

Designation of National Highways as a relevant public authority

The following is UK100's response to the Department for Environment, Food and Rural Affairs' consultation seeking views on the designation of National Highways as a relevant public authority.

Consultation questions

Do you agree or disagree with the proposal to designate National Highways as a "Relevant Public Authority"?

Strongly agree

Designating National Highways as a "Relevant Public Authority" who can then be required to act as 'Air Quality Partners' within the LAQM Framework is essential to effectively reduce air pollution within LAQM areas. Many sources of local pollution are outside local authority control, a major source being the Strategic Road Network, and so the engagement of public bodies which are in part responsible for poor air quality, particularly National Highways, is critical. No one stakeholder can tackle air pollution alone, and so it is necessary to require all relevant stakeholders to work together on improving air quality within LAQM areas.

But many UK100 members have found that effective engagement with National Highways is difficult, and they struggle to find out information from them or gain tangible support from National Highways for air quality action. Our members have reported struggling to gain money from National Highways for improving air quality within LAQM areas within their local authority area. Our members have found that the duty of National Highways to cooperate within local authorities hasn't been enough to get National Highways to agree to significant action to reduce its contribution to local air quality problems. Our members agree that National Highways should be required to be more transparent on what exactly their contribution to air quality is, through providing more air quality monitors, as it is hard to find out what National Highways' contribution to local air pollution is, as they have not provided data on this when requested to. Our members have found that National Highways engages with local authorities more on the movement of traffic and planned works - but much less on their contribution to air pollution.

Our members have reported that when they have tried to engage with National Highways on air quality action, it has been difficult to get them to agree on what they were responsible for. National Highways should be held to the same standards as local authorities on air quality management area designation and responses. It is understood that National Highways do not currently have enough people responsible for working on air pollution or enough money to spend on action to tackle air pollution, when considering their significant role in contributing to local air pollution. However, National Highways does have access to national funds for tackling air pollution, which is more than most local authorities which have almost nothing unless they have successfully bid for pots of funding. Therefore National Highways will need to contribute more in terms of funding to Local Air Quality Action Plans, unless local authorities are given more funding for this purpose.

However, our members noted the issue that AQMAs are a highly localised way of addressing air pollution but it is very hard to resolve the problems through local actions only. To effectively reduce air pollution we need to decarbonise road transport, drive a modal shift to public and active transport and reduce the volume of car traffic. Highly localised action such as reducing congestion on a particular junction at a motorway will be ineffective in reducing air pollution long term compared to action to decarbonise vehicles and reduce car traffic.

It is critical that National Highways is required to identify improvements which they can make to promote and prioritise active travel and public transport to both reduce air pollution and reach Net Zero. It is imperative that the designation of National Highways as a Relevant Public Authority requires them to implement actions to prioritise public and active transport on the Strategic Road Network within their contribution to Local Air Quality Action Plans, they need to take action beyond just traffic management and encourage the reduction of car traffic. This requires a rethinking of National Highways' Strategy, to think past road expansion and focus on a modal shift from private to public and active transport, which would reduce both air pollution and congestion.

Would you agree or disagree that designating National Highways as a “Relevant Air Public Authority” would increase the effectiveness of local air quality management?

Strongly agree

What do you think of the draft statutory guidance “working with National Highways” (please see Annex A)?

The guidance seems to be logical and if implemented effectively will significantly improve the current situation. However, it will be most important to ensure that roles and responsibilities are clearly defined at the outset for the partnership to be successful. Moreover Defra and National Highways need to be mindful of local authority capacity and resources. LAs are often achieving a lot with a limited internal capacity and this is why underpinning the who will do what and a clear set of expectations at the outset of the partnership is a fundamental consideration for the draft statutory guidance.

We would encourage Defra to include a point in the draft statutory guidance about the role of traffic reduction measures in reducing NO₂ emissions - including for National Highways to contribute to improving active and public transport infrastructure on the Strategic Road Network, such as separate bus and cycle lanes.