



RTPI

Royal Town Planning Institute

RTPI response to UK Government consultation on the Draft UK National Air Pollution Control Programme

September 2022

About the RTPI

The RTPI champions the power of planning in creating sustainable, prosperous places and vibrant communities. We have over 27,000 members in the private, public, academic and voluntary sectors. Using our expertise and research we bring evidence and thought leadership to shape planning policies and thinking, putting the profession at the heart of society's big debates. We set the standards of planning education and professional behaviour that give our members, wherever they work in the world, a unique ability to meet complex economic, social environmental and cultural challenges.

This RTPI response covers each of the UK nations. We have indicated where specific comments relate to a specific nation in bold.

General comments

We recognise the increasing importance of improving our air quality, not only for the environment, but also for our health and well-being. We believe it is vital that air quality issues, actions and targets are considered holistically, with the wider sectors, including planning, working towards a shared vision. To support this, we believe increasing awareness and behaviour change initiatives in relation to air quality is required.

The involvement of planning authorities would improve integration and mitigate risks around projects requiring planning consent and help to deliver goals and targets.

Support and resources for joint working on strategies, plans and initiatives and their implementation is important for impact and delivery.

Our response to specific consultation questions is set out below.

Specific consultation questions

11. After the publication of this NAPCP, UK government and devolved administrations will continue to develop our policy measures and approaches. Please inform us of any further measures you think we should consider to help achieve the UK ERCs most effectively. Proposals should be evidence based.

Please select a country from the list below to which your measure(s) relate to and use the text box and file upload button to describe the proposed measure and supporting evidence.

o UK wide

Wider impacts, behaviour change and investment

We note the seven packages, however we must think beyond the individual technologies and approach and address the issues holistically. The significance of place and spatial interactions within and between places is an important aspect of improving air quality that is not addressed in the Draft Programme.

The role of planning is to look to the long-term making a balance between competing interests and setting the framework and decisions for a sustainable future. The planning system sets the context for development and creates the enabling conditions for a sustainable and healthy built environment. The planning system and planners have an important role to play in addressing the issues holistically.

A wider, more holistic approach incorporating planning, well-being, social impact etc, supported by promotional initiatives and other activities (such as supporting wider travel behaviour change etc.) could help to enhance outputs and outcomes and push beyond compliance with threshold limits. This in turn would support the consideration of unintended consequences of the Programme and efforts to improve air quality more broadly. For example:

- We recognise the role that road user charging could play in delivering cleaner air. We equally recognise the benefits of Clean Air Zones/Low Emission Zones in terms of reducing air pollution, However, such initiatives equally need to take full account of wider social impacts in terms of charging for the use of polluting vehicles and the displacement of traffic etc.
- Has consideration been given to the potential increased pollution from tyres, that we could see with the increased emphasis on electrification of vehicles?

Investment is needed for a range of supporting actions to achieve local behaviour change. These range from upskilling transport and planning professionals in infrastructure planning and design through to investment in softer promotional and training activities including cycle training, pedestrian training and active travel planning in schools, building on the work of Sustrans and also following the example of Cardiff Council's recently-launched [Active Travel Schools programme](#).



Joined up working across national strategies and plans

It's far too simplistic to rely on one sector or individual programs or plans to deliver improvements in air quality, equally we can't assume that given the option people will walk or use public transport, given levels of car dependency. Therefore, in order to maximise impact, it is essential that national strategies and investment plans across the UK aligned with achieving commitments to improve air quality and tackling the climate change emergency. Shared learning across the UK nations is also an important part of this.

England: The RTPI and Broadway Institute are promoting the concept of [Local Environment Improvement Plans](#) which would draw together all the many environmental planning initiatives inherited from the EU into a single plan covering wider areas. This would be based on the current Local Nature Recovery Strategies in the Environment Act but would go much further to cover the whole range of initiatives under Nature Water and Climate, including air quality. This is because achieving air quality requires action across a range of geographical areas and also a range of sectors including transport and land use planning. Only by having a Local Environment Plan aligned with other strategies within the same wider area can the full benefits of joining up policy be achieved.

England: The RTPI have concerns around the current lack of coordination between national policy on rail, road and air networks in England. We would expect government to begin a much more integrated approach to interurban transport with a single national policy statement in future. We also have questions around how the demand for interurban travel will be met and by which mode, taking into account our climate obligations.

Wales: RTPI Cymru have called for supplementary planning guidance for Wales which focuses on integrating land use planning considerations with consideration of the provisions of industrial emissions legislation and controls.

Northern Ireland: RTPI's 'Asks of the Northern Ireland Assembly and Executive' (2022), called on the Executive to take a leadership role in delivering climate action for Northern Ireland, supporting all Departments, local government, and other stakeholders and business. The Executive has a natural role to be the coordinating body and lead the necessary actions to support climate action in Northern Ireland.

