

LONDON SUSTAINABLE DEVELOPMENT COMMISSION (LSDC)
CONSULTATION SUBMISSION ON THE MAYOR'S DRAFT AIR QUALITY STRATEGY:
CLEARING THE AIR, AUGUST 2010

1. Introduction

The London Sustainable Development Commission (LSDC) was established in 2002 to advise the Mayor of London on ways to make London a sustainable, world-class city. The Commission is an independent body advising, supporting and challenging policy makers to promote a better quality of life for all Londoners, both now and in the future, whilst also considering London's wider global impacts.

The LSDC is grateful for the opportunity to comment on the draft Air Quality Strategy for London. As a 'critical friend' to the GLA, the LSDC has an important role in promoting sustainable development in London and advising on the sustainable nature of London wide strategies.

There are many topics covered by the strategy where the drafting has taken forward policies and proposals that the LSDC is able to support. These are referenced in the main body of this paper. There are also some areas for improvement which we have identified in this paper although the Commission does recognise that this is a consultation draft and that it is inevitable that some of the detail will not be there yet. The Commission would therefore be happy to be involved in further iterations of the strategy.

We would be happy to meet with your team to discuss these comments and issues further and look forward to hearing more about any amendments to the proposals. We would also welcome the opportunity to have a wider discussion with the GLA on how the LSDC may be able to assist in the development of further sustainable options and policies for improving London's air quality.

2. Overview

Pollution from particulates and nitrous oxides represent one of the greatest threats to London life and therefore demand priority action, irrespective of the legal imperatives from the EU. London's performance in the league table of major cities is poor and reduces its competitiveness. This is damaging economically as well as socially and environmentally.

The strategy which aims to address these concerns has much to commend it. It analyses in detail the air quality problems for London identifying causes and listing a large number of measures to reduce pollution levels and the impacts on health and quality of life in general.

3. Specific Comments on the Strategy

Overall, the policies proposed reflect the issues that need to be addressed and are welcomed. The Mayor's push for the development of a lower emissions strategy for all London's public sector vehicles is to be commended.

We support the stance taken on electric vehicles (and we should aim to ensure the energy sources are equally clean). We also welcome the support given to boroughs who wish to develop parking schemes based on CO₂ and air quality pollutants but would urge the Mayor to go further and actively promote such schemes.

There are however gaps and the challenge of managing the implied programme of change is massive. It would be good to see a clearer sustainable travel hierarchy in future drafts of the strategy.

3.1 Tackling source of pollution

On particulates, the planned actions may (just) get to EU limits, but those limits are not safe. WHO has tougher levels and the strategy itself acknowledges that we ought to be going further. Even if it does get to the limits, the measures are piecemeal and “end of pipe”, e.g. washing down roads (which in turn pollute water sources) and random/emergency closures on bad days (with disruptive consequences), rather than tackling the source of the pollution. On NO_x, the plan falls well short of what is needed.

Certainly determined and radical action is needed to tackle the problem at source. The LSDC notes that the London Assembly’s Environment Committee that looked at the previous draft of the strategy unanimously recommended a central clean air zone. The strategy should at least consider this option and any other measures which deliver a similar outcome.

Behavioural change is exceptionally difficult to achieve unless backed by legislation and enforcement as evidenced by recent research which looked at campaigns on, for example, drink/drive, seat belt wearing (see “Behave Yourself ” PACTS’s research paper). These need to be factored into delivery plans.

3.2 Health considerations

On detail, more could be made of the value of walking (no emissions, better health) and of the need to make it safer and more appealing. One consideration could be pedestrianisation which would make a huge difference to some of the blighted parts of London.

More could also be done to mobilise the health authorities to support walking and cycling and promote cleaner transport. Recent reports suggest that cyclists are far more likely to suffer from the effects of inhalation and ingestion of pollutants than car occupants. To encourage cycling the strategy has to clamp down harder on the main sources of such pollution.

This could be achieved through the strategy proposing more visible indicators of the level of pollution in key areas, as it would help to bring the problem home to the public and help to shape opinion.

The strategy should also highlight the health benefits for the poorest and explain in more detail that the exposure levels for groups of people in the more densely populated areas of London, which are close to main roads, will clearly be higher than other areas especially where there is more limited green space to offset the impacts.

The problems of poor housing, low incomes, and general health issues will be exacerbated by poor air quality so we would expect the strategy to give priority to such areas. The strategy is rather two dimensional on this point focussing on concentrations by transport arteries rather than concentrations of disadvantaged people who are at greater risk because of their greater vulnerability. This may require a more sophisticated analysis than is at present available.

As a start it would be instructive to show where the levels of premature deaths are the highest in London (the figure of 50,000 premature deaths for the UK is striking).

3.3 Economic/Business impacts.

The report rightly highlights the investment that has gone into such things as electric vehicles. It usefully reminds us of the financial benefits of cleaner air by reducing demand on hospitals. We strongly support the need for a better understanding of the cost/benefits here. We need to persuade government to join up its accounting so that investment in cleaner air can be offset against lower health service expenditure.

We also need to stress the business benefits for the economy, in general (not excluding London), of investing in cleaner technologies (tyres, brakes, air quality measuring and analysing kit, better heating and cooling equipment, transport etc). London could and should become the engine of growth in these areas where demand is bound to grow. There is great potential for the strategy to galvanise and boost London's research and financial capabilities to invent, innovate, and develop so that London becomes a powerhouse for clean air.

4. In Conclusion

The main problem on air quality is that so many organisations have a finger in the pie that it is hard to make any one of them properly accountable. The Mayor has a leadership role but it is hard to exercise it when he doesn't control all the levers.

One consideration would be to nominate an individual who would make it their sole priority to drive out pollution and work towards a zero emissions vision for London. This would be a more eye-catching and ambitious approach than simply having to conform to an EU directive.

The remit would be to show the leadership needed to mobilise the boroughs, health authorities, businesses and the third sector to work together (as has worked well in similar circumstances for road safety where, incidentally, government policy makers are looking at the possibility of "vision zero" for road death and serious injury).

LSDC
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