

**HOUSE OF COMMONS ENVIRONMENTAL AUDIT COMMITTEE:**  
**INQUIRY INTO AIR QUALITY**

**Memorandum from the City of London Corporation**

*Submitted by the Office of the City Remembrancer*

1. The City of London Corporation has a strong history of taking action to improve air quality in London. The City Corporation was the first local government authority to introduce a smokeless zone, and later the first authority to obtain powers to stop the burning of sulphurous fuel, achieved through private parliamentary acts passed in 1954 and 1971, respectively. Nevertheless, owing to its central London location and the density of development, poor air quality continues to be an issue for the City. Like other central London boroughs which surround it, the City of London suffers from higher than average levels of air pollution. As a result, the City does not meet health based targets for nitrogen dioxide and fine particles (PM<sub>10</sub>). Although over 90% of those working in the City travel to and from work by public transport, road traffic is the main source of pollution, supplemented by commercial and domestic heating. Construction and demolition activities are also a significant source.
2. With its central London location, the City is heavily affected by pollution generated in neighbouring authorities, and across London as a whole. As with other areas in the southeast of England, the City is affected by pollutants (notably fine particulates) thought to originate from continental Europe. The contribution of sources within the boundary of the Square Mile to the NO<sub>x</sub> concentrations measured at background sites is around 30%. At the busiest, most polluted roadside sites it can reach 85%. For PM<sub>10</sub>, emissions from outside the Square Mile are more dominant. Emissions that originate within the City boundary contribute to just 8% of concentrations of PM<sub>10</sub> at background sites, and up to 37% of the concentrations measured at the busiest roadside sites.<sup>1</sup>

***Joined Up Policy***

3. In 2011 the City Corporation adopted an Air Quality strategy, which sets the strategic direction for air quality policy in the City up to 2015. The Corporation aims to ensure that all corporate policies and action plans reflect the importance that the City Corporation has placed on improving air quality in the Square Mile. Workshops have recently been held for the staff responsible for corporate policy across all areas to ensure that the aims and objectives set out in corporate policy contribute to improved air quality, and to prevent conflicts arising.
4. The City Corporation uses its position as a planning authority to improve air quality. The City's planning policies include requirements for:
  - Low NO<sub>x</sub> boilers;
  - Low NO<sub>x</sub> combined heat and power technology;
  - Limited car parking spaces;
  - Energy efficient buildings;

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<sup>1</sup> These figures are based on the Greater London Authority's London Atmospheric Emissions Inventory 2008.

- Chimneys that terminate above roof height to aid dispersion of pollutants; and
- Tight control over emissions during demolition and construction.

The use of biomass and biofuels is also deterred, and the Corporation actively works with the construction and demolition industry to minimise emissions associated with development. In addition, air quality is an important consideration in the design of the urban realm, with the aim of reducing local emissions and the public's exposure.

5. Improving air quality is a key component of the City's Local Implementation Plan, which outlines how the Mayor of London's Transport Strategy will be implemented in the City. The plan includes commitments to reduce levels of air pollution caused by transport in the City, and to reduce the adverse health effects of transport in the City on health, particularly those related to poor air quality.
6. In addition to ensuring its own action on air quality is coherent and joined up, the City Corporation aims to work in partnership with other organisations to help shape national and regional air quality policy. For example, the City Corporation provides the chair for the London Air Quality Steering Group, and is an active member of the central London air quality cluster group. The Corporation also works closely with King's College London and University College London on research and air quality improvement projects. In addition, in July the Lord Mayor of the City of London Fiona Woolf will jointly host an event on air quality with the Mayor of London. The event will showcase the work being done on air quality across London, and provide a forum for stakeholders and policy makers to develop the pan-London and national responses on air quality.

### *Support for local authorities*

7. As much of the air pollution in the City originates from outside of the Square Mile, the City Corporation alone cannot reduce air pollution in the Square Mile to within limit values by the target year of 2020. This requires a more strategic approach, with action at regional and national levels. For example, the City would benefit from pan-London policies such as a requirement to install low NO<sub>x</sub> boilers in urban areas, and national policies to discourage the uptake of diesel vehicles in urban areas.
8. The City Corporation's own response on air quality is also hampered by very limited regulatory powers. Those that are available are not fit for purpose. For example, while the City Corporation is committed to issuing Fixed Penalty Notices for unnecessary idling of vehicle engines, the regulations have so far proved ineffective in dealing with the problem. The response to air pollution would be greatly improved with enhanced powers in this area through an updated Clean Air Act to provide for the effective control of emissions from fuels and technology in use today.

