

Darren Johnson AM Chair
Environment Committee
London Assembly
City Hall
The Queen's Walk
London SE1 2AA

11 January 2009

Dear Darren

Investigation by the Environment Committee of the London Assembly into air quality up to 2012: 'Ridicule for breaching air quality laws every year'; or a 'Standing ovation for showing the world how to address air pollution and sustainability issues'

I am writing on behalf of the Campaign for Clean Air in London (CCAL) to submit evidence to the Environment Committee of the London Assembly (LAEC) as part of its forthcoming investigation into air quality in London. All members of the LAEC are copied on this letter.

Summary

The LAEC's investigation is taking place in the right place at the right time. Indeed, there is a once in a lifetime opportunity to:

- improve London's air quality for the first time in 10 years;
- show those involved in long term planning for climate change what it takes, in practice, to reduce air pollution (i.e. a mixture of technology, behavioural change and political will);
- build upon a desire for a step change in road pricing (through 'tag and beacon' or its equivalent); and
- deliver a magnificent London 2012 Summer Olympics and Paralympic Games with a valuable lasting legacy.

All it would take to achieve this goal is a commitment from the Prime Minister that the government will comply fully with [health based] air quality laws that is followed by determined action. Mayor Johnson too will need to play his part since, while not having [today] a legal duty to ensure limit values are achieved, he holds the key to deliver most of the solutions. Success with leaded petrol, the ozone layer and acid rain show what can be achieved if sufficient political will exists.

Please take this opportunity to press for such a commitment from the Prime Minister (and others). Please back such a call with clear recommendations from the LAEC supporting the most obvious solutions (e.g. one or more additional inner low emission zones) and highlight key issues (e.g. the monitoring of 'PM_{2.5}').

With impetus from the LAEC and others on air quality, London could achieve major long term environmental, social and economic benefits and establish itself firmly as the world's leading city.

Investigation focus and report content

CCAL suggests that the LAEC's report into air quality might be titled 'Air quality: the health impact and how to address it before London 2012'. That would be a wonderful legacy.

You may be aware that the government published on Thursday 8 January its report on 'Air Pollution in the UK 2007'. See:

<http://www.airquality.co.uk/archive/annualreport/annualreport.php>.

CCAL urges the LAEC to consider as part of its investigation and report:

1. Monitored air quality and its trends: The shocking facts (now and forecast to ensure the real problems are identified)
 - a) the extent of the existing and forecast breaches of standards for nitrogen dioxide
 - b) (NO₂), tropospheric ozone (O₃) and particulate matter (PM₁₀ and PM_{2.5}); where will these breaches occur? The middle of London, arterial roads, airports etc.;
 - c) the real trends e.g. no improvements in PM₁₀ and worsening ozone levels. Bear in mind that oft-repeated references to improvements since 1990 are misleading since air quality has generally deteriorated since the late 1990s; and
 - d) the shocking facts e.g. London has the worst annual average NO₂ of any capital city in western (or eastern Europe). See: <http://www.urbanaudit.org/rank.aspx>
2. Health: The shocking impact of poor air quality in London
 - a) the health impact – what, how many people affected (tens of thousands for PM₁₀ and over 1.3 million Londoners for NO₂)?;
 - b) the monetary cost ('The Roger's Review' in 2006);
 - c) quality of life; and health inequalities within boroughs caused by poor air quality.
3. Sources: Who/what pollutes most in the most polluted areas (now and forecast to ensure sustainable solutions)?
 - a) focus on the worst air quality by:
 - (i) severity (e.g. where laws are most heavily breached); and
 - (ii) the largest number of people effected i.e. deep and broad;
 - b) non-transport sources e.g. gas combustion;
 - c) transport e.g. taxis;
 - d) the real contribution from older diesel vehicles i.e. not just theoretical emission standards; and
 - e) how many people are affected?
4. The framework: World Health Organisation (WHO) recommendations, air quality laws and the Host City Contract for London 2012
 - a) Key WHO recommendations. Note: PM_{2.5} not to be more than 10 micrograms per cubic metre;
 - b) highlight that laws, in place since 1999, and due to be met by 2005 are still being broken;
 - c) the disjunction between the responsibilities of the government and the Mayor of London;

- d) the 'Greenest Games'; and
- e) the opportunity for the Commission for Sustainable London 2012 to act assertively.

5. Key factors to consider including 'external' forces

- a) acknowledge explicitly the gap currently in quantum and timescale;
- b) climate change will adversely affect air quality – especially tropospheric ozone;
- c) some others will help e.g. European Union vehicle emission standards;
- d) sharing best practice from/with elsewhere e.g. <http://www.lowemissionzones.eu/>;
- e) the importance of considering air quality and climate change holistically (using 'The London Principle' to evaluate trade-offs);
- f) the necessity of cost-effectively complying with deadlines not cost-benefit analysis using arbitrary parameters and an open-ended timescale; and
- g) the opportunity to create a local and international 'tipping point' of change (i.e. 'The London Matrix').

