

	
Cabinet Meeting	9 October 2012
Report of the Cabinet Member for Planning, Transport and Sustainability	

Adoption of the Low Emission Strategy

Summary

1. An overarching low emission strategy (LES) has been developed to achieve further reductions in emissions of local and global air pollutants, mainly by promoting and incentivising the use of low emission and alternatively fuelled vehicles. This is essential to help deliver Council Plan priorities on protection of vulnerable people and the environment and to meet legal obligations in relation to health based national air quality objectives and delivery of carbon reduction targets. The LES also supports other council priorities relating to getting York moving and growing the economy. This report presents the results of the recent LES public consultation; Cabinet is asked to note and accept the results and to formally adopt the revised low emission strategy circulated with this report.

Background

2. Due to a trend of deteriorating local air quality and challenging greenhouse gas reduction targets it was agreed in 2010 to develop an overarching 'low emission strategy' LES for the city (*Executive Report, 8 June 2010*). The LES aims to achieve a holistic approach to reducing emissions of greenhouse gases and local air pollutants across York, primarily by promoting and incentivising the use of low emission technologies and fuels, and encouraging eco-driving techniques. It also supports and builds upon existing sustainable travel and development policies.

3. In April 2012 Cabinet approved a draft LES for public consultation (*Report of the Cabinet Member for City Strategy and Air Quality, 3 April 2012*). The consultation took place between 23 April and 25 May 2012. The results of this consultation and amendments to the draft LES are summarised later in this report.

Links to Council Plan and other policies

4. Air quality is a direct contributor to quality of life for York's residents and visitors. Good air quality contributes towards a general sense of well being and helps promote healthy lifestyles by allowing exercise and leisure activities to take place in a clean, pleasant and safe environment. Poor air quality puts health at risk and in some cases may lead to premature death. It places additional financial burden on local health services and can make everyday life a struggle for some of the most vulnerable members of society. Local air quality improvement is important for delivering Council Plan priorities in relation to protection of vulnerable people and the environment. It also contributes significantly towards other priorities such as getting York moving and growing jobs and the economy.
5. Reducing carbon emissions is also essential to the protection of the environment in York. Uncontrolled climate change is predicted to have serious local implications for York's communities, its' economy and built and natural environment. Climate change can lead to increased local flooding, structural damage to buildings and loss of wildlife. This may place additional pressures on local emergency services and transport networks and could have serious economic consequences. Wider indirect impacts on population and availability of food supplies could be even more serious. Reducing carbon emissions will also play a key role in delivering a number of the Council Plan priorities.
6. The current approach to reducing emissions from transport in York is based mainly around sustainable travel (moving car trips to more sustainable modes such as walking and cycling). Whilst there have been many notable successes in this area there still remain a large number of vehicles on York's roads emitting both local and global pollutants. Many of these vehicles such as buses, taxis and service /fleet vehicles play an essential role in delivering council priorities on getting York moving and building the economy, but they also contribute significantly towards local pollutant and carbon emissions.

7. Emissions from buses, taxis and service /fleet vehicles are not fully addressed by the sustainable travel measures contained in the current local air quality action plan (AQAP2). Similarly the climate change framework and action plan (CCFAP) concentrates mainly on reducing carbon emissions from buildings through energy efficiency and the use of alternative fuels to provide heat and power. As with local air quality improvement, reducing carbon emissions from transport currently relies on the achievement of large scale modal shift with little consideration of the emissions from those vehicles that enable the modal shift i.e. buses, taxis and fleet vehicles.
8. The LES will bridge the existing policy gaps in the AQAP2 and CCFAP by ensuring that in the future residents, businesses and transport providers are provided with the necessary information, infrastructure and support to enable them to adopt alternatively fuelled vehicles and technologies. This will ensure emissions are reduced from all transport sectors, and in many cases offers the potential for considerable long term financial savings and opportunities for job creation. Due to the close links that exist between emissions and transport, the LES has been fully integrated into the Local Transport Plan (LTP3). Transport management and development control policies relating to sustainable travel remain very important priorities for the council as do measures to reduce carbon emissions from buildings and energy use as set out in the CCFAP. The LES supports but does not replace these policies.
9. The overarching LES is a high level strategy document giving an indication of the measures to be taken to further reduce emissions in the city. Once formally adopted the timescales for delivery of individual measures and emission reduction targets will be set out in a revised Air Quality Action Plan (AQAP3) to be published in 2013. Progress on the delivery and success of the LES measures will be regularly reported internally to the Environment Board and annually to DEFRA (Department for the Environment, Food and Rural Affairs).

