



London Local Air Quality Management

Recent new evidence from King's College London suggests that air pollution is leading to more premature deaths in London than previously feared. This, as well as recent court cases and the threat of more legal action to come, has helped push the issue of air quality higher up the national and local agenda. With these issues in mind, the Mayor has launched a consultation on how boroughs and City Hall will work together in the future to monitor air pollution, agree areas to focus on and plan actions to reduce emissions. This proposed system, called London Local Air Quality Management (LLAQM), is explored in this briefing

Overview

A recent study by King's College London found that nearly 9,500 people died prematurely in 2010 as a result of long-term exposure to air pollution. This study combined the impacts of NO_x and particulate matter (PM-10 and PM-2.5) for the first time. Within London, these pollutants are primarily caused by road transport, whether this be through tyre and break wear (which is a key source of particulates), or tailpipe emissions. Other sources include domestic and commercial gas emissions relating to heating.

Earlier in 2015, the Supreme Court found that the UK government needs to prepare a new national strategy for air quality, including plans for the areas that are forecast not to meet EU limit values by 2020, which includes London. The European Commission has also begun legal proceedings against the UK for its failure to meet EU legal limits for nitrogen dioxide (NO₂). This process is a lengthy one but it does represent a threat to local authorities because the Localism Act sets out a process that allows the government to pass down fines.

London Local Air Quality Management (LLAQM)

Currently, how boroughs monitor air pollution, agree Air Quality Management Areas (AQMAs) and identify actions to tackle pollution in Air Quality Action Plans, is governed by the national Local Air Quality Management system. The Mayor now proposes to build on changes that Defra has proposed to this system to develop the LLAQM, applying the powers that he has under the Environment Act 1995 (as amended by the GLA Act 1999).

The proposals will see:

- A new requirement to update Air Quality Action Plans every five years as a minimum.
- A new requirement for boroughs to consult the GLA in writing on any proposals to remove, move or add council-owned automatic NO₂ or PM monitoring stations.

- A new requirement to undertake a desktop assessment of AQMAs every four years.
- A new Annual Status Report replacing a number of existing reports and assessments.
- A removal of the reporting requirements for four pollutants where limit values have consistently been met.
- A new role for local authorities in working towards PM-2.5 reduction.
- Encouragement for boroughs and the GLA to work together on tackling air quality hot spots (“Air Quality Focus Areas”).
- A new requirement to enforce the Mayor’s Non Road Mobile Machinery (NRMM) Low Emission Zone through planning.
- Encouragement for boroughs to get Directors of Public Health and Heads of Transport to buy into air quality strategies.
- A new requirement for boroughs to report on progress against Cleaner Air Borough criteria.

The GLA has also published a draft Air Quality Action Matrix. This sets out, assesses and prioritises actions that boroughs can include in their Air Quality Action Plans and then implement. These include:

- Joining the Fleet Operator Recognition Scheme (FORS) for the borough fleet and obtaining Gold accreditation.
- Developing Low Emission Neighbourhoods.
- Ensuring that green spaces and infrastructure is included in new developments.
- Supporting walking and cycling.
- Installing residential electric vehicle charge points.
- Giving priority loading for ultra-low emission vehicles in loading bays.
- Promoting lessons on air quality in schools.
- Enforcing Combined Heat and Power and biomass air quality policies.

To try to ensure that borough officers can spend more time working on actions to tackle pollution and less time writing reports, the GLA has published templates of the Air Quality Action Plan and Annual Status Report documents that boroughs will be required to prepare under the new system. It is inviting comments on these documents.

The consultation on the LLAQM runs until 25 September 2015.

Analysis

Action on Air Quality

Many of the actions included in the Mayor’s draft Action Matrix are things that boroughs are already planning and delivering to improve air quality and reduce harm caused by pollution. As well as encouraging walking and cycling through locally developed schemes (including “mini Hollands”), some boroughs are assisting residents and businesses that want to switch to ultra-low emission vehicles through the provision of new charging infrastructure. Boroughs are also charging more for parking permits from the most polluting vehicles, discouraging idling and/or insisting on Construction Logistics Management Plans. Many boroughs are focusing on educating people on the dangers of air pollution and what can be done to reduce emissions and exposure. Commonly, this has been through schools or through health professionals. Providing green infrastructure and planting trees and shrubs can help to absorb air pollution. This is another approach that many boroughs are using.

The next round of the Mayor’s Air Quality Fund (MAQF) offers the opportunity for boroughs to continue to develop local proposals to tackle air quality in the period 2016-2019. The deadline for bids for “standard” projects is 14 September, with an announcement due to be made on which projects have been successful in November/December 2015. Through this round of the MAQF, £2,000,000 has been made available for two Low Emission Neighbourhoods across the capital. The Mayor will announce which areas are to be given “seed funding” to develop their bids in October 2015.

London Councils continues to lobby for action at London-wide and national level to improve air quality. We are keen to see the Mayor be more ambitious in his plans for the Ultra Low Emission Zone (ULEZ), including working with boroughs that would like to be part of the ULEZ to consider how the boundary of the zone could be expanded. We also want to see more buses across London meeting the Euro 6 standard from 2020. TfL has recently indicated a willingness to consider options for expansion of the ULEZ and has announced that a further 400 Euro 5 buses operating outside of central London will be retrofitted to meet Euro 6 by 2020. At a national level, we are keen to see the government remove the threat of fines for non-compliance with EU limit values being passed down and for it to work positively with London to tackle the issue, including fiscal incentives and disincentives.

