

Committee(s):	Date(s):
Port Health and Environmental Services – For Decision Planning & Transportation – For Information Health and Wellbeing Board – For Information	7 July 2015 14 July 2015 18 September 2015
Subject: City of London Air Quality Strategy 2015 – 2020 (and update)	Public
Report of: Director of Markets and Consumer Protection	For Decision
Summary	
<p>The City of London Corporation published an Air Quality Strategy in 2011. The Strategy, approved by the Port Health and Environmental Services Committee (PHES) in March 2011, expires in 2015.</p> <p>A draft air quality strategy for 2015 through to 2020 was presented to the PHES Committee in November 2014. It has since been subject to consultation. The consultation comments are appended to this report as Appendix 1, together with the action taken to address each comment. The final Air Quality Strategy is attached as Appendix 2.</p> <p>The strategy fulfils the City of London’s statutory obligation to assist the Government and Mayor of London to meet European Limit Values for nitrogen dioxide and fine particles (PM₁₀). It also reflects the high priority placed on reducing the impact of air pollution on the health of residents and workers, as detailed in the City and Hackney Joint Strategic Needs Assessment.</p> <p style="text-align: center;">Recommendations</p> <p>I recommend that your Committee approves the attached Air Quality Strategy, subject to any comments received at your meeting.</p>	

Main Report

Background

1. At high levels, air pollution can have both short-term and long-term effects on health. It is responsible for the premature death of over 4,000 Londoners each year and is associated with cardiovascular and cardiopulmonary disease, lung cancer and respiratory disease. Children and the elderly are the most vulnerable.
2. Air quality targets are defined in European legislation as Limit Values. The UK Government has a duty to ensure that air quality in the UK meets the Limit Values.

3. The Limit Values have been adopted into domestic legislation by the UK government as air quality objectives. The City of London has a statutory duty to work towards the objectives. The Mayor of London has a legal obligation to ensure that the air quality objectives are met across London.
4. Despite a wide range of action taken to improve air quality, the objectives, and consequently Limit Values, for nitrogen dioxide continue to be breached across London. The European Commission (EC) has commenced legal proceedings against the UK for failing to comply with the nitrogen dioxide Limit Values by the prescribed date and failing to submit a credible plan outlining how the Limit Values will be met. Compliance with the annual average Limit Value for nitrogen dioxide in London, particularly central London, is proving to be very challenging. This is principally due to exhaust fumes from diesel vehicles.
5. It has been suggested by DEFRA that, following the Localism Act 2013, fines for failing to comply with the European Limit Value could be passed on to local authorities, who have not fulfilled their obligation to work towards air quality objectives. It is important, therefore, that the City has robust policies in place.
6. Following a Supreme Court ruling in April 2015, Defra is compiling a new Air Quality Plan to submit to the European Commission detailing how the limit values for nitrogen dioxide will be met in all areas across the United Kingdom, including London, as soon as possible. This report will be subject to public consultation and must be submitted to the European Commission by 31 December 2015.
7. On 1 June 2015 the Chairman of PHES and the Westminster City Council Cabinet Member for Sustainability and Parking sent a joint letter to the Secretary of State for the Environment, Food and Rural Affairs outlining the need for bold action to achieve the Limit Values. A copy of the letter is attached as Appendix 3
8. In addition to the statutory obligation to take action to improve air quality, the City Corporation also has responsibilities for improving public health. This was introduced by Health and Social Care Act 2012. Public Health England (PHE) has conducted a Health Impact Assessment of the effects of fine particles (PM_{2.5}) on public health. PHE has ranked air pollution as the 5th out of 12 causes of mortality risk across London.
9. Air pollution is a real concern for City residents. During a public consultation event held by the City Corporation to identify issues which would form the priorities in the Joint Health and Wellbeing Strategy (JHWS), air quality was ranked as the third highest public health concern for City residents. As a consequence, the City of London JHWS has identified improving air quality as a key priority to improve the health and wellbeing of City residents and workers. The updated City Air Quality Strategy reflects this.

Key Policies and Proposals

10. The air quality strategy outlines air quality policy at the City from 2015 through to 2020. It builds upon actions contained within the 2011 air quality strategy. It

fulfils the City Corporation's statutory responsibilities in relation to Local Air Quality Management. The strategy also outlines proposals for reducing the health impact of air pollution on residents and workers.

11. There are 60 actions contained within the strategy. The following action was added as a result of the consultation:

'The City Corporation will ensure that all relevant Corporate strategies and policies will reflect the importance of improving local air quality and reducing exposure.'

12. Action is divided into ten key policy areas:

- Air quality monitoring
- Political influence and commitment
- Working with the Mayor of London
- Working with other external organisations
- Reducing emissions from transport
- Reducing emissions from new developments
- Leading by example
- Recognising and rewarding good practice
- Raising awareness
- Air quality and public health

13. It is recognised that the City Corporation cannot take action in isolation to improve air quality to an acceptable level in the Square Mile. Many measures contained within the strategy, therefore, are about influencing action by other organisations, both locally and across London.

