- a) **Measures to support individuals and businesses to upgrade their vehicles to low emission alternatives.** This could include:
  - Measures to increase retrofit uptake (building on the bus retrofit scheme) where all or part of a vehicle is modified with pollution-reducing and/or fuel saving technologies potentially reducing the amount of NO<sub>2</sub> emitted.
  - Measures to encourage uptake of low emission vehicles for example actions that could further increase provision of electric vehicle charging points.
- b) **Measures making it easier for individuals to undertake a shift in the transport that they use.** Some people may be able to switch to cleaner travel options such as buses, car clubs, walking or bikes. This could include:
  - Measures to increase travel in car clubs, bikes, trains etc. which could include awareness raising campaigns or subsidised travel.
  - Increased park and ride, car sharing or employment travel schemes.
  - Closer working between local authorities and bus operators to increase the attractiveness of local bus services and make it easier for people to change the way they travel.
  - Other support to encourage people to change transport such as improved communications and more general public transport improvements.
- c) **Measures to reduce the cost of a charging zone on certain individuals.** Where a charging zone has been implemented, there may be a case for providing a discount or exemption on the charge to certain groups of people.
- d) **Targeted vehicle scrappage schemes** – where people are encouraged to scrap older polluting vehicles in exchange for a reward which could include a discount on a less polluting vehicle.

**Question 1: Are there other policy options not set out in the list above that should be considered in order to minimise the impact of local air quality interventions on individuals or businesses? This could include measures such as guidance or communications material. Please provide evidence to support your proposal. Any proposals should take into account the assessment criteria set out in the next section.**

### 3. Assessment criteria

11. The measures set out in this consultation could help minimise the impact of local air quality interventions on local businesses, residents and those travelling into towns and cities to work. They include measures that could encourage people to switch to less polluting forms of transport or upgrade their own vehicle. Note that these are not measures required to achieve compliance - the government's policies to address ongoing NO<sub>2</sub> exceedances are set out in the Plan published in July 2017. Instead the key objective would be to support people and businesses impacted by local air quality interventions.
12. There are a number of supporting objectives set out below that will be used by government in assessing any options:
- **Target support on those that need help** – This could include: people who have to travel into air quality hotspots regularly for work, travel or because they live in the zone who do not have access to alternative modes of transport; people who would find it difficult to change to a different mode of transport such as trades vans; and people on low incomes who cannot easily afford to upgrade their vehicles. Any measures would need to demonstrate ability to target these groups effectively.
  - **Offer value for money for taxpayer** – As the NO<sub>2</sub> Plan published in July 2017 set out, measures will be funded by relevant taxes on new diesel vehicles and therefore proposals put forward would need to be fair to taxpayers.
  - **Minimal negative impact on air quality or other pollutant levels** – Ideally any policy would support improvements to air quality, however we recognise that for some measures (e.g. charge discounts) this would not be feasible and so at a minimum they should minimise any adverse effect on pollution levels (including NO<sub>x</sub> and CO<sub>2</sub>).
  - **Not create any delays to the implementation of the NO<sub>2</sub> Plan** – It is important that measures complement the existing policies set out in the NO<sub>2</sub> Plan and that they do not impact the ability to reduce NO<sub>2</sub> levels as quickly as possible.
  - **Be delivered with minimal risk of fraud or abuse** – We will need to consider the potential for any measure to be open to abuse. We expect that some of the more complex targeted options could have significant risks of fraud. It is important that any option balances complexity with scope for gaming.
  - **Be credible, deliverable and timely** – Any option should have a viable delivery route and be able to provide support in a timely way.
  - **Avoid market distortion** – Any policy should aim to not unnecessarily distort the vehicle market or create negative behavioural impacts.
13. We welcome evidence from stakeholders in relation to all of the above criteria as part of their responses.