### *European Commission fines*

9. The UK Government is responsible for ensuring compliance with EU air quality obligations. Local authorities have a statutory obligation under the Environment Act 1995 to 'work towards' air quality objectives. Where local authorities can clearly demonstrate that they have been active in trying to improve local air quality, and much of the pollution does not originate within their boundary, they should not be

held responsible for failure to meet European Union limits. Nor should they be required to shoulder any subsequent fine.

### *Implications of public health responsibilities*

10. Poor air quality can harm human health and increase the incidence of cardiovascular and lung disease. The City of London Health and Wellbeing Board has prioritised action on air pollution in its Joint Health and Wellbeing Strategy. To complement this, the City Corporation has commissioned analysis of how the Health and Wellbeing Board could improve air quality and reduce public exposure. The resultant report was presented to the Board in January 2014, and recommendations are currently being implemented. These include running workshops for staff, carrying out a Rapid Health Impact Assessment of the Local Implementation Plan, and incorporating public health into a revised Air Quality Strategy, which is due to be published this year.
11. Given the importance of air quality to public health, greater clarity and guidance on local authorities' responsibilities in this area would be beneficial. In the public health indicators compiled by the Department of Health, the air pollution measure is based on exposure to PM<sub>2.5</sub>. However, this does not cohere with local authority obligations under the Environment Act 1995, which places no statutory obligations on local authorities in respect of PM<sub>2.5</sub>. The obligation is for PM<sub>10</sub>. Local authorities are no longer implementing measures to reduce PM<sub>10</sub> as compliance with the limit value has been achieved, yet reducing PM<sub>10</sub> concentrations further would have the benefit of reducing concentrations of PM<sub>2.5</sub>.

### *Low emission zones and vehicle emission limits*

12. To date, low emission zones have been based on vehicle Euro Standards. However, it is widely accepted that Euro Standards for NO<sub>x</sub> produced by diesel vehicles have not worked. It is anticipated that Euro VI, which is being introduced from 2014, will be more effective, but this is not guaranteed. Low emission zones should therefore be implemented to encourage alternative fuels and forms of transport. This should be complemented by other measures to reduce vehicle emissions such as pedestrianisation, timed road closures and other forms of traffic restriction. Consideration should also be given to widening the remit of low emission zones beyond restricting access by certain vehicles.

### *Public Awareness Campaigns*

13. Increasing public awareness and understanding of air pollution is an important part of the City Corporation's Air Quality Strategy. It is also key to helping people reduce their own exposure to air pollution. As a result, the City Corporation has introduced a number of measures to raise public awareness of air quality, including:
  - Running two large Citizen Science programmes in which residents are measuring air pollution on a micro scale in their locality to improve their understanding of how pollution varies in an urban environment;
  - Working with Barts Health NHS Trust to provide advice to the groups most vulnerable to the negative health effects associated with poor air quality on how to reduce their exposure;

- Engaging with the City's primary school on air quality and implementing measures around the school to reduce the exposure of the children;
  - Working with King's College London, to develop a free smart phone app, 'CityAir'. The app provides targeted messages on days of high pollution and generates low pollution travel routes allowing users to avoid the most polluted areas; and
  - Running a business engagement programme intended to raise the profile of air pollution with City workers, and enlist the help of businesses to improve local air quality. The engagement programme has revealed that businesses see air pollution as an important issue for the health and wellbeing of their staff, as well as for their own Corporate Responsibility agendas. The City Corporation held an event in March 2014 to mark the efforts of air quality champions, which included major banks, law firms, property companies, food outlets and hotels.
14. Notwithstanding these actions and the recent publicity surrounding the Saharan dust episodes in April 2014, the public appear largely unaware of the impact of London's air quality on health. A national campaign to raise awareness of air quality as an issue and how to reduce exposure would assist local campaigns that have already begun.

***Public transport, cycling and walking***

15. Encouraging people to walk or cycle is unlikely to have a significant impact on air quality in the City. Over 90% of City workers already commute to work using public transport, and only a very small proportion of emissions of pollutants in the City are from private cars. As a result, any additional take-up in cycling or walking is likely to be by those who use public transport, rather than a car. Changes to infrastructure to reduce the number of vehicles on the road would be more effective.
16. Local air quality could be improved if more individuals walked or cycled for short journeys instead of using taxis. The City Corporation is promoting these alternatives through its business engagement programme. The Corporation is also attempting to reduce the number of empty taxis driving around looking for a fare by improving rank provision, and ensuring ranks are used by taxi drivers and the public.

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