

## **London Assembly Environment Committee response to the Mayor's final Air Quality Strategy**

This short paper outlines the work of the Environment Committee on the Mayor's Air Quality Strategy in the current Mayoral term, welcomes the areas where Committee recommendations have been addressed, and identifies certain areas where recommendations have not been addressed or there are new or outstanding issues. The Committee would welcome a response to this paper and the specific questions it contains.

### **1. Previous work of the Committee and recommendations addressed**

This Committee has contributed to the development of the strategy through the report *Every Breath You Take* in April 2009, a response in October 2009 to the Assembly consultation draft of the strategy, and a further letter in response to the public consultation draft of March 2010.

Several of the Committee's points are therefore embodied in the final strategy, and these are welcomed, as is the whole process of engagement with the Committee's work.

In particular the Committee notes the emphasis in the final strategy on public health. Following the Committee's highlighting of this issue in 2009, the Mayor commissioned research to estimate the mortality attributable to airborne particulate matter across London at the ward level. The London-wide estimate that airborne particulates contribute to around 4300 additional premature deaths each year is now a central finding informing the air quality strategy. The research also found that every reduction in the concentration of these pollutants is likely to lead to a proportionate reduction in these additional premature deaths. This demonstrates the strong public health imperative to meet national/EU targets on air quality and, in the case of particulates, to go beyond the national/EU targets towards the more stringent World Health Organisation targets.

Linked to this was the Committee's emphasis in 2009 on the need for better public information about local air quality. The strategy now includes a policy to improve public communication of air quality information, to enable Londoners to make choices to protect their own health and contribute to improving air quality in their own areas.

The strategy has also now taken forward specific suggestions of the Committee on reducing transport emissions, including upgrading the bus fleet to Euro IV emission standards and pressing the Government to offer grants for retrofitting pollution abatement measures to private vehicles. The Committee's suggestion of one or more extra low emission zones in the most polluted parts of London is once again under consideration – the Mayor must of course give due weight in this consideration to the health of those who live in, work in and visit these areas, in addition to economic and other considerations. Given the urgency of London's air pollution problem, the Committee would like an update on TfL's feasibility work and on the progress made in the discussions with boroughs, and a date by which the final decision will be taken.

The presentation of the strategy document has also improved in successive drafts: as recommended by the Committee, the final version shows the effect over time on pollutant emissions of both the measures included in the strategy and the measures that the strategy says the Government will have to take to meet national and EU targets, and it includes an implementation plan with timescales.

## 2. Further issues

This section notes some overall issues that remain with London's efforts to improve air quality, and some specific points where the Committee believes that further attention to its recommendations could be helpful.

### **Particulate matter (PM<sub>10</sub>)**

#### *EU limit values for PM<sub>10</sub>*

PM<sub>10</sub> levels have been high in London for some time, and have been reducing as anti-pollution measures have taken effect. The strategy is directed at demonstrating achievement of the EU limit values for PM<sub>10</sub> by 2011. Failure to meet these values by 11 June 2011, and/or to satisfy the European Commission with a "revised London action plan to be drawn up by June 2011" could leave the UK liable to fines in the range of hundreds of millions of pounds. However, provisional figures from the monitoring station on Marylebone Road showed that the year's permitted 36 exceedences of the PM<sub>10</sub> daily limit have occurred in less than four months. The Committee notes evidence from Kings College London that pollution from continental Europe has contributed to these recent exceedences, and that evidence to the contrary has been provided by the European Commission.

The final strategy also has no reference to margins of tolerance in the period up to 2011, though this Committee recommended they be addressed.

Can the Mayor repeat his reassurance that the measures contained within the Air Quality Strategy are delivering the reductions in pollution necessary to achieve compliance with the limit values in time? Are there any additional measures in the revised London action plan for the European Commission?

There is a proposal in the current Localism Bill to empower the UK Government to pass fines such as this on to other public authorities, including the GLA. The Mayor and Assembly support modifications to the Bill, so that an independent judicial process would judge how any fines should be allocated between Government and local authorities.

We note the evidence from Isabel Dedring at our meeting on 13 January 2011 that the monitoring network needs to be refreshed because some sites do not meet European criteria for inclusion due their positioning. Can the Mayor provide the detail of which sites were referred to as not meeting the criteria for making the case to Europe and why specifically they would be excluded?

#### *Health effects and WHO recommended limit values*

However, in addition to the potential fines, it should be noted that particulate pollution contributes to the estimated thousands of extra premature deaths in London each year. The particulate concentration limits recommended by the World Health Organisation are much more stringent than those imposed by the EU, and the Committee in January heard recommendations from Kings College London air quality experts that the WHO limits should be the target for air quality work. A report recently published by the European scientific collaboration APHEKOM found that bringing London's PM<sub>2.5</sub> concentrations down to the WHO recommended levels would lead to an average increase in life expectancy of 2.5 months for Londoners over 30.

The Mayor and his team should therefore work to continually improve London's air quality to benefit the health of Londoners, even after the national/EU targets are met.

#### *Taxi emissions*

We note that the expected reduction in PM<sub>10</sub> emissions from taxi exhausts by 2015 is 50 per cent in the final version of the strategy, whereas it had been 60 per cent in the public consultation draft. Can the Mayor provide the Committee with details of this modelling, demonstrating how this discrepancy can be accounted for?

#### **Nitrogen dioxide (NO<sub>2</sub>)**

The strategy is directed at demonstrating achievement of the EU limit values for NO<sub>2</sub> by 2015, again to avoid EU fines. However, it states that the Mayoral actions it contains will be far from sufficient to meet the limits. It calls on the Government to implement a specific programme of measures to support compliance. The GLA will contribute information for a national action plan to be submitted to the EC in support of the application to extend the limit value deadline to 2015. The Committee would like a progress report and an estimated implementation timescale for the national actions.

The Committee also believes that action to tackle NO<sub>x</sub> pollution is essential, and joins the Mayor in calling on the Government to devise, resource and implement an effective national action plan, in collaboration with regional and local partners such as the GLA. In taking resourcing decisions, the Government should consider its own estimate that the costs of air pollution in the UK are equivalent to between £9 billion and £19 billion per year, and that both pollution and people's exposure to it are concentrated in large cities, especially London.

The Committee also wishes to see the Mayor review his own Air Quality Strategy after the publication of the national action plan, and if necessary to build upon London-specific measures to be sure that the EU limit values for NO<sub>2</sub> are met in London.

The Committee looks forward to the Mayor's response to the questions and issues raised in this paper.