## 4. Measures to support individuals and businesses to upgrade to low emission alternatives

### Further support for retrofit

14. Retrofitting refers to all or part of an engine being modified with pollution-reducing and/or fuel saving technologies. These include: exhaust gas treatment technologies, such as selective catalytic reduction technology, thermal management technology; fuel saving technologies such as hybridisation; and more extensive modification for fuel conversion to compressed/ liquefied natural gas, electric, hydrogen or liquefied petroleum gas. Some retrofitting technologies have the potential for significant reductions in emissions of NO<sub>2</sub> and other emissions.
15. The UK government believes that continued development, promotion and implementation of innovative retrofit technology could be an important element of reducing emissions of NO<sub>2</sub> and help bridge the gap in the journey towards zero emissions by 2050. At a local level, the UK government expects local authorities to consider the impact retrofitting could have on their pollution levels, in particular for public transport fleets and more generally to set a lead in cleaning up their own fleets and meeting local air quality objectives.
16. The government has already invested over £27m to support retrofit. The NO<sub>2</sub> Plan sets out more detail on current activity including:
  - **Providing additional funding for bus retrofit:** The NO<sub>2</sub> Plan set out that the UK government has committed an additional £40 million in support for retrofitting of thousands of older buses in England and Wales. The UK government will maximise support for towns and cities with the greatest air quality compliance challenges and issued further information on 11 September 2017 to local authorities on the design of the initial two-year £30 million scheme, including timings and how to apply.
  - **Setting up a retrofit accreditation scheme:** Alongside the NO<sub>2</sub> Plan, the Low Carbon Vehicle Partnership launched a Clean Vehicle Retrofit Accreditation Scheme (CVRAS) for buses initially with other vehicle types to follow. The Accreditation Scheme will provide independent evidence that a vehicle retrofit technology will deliver the expected emissions reductions and air quality benefits. It will enable drivers, technology manufacturers, businesses and local authorities to be confident that accredited technologies provide the appropriate emissions reductions.
17. The policies set out above and in the NO<sub>2</sub> Plan will help support up to 2350 older buses to upgrade and reduce NO<sub>2</sub> pollution, in addition to the 5000 older buses in being upgraded in London.
18. The majority of retrofitting in the UK has focussed on large vehicles such as buses. We welcome comments from stakeholders on technologies that are viable and



economical on smaller vehicles such as vans, including any evidence on costs of potential products for different vehicle types. For example we welcome evidence from stakeholders on the potential to retrofit vans to use liquefied petroleum gas (LPG) and suggestions on what government or industry can do to help facilitate this.

19. There may be additional individuals or businesses that need support to retrofit their vehicles and we welcome comments from stakeholders on what more we can do to support specific sectors.

**Question 2: Please provide evidence on what else could be done to support people to upgrade or retrofit their vehicles in line with the assessment criteria set out above. If there are specific sectors that need support, please set out evidence to support this.**

**Please provide evidence on potential limitations to uptake (e.g. industry capacity, refuelling infrastructure, consumer acceptance, examples of where retrofit has not worked as expected) and evidence of environmental impacts and the costs of potential technology for different vehicle types.**

## **Further support for ultra low emission vehicles**

20. Central to the UK government's objective of tackling NO<sub>2</sub> and CO<sub>2</sub> emissions is its ambition for Britain to lead the world in ultra low emission vehicle technology and use. Investment to date includes around £1 billion to support ultra low emission vehicles, including investing in the UK's charging infrastructure and funding the Plug-in Car and Van Grant schemes. Further information on how government is supporting ultra low emission vehicles is set out in the NO<sub>2</sub> Plan.
21. The government has announced an end to the sale of all new conventional petrol and diesel cars and vans by 2040. The shift to ultra-low and zero emission vehicles is well under way, and will continue to gather pace over the coming years as we move towards 2040.
22. The government is already supporting local authorities to encourage the take up of ultra low emission vehicles through its Go Ultra Low City Scheme where eight authorities are trialling local measures and incentives including preferential parking schemes, demonstrating ultra low emission vehicle uptake in their own fleet, or providing a range of electric chargepoints options, including for those without off-street parking. The government is also providing funding to authorities across the country to support ultra low emission taxis and buses and related chargepoint infrastructure. We welcome views from stakeholders on what else central government, local government or industry could do to support local authorities to encourage the uptake of ultra low emission vehicles.
23. In addition, the 2017 Autumn Budget announced further measures to support consumer demand for ultra-low emission vehicles, including the creation of a new £400m Charging Infrastructure Investment Fund (£200 million government investment to be matched by private investors), regulatory measures to accelerate the deployment of chargepoints and an extra £100m for the Plug-In Car Grant.

