



EC Consultation on Emission Limit Values for Heavy Duty Vehicles

LACORS Response

1. LACORS (The Local Authorities Coordinators of Regulatory Services) is a local government central body working with, and on behalf of, the UK local authority associations. Our vision is to be an exemplar local government organisation, leading on policy development, driving improvement and adding value to council regulatory services. LACORS facilitates good practice and consistency in the delivery of regulatory services, enhancing their contribution to local communities. We lobby on behalf of local government and ensure that legislation and Government policy can be practically implemented.
2. Councils play a key role in delivering the UK government's strategy for meeting objectives on improving air quality and reducing harmful pollutant emissions under the EU Air Quality Framework and Daughter Directives. They have a statutory duty, under Part IV of the Environment Act 1995, to monitor and review air quality within their areas. Where levels of pollutants are likely to exceed the Air Quality Objectives set out in the National Air Quality Strategy, councils are required to establish an Air Quality Management Area and produce a corresponding Air Quality Action Plan outlining the ways in which they will address the exceedances.
3. Additionally, the Government has recognised that councils have a significant role to play in reducing CO₂ (carbon dioxide) emissions in order to tackle climate change, and that policies to address poor air quality and climate change should be considered in an integrated, holistic manner.
4. Councils are currently utilising a wide range of innovative methods within their power to tackle poor air quality; in some cases these will also reduce CO₂ emissions. These include, for example, improved links with land-use and transport planners to ensure that new developments have suitable access to public transport and integrating air quality information into Local Transport Plans. In addition, councils are encouraging a shift away from car use through schemes such as high occupancy vehicle lanes, car share clubs, and improving public transport through initiatives such as park and ride schemes.
5. Although councils can have a positive impact on air quality by implementing strategies such as those described above, they have no direct control over the emissions from road vehicles which create air pollution in their areas. Traffic is commonly recognised as the major contributor to air pollution, especially with regard to particulates and nitrogen oxides, the adverse health impacts of which have been widely documented. Tighter limits on emissions from vehicles are therefore essential to significantly improving local air quality.

6. LACORS welcomes the introduction of a further 'euro-standard' and considers it desirable to restrict emissions of pollutants as stringently as possible; however, this should not be at the expense of increasing CO₂ emissions. LACORS would therefore advocate a balanced scenario whereby emissions of gases that reduce air quality are most reduced without increasing the amount of CO₂ emitted. Of the four scenarios outlined in the consultation, Scenarios C and D are considered to be carbon neutral. Scenario D sets lower limit values for nitrogen oxides and would therefore appear the most appropriate.

7. LACORS would welcome further research into technological means of further reducing vehicle emissions of nitrogen oxides and particulates without generating increased levels of CO₂.

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