Current air quality situation and impacts on health

10. The main air pollutants of concern in York are nitrogen dioxide (NO₂) and particulate (PM). These pollutants have been linked to lung diseases (asthma, bronchitis and emphysema), heart conditions and cancer. Based on national estimates, pro rata between 94 and 163¹

¹ Committee on medical effects of air pollution (COMEAP, 2009) estimate 29,000 premature deaths each year in UK. Environmental Audit committee estimate up to 50,000 premature deaths

people may die prematurely in York each year due to the impacts of poor air quality. This is more than the estimated combined impact of obesity and road accidents together.

11. The Environment Act 1995 requires all local authorities to 'review and assess air quality in their areas and to declare 'Air Quality Management Areas (AQMAs)' where health based UK air quality objectives are unlikely to be met. Where an AQMA has been declared the local authority must draw up an Air Quality Action Plan (AQAP) and demonstrate annually to DEFRA that it is actively pursuing compliance with the air quality objectives.
12. York declared its first AQMA in 2002 due to exceedances of the annual average objective for NO₂ at various locations around the inner ring road. Annual average air quality objectives are set at a level aimed at minimising the long term 'chronic' health impacts of poor air quality on the most vulnerable members of the population (those already suffering from conditions such as asthma, bronchitis and emphysema). Two further AQMAs have recently been declared due to exceedances of the annual average NO₂ objective in Fulford (2010) and Salisbury Terrace (2012). The ongoing increase in long term underlying concentrations of air pollutants is likely to be having a debilitating impact on the lives of York's most vulnerable residents.
13. Recently breaches of the short term hourly objective for NO₂ have also been recorded at a number of locations on the inner ring road. The short term objective is set at a level aimed at minimising the 'acute' impacts of existing respiratory conditions, for example the severity and frequency of asthma attacks in an existing sufferer. Breaches of the hourly objective for NO₂ puts the most vulnerable members of York's society at increased risk of severe health impacts.
14. Unless air quality is significantly improved it may become necessary to limit the types of development allowed in some parts of the city for health reasons, e.g. developments that regularly attract members of the public for periods of greater than an hour. This could include outdoor entertainment areas, pavement cafes and accommodation (including short term accommodation such as hotels and guest houses). Breaches of the hourly objectives for air pollutants have the potential to significantly impact on the council's aspirations in relation to improving

the public realm and reinvigorating the city centre. The boundaries of the city centre AQMA have recently been amended (September 2012) to reflect the increased number of properties affected by poor air quality and those areas where the hourly objective is now known to be exceeded.

15. Currently national air quality objectives for PM₁₀ (particulate matter less than 10 microns in diameter) are met in York, however health based objectives for ultra-fine particles PM_{2.5} (those less than 2.5 microns in size and able to enter the bloodstream) have not yet been set. At the moment there are no known safe exposure limits for these ultra fine particles. Particles arising from diesel engine exhausts have recently been confirmed to be carcinogenic by the International Agency for Research on Cancer (IARC)². On this basis it can be assumed that although the current national air quality objectives for PM₁₀ are met in the York there remains a likely, but currently unquantifiable impact on health from ultra fine particles (PM_{2.5}) and diesel particulates. Therefore particulate emissions from all sources, as well as NO₂ need to be reduced.

LES approach to reducing emissions

16. The LES vision is to *'transform York into a nationally acclaimed low emission city'*. It is an overarching strategy with the following objectives:
 - a. To raise public and business awareness and understanding of emissions to air in order to protect public health and meet the city's ambitious carbon reduction targets.
 - b. To minimise emissions to air from new developments by encouraging highly sustainable design (via sustainable design aspects of the emerging Development Plan) and the uptake of low emission vehicles and fuels on new developments (via LES)
 - c. To minimise emissions to air from existing vehicles by encouraging eco-driving, optimising vehicle maintenance and performance (including that of abatement equipment) and providing businesses, residents and visitors with incentives and opportunities to use low emission vehicles and fuels

² IARC Monographs List of Classifications by Cancer Site (March 2012) <http://monogrpahs.iarc.fr>