24. The government plans to publish by March 2018 a strategy setting out a pathway to zero emission transport for all road vehicles. This will include how ultra low emission vehicle uptake will be supported at the national level.

**Question 3: We welcome views from stakeholders on what else government and industry can do to support local authorities to encourage the uptake of ultra low emission vehicles.**

## 5. Measures to support individuals to switch to other forms of transport

25. The introduction of local air quality interventions may encourage people to switch to other modes of transport which includes a wide range of less polluting options. For some individuals or businesses, they may need additional support or incentives to make this switch. This could include any combination of the following:

- **Measures to support car club membership or use:** Car clubs provide access of shared vehicles for members on a pay as you drive basis. They provide the opportunity to access a newer less polluting vehicle for regular or occasional use. Most car clubs enable members to reserve a vehicle online or via an app, and to then unlock that vehicle and drive off. Stakeholders could suggest ideas on what more local government or industry could do to increase access to car clubs. Membership could also be offered to individuals impacted by local air quality interventions to encourage them to switch to an alternative transport method.
- **Measures to support other forms of transport such as trains, taxis, cycling or walking:** In April 2017, the UK government published its Cycling and Walking Investment Strategy which identifies £1.2 billion which may be invested in cycling and walking from 2016-2021. Additional support could be provided to encourage uptake of travel on trains, ultra low emission taxis, by bike or by foot. For example travel discounts could be offered to people impacted by local air quality interventions such as low income households to substitute some of their travel with cleaner modes of transport. Furthermore, access to cycling and walking infrastructure could be improved, making it safer and more attractive to choose an active mode of travel for short and medium distance journeys. Bike hire could become more widely available, particularly at railway stations, giving people more choice to make the 'last mile' of their journey by more sustainable means.
- **Increased park and ride, encouraged use of car sharing or employment travel schemes:** Many journeys within an area are made to and from key locations such as hospitals, shopping centres, large workplaces and transport hubs. Investing in park and ride facilities, car sharing services and supporting employer led travel schemes could provide individuals with low emission alternatives to single-occupancy car journeys, offering potential savings to the individual while improving air quality. Promoting the Cycle to Work Scheme which offers employees the opportunity to hire a bike from their employer through a salary sacrifice scheme making it an affordable and commute option.
- **Measures to support bus travel:** Additional support could be required to make improvements to bus services and encourage increased uptake. In particular, local authorities and bus operators should work closely together to see how far existing bus networks offer a viable alternative for those looking to switch their means of transport. More specifically, free travel bus passes are already available for older or disabled people. Additional discounts could be provided to encourage people to switch to buses in areas with high NO<sub>2</sub> exceedances,

potentially targeted to those most in need of support such as low income households. Going further, low emission buses, such as electric or hydrogen powered ones, offer significant carbon dioxide savings and improved air quality.

- **Improving transport as a service.** Many people already use a range of technologies to support their travel. For instance, both travel planning apps and integrated ticketing have made it easier and more convenient for people to choose multi-modal travel options. However, these services are not available everywhere and an expansion of the transport service offer could make more sustainable modes of transport accessible to a wider audience.

26. All of the above measures could be complemented with interventions that seek to raise awareness about alternative travel options and engage people; with research indicating that a combination of “hard” (i.e. infrastructure improvements) and “soft” measures (i.e. incentives, trials, awareness raising) are most effective at driving behavioural change.

**Question 4: Please provide evidence on how the measures to support individuals to switch to other forms of transport set out above could be designed to meet the assessment criteria. In particular, responses could include suggestions on:**

- **How the ideas above could be designed to support those most in need such as low income households or small businesses**
- **How the options could be geographically targeted at people most affected by local air quality interventions**
- **What else local authorities or industry could do to encourage people to change their mode of transport, including measures such as communication campaigns.**

