Summary of responses to the consultation on an update on measures being taken to reduce the risk of non-compliance with the daily limit value for Particulate Matter ($PM_{10}$) in London

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Introduction

1. On 12 October 2011, Defra published a 12 week consultation inviting views on a delivery update on the measures being taken in London to reduce the risk of non-compliance with the daily limit value for particulate matter (PM$_{10}$) as defined in the EU Ambient Air Quality Directive 2008/50/EC. The consultation closed on 6 January 2012.

2. Further details of the consultation can be found on the Defra website (http://www.defra.gov.uk/consult/2011/10/12/particulate-matter-pm10/).

Consultation Response

3. Nine responses to the consultation were received. Four of the responses were from interested environmental organisations; three responses were from individuals, one from a local authority and one from a political group. A list of respondents can be found at the end of this document.

4. The table below summarises the main comments on the measures set out in the update. Some respondents commented on issues outside the scope of the consultation including on the air quality monitoring and assessment regime in London and the lawfulness of the Air Quality Plan. These comments have been noted.

Next Steps

5. We would like to thank the respondents for their comments on the measures in the update and also for their suggestions on future measures. The consultation comments have been shared with the Department for Transport and Greater London Authority and will be factored into future discussions on local air quality improvement measures.

6. Looking ahead, the 2011 air quality compliance assessment for London will be completed and submitted to the European Commission in September. A report from the Mayor of London on the effectiveness of the Clean Air Fund measures included in the delivery update is expected in late 2012.

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<th>Main Issues Raised in Response to the Consultation</th>
<th>Summary of Responses and Government Response</th>
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<td>Reducing the risk of non-compliance with the PM$_{10}$ daily limit in London.</td>
<td>Many of the measures included in the update (e.g. on vehicle idling) were welcomed and supported but the majority of respondents felt that further action was needed if the EU daily limit for PM$_{10}$ is to be met consistently across London. Either additional measures or the tightening of existing measures were proposed to help ensure compliance is achieved and maintained. Additional measures proposed included: a Low Emission Taxi Fund to offset the cost of Euro 5 taxis; a new inner-city Low Emission Zone with tighter standards; an updated Electric Vehicle Delivery Plan and further incentives for electric vehicle users. Other respondents proposed: tightening the new taxi and private...</td>
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hire vehicle (PHV) age limits; including a scrappage scheme alongside the congestion charge greener vehicle discount; ensuring consistency of cycling provision across London; and addressing cycling infrastructure and safety issues to further encourage the modal shift to bike.

**Government Response:** The Mayor of London has set out a comprehensive strategy to reduce PM$_{10}$ emissions in central London by a third by 2015. This includes a combination of London-wide measures, such as tightening of Low Emission Zone standards, and targeted local measures, such as the use of dust suppressants. The Government is committed to working with the Mayor, London Boroughs and other stakeholders to deliver further improvements in air quality in London.

### Including ‘experimental’ measures

Whilst some of the newer approaches being taken to reduce PM$_{10}$ concentrations in London were welcomed, several respondents were concerned that these measures (e.g. dust suppressants) were experimental and in their view the air quality benefits were not conclusive. Instead, there was a preference for tried and tested measures (e.g. LEZ tightening, support for cleaner taxis) where the impacts were known and could be quantified.

**Government Response:** The effectiveness of the measures being taken is being assessed by TfL and a report will be published later this year. We support the application of new and innovative approaches to improve local air quality. Interim findings from the first year of monitoring demonstrated that the application of dust suppressants achieved up to a 14% decrease in local PM$_{10}$ concentrations.

### Targeting measures at pollution hotspots

Six of the respondents felt that many of the measures in the update focused on discrete pollution hotspots rather than reducing population exposure to air pollution across the capital. Pollution hotspots can move over time and it was felt that further action is likely to be more effective if measures tackling emissions at source were implemented on the basis of their impact across London.

**Government Response:** This delivery update focused specifically on the local measures being taken to reduce the risk of exceedences of the PM daily limit value in those parts of Greater London where problems had previously been identified as part of our national assessment process. A wider range of actions to reduce emissions and improve air quality are set out in the Mayor’s Air Quality Strategy. These measures are expected to reduce PM$_{10}$ emissions in central London by a third by 2015.

### Speed of measure implementation

Many respondents highlighted the need for urgency in implementing the measures required to ensure London achieves compliance with the PM$_{10}$ daily limit and were concerned that some of the measures included in the update e.g. the financial incentive scheme for taxis, may have been delayed. It was important that the measures had a clear timetable for implementation.

**Government response:** All the local measures being delivered...
by the 2011 Clean Air Fund will be fully implemented by the end of 2012. Other measures being delivered by the Mayor of London, such as new age limits for taxis and a tightening of the Low Emission Zone standards came into effect in January 2012. A clear timetable for implementation has been set out and timely action is being taken to help ensure London meets EU limit values for PM$_{10}$.

List of Respondents to the Consultation

- Campaign for Clean Air in London
- Client Earth
- Darren Johnson
- Friends of the Earth
- Graham Phillips
- Healthy Air Campaign
- Liberal Democrat London Assembly Group
- Royal Borough of Kensington and Chelsea
- Tim Henderson