14. The City Corporation is required to report on progress with each action contained within the strategy on an annual basis.

Proposals

15. I propose that, subject to comments received at your meeting, the attached air quality strategy is adopted.

Financial Implications

16. Project work contained within the strategy will be funded using the following sources: the Mayor's Air Quality Fund (MAQF), Department of Environment Food and Rural Affairs Air Quality Grant, Local Implementation Plan funding and Section 106.

17. The City Corporation has been in receipt of £280,000 over 3 years (2013 – 2016) for air quality improvement work in the Square Mile and a further £100,000 over 3 years to work with Bart's Health NHS Trust. A further application for grant funding from the Mayor's Air Quality Fund will be made this year to cover the time period 2016 -2020.

Corporate and Strategic Implications

18. The work on air quality sits within key policy priority 3 of the Corporate Plan: 'Engaging with London and national government on key issues of concern to our communities....' Working with the Mayor of London on air quality is specifically mentioned as an example.

Consultees

19. The draft air quality strategy has been subject to external and internal consultation and comments have been incorporated into the final strategy where appropriate.

Conclusion

20. The City Corporation has produced an updated air quality strategy designed to reduce the impact of poor air quality on the health of City residents, workers and visitors. The strategy fulfils the City's statutory obligations to assist the Government in meeting air quality Limit Values for nitrogen dioxide and fine particles and responsibilities for improving public health. Subject to comments received at your meeting, the air quality strategy will be adopted.

Background Papers:

The City of London Air Quality Strategy 2011 - 2015.

Appendix 1:

Consultation comments and corresponding action

Appendix 2:

The City of London Draft Air Quality Strategy 2015 - 2020.

Appendix 3:

Copy of letter to Defra from the Chairman of PHES and Westminster City Council Cabinet Member for Sustainability and Parking.

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Appendix 1: Consultation comments and action

Respondent	Comment	Action
Clean Air in London	Measures to restrict and ban completely diesel vehicles and generators from the City of London by 2020 with an intermediate step by early 2018. Other leading cities in Europe are already taking such steps. Please ensure that such measures include specific actions and measurable targets. Biomass burning must also be banned in the City of London.	Biomass is actively discouraged and this has proved very effective to date. There are actions in the strategy to look at alternatives to diesel generators. Completely banning diesel vehicles would need to be considered very carefully and has not been included as a specific action in the strategy document at this time.
Clean Air in London	More measures to encourage the take-up of ultra low emission vehicles to balance the restrictions, measures and targets in Point 1 above	Options for encouraging ultra low emission vehicles will be considered with Defra, DfT, TfL, the GLA and neighbouring boroughs.
Clean Air in London	Please ensure that areas where people are encouraged to spend their time are managed in a way that reduces their exposure to air pollution. This is likely to become an increasing priority for Public Health England, combined with air pollution warnings and other steps. Pedestrianising Cheapside would be a good example. Please continue your excellent work with businesses which is 'world leading' and the public e.g. City Air	A public realm consultancy is working on a report for the City Corporation which looks at how the urban realm can be designed to reduce exposure to pollution in the City. The work with the City business community is ongoing.
Clean Air in London	CAL is deeply concerned that the Mayor of London may be seeking to reduce the monitoring of air pollution in 'hotspots' as part of changes to Local Air Quality Management in London. Please resist vigorously any such pressures.	The City Corporation is committed to air quality monitoring and will resist any proposals to reduce the amount of monitoring that takes place.

Respondent	Comment	Action
Dearman Engines	Regulation should recognise the impact of the emissions from the whole vehicle rather than the primary powertrain alone (this is in relation to refrigeration vehicles).	The City Corporation isn't the body responsible for regulating vehicle emissions but this will be looked into, to see what options there may be.
Dearman Engines	Strong support for the phasing out of standby generators that run solely on diesel". The use of diesel generators for backup power in the City of London is out-dated when zero-emission alternatives exist.	The strategy includes an action to work with businesses and developers to seek alternatives.
Dearman Engines	Strong support for the development of "a policy on the use of standby generators for generating energy other than when electricity supplies are interrupted" Consult with stakeholders in the backup power market during the creation of a policy on standby generation.	Stakeholders will be consulted when this is considered.
City of London Public Health	There is little mention in the Draft strategy of the City's Air Quality Management Area (AQMA) status, I understand this is because it is explained at length in the 2011-2015 strategy but I suggest AQMA status could do with a brief summary/update in this draft.	Added to the strategy document.
City of London Public Health	I also think a more in depth justification as to why the additional pm2.5 monitor is being placed at the Sir John Cass school location rather than another location.	Added to the strategy document.
Transport for London	Taxi ranks are an important part of the transport network in London and we would fully support more ranks being appointed in the City of London in locations where these will be used by the public and taxi drivers.	The City Corporation will liaise with TfL over this.