Infrastructure

As planning and investment decisions in respect of infrastructure provision can positively or negatively impact upon air quality, it is essential that air quality be referenced within the remit of the National Infrastructure Commission along with the National Infrastructure Commissions for Scotland and Wales. In Northern Ireland, air pollution is the responsibility of the Department for Agriculture, Environment and Rural Affairs – recognition of its wider relevance, across the Departments should be clear.



Wales: In Wales the Active Travel (Wales) Act 2013 represents a significant shift in land use policy in Wales. It recognises the central role of active travel in creating sustainable places and contributing to the goals of the Well-Being of Future Generations (Wales) Act 2015 and an opportunity to address air pollution. However, a key issue in the successful provision and use of active travel provision is local government resource. In this regard, we do have concerns about the capacity of local planning authorities, with most authorities having lost significant capacity in recent years.

RTPI Research

We are pleased that the programme recognises the significant proportion of air pollution that is created by transport, particularly road transport. The RTPI has long called for close working between spatial planners and transport planners to achieve a shared vision and maximise impact on the ground. We have published significant research addressing some of the issues along with climate change, more generally.

- [RTPI | Net Zero Transport: the role of spatial planning and place-based solutions](#)
(England: January 2021)
This research explores how different places can achieve an 80% reduction in surface transport emissions by 2030, as part of a pathway to net zero by 2050. It combines advanced carbon modelling with stakeholder workshops to test the impact of carbon reduction interventions. “This research starts from the premise that there is a clear relationship between spatial planning and carbon, and that only a place-based approach can deliver net zero transport emissions and be a catalyst for better placemaking to deliver healthier, happier, more resilient communities.”
- [RTPI | The Location of Development](#)
(England: December 2021)
This report is part of a series on the location of development. This research seeks to build on the previous reports, by looking across major housing sites with approved planning permission, across England. It analyses average journey times by different modes of transportation from developments to amenities. It focuses on how well-located new developments are to services and amenities, the ease of access to which supports standards of living and opportunity. Crucially, it will help to identify how well amenities are accessed by sustainable and affordable transport options, including public transport and walking.
- [RTPI | Place-Based Approaches to Climate Change](#)
(UK: March 2021)
This research focuses on the importance of a ‘place-based’ approach to climate change, exploring how collaborative working between departments in local authorities can mainstream climate action within planning and vice versa. The research suggests that while there are significant opportunities for joint working between planning officers and climate and sustainability colleagues, there is a resourcing and skills gap within the planning profession that needs to be addressed so planners can play a leading role in



the place-based response to the climate and ecological emergency from within local authorities.

13. We have outlined the uncertainty of projections in the ‘UK NAPCP additional factors’ above. Please provide any additional information on potential changes over the next 8 years which may impact emission projections. Please also select the category that your information relates to.

o Other

We recognise the uncertainty and difficulties around future projections (in particular those listed in the consultation document) and the aims of this programme and its technical approach in addressing air pollution, but this must be supported by a broadening awareness/educating of air quality issues alongside addressing future behaviour change. We believe these issues could have a significant impact on emission projections over the next 8 years.

Encouraging changes in behaviour which contribute to air pollution is challenging and will require a multi-faceted approach involving greater collaboration between key agencies such as those in the health sector, local authorities, academic bodies, third sector and local advocacy groups and covering educational initiatives and information campaigns targeting key actors with a role to play in improving air quality and people across all age groups.

Raising public awareness and encouraging positive action will require a targeted approach to communications. For example, many local communities are affected by air pollution from traffic and, in particular, the nuisance and harmful effects upon health of the anti-social practice of engine idling. Combatting this practice will require a combination of national messaging and local campaigns which targets individuals as residents of communities but also as motorists and members of school communities. Curriculum-linked activities focussed on the journey to school and encouraging wider active travel is important

14. In revising the NAPCP the UK has followed the format set out in EU implementing decision 2018/1522. Do agree or disagree that the format of the NAPCP could be improved?

Agree

The break down of the frameworks and actions across the UK jurisdictions is interesting. This is a lengthy, technical document, which would benefit from an introduction, index and glossary to help non-technical stakeholders engage with the document.

While many of the references are clear on which nation they apply to, there are some references to legislation and policy that require clarification on which nation they apply.



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The programme could refer and provide further details of the monitoring framework attached to this programme and the links with monitoring in each of the jurisdictions. It is important that the document recognises that achieving air quality standards on the ground will have different challenges and implications for different places. Other than achieving the set air quality standard(s) will there be any other measurements to measure success?

We note the programme refers to “responsibilities attributed to national, regional and local authorities”, it would be helpful for this to be extended to include key agencies and actors responsible for each policy area. It could include actions to ensure that there is clear ownership and to support collaboration, although we recognise that this might be more suitably addressed at a national level, within each jurisdiction. In relation to **England**, we note that the Department for Leveling Up, Housing and Communities (DLUHC) is not mentioned at 2.3.2 of the Draft document (Responsibilities attributed to national, regional and local authorities), yet this Department would have a significant role to play in the future development of the Programme and its implementation.