- d. To lead by example in minimising emissions from council buildings (via CCFAP), fleet and other activities and to showcase low emission technologies whenever possible
 - e. To encourage inward investment by providers of low emission technology, fuels and support services
 - f. To maximise sustainable transport and reduce localised air quality breaches through traffic demand management, smart travel planning, and potentially regulatory control (via LTP3, LES and revisions to the AQAP).
17. One of the key outcomes from the LES will be a greater proportion of low emission and alternatively fuelled vehicles within the general vehicle fleet. This will be achieved by:
- a. Increasing availability of electric vehicle recharging points across the city and introducing other alternative fuel infrastructure such as compressed natural gas (CNG);
 - b. Providing fiscal incentives for the use of low emission vehicles and alternative fuelled vehicles by the public, such as reduced parking charges and retail linked reward schemes;
 - c. Giving greater recognition and support to vehicle operators who are leading the way in adopting new low emission technologies and fuels (via the Eco-stars fleet recognition scheme);
 - d. Assisting bus operators, taxi drivers and other business fleet operators to trial and purchase lower emission and alternatively fuelled vehicles;
 - e. Considering a low emission zone (LEZ) to ensure only the cleanest buses, lorries and taxis can enter areas of the city which have poor air quality
 - f. Requiring new developments to incorporate low emission and alternatively fuelled vehicles into new vehicle fleets and providing on site opportunities for refuelling e.g. electric vehicle recharge points.
 - g. Investigating freight transshipment and low emission vehicle deliveries for the city centre

18. To support the roll out of the LES measures CYC must lead by example and embed LES principles into many aspects of its own work. This will require a greater emphasis on emission reduction in areas such as transport planning, strategic planning and licensing of taxis. The introduction of high profile low emission and alternatively fuelled vehicles into the council fleet and their use on CYC procured transport services (such as social and school transport) will send out the right message and help to reduce vehicle operating costs. A fleet review is currently being undertaken by the Energy Savings Trust (EST) to determine which alternatively fuelled vehicles are most suited for use by CYC and the cost savings they could provide.

Consultation process

19. A consultation on the first draft of the LES was undertaken between 23 April and 25 May 2012 via an online questionnaire available on the consultation page of the CYC website and CYC's dedicated air quality website 'JorAir' www.jorair.co.uk. The questionnaire was developed in conjunction with the business development team and was advertised locally via a general press release, the main council website, JorAir and articles in Your Voice (issue 4) and Buzz (staff magazine). Additional email notification of the consultation was sent out directly to:
 - York Environment Forum, York in Transition, Friends of the Earth (York branch) and St Nicholas Fields;
 - regional and national contacts who have previously attended LES and air quality events in York including public transport operators, representatives of the NHS and local fleet operators;
 - the wider air quality community including the Yorkshire and Humberside Pollution Advisory Council (YAHPAC), the Low Emission Strategies Partnership (LESP) and Air Quality Bulletin (main air quality professional journal)

A copy of the questionnaire can be found at annex 1.

Consultation responses

20. A summary of the comments from 47 online questionnaires and 8 written responses is included in this report. A detailed analysis of responses to the questionnaire can be found in annex 1. Annex 2 contains a summary of individual written responses.

21. Questionnaire responses were received from a wide range of people including individual members of the public, people with business and/or development interests in the city, transport operators, academics and other local authority representatives. Additional written communications were received from two suppliers of low emission technologies, NHS representatives, the freight transport association, another local authority, the Low Emission Strategies Partnership (LESP) and an internal communication from city and environmental services. The range of responses indicates that the consultation successfully reached a wide audience.
22. In general there was a good level of existing knowledge and understanding of the sources and impacts of climate change and local air pollutants amongst the respondents with most stating that they had a good or detailed knowledge of both local air quality issues and climate change. The area least understood by those completing the questionnaire was the impact of local air pollutants. The high level of existing knowledge amongst the respondents indicates that the consultation was responded to mainly by those already with an active interest in air quality and climate change issues and an understanding of the implications. A further assessment of existing knowledge amongst the general public will be undertaken prior to the commencement of LES marketing campaign to ensure it is targeted at the right level and that its effectiveness can be monitored.
23. The LES has strong links to four main issues in the city (poor air quality, climate change, traffic congestion and the local economy). Of these four issues the highest levels of concern amongst the questionnaire respondents related to the impact of poor local air quality: 79% of respondents tended to agree with the draft vision '*to transform York into a nationally acclaimed low emission city*'. There was also generally strong support for the full scope of measures in the LES with most respondents indicating that the proposed timescales and priorities were acceptable. Some concerns were raised about the proposed timescale for introduction of new taxi licensing emission standards which have now been addressed (see paragraph 26). When asked about their own personal priorities the respondents indicated the following measures were of most importance:
 - maximising sustainable transport and reducing local air quality breaches (includes consideration of a low emission zone)

