

ADPH and LEDNet joint response to stage 2 of the Mayor's Air Quality Consultation

This is a joint response on behalf of the Association of Directors of Public Health (ADPH) for London, which represents Directors of Public Health in London local authorities, and London Environment Directors Network (LEDNet), which represents Directors of Environment in London local authorities.

Both ADPH London and LEDNet recognise the magnitude of the problem of air quality within the capital and the significant impact it has on the health of the population of London and the environment. At present, the annual mortality burden from long term exposure to PM_{2.5} and NO₂ is estimated to be equivalent to up to 9,400 deaths. It is evident that further action by all those responsible for the health of London's residents is needed.

A welcomed strategy

The introduction of schemes like the proposed ULEZ is a welcome way of reducing air pollution and discouraging heavily polluting vehicles from our roads. We therefore strongly support the introduction of the ULEZ in addition to other measures that aim to address poor air quality within the capital such as the Emissions Surcharge, exemptions to which should be minimized. To ensure a meaningful improvement in air quality, we would urge the initiation of all measures in the strategy at the earliest date possible. In addition, we would urge that serious consideration be given to making London a diesel-free city, including a ban on the use of diesel fuel.

Unintended consequences of the strategy

We would urge for any vehicle-control scheme to be London-wide to avoid unintended repercussions at the peripheries, such as increased air pollution and accidents resulting from heavy and polluting traffic diverting through vulnerable communities.

We also wish to highlight the ongoing uncertainty surrounding the extent to which the lower-emission vehicles promoted by the Strategy contribute to air pollution and the disparity between the levels measured in the laboratory versus real-life settings.

The completion of the integrated impact assessment is welcome. However, we would like to have assurance that the recommended mitigation interventions will be implemented and monitored appropriately.

The cumulative impact of developments in the capital

We also wish to highlight the need for further consideration to be given to the effects construction within the capital can have on air quality. At present, the impacts on air quality of individual planning applications are assessed in isolation; we would welcome a strategic approach that considers the cumulative impact of multiple developments such as 'canyon effects', the density of pollutants during construction and increases in traffic congestion. The impact of the type of equipment and machinery used, and duration of emissions, requires consideration, with specific reference to the impact of using those powered by diesel fuels.

The health co-benefits

Air quality is a key element in which the environment can affect the health of Londoners, the Mayor can make this go further. Whilst the welcomed use of lower-emission vehicles would improve air quality to some extent, we would like to see additional emphasis on associated actions that also support active ways to travel that promote physical activity, such as walking and cycling and public transport, all of which should be safe and accessible to all and prioritised over private motorised forms of transport i.e. fewer cars which are less polluting rather than just less polluting cars. This would not only increase levels of physical activity but also reduce the likelihood of disturbing settled particulate matter bringing it back into the air (re-suspension).

We would encourage the Mayor to continue to ensure strong links between air quality improvement efforts and the wider strands of his planning and transport strategies for London. To successfully address air quality while maximizing the realisation of health co-benefits, collaboration across multiple sectors and policies is needed.