

ON KNIGHTSBRIDGE ASSOCIATION LETTERHEAD

Ken Livingstone
Chair of TfL Board
Central Customer Services
23rd Floor Empress State Building
Empress Approach
London SW6 1TR

Dear Mr Livingstone

9 April 2006

Low Emission Zone consultation

I am writing on behalf of The Knightsbridge Association, which represents over 1,000 people and businesses in the area between Hyde Park Corner and Queen's Gate, in response to the consultation being carried out by Transport for London (TfL) on your behalf on a proposal to introduce in 2008 a Low Emission Zone (LEZ).

The primary purpose of writing is to ask whether the proposals you are considering will go far enough, fast enough, to meet the UK Air Quality Standard objectives and EU limit values for nitrogen dioxide (NO₂) and particulate matter (PM₁₀) in the Knightsbridge area. As you know, NO₂ is associated with lung diseases and an increase in allergic reactions and PM₁₀ affects the respiratory and cardiovascular systems, can worsen existing respiratory complaints and cause premature death (and can also carry carcinogenic compounds into the lungs). **If the proposals are likely to be insufficient for the Knightsbridge area, should you include in your new strategy, for example, traffic management and other solutions to ensure that the legally binding targets are met?**

We have been alarmed to discover that air pollution levels in the Knightsbridge area are regularly among the very worst in London. Reported annual mean levels of NO₂ in Knightsbridge were higher than those in Marylebone Road in 2001 (84 versus 82 ppb) and were the highest in London in 2002 (86 versus 80 ppb at Chelsea Town Hall). Maximum hourly levels of NO₂ were dramatically higher in Knightsbridge than Marylebone Road in 2001 (325 versus 273 ppb), 2002 (366 versus 237 ppb) and 2004 (472 versus 361 ppb). We have no recent data for PM₁₀ and other particulates in this area since the City of Westminster Pollution Monitoring Station at the top of Trevor Place was closed in November 2000 (after recording a peak of 116ppb of PM₁₀ on 5 October 2000 and exceedances of the 50 ppb objective of 35 days per annum on 16 occasions in less than six months of 2000) and the Royal Borough of Kensington and Chelsea station in Brompton Road does not monitor PM₁₀.

In our view, the current Pollution Monitoring Site configuration is likely to understate substantially the air pollution problem in the Knightsbridge area. The worst air pollution occurs near the northern end of top of Sloane Street in an area surrounded by large buildings, where there are 12 incoming lanes of traffic (and double that when exiting

traffic is grid-locked), whereas the monitoring station is nearly 400 metres away at the (recently created) narrowest point in Brompton Road (i.e. where traffic volumes are lowest because there is only one eastbound lane and one westbound lane because of a bus lane and a bus stop on opposite sides of the road). **We urge you to establish urgently at least one additional monitoring site close to the worst of the air pollution in the Knightsbridge area to track NO₂ and PM₁₀ air pollution (and perhaps other air pollutants).**

We understand from TfL's supplementary report of 30 January 2006 that provisional data for 2005 indicates that levels of PM₁₀ and NO₂ exceeded the annual mean objectives at more than one monitoring site in London. TfL's report makes clear that exceedances of these standards in 2005, by ratified data, would be a legal breach of UK regulations. We understand that, under local air quality management (LAQM), local authorities, including the Greater London Authority (GLA), have a statutory obligation to work towards these national air quality objectives. **We await the publication of this data expected in May.**

We are keen to understand, through a meeting or otherwise, whether TfL and the Mayor's office considers that the combination of the Congestion Charge Extension from February 2007 and TfL's currently proposed Low Emission Zone plans from early 2008 are likely to reduce actual air pollution levels sufficiently to meet official air pollution targets across the Knightsbridge area. Air pollution maps, for example, show that annual mean NO₂ levels are substantially greater in local residential streets than the objective of a maximum of 40 ppb and are much higher in the main thoroughfares of Brompton Road, Knightsbridge and Sloane Street. **Even if targets for NO₂, PM₁₀ and other air pollutants are likely to met over the next two years, we are keen that air quality should be improved more quickly e.g. through reductions in overall traffic volumes, the essential early reinstatement of the right-turn from Knightsbridge to Brompton Road by the Burberry building and by measures to control dust from massive local redevelopments.**

We are keen also to understand, again through meetings with Martin Low and/or Paul Morse or otherwise, the detail of any plans (including approaches, expected outcomes and timings) of the City of Westminster and the Royal Borough of Kensington and Chelsea to address air pollution specifically in the Knightsbridge area, given that TfL's website refers to "encouraging London boroughs to improve air quality at a local level through the local Air Quality Management system which could include programmes to reduce emissions from local traffic, new developments, construction activities and borough fleets".

I look forward to hearing from you and the two Councils (to whom I have also addressed this letter). I have copied Council Leaders Sir Simon Milton and Councillor Merrick Cockell for their information and would welcome any comments or suggestions they may have. I have copied other interested parties.

Yours sincerely,

Simon Birkett
Planning and Environment Committee

To:
Martin Low, Director of Transportation
Paul Morse, Interim Executive Director for Transport, Environment and Leisure Services

Cc:
Councillor Sir Simon Milton, The Leader of the Council, City of Westminster
Councillor Merrick Cockell, Leader of the Council, The Royal Borough of Kensington and Chelsea
Mrs Gwyneth Dunwoody MP, Chairman of The Transport Committee
Mark Field MP
Low Emission Zone Consultation team
Michael Wright, Chairman, Planning and Environment Committee