## 6. Measures to reduce the cost of a charging Clean Air Zone on certain individuals

27. Implementing charging zones is one potential approach to reduce nitrogen dioxide pollution.
28. The NO<sub>2</sub> Plan sets out that, in developing their local plans, local authorities should consider a wide range of innovative options. Their plans could include a range of measures such as: changing road layouts at congestion and air pollution pinch points; encouraging public and private uptake of ultra low emission vehicles; using innovative retrofitting technologies and new fuels; and, encouraging the use of public transport. If these measures are not sufficient, local plans could include access restrictions on vehicles, such as charging zones or measures to prevent certain vehicles using particular roads at particular times. However, local authorities should bear in mind such access restrictions would only be necessary for a limited period and should be lifted once legal compliance is achieved and there is no risk of legal limits being breached again. In addition, interventions funded through the Clean Air Fund could enable local authorities to avoid the imposition of restrictions on vehicles, such as charging zones.
29. Given the potential impacts on individuals and businesses, when considering between equally effective alternatives to deliver compliance, the government believes that if a local authority can identify measures other than charging zones that are at least as effective at reducing NO<sub>2</sub>, those measures should be preferred as long as the local authority can demonstrate that this will deliver compliance as quickly as a charging zone.
30. The NO<sub>2</sub> Plan set out more information on charging zones (see section 7.4.1.1) including that they would be sub-divided into classes A-D on the basis of the types of vehicles to which the charging scheme may apply, with cars only being subject to a charge in class D zones. The Clean Air Zone Framework<sup>2</sup> set out more information on exemptions and discounts including:
- Where charging is proposed there is a general presumption that the requirements will apply to all vehicles according to the relevant zone class. There will be certain circumstances where exemptions and discounts from a charge will be appropriate. This may be because of: a person's particular circumstances; the type of vehicle concerned may be difficult or uneconomic to adapt to comply with a zone's requirements; or the operation a vehicle is engaged in is particularly unique or novel.
  - Discounts and exemptions should, in general, be based on the principles that;

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<sup>2</sup> <https://www.gov.uk/government/publications/air-quality-clean-air-zone-framework-for-england>

- specialist vehicles that can never be compliant should qualify for an exemption from a charge;
- a sunset period should be allowed for specialist or more novel vehicles that can become compliant in a suitable time to allow for them to be changed.
- While exemptions should be kept to the minimum necessary in order to maximise the benefits of a zone, local authorities may also consider additional exemptions or discounts based on particular local circumstances. Local authorities may consider ways in which the cost of any charge to enter areas could be reduced for groups they identify as facing particular challenges, so long as this is achieved in a way which does not slow down the achievement of the outcomes of the zone. This might, for example, take into account the location of a charging zone in relation to key local businesses or services.

31. Local authorities therefore have the tools needed to be able to apply discounts or exemptions to support people impacted by a charging Clean Air Zone. A discount or exemption would make paying the charge more affordable for the target group but is less likely to encourage behavioural change, which will mean sacrificing some air quality improvements as non-compliant vehicles continue to enter a Clean Air Zone. Each local authority would need to assess if they have scope to allow such exemptions without risking failure to achieve compliance with the legal limits in the shortest possible time.

**Question 5: We welcome views from stakeholders on how local authorities could use exemptions to support individuals and businesses affected by a charging Clean Air Zone taking into account the assessment criteria set out in this document and working within the terms of the Clean Air Zone Framework.**

## 7. Targeted scrappage

32. One potential measure is a targeted vehicle scrappage scheme where owners are given an incentive to remove older, more polluting vehicles from the road such as support to switch to a cleaner vehicle. A scrappage scheme could target support at those who are most likely to be most significantly impacted by interventions to improve air quality.

33. Vehicle manufacturers have previously run their own scrappage programmes, and from August of this year we have seen most of the leading car manufacturers announcing national scrappage and trade in schemes that offer substantial discounts off the purchase of a new vehicle. We welcome the introduction of these schemes and further industry action to support air quality as they can help some owners of older vehicles to purchase a cleaner vehicle and show that the car industry is taking action to improve air quality. We are particularly supportive of the schemes that commit to scrapping the older vehicles, so that we can be sure they are helping to increase fleet turnover and improve air quality. We would welcome the announcement of further scrappage schemes and measures from manufacturers, to give consumers the greatest possible choice and ensure the maximum number of people benefit.