- improving vehicle efficiency and providing incentives and opportunities for the use of low emission vehicles and fuels
- minimising emissions from development (via sustainable design and encouraging uptake of low emission vehicles and fuels)

These stated priorities will be considered further when revising the AQAP and reflected in the detailed delivery programme for the LES measures.

24. Respondents suggested additional measures to be included in the LES but the majority of these were directly related to existing measures in the draft LES or are already being progressed through other council plans such as LTP3. They included better use of traffic lights to manage traffic flow, concerns about hours of operation, cost and occupancy of bus services and more use of vegetation as a means of removing emissions from the atmosphere. Responses and suggested follow up to these suggestions can be found in annex 1.
25. In summary most respondents were generally satisfied with the content of the proposed LES and supportive of its aims. 18 out of the 47 respondents made additional comments which were broad in nature but generally fell into the following categories:
 - Those expressing strong support for the LES (3 respondents)
 - Those stating the LES did not go far enough (1 respondent)
 - Those that felt the LES measures and timescales were unrealistic / unlikely to be delivered (4 respondents)
 - Those making comment with respect to the consultation process (7 respondents)
 - Those raising concerns about other CYC policies and initiatives (2) respondents
 - Other general comments (2 respondents)

Changes made to the LES as a result of the consultation responses

26. As detailed above the majority of the LES consultation respondents were supportive of the draft LES and unable to identify any major omissions. As a result only a few minor amendments to the consultation draft version of the LES have been made prior to circulation of this report as a direct result of the consultation feedback. The main changes to note are:

- Under objective 1 - Inclusion of a commitment to work closer with the new Director of Public Health and specialist health promotion staff to ensure the health impacts of air pollutants are better understood and recognised.

- Under objective 3 – Timetable for setting new emissions based licensing criteria for taxis reconsidered to give more opportunity for consultation with the taxi industry. Introduction of new emission standards for all taxis originally scheduled for end of 2012, now scheduled for end of 2013 to allow more time for development of suitable standards and opportunities for consultation

Other changes to the draft LES

27. A number of other changes have been made to the draft LES since it was last considered by Cabinet. These changes reflect progress made locally on the delivery of low emission measures, the increasing availability and affordability of low emission solutions and recent increases in the level of funding available to support delivery of the LES. Increased funding levels are due to further success in the recent round of DEFRA air quality grant funding. A total of £94,490 has been secured from DEFRA to support further work on:

- Marketing and promotion of the LES concept and education relating to the impacts of emissions to air
- A feasibility study to consider opportunities for the introduction of a CNG refuelling station in York
- A feasibility study to consider the adoption of anti-idling emission legislation in York
- Promotion of low emission and alternative fuelled vehicles including provision of vehicle demonstration days and further incentives to taxi drivers to replace their existing vehicles with lower emission options

The main additional changes to the LES are:

- Commitment to a feasibility study for CNG refuelling
- Commitment to a feasibility study on potential adoption of anti-idling legislation
- Addition of electric buses to list of alternative fuels to be considered for buses in the city (previously only hybrid and gas vehicles)

considered worthy of consideration but recent technological developments and emerging markets now make electric buses a real possibility)

- Accelerated dates for trialling and adopting alternatively fuelled buses in York - particularly at Park and Ride sites
- A commitment to introduce electric vehicle recharging points into hotels and guesthouses in conjunction with the charity Zero Carbon World
- The timetable for delivery of revised planning documents to support LES
- Commitment to information events for taxi drivers and provision of financial incentives to encourage use of lower emission vehicles by taxi drivers
- Accelerated timescale for introduction of alternatively fuelled vehicles into car clubs
- Undertaking of a CYC fleet analysis by Energy Savings Trust to identify opportunities for alternative vehicle use in CYC fleet