Respondent	Comment	Action
City of London Dept. of Built Environment	<p>Air quality monitoring shows that there has been very little improvement in the City's air quality since the 1990s. We should be taking a more radical approach as we did in 1954 we were the first local authority to introduce a smokeless zone and in 1971 as the first to obtain powers to stop the burning of sulphurous fuel. This could include actions such as:</p> <ul style="list-style-type: none"> • consolidation centres to reduce the number of single item deliveries in the City • changing the use of local distributor roads to minimise traffic • progressive tightening of emissions limits for diesel vehicles using the City's roads • the provision of more taxi ranks alongside abolition of the practice of driving around plying for hire 	<p>The forthcoming Freight Strategy will consider consolidation centres.</p> <p>Other issues will be discussed with the Dept of Built Environment.</p>
City of London Dept. of Built Environment	<p>The citizen science work is really interesting and should be given more emphasis. Air quality monitoring through citizen science or through more ubiquitous monitoring sensors perhaps associated with street lighting could become an important source of data by 2020.</p>	<p>This level of detail on one project isn't necessary for a strategy document – the detailed report relating to the project has been signposted.</p> <p>Two portable NOx analysers will be purchased during 2015. These can be attached to lamp posts and will be moved around the City to measure pollution at different locations.</p>

Respondent	Comment	Action
City of London Dept. of Built Environment	The other element missing in the Strategy are details. For example there is a statement that practical solutions will be funded through S106 and LIP funding but I couldn't see any further detail on what these practical solutions would be. Another example is the desire to move away from diesel in Corporation vehicles, where possible, but there are no timeframes, targets or monitoring elements through which this objective would be achieved. You could consider including an action plan to provide these details.	A table with details about each action, together with timeframes and outcomes. has been included as an Appendix.
City of London Dept of Built Environment	Also considering the significant contribution diesel fuel makes to air pollution in London I think solutions to this issue are underemphasised.	This will be considered under traffic management policies.
City of London Dept of Built Environment	Policy 2: should refer to the use of CIL, s106 and LIP funding as possible funding sources to deliver air quality improvements	This has been included.
City of London Dept of Built Environment	Policy 7: should also refer to co-ordination of planning and other policy statements and strategies with the air quality strategy and making air quality a common thread running through the activities of the City Corporation	This has been included.
City of London Dept of Built Environment	Section 2.2: final paragraph refers to further detail in the 2011 Strategy. If the draft Strategy is intended as a replacement to the 2011 one, then this detail ought to be included in the current document, or attached as an appendix.	Appendix added

Respondent	Comment	Action
City of London Dept of Built Environment	Section 4.2: working with the Mayor – there needs to be reference to the Mayor’s Cycling Strategy and particularly his Cycle Superhighways programme, which will deliver a dedicated cycle route along Thames Street which could result in lower motorised traffic and deliver improvements in air quality.	This has been included.
City of London Dept of Built Environment	Section 4.4. (and elsewhere) refers to employment of 350,000 – the estimated current figure is approx. 400,000.	This has been amended.
City of London Dept of Built Environment	Section 4.4.3: could also refer to environmental improvements delivered around individual buildings through s106 agreements, which can increase tree planting and improve urban greening.	This has been included.
City of London Dept of Built Environment	Is there also a need to refer to Sustainable Drainage (including green roofs) – although designed to reduce rainwater run-off, they normally also have the effect of improving biodiversity and reducing pollution levels, through planting.	This has been included.
Greater London Authority	Actions should include timelines for delivery, further details on specific measures and outcomes.	Included as an Appendix.
Greater London Authority	The strategy refers to the proportion of emissions from taxis as detailed in the 2011 Air Quality Strategy, but this is likely to be an overestimate as it was before the taxi age limit came into force.	Explained in a footnote.

Respondent	Comment	Action
Greater London Authority	It would strengthen the public health section if you were add that measures to improve air quality can have significant positive impacts on a range of Public Health Outcome Framework measures.	This has been included.
Greater London Authority	If air quality has been identified as a priority for the health and wellbeing board we would expect there to be a list of actions being implemented by the City's public health team using their ring fenced public health budget to tackle air quality.	City funds for implementing public health improvements are very limited as the formula is based on number of residents. Consequently no funding is available for air quality.
Greater London Authority	It would be beneficial if you could report your PHOF measure for PM2.5 and the scale of action required to bring this down to a safe level and then a set of actions for how you plan to deliver this improvement.	This has been included.
Greater London Authority	It would be good for the strategy to recognise that while NO2 is not a PHOF measure it has impacts on health independently of PM.	This has been included.
Greater London Authority	You haven't included any measures to reduce private car trips.	Existing Corporate policies already discourage private car trips. As their contribution to emissions in the Square Mile is relatively low, it isn't considered that the Air Quality Strategy needs to include actions to reduce private car trips further.

Respondent	Comment	Action
Greater London Authority	You may wish to consider including taxi rank information within the City way finding system.	This will be considered.