6. Primary measures

- a) 'selling the carrot': a major communications exercise to build a deep public understanding of the air quality problem in London; its health and other impacts; its causes; its solutions; and the wider benefits of action e.g. on obesity and climate change;
- b) non-transport measures e.g. addressing gas emissions, best practice on demolition and construction and encouraging better practice with festival bonfires;
- c) one or more additional inner low emission zones (LEZs) which should be backed by a national scheme for the abatement of hazardous emissions e.g. particulate matter and oxides of nitrogen (NOx). Include a table showing indicative costs to upgrade diesel and petrol vehicles by one Euro engine emission standard. Getting rapidly to (equivalence with) Euro 4 standards for particulate matter and NOx is crucial;
- d) reducing rapidly harmful emissions from taxis – the 'polluter must pay' (i.e. passengers); removing unnecessary restrictions (e.g. on turning circles); the need to get to Euro 4 standards for particulates and NOx by 2011;
- e) the opportunity offered by dynamic road pricing (such as 'tag and beacon' or its equivalent);
- f) accelerating currently planned initiatives e.g. modal shift, cycling etc.;
- g) best practice sharing by the Greater London Authority and Transport for London and the need for 'prioritisation' and 'guidance' i.e. each borough should not have to do its own cost-benefit analysis to participate in the Mayor's cycle scheme and we must avoid (say) large gaps in the availability of electric charging points;
- h) parking measures by boroughs to provide a 'modest' price signal (particularly in respect of diesel vehicles); and
- i) the cost-effectiveness of behavioural change e.g. people can protect health and save money.

7. Secondary measures

- a) 'advertising' in London to include details of emissions per kilometre for carbon dioxide, particulate matter and oxides of nitrogen;
- b) the greater use of communications and alerts when air quality is (quite) poor; and
- c) the importance of updating and publishing in full and much more quickly the London Atmospheric Emissions Inventory (LAEI) data. It is disappointing that the latest 'annual' report is for 2004.

8. Other issues

Ensuring that fine particulate matter (PM_{2.5}) is being monitored robustly in London.

9. Recommendations

10. The opportunity

‘The London Circles’

The government has admitted that road transport is the cause of all the current breaches of air quality laws in the United Kingdom (UK), with diesel emissions being by far the biggest single component.

The solutions involve two overlapping ‘circles’ of measures (‘The London Circles’) – one for congestion and one for emissions – that target the most polluted vehicles in the most polluted areas with technology-based solutions and create a tipping point of behavioural change backed by awareness, persuasion, incentives and regulation (when necessary). Behavioural change offers the most cost-effective solutions.

In the emissions circle, we need urgently one or more additional inner low emission zones (LEZs) – at least in central, east and west London – to reduce harmful emissions. The fairest measures will involve making the ‘polluter pay’ and give people the choice of: not entering the most polluted area with the most polluting vehicle; choosing (longer) alternative routes; upgrading their vehicles; using other modes of transport; and/or paying (a fine) to continue polluting. At the margin, even the existing LEZ reduces congestion by deterring some vehicles from entering London.

In the congestion circle, road pricing is essential, fair and much needed to tackle congestion which is bad now and forecast to increase significantly in coming years. The best version of this is dynamic road pricing (such as ‘tag and beacon’ or its equivalent) which CCAL understands could be introduced rapidly initially within central, east and west London. Road pricing reduces emissions and ‘makes the polluter pay’ since vehicles produce less than half as much air pollution once their speed reaches 30 kilometres per hour.

In CCAL’s view, with road transport the biggest single cause of breaches of air quality laws, there is a massive opportunity for London to pursue a holistic package of measures that tackle emissions and congestion that could transform its future and that of many other large cities. For example, the rapid introduction of a combination of: one of more inner low emission zones; and dynamic road pricing (such as ‘tag and beacon’) could ensure full compliance with air quality laws and tackle the spectre of ever increasing congestion in our cities.

A vision of road transport built on ‘The London Circles’ offers the opportunity to carry with it the Mayor of London, the government, all the political parties, business, community groups and non-governmental organisations. Indeed, without such a vision and such a broad range of support, it seems unlikely – without action by the courts – that the legal and other challenges facing the UK in London will be met.