Formal adoption of the LES

28. Following completion of the public consultation process and subsequent amendments to the consultation draft LES the cabinet is now requested to consider formal adoption of the current version of the LES circulated with this report (subject to minor changes requested at this meeting)

Options

29. (a) To accept the findings of the LES consultation (detailed in sections 19-25 of this report) and the resulting amendments to the consultation draft LES. To formally adopt the amended LES circulated with this report as York's first Low Emission Strategy (subject to any further minor amendments requested at this meeting)
30. (b) To reject the findings of the LES consultation (detailed in sections 19-25 of this report) and the resulting amendments to the consultation draft LES. To defer formal adoption of the amended LES circulated with this report until further consultation / further amendments as requested at this meeting have been completed.

Analysis

31. Option (a) will ensure York retains its reputation as a pioneer in the adoption of an overarching low emission strategy and stay in a good position to attract low emission vehicles, technologies and associated jobs ahead of other local authorities. It will allow work to commence on the development of a new low emission based Air Quality Action Plan (AQAP3) for the city and ensure low emission measures start to be delivered as soon as possible to improve air quality, protect public health and help deliver CO₂ reduction targets .
32. Option (b) will delay the timescale for formal adoption of an LES in York. This may harm York's reputation as a pioneer in the development of low emission strategy measures and may result in York missing out on government funding and opportunities to attract low emission vehicles, technologies and associated jobs. It will also delay the development of new low emission based Air Quality Action Plan (AQAP3) for the city and the delivery of new measures to improve air quality, protect public health and help deliver CO₂ reduction targets.

Council Plan

33. As discussed earlier in this report (paragraph 4) the LES will strongly support council priorities on protection of vulnerable people and the environment. It also has wider implication for the Council Plan as follows:
 - **Create jobs and grow the economy** – encouraging the accelerated uptake of alternatively fuelled vehicles in York will stimulate the market for supply and maintenance of new vehicle technology and refuelling infrastructure in the area. This has the potential to attract new manufacturing and service industries to the area creating new 'green' jobs and training opportunities. There is also potential for developing a 'green' tourism offer based around low emission travel opportunities. The provision of alternative vehicle fuel infrastructure is essential to ensure York retains transport links with other cities as alternative technology begins to penetrate the mass vehicle market. The use of alternatively fuelled vehicles can also offer considerable financial savings to local businesses and

residents resulting in more opportunity to re-invest in the local economy

- **Get York moving** - the LES will help reduce emissions from buses and taxis resulting in improved air quality and public perception of public transport. This will be achieved by improving eco-driving standards and rewarding low emission fleet operators (via eco-stars scheme), setting emission standards for taxis and providing financial incentives to purchase cleaner vehicles, giving priority access to the cleanest vehicles (LEZ study) and introducing zero emission buses on Park & Ride services. Cleaner and more reliable public transport reliance should reduce car use.
- **Build strong communities** – further development of the LES measures and the revised AQAP 3 will include further engagement with the public on issues such as air quality, climate change, public health and travel options.
- **Protect vulnerable people** – ensuring the health of people, especially the most vulnerable, by reducing air pollution.
- **Protect the environment** – cutting carbon emissions and improving air quality protects the environment

Implications

34. The various implications of this report are summarised below:

(a) Financial

Implementation of the measures in the LES will require both capital and revenue funding. Within the LES measures are identified as being low cost, medium cost or high cost. It is envisaged that all the low cost measures (<£40k) will be deliverable from within existing budgets, mainly the LTP3 capital programme and air quality grant funding. Medium cost measures (£40K to £100k) will require additional funding above and beyond current resources. It is anticipated that the majority of this funding will be obtainable from additional government grant opportunities and private investment. An additional £94,490 in air quality grant funding has already been obtained since the last report to members. The high cost measures > £100k are those which currently remain aspirations. They are indicative of what could be achieved with significant additional investment in the delivery of

LES measures but are unlikely to proceed under current funding arrangements.

(b) Human Resources (HR)

A low emission officer has been employed by EPU to support delivery of the LES measures using LSTF funding. Delivery of many of the LES measures will require a cross-directorate approach. Departmental responsibility for the delivery of specific LES measures is clearly identified within the draft consultation LES.

(c) Equalities

Vulnerable people with respiratory and other illnesses are more likely to be affected by poor air quality. The LES measures seek to mitigate this.

