

ON KNIGHTSBRIDGE ASSOCIATION LETTERHEAD

My reference: Transport/EU/01

Mr Stavros Dimas
The Commissioner for the Environment DG
Environment Directorate-General
European Commission
B – 1049
Brussels
Belgium

By post and email to: stavros.dimas@cec.eu.int

10 May 2006

Dear Commissioner Dimas

Revised National Emission Ceilings Directive: Central London

I am writing on behalf of The Knightsbridge Association, which represents around 1,000 people and businesses in the area between Hyde Park Corner and Queen's Gate in Central London, to seek your commitment to protecting local residents, local businesses and visitors (of which there are many) in the Knightsbridge area from high levels of air pollution from nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) when the Commission puts forward proposals for a revised National Emission Ceilings Directive in mid to late 2006.

Air pollution levels in the Knightsbridge area are regularly among the very worst in the United Kingdom. Although the current Air Quality Strategy consultation published by Defra refers only to Marylebone Road exceeding the Strategy's 1-hour objective in 2004, in fact Brompton Road in Knightsbridge also exceeded that objective in 2004 (by 14 times at 254 hours). So far in 2006, air pollution at the Brompton Road monitoring site (with annual mean and exceedance levels of 105 µg/m³ and 192 hours respectively) has exceeded NO₂ levels at Marylebone Road (with annual mean and exceedance levels of 100 µg/m³ and 177 hours respectively). This data is available at www.londonair.org.uk.

We have no recent data for PM₁₀ and other particulates in this area since the local Pollution Monitoring Station was closed in November 2000 (after recording a peak of 116µg/m³ of PM₁₀ on 5 October 2000 and exceedances of the 50 µg/m³ objective of 35 days per annum on 14 days in less than six months of 2000).

Given the seriousness of the air pollution problem in this area, please confirm on behalf of the European Commission that it is committed (as a minimum) to:

1. maintaining the current 2010 European Union (EU) legal limits on annual mean and

- exceedance levels of nitrogen dioxide (NO₂) and particulate matter (whether currently through PM₁₀ measures or in future through new PM_{2.5} measures) and ensuring their full enforcement in areas where there are significant residential, business and/or visitor populations potentially exposed to the emissions for extended periods;
2. requiring any derogations from EU legal limits for air quality to be approved by the European Commission at its sole discretion; and
 3. rejecting any requests for derogations from current or future EU legal limits on NO₂, PM₁₀ or PM_{2.5} in areas where there are significant residential, business and/or visitor populations potentially exposed to the emissions for extended periods.

Separately, it would be positive if the Environment Directorate-General would issue guidance to Member States to the effect that efforts by them and/or local authorities to reduce air pollution by means that, in themselves, or, in total, cannot achieve the EU legal limits for air pollution will never be considered as having made “all reasonable efforts” to achieve those limits e.g. the London Low Emission Zone may only reduce air pollution by say “15%” when exceedance levels are multiple currently of the EU legal limits for air pollution.

EU legal requirements that bind all Member States on air quality limits (when backed up by tough enforcement action) may represent the best chance for residents, businesses and visitors in the Knightsbridge area to achieve reductions in the current, unacceptable, levels of air pollution.

I attach some selected recent relevant comments in an Appendix for your information.

I have copied the Secretary of State for the Environment, Food and Rural Affairs, the Secretary of State for Transport, the Mayor of London and local Authority Leaders Sir Simon Milton and Councillor Merrick Cockell for their information. I have copied other interested parties.

I look forward to hearing from you.

Yours sincerely,

Simon Birkett
Chairman
Transport and Environment Committee

Cc: Mogens Peter Carl, Director General
David Grant Lawrence, Env. 2 Legislation and other Inter-Institutional activities
Pia Bucella, Director, Directorate A: Communication, Legal Affairs & Civil Protection
Jos Delbeke, Director, Directorate C: Climate Change and Air
Rt. Hon. Douglas Alexander MP, Secretary of State, Department for Transport
Rt. Hon. David Miliband MP, Secretary of State, Department for Environment, Food and Rural Affairs
Mr Ken Livingstone, The Mayor of London
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

Councillor Frances Blois

Councillor Tony Devenish

Councillor Philippa Roe

Councillor Dr Ian Hanham

Councillor Margot James

Councillor Mrs Shireen Ritchie

Charles Elphicke

Martin Low, Director of Transportation

Paul Morse, Interim Executive Director for Transport, Environment and Leisure Services

London Low Emission Zone Consultation Team