



UK Representation
to the EU Brussels

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Dear Marianne,

**AIR QUALITY: UK, GREATER LONDON AGGLOMERATION ZONE -
EXEMPTION UNTIL 2011 FROM THE OBLIGATION TO APPLY THE DAILY LIMIT
VALUE FOR PM₁₀**

Further to my authorities' re-submission of 4 May for the additional time available under Article 22 of the directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC) to meet the daily limit value for PM₁₀ in London, we have had an informal request from the Commission for further clarification of a number of issues. A response has been sent to the relevant Commission official but to ensure transparency in the assessment process my authorities consider that it would be helpful to also submit the following information formally.

1. Question of whether the Marylebone Road Monitoring Station is representative of the highest PM₁₀ concentrations in London.

The assessment of air quality in London uses modelling to supplement monitoring data, and this shows that while the Marylebone Road monitoring station is amongst the highest points of exceedence, the highest point lies a short way from the site along the Marylebone Road. The national assessment uses the highest point of non-compliance, whether monitored or modelled, in order to determine the compliance gap and subsequent achievement of the limit values. The UK notification of 5 May 2009 used both monitoring and modelled data for Marylebone Road, and the assessment work for the 2010 re-notification confirmed Marylebone

Road as having the highest exceedences (both modelled and monitored). The re-submission provides therefore an accurate assessment, using the best available evidence, which demonstrates the elimination of both monitored and modelled exceedences by 2011.

There are other local air quality assessment data in London in the public domain. These data support local air quality management decisions and so there are monitoring stations sited according to different siting and representativeness criteria which may mean that they are in locations which would fail the requirements of the Ambient Air Quality Directive. My authorities do, however, undertake an annual assessment of data generated through local air quality management to see if a particular station needs to be brought into the national network, in addition to the Article 5 assessment required by the Directive.

The re-submission was prepared by my authorities in conjunction with the Greater London Authority, taking full account of their detailed traffic projections and more local modelling. The assessment commissioned by the Greater London Authority to support the development of the draft Mayor's Air Quality Strategy produced the same list of hotspots as the national assessment and also predicts full compliance in 2011.

The request for clarification also referred to recent changes in assessment methodology. My authorities have updated the base year for projections, from 2005 to 2008 which makes the assessment more robust. The only monitoring data available in 2005 with which to ground the national model were non-reference compliant TEOMs, or a small number of Partisols which, as was publicly reported, suffered from severe data issues. The base data therefore had to have a number of correction factors applied to it, each of which increased the uncertainty. The 2008 data were assembled using a larger network of FDMS TEOMs (Type BC which have demonstrated full equivalence to the reference method with no correction) and TEOMs using the VCM correction method (which has also demonstrated full compliance), and is therefore far more robust. Projection uncertainty also increases with time, and so projecting from 2005 to 2011 is inherently more uncertain than projecting from 2008 to 2011.

2. Fate of the Western Extension (WEZ) of the Congestion Charging Zone: impacts on air quality.

The available evidence is that the WEZ had a negligible impact on air quality, and no impact on exceedences of the PM₁₀ limit values. Therefore, its inclusion or not in the projections makes no material difference to the outcome of those projections with respect to compliance with the limit values in 2011.

When the London submission was made in 2009, the traffic growth forecasts included the WEZ, which at the time was reasonable as WEZ withdrawal was not confirmed policy. These projections were used to inform the 2010 re-submission, which concluded that compliance would be achieved in 2011 at the highest monitored location (Marylebone Road). This conclusion has been validated by the more recent modelling undertaken in support of the Mayor's draft Air Quality Strategy. This did not include the WEZ in its list of policies but has also projected compliance by 2011 (with appropriate priority location measures as necessary).

My authorities have responded in detail to London stakeholder representations on this specific issue and have copied this to Commission officials. As made clear in the UK submission of 4 May, the projections demonstrating compliance with the daily limit value in 2011 do not include or rely on any of the further measures from the Mayor of London's draft Air Quality Strategy.

I hope that you find this additional information useful in assessing the re-submission of 4 May.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gian Marco Currado', with a stylized flourish at the end.

Gian Marco Currado
1st Secretary, Environment