34. Considering the recent introduction of scrappage schemes by a number of manufacturers, we are interested in gathering evidence of whether there is a role for further targeted schemes – and if so, how any taxpayer-funded scheme could be designed so that it complements existing schemes, represents value for money, is deliverable without introducing significant fraud risk, and is suitably targeted. A targeted scrappage scheme could theoretically be designed to include any combination of the following:

- **Eligible vehicle for scrappage:** What age/Euro standard of vehicle would be eligible, noting newer vehicles would cost considerably more to incentivise scrappage given their higher residual values.
- **Geographic targeting:** A scrappage scheme could look to target the vehicles regularly driving into areas with high NO<sub>2</sub> exceedances. This approach risks excluding people who are impacted but don't quite fit into the eligibility criteria. Options include:
  - Base eligibility on certain postcodes in and around high polluting areas. For example, a scheme could use Travel to Work Areas.
  - An alternative option would be to install automatic number plate recognition (ANPR) cameras to track how frequently vehicles enter a high polluting area. This would be highly accurate, but potentially costly and could create perverse incentives.
- **Income targeting:** One way to target those most in need of support is to focus a scheme on low income households. This could be achieved by focusing support on households in receipt of particular benefits and Child/Working Tax Credits.

- **Reward for scrappage:** There are a variety of potential rewards someone could receive for scrapping a vehicle including: cash; a discount on a new replacement vehicle; a discount on a second hand replacement vehicle; or vouchers to switch to a different form of transport. Our assessment is that a scheme that provides a discount off a second hand vehicle would be significantly more complex to administer and has significantly higher risks of fraud as it would involve working with a large number of second hand dealers. For example, there would be a risk that the replacement vehicle is not a compliant model and it would be difficult to enforce this.

35. As set out above, whilst targeted scrappage could be a potential measure to help people upgrade their vehicle, there are a number of substantive challenges associated with designing a scrappage scheme which would need to be addressed in order for government to consider progressing further. The NO<sub>2</sub> Plan published in July set out these challenges as follows:

- **Ensuring a fair use of taxpayer funds:** Scrappage schemes can be expensive, and evidence suggests that it could be a poor use of taxpayer money. For example, analysis of the UK's 2009 scheme and other schemes abroad suggests that the main beneficiaries are people who were planning to purchase one anyway, so the impact of government funding was subsidising individuals to bring forward new purchases.
- **Ensuring any scheme is targeted towards those drivers most impacted:** Any scheme would need to target drivers who are directly impacted by measure to improve air quality: for example, a Clean Air Zone. However, clearly distinguishing between those who should be supported from those who should not is complex and risks excluding those who would be impacted by local air quality measures.
- **Ensuring a scheme helps those who most need it:** Even when targeted, those who take up a scrappage scheme will usually be required to provide some funding of their own towards the new purchase. Evidence from previous schemes suggests that those who benefit are those who could otherwise afford to purchase a new car: with those who are unable to bridge the funding gap unable to take part.
- **Ensuring a scheme is deliverable, and is not open to fraud and abuse:** The more a scheme is targeted towards a specific set of drivers, the more scope there is for a scheme to be open to fraud and abuse.
- **Avoiding market disruption:** Developing a targeted scheme could weaken demand until any scheme was launched. If people hold onto old vehicles which they would otherwise have upgraded, or even purchase old vehicles in the hope of qualifying for the scheme, this would have a negative impact on air quality.

36. The government welcomes evidence from stakeholders on scheme designs that could address the challenges set out above.



**Question 6: Please provide evidence on whether a targeted scrappage scheme could be designed to meet the assessment criteria. In particular, responses could include evidence on:**

- **How to target vehicles affected by local air quality measures geographically so as to:**
  - **Minimise the extent to which there are arbitrary winners and losers**
  - **Minimise overly complex implementation requirements**
- **How to direct support to low income households or small businesses most in need of support**
- **The impact a scheme could have on the car and van market**
- **Suggestions on how to maximise value for money for the taxpayer**
- **Suggestions on how a scheme could be delivered to minimise fraud, including how a scheme could be designed working with the second hand market**

## 8. How you can have your say

### Who can respond?

This is a public consultation which is open to anyone with an interest in providing comments. It is likely to be of particular interest to local authorities, environmental groups, the transport and public health sectors, and other organisations with an interest in air quality.

### How to respond

This consultation will run for 6 weeks from 22 November 2017 to 23:59 on 05 January 2018.

When considering the content set out above, please consider the questions set out below, which form the basis of this consultation.

