

CAMPAIGN FOR CLEAN AIR IN LONDON

“The cross-party campaign to achieve urgently and sustainably at least World Health Organisation recommended standards of air quality throughout London”

Campaign website: www.cleanairinlondon.org

Councillor Robert Davis DL
Deputy Leader of Westminster City Council
Cabinet Member for Built Environment
City of Westminster
P.O. Box 240
Westminster City Hall
64 Victoria Street
London SW1E 6QP

For the attention of Nina Miles

27 September 2008

By email to: airqualitystrategy@westminster.gov.uk

Dear Councillor Davis and Nina Miles

Developing a new Air Quality Strategy and Action Plan

The strategy needs a clear vision – backed by measurable objectives - and must recognise the urgency and major work needed for London to comply, belatedly, with air quality laws

This response to the City of Westminster's (WCC's) consultation on 'Developing a new Air Quality Strategy (AQS) and Action Plan', which closes on 30 September 2008, is sent on behalf of the Campaign for Clean Air in London (CCAL).

<http://www.westminster.gov.uk/environment/pollution/airpollution/strategy.cfm>

This response follows an excellent meeting of the Westminster Amenity Society Forum (WASF) earlier this week, at which CCAL thanked WCC, and Nina Miles in particular, for the excellent work done to date in preparing this initial consultation document.

CCAL is supported by all amenity societies that are members of WASF any of whom may wish to make separate additional submissions to WCC on the AQS.

The Campaign for Clean Air in London

CCAL has only one aim which is to achieve urgently and sustainably at least World Health Organisation (WHO) recommended standards of air quality throughout London. Our immediate priority is to ensure that air quality laws, based on WHO recommendations for particulate matter (so called PM₁₀) and nitrogen dioxide (NO₂), established by the new European Union directive on ambient air quality and cleaner air for Europe (the AQ Directive) are rigorously enforced in each of the next four years leading up to the London 2012 Olympic and Paralympic Games.

CCAL has received support from Mayor Johnson, leading politicians from the four main political parties in London as well as leading business and community groups including the Central London Partnership, London First and The Knightsbridge Business Group. We have also received a pledge of support from Environmental Protection UK (formerly the National Society for Clean Air and Environmental Protection).

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Comments on the draft AQS

CCAL’s key comments are:

1. Air quality is the top environmental concern for WCC’s residents - CCAL was not surprised to see on page 7 that the highest number (35%) of respondents to a recent survey undertaken by WCC to determine residents’ attitudes to noise, found that poor air quality topped the list of problems that personally affected them. Furthermore, those residents who said they are affected by four or more environmental problems, when asked which three problems they are most affected by, cited rubbish and litter (46%), dog fouling (40%) and poor air quality (39%). This highlights the importance that WCC should attach to improving air quality in Westminster.
2. The AQS needs a vision and a sense of urgency: CCAL’s most important comment is that the AQS needs a clear vision – backed by timescales, measurable objectives and appropriate resources – that recognises the urgency and major work needed for London to comply belatedly with air quality laws. For example, the vision could be “To achieve urgently and sustainably at least World Health Organisation recommended standards of air quality throughout Westminster through direct measures and the lobbying of others”. At a minimum, WCC should commit to use its best efforts to implement successfully actions to improve air quality in Westminster, when it exceeds Limit Values, which are meaningful when judged in the context of all its available powers and the deadlines applicable under UK and European law.

In this context, CCAL applauds WCC’s aim to re-establish Westminster as an exemplar ‘green’ authority. However, the strategy says nothing about what achievements this will require or within what timescale. Please set clear milestones in the AQS. It is possible that WCC has fallen from its position as an exemplar ‘green’ authority by not setting and achieving such milestones in the past.

3. WCC should match resources to the top concern of its residents: CCAL believes that WCC may only have only one full-time person allocated to air quality matters, compared to many people and much money, say, for noise matters. CCAL urges WCC to prioritise air quality more appropriately and allocate sufficient resources to the issue of most concern to residents. Not least, air quality laws will continue to be broken in Westminster unless WCC plays a leading role in the successful implementation of suitable measures.
4. Air pollution near Westminster’s busiest roads must be reduced by over one-third in 15 months to comply with air quality laws: The AQS should take account of the need under Article 22 (paragraph 3) of the AQ Directive for the UK to ensure that the Limit Value plus a Margin of Tolerance are not exceeded if the time extension provisions are used i.e. average annual levels of particulate matter (PM₁₀) must not exceed 40 micrograms per cubic metre (µg/m³) (if no time extension is granted) or 48 µg/m³ (if it is). Similarly for nitrogen dioxide (NO₂), average annual levels of NO₂ must not exceed – from January 2010 - 40 µg/m³ (if no time extension is granted) or 60 µg/m³ (if it is). Both are important but Figure 2.1 on page 9 shows the many places (all roads) where NO₂ is forecast to exceed 60 µg/m³ still in 2010 – this will be illegal since air quality laws allow no derogations for such breaches.