Key messages

CCAL urges the LAEC to highlight particularly several points in its recommendations:

- i. the many benefits to be gained from building a broad and deep understanding amongst Londoners of air quality issues and challenges. Our political leaders seem to have ended up in the worst of all possible worlds: they have shied away from this approach perhaps through fear of frightening people and/or fear of being frightened by people frightened about the issue! In the best of all possible worlds, as Defra's research has shown, much can be achieved once people understand the issues. Modest action or price signals are often all that is required then to achieve widespread and rapid change. We should recognise also that (some) regulation is needed for most people some of the time and some people all of the time if 'the polluter' is to be tackled and free-riders are to be 'discouraged';
- ii. the need for London to introduce one or more additional inner low emission zones by early 2010. To be fair, such a scheme must treat all polluters equally in proportion to their emissions. Some 40 cities in Germany, for example, are expected to have schemes in place by the end of 2009 to comply with the same air quality obligations. The German schemes are simple, nationally backed and cost-effective with inputs proportional to outputs. One or more inner LEZs in London might even allow the slower tightening of the existing outer-London LEZ. There is a tremendous opportunity to broaden substantially the LEZ planned for London 2012 and make it one of the most valuable legacies for London – please encourage the Commission for Sustainable London 2012 and the Olympic Delivery Authority to focus on this opportunity;
- iii. the opportunity to pursue urgently dynamic road pricing (such as 'tag and beacon' or its equivalent) as a complementary measure in parallel with one or more additional inner LEZs. By tackling congestion directly, it may be possible to introduce more modest inner LEZs (and road pricing) initially and tighten it (them) as legal deadlines and London 2012 approach e.g. the Euro 3 engine emission standards for particulates only initially rather than full Euro 4 equivalence;
- iv. a plan is needed to reduce harmful emissions from gas (domestic, industrial-commercial consumption and gas leakage). Some 40% (Outer Greater London) to 63% (Central Greater London) of NO_x is expected to come from gas by 2010 with an adverse trend. Note the importance also of tackling 'Part A Processes' (i.e. larger industrial-commercial installations) at 10.3% and airports at 12.1% of NO_x emissions in Outer Greater London according to the LAEI 2004. London also needs to avoid problems with biomass burning;
- v. the need to focus on the most effective measures and ensure that deadlines are met with clear accountability for success (or failure). The UK is littered with 'busy fool' measures that achieve little or nothing. Instead we need to identify the real problems (i.e. worst local pollution and largest number of people affected) and tackle them with meaningful solutions that focus on meeting deadlines (in particular the legal deadlines of 2010 (for NO₂) and 2011 (for PM₁₀) and London 2012 (for air quality generally));
- vi. looking ahead, there is a crucial need to ensure that PM_{2.5} is monitored robustly. A base line is being set over 2009, 2011 and 2012 that will be used to set exposure reduction levels

for the next decade. Once limit values have been met, these exposure reduction obligations will become a key driver of public health benefits. Conversely, a 'flaky' baseline would undermine a large part of future air quality regulation. There have been suggestions in the past that the UK's monitoring equipment may have accuracy 'issues'. Please therefore will the LAEC satisfy itself that the monitoring and modelling of PM_{2.5} planned for London will be robust. In this regard, you may wish to see an investigative article on page 6 of the January 2009 edition of the excellent Air Quality Bulletin; and

- vii. the need for our political leaders to demonstrate, with robust follow-through, the political will needed to grasp the once in a lifetime opportunity to deliver meaningful environmental, social and economic benefits for London through air quality improvements.

There is much to gain and much to do. Let us remember though that, ultimately, the risk of premature death and 'permanent' climate change caused by an inability to tackle air pollution, are even worse fates than economic problems. Please therefore set a bold vision for the future.

London 2012 offers the opportunity of once in a lifetime legacy benefits

London has a magnificent opportunity to enhance its reputation as the world's leading city over the next four years as it prepares for and delivers the London 2012 Summer Olympics and Paralympic Games. More importantly still, London has the opportunity to establish meaningful air quality benefits for itself that could also show the whole world how air pollution – whether air quality or climate change – can be tackled successfully. CCAL urges the LAEC to be a catalyst in triggering this opportunity in each of the next four years.

Finally, CCAL wishes to express its appreciation for all the work done by you and the LAEC to highlight London's poor air quality and propose practical solutions to improve it.

With best wishes.

Yours sincerely

Simon Birkett Principal Contact
Campaign for Clean Air in London

Cc:

Murad Qureshi AM, Deputy Chair, Labour

Gareth Bacon AM, Conservative James Cleverly AM, Conservative Roger Evans AM, Conservative

Nicky Gavron AM, Labour

Mike Tuffrey AM, Liberal Democrat

The Lord Hunt of Kings Heath, Minister for Sustainable Development and Energy Innovation

Dr Martin Williams, Senior Reporting Officer, Air Quality and Industrial Pollution Programme, Defra