(d) Legal

The draft low emissions strategy is a non-statutory document. CYC does though have a statutory duty to periodically review the air quality within its area both at the present time and as regards future air quality. There is a duty to designate an air quality management area where air quality objectives are not being achieved or are not likely to be achieved. Once an area has been designated there is a duty to carry out an assessment and prepare an action plan for the area. DEFRA have issued statutory guidance to which the Council must have regard in exercising these functions.

The implementation of measures proposed in the Strategy will involve the use of other legal powers such as traffic regulation and planning powers, and their use will need to be considered on a case by case basis.

Having consulted the public on the contents of the Strategy, in making its decision. the Cabinet is under an obligation to pay proper regard to the comments received.

(e) Crime and Disorder

There are no crime and disorder implications

(f) Information Technology (IT)

There are no IT implications

(g) Property

Energy efficiency measures within council owned properties are currently delivered under the CCFAP and the PSHS. There will be no change to this arrangement as part of the LES implementation. There will be a requirement to accommodate electric vehicle recharging infrastructure in some council owned car parks, offices, housing and leisure facilities. There will also be a need to consider in more detail the suitability of biomass technology for use in council owned buildings, particularly schools.

(h) Other

There may be highways implications associated with implementing a LEZ within the city centre. This will be explored, consulted upon and fully reported to members, should the results of the feasibility study suggest that such a scheme is cost-effective for the city.

There will be a requirement to produce revised supplementary planning guidance to ensure LES measures are incorporated into new developments.

Risk Management

35. In compliance with the Council's risk management strategy, failing to meet the health based air quality targets, considering the likelihood and impact, the current net risk rating is 21 or High. The development and implementation of a LES and revised AQAP, together with the continued delivery of the CCFAP and PSHS should reduce the risk to Medium.

Recommendations

36. The Cabinet is advised to:

Approve option (a) Accept the findings of the LES consultation (detailed in sections 19-25 of this report) and the resulting

amendments to the consultation draft LES. To formally adopt the amended LES circulated with this report as York's first Low Emission Strategy (subject to any further minor amendments requested at this meeting)

Reason: This option will ensure York retains its reputation as a pioneer in the adoption of an overarching low emission strategy and stays in a good position to attract low emission vehicles, technologies and associated jobs ahead of other local authorities. It will allow work to commence on the development of a new low emission based Air Quality Action Plan (AQAP3) for the city and ensure low emission measures start to be delivered as soon as possible to improve air quality, protect public health and help meet CO₂ reduction targets.

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Specialist Implications Officer(s) None							
Wards Affected: <i>List wards or tick box to indicate all</i>			<table border="1"> <tr> <td data-bbox="1174 1863 1270 1908">All</td> <td data-bbox="1270 1863 1361 1908">X</td> </tr> <tr> <td data-bbox="1174 1908 1270 1953"></td> <td data-bbox="1270 1908 1361 1953"></td> </tr> </table>	All	X		
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For further information please contact the author of the report							

Background Papers:

Air Quality Update - Meeting of Cabinet Member for City Strategy and Air Quality (June 2012)

Low Emission Strategy Consultation — Cabinet (3 April 2012)

Air Quality Update – Meeting of Cabinet Member for City Strategy and Air Quality (5 January 2012)

Draft Framework for York Low Emission Strategy - Executive (15 March 2011)

Climate Change Framework and Climate Change Action Plan for York – Consultation results and proposed changes – Executive (19th October 2010)

Air Quality Update – Executive Member for Neighbourhoods (16 Nov 2010)

City of York's Local Transport Plan 3 – Draft 'Framework' LTP3 – Decision Session Executive Member City Strategy (5 Oct 2010)

A Low Emission Strategy for York - Executive Member for Communities and Neighbourhoods (8 June 2010)

Low Emission Strategies – Using the Planning System to reduce transport emissions – DEFRA Good Practice Guidance (January 2010)

National Air Quality Strategy

Air Quality Strategy for England, Scotland, Wales and Northern Ireland – DEFRA (July 2007)

Annexes

- Executive Summary (extract from the Low Emission Strategy)
- Summary of Actions (extract from the Low Emission Strategy)
- Low Emission Strategy (full document) available on-line only
- Annex 1 (Consultation questionnaire and responses) available on-line only
- Annex 2 (Summary of additional consultation responses) available on-line only