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5. ‘The London Principle’: Please apply ‘The London Principle’ (or perhaps ‘The Air Pollution Trade-off Principle’) when assessing climate change and air quality trade-offs (e.g. when considering the graph on page 40). Tackling air pollution holistically requires difficult trade-off decisions between air quality and climate change issues. CCAL encourages policy makers, like WCC, to accept a disbenefit of say 5% in climate change terms provided there is an associated benefit of say 50% in air quality terms (and vice versa) i.e. one to 10. Such an approach should be considered acceptable since large benefits may be hard to find and small disbenefits can be rectified relatively easily through a combination of other policy measures. An example of the former would be slightly increased fuel consumption and emissions of carbon dioxide while an example of the latter would be sharply reduced hazardous emissions.
6. One or more additional, inner, Low Emission Zones are needed: CCAL urges WCC to lobby vigorously for the adoption by early 2010 of one or more additional, inner, low emission zones to reduce sharply air pollution in Westminster since this is likely to be the most cost effective means of complying with air quality laws (as dozens of other cities in Europe have decided). CCAL urges WCC also to adopt measures set out in its letter to the Mayor of London dated 13 July 2008 (on which WCC was copied). That letter is attached to and forms part of this submission. It recommends, for example, the removal of free parking at weekends in central London, since such concessions contribute to heavy congestion at weekends, and the charging of motorcycles (since they are estimated to contribute 18% to PM₁₀ road traffic emissions i.e. just more than cars).
7. Create a ‘tipping point’ of behavioural change: CCAL urges WCC to create a ‘tipping point’ of behavioural change in Westminster that will result in people taking steps to reduce sharply their hazardous emissions. For example, many Councils with serious air quality problems are introducing emissions related parking charges. In CCAL’s view, these should target particularly older diesel vehicles since these are the most polluting vehicles in cities. The omission of such parking measures from the AQS is very surprising.
8. Don’t be a ‘busy fool’: Finally, CCAL urges WCC to quantify the expected impact and cost effectiveness of the measures it is considering to improve air quality in Westminster (not least in relative terms) to ensure that WCC will play its full part in the UK complying fully with air quality laws. Please prioritise the most cost effective measures, which will most likely require behavioural change, even if that requires bold political leadership from WCC. A lack of such work, or a lack of political will, would probably cause WCC to be a ‘busy fool’ in respect of air quality i.e. many inputs but few, if any, worthwhile outputs.

CCAL would be pleased to discuss this response with you or your colleagues.

With best wishes.

Yours sincerely

Simon Birkett
Principal Contact

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Campaign for Clean Air in London

By hand: Winston Fletcher, Chair, The Knightsbridge Association
Carol Seymour-Newton, Honorary Secretary, The Knightsbridge Association

Cc: Councillor Colin Barrow, Leader of the Council, City of Westminster
The Rt. Hon. Hilary Benn MP, Secretary of State for Defra
Boris Johnson, Mayor of London
Sir Simon Milton, Deputy Mayor

ORGANISATIONS

Helen Ainsworth, EU and International Air Quality, Defra
Jenny Bates, London Regional Campaigns Co-ordinator, Friends of the Earth
James Bidwell, Chief Executive, Visit London
John Brewster OBE, Chairman, Port Health and Environmental Services Committee, Corporation of London
Patricia Brown, Chief Executive, Central London Partnership
Simon Davies, Department for Transport
Nick Fairholm, Transport for London
David Higgins, Chief Executive, Olympic Delivery Authority
Tim Hockney, Executive Director, London First
Professor Frank Kelly, Kings College London
Dr Michal Krzyzanowski, Regional Adviser, Air Quality and Health, WHO
Sarah Legge, GLA Principal Policy Adviser – Air Quality
Blake Ludwig, Campaign Director, Alliance Against Urban 4x4s
Professor Bob Maynard, Health Protection Agency
Philip Mulligan, Chief Executive, Environmental Protection UK
Derek Picot, Chairman, The Knightsbridge Business Group
Dragomira Raeva, EU Policy Unit, European Environmental Bureau
Dr Martin Williams, Head of Air and Environment Quality Division, Defra
Tim Williamson, National Air Quality Assessment, Defra

LEADING POLITICIANS

John Bowis MEP, Conservative
Jean Lambert MEP, Green
Baroness Ludford MEP, Liberal Democrat
Claude Moraes MEP, Labour
Richard Barnes AM, Statutory Deputy Mayor and Leader of the Conservative Group
Len Duvall AM, Leader of the Labour Group, London Assembly
Darren Johnson AM, Green, Chair of the Transport and Environment Committee
Mike Tuffrey AM, Leader of the Liberal Democrat Group, London Assembly
Valerie Shawcross AM, Chair of the Transport Committee, London Assembly
Councillor Merrick Cockell, Leader of Kensington and Chelsea Council