“
London Councils continues to lobby for action at London-wide and national level to improve air quality and we are keen to see the Mayor be more ambitious in his plans for the Ultra Low Emission Zone
”

London Local Air Quality Management

The Mayor has published an impact assessment of the new LLAQM proposals, which considers the impact on officer time, financial implications and air quality. This has found that “overall, the changes would slightly reduce the officer time spent by boroughs on air quality reporting due to the streamlined approach and provision of templates, guidance and data, which would enable better planning and delivery of measures to improve air quality”. It is important to note, however, that this assumes that boroughs are currently undertaking periodic reviews of air quality in their areas, designating AQMAs where limits are not meeting (or are unlikely to meet) limits and keeping Air Quality Action Plans up to date. The new requirement for updating Action Plans every five years for example, is recognised as adding impetus where existing Action Plans are out of date.

The impact assessment also notes that “the main benefits of the scheme are the increased provision of information, tools and co-ordination to help ensure a more strategic London-wide approach to Local Air Quality Management”. The GLA is proposing to prepare bespoke information on air quality emissions, concentrations and mapping resources to boroughs, which will help them undertake assessments and prepare reports. The consultation document states that the GLA will absorb the cost of this.

The Mayor’s consultation document proposes that the GLA will work with Defra to produce London-specific guidance on the LLAQM system. There are aspects of the consultation proposals that rely on this guidance to clarify what will be expected of boroughs. This includes the proposed new role for local authorities to “work towards reductions in PM-2.5” and what is defined as a “significant” change in concentrations of pollutants that will necessitate a reassessment of AQMAs. The Mayor intends to consult on this technical guidance in December 2015, publish the final version in February 2016 and then require the first round of reassessments of AQMAs and the first annual reports later in April/May 2016.

The impact assessment does not consider the cost of maintaining the network of monitoring stations to boroughs, despite the consultation document noting that this is “crucial” and setting out a proposal that boroughs should consult the GLA before removing, moving or adding council owned stations.

The impact assessment states that “if implemented across London, the measures quantified in the Action Matrix could deliver a reduction in NOx emissions of up to 16 per cent”. However, it notes that “it is not expected or anticipated that all boroughs will deliver all of the actions. Even if they wanted to, it is highly unlikely that boroughs could do this, given the uncertainties over the funding that boroughs will be able to make available to tackle air quality and the fact that some of the actions are not within boroughs’ control.

The Mayor’s consultation document proposes that the GLA will report annually to the London Councils’ Transport and Environment Committee on any areas of best practice and under-performance on air quality.

Commentary

Air pollution does not respect administrative boundaries and some solutions are better planned and implemented at a regional level. As such, there are benefits of a more integrated approach to air quality monitoring and planning across London and parts of the public sector. Tackling this issue is important for the health of London's residents and will also help to limit the threat of any fines from the European Commission being handed down to London's local authorities.

The Mayor's objective of reducing unnecessary bureaucracy in order to focus on actions is to be welcomed. However, boroughs will want to carefully consider what work they are currently doing on monitoring and reporting on air quality and whether these proposals will actually free up their officers and members so that they can focus on developing and implementing actions. To some extent this may depend on the detail included in the Mayor's guidance, which will be the subject of a later consultation. Boroughs will want to keep this under review. The Mayor is proposing to require that boroughs consult the GLA on any proposals to move, remove or install air quality monitoring stations that they own. Boroughs may want to consider whether this is reasonable and what impact this could have on resources, the timing of developments / public realm schemes that may require movement of these monitors and plans to strengthen the monitoring network, for example.

The draft Action Matrix that the Mayor has published for consultation is a useful tool for boroughs to use when deciding how to reduce emissions or reduce the harm caused by pollution. This draws on the good work that boroughs are already doing. It must be recognised, however, that these schemes require funding and that the Mayor's Air Quality Fund will not allow all of the actions to be taken in each borough.

A strong focus on reducing air pollution from the Mayor and TfL remains crucial. Boroughs that consider that an expanded ULEZ could have benefits in their area should take the opportunity to work with TfL to consider options for this. London Councils will continue to lobby for initiatives at a London-wide and national level that will be essential to improve air quality in the capital and encourage the Government to work positively with local authorities to tackle the issue rather than threatening them with fines.

London Councils will respond to the LLAQM consultation and local authorities are encouraged to let us know if they have any comments on the proposals. We are also keen to hear about the actions that authorities are taking to improve air quality.

Author: Steve Craddock, Principal Policy Officer (T: 020 7934 9832)

[Click here to send a comment or query to the author](#)

Links:

[Mayor's Air Quality Fund](#)

[Low Emission Neighbourhoods \(within Transport Emissions Roadmap\)](#)

[LLAQM consultation](#)

This member briefing has been circulated to:

Portfolio holders and those members who requested policy briefings in the following categories: Environment

“
Air pollution does not respect administrative boundaries - as such, there are benefits of a more integrated approach to air quality monitoring and planning across London
”