Please respond to the consultation through gov.uk or by emailing [2017AirQualityPlan@defra.gsi.gov.uk](mailto:2017AirQualityPlan@defra.gsi.gov.uk)

### Questions for consultation

**Question 1:** Are there other policy options not set out in the list above that should be considered in order to minimise the impact of local air quality interventions on individuals or businesses? This could include measures such as guidance or communications material. Please provide evidence to support your proposal. Any proposals should take into account the assessment criteria set out in the next section.

**Question 2:** Please provide evidence on what else could be done to support people to upgrade or retrofit their vehicles in line with the assessment criteria set out above. If there are specific sectors that need support, please set out evidence to support this.

Please provide evidence on potential limitations to uptake (e.g. industry capacity, refuelling infrastructure, consumer acceptance, examples of where retrofit has not worked as expected) and evidence of environmental impacts and the costs of potential technology for different vehicle types.

**Question 3:** We welcome views from stakeholders on what else government and industry can do to support local authorities to encourage the uptake of ultra low emission vehicles.

**Question 4:** Please provide evidence on how the measures to support individuals to switch to other forms of transport set out above could be designed to meet the assessment criteria. In particular, responses could include suggestions on:

- How the ideas above could be designed to support those most in need such as low income households or small businesses

- How the options could be geographically targeted at people most affected by local air quality interventions
- What else could local authorities or industry could do to encourage people to change their mode of transport, including measures such as communication campaigns.

**Question 5:** We welcome views from stakeholders on how local authorities could use exemptions to support individuals and businesses affected by a charging Clean Air Zone taking into account the assessment criteria set out in this document and working within the terms of the Clean Air Zone Framework.

**Question 6:** Please provide evidence on whether a targeted scrappage scheme could be designed to meet the assessment criteria. In particular, responses could include evidence on:

- How to target vehicles affected by local air quality measures geographically so as to:
  - Minimise the extent to which there are arbitrary winners and losers
  - Minimises overly complex implementation requirements
- How to direct support to low income households or small businesses most in need of support
- The impact a scheme could have on the car and van market
- Suggestions on how to maximise value for money for the taxpayer
- Suggestions on how a scheme could be delivered to minimise fraud, including how a scheme could be designed working with the second hand market

## Consultation and data protection

A summary of responses to this consultation will be published on the government website at: [www.gov.uk/defra](http://www.gov.uk/defra). The summary will include a list of organisations that responded but not personal names, addresses or other contact details.

Information provided in response to this consultation, including personal information, may be made available to the public on request, in accordance with the requirements of the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIRs). Defra may also publish the responses to the FOIA/EIR requests at: [www.gov.uk/defra](http://www.gov.uk/defra).

If you want your response, including personal information such as your name, that you provide to be treated as confidential, please explain clearly in writing when you provide your response to the consultation why you need to keep these details confidential. If we receive a request for the information under the FOIA or the EIRs we will take full account of your explanation, but we cannot guarantee that confidentiality can be maintained in all circumstances. However, Defra will not permit any unwarranted breach of confidentiality nor will we act in contravention of our obligations under the Data Protection Act 1998

(DPA). An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as a confidentiality request.

Defra will share information provided in response to the consultation, including personal data, with the devolved administrations for the purposes of response analyses and provision of reports. Defra may share information provided in response to the consultation, including personal data, with a third party of contracted external analysts for the purposes of response analysis and provision of a report.

Defra is the data controller in respect of any personal data that you provide, and Defra's Personal Information Charter, which gives details of your rights in respect of the handling of your personal data, can be found at:

[www.gov.uk/government/organisations/department-for-environment-food-rural-affairs/about/personal-information-charter](http://www.gov.uk/government/organisations/department-for-environment-food-rural-affairs/about/personal-information-charter).

This consultation is being conducted in line with the "Consultation Principles" as set out in the Better Regulation Executive guidance which can be found at:

[www.gov.uk/government/publications/consultation-principles-guidance](http://www.gov.uk/government/publications/consultation-principles-guidance).

If you have any comments or complaints about the consultation process, please address them to: Defra Consultation Coordinator, Area 8A, Nobel House 17 Smith Square, London, SW1P 3JR; or email: [consultation.coordinator@defra.gsi.gov.uk](mailto:consultation.coordinator@defra.gsi.gov.uk).