



Defra's Review of Local Air Quality
Management in England

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LONDON COUNCILS' RESPONSE TO THE DEFRA "REVIEW OF LOCAL AIR QUALITY MANAGEMENT IN ENGLAND" CONSULTATION

London Councils is committed to fighting for resources for London and getting the best possible deal for London's 33 councils. Part think-tank, part lobbying organisation, and part service provider, London Councils formulates policies, organises campaigns and runs a range of services all designed to make life better for Londoners.

London Councils welcomes the opportunity to comment on this consultation and Defra's decision to extend the deadline to 13 September, from the original deadline of 30 August. However, as with Defra's previous consultations on the Waste Management Plan for England and flood risk insurance, the timing is unhelpful with the summer holiday period falling within the time set aside for responses. This makes it more challenging for stakeholders to adequately consider and respond to the important issues raised in the consultation, and for us to obtain views from across 33 London councils.

The Mayor of London and I wrote a joint letter to the Rt. Hon Owen Patterson, on 1 August, seeking commitment from the government to additional steps to help us deliver further improvements to air quality in London (letter at Annex 1).

One of the areas our letter asks the government for further progress on is enhanced coordination within and across levels of government on air quality including Local Air Quality Management (LAQM):

"With the tools and resources needed to tackle air quality distributed across different levels of Government (central, regional, local) and within multiple government departments (Defra, Dft, DECC, DCLG etc), we look to government to provide the necessary coordination to ensure appropriate action is taken at all levels. The LAQM review provides a unique opportunity to address these issues and put in place improved coordination mechanisms (e.g. on planning policy) and greater central government support. For the LAQM review itself, it is vital that Air Quality Management Areas and borough reporting and assessment responsibilities are retained, reflecting the unique air quality challenges the capital faces."

It is vital that the poor air quality in London is tackled. The excess mortality and illness caused by air pollution, with an estimated 4,000 premature deaths in London every year, is a major public health problem. Furthermore, the continued failure to meet European NO₂ objectives continues to mean that there is a real threat of a substantial European Commission fine.

LAQM, including Air Quality Management Areas and borough reporting and assessment, is an important element of the capital's efforts to improve air quality and people's health. It enables local measurement of the effectiveness of particular actions, as well as providing an evidence base relating to planning applications, transport interventions and public health policies.

The consultation document states that the government can pass on fines for failure to meet EU deadlines to local authorities and public bodies, where they have failed to take action when they could. This continues to be a major concern for London local government, particularly when further government action is necessary to bring about the significant air quality improvements required in London. This includes further action on Euro standards for vehicle emissions and static combustion sources (see the letter in Annex 1).

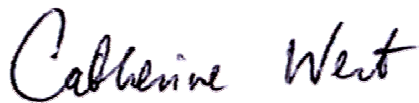
On the four options for changing local air quality management in the consultation, there is some concern, amongst London local authorities, that none of the options adequately meet consultation Aim 2 that “local government and other stakeholders are clear on their roles and responsibilities and what they can do to help improve air quality”. Further, their view is that both Option 3 (“Stronger alignment with EU requirements to meet air quality limit values” and Option 4 (“Separate LAQM duties do not exist”) would have a highly detrimental impact on local air quality.

There is some support for Option 2 (“Concentrate on action planning and focused reporting”) – albeit with some modification – and, to a lesser extent, Option 1 (“Business as usual with limited changes”). Of the options presented, some councils feel that Option 2 is likely to be the most beneficial for air quality outcomes. Given the challenges that London faces to meet air quality limit values, there is also some support for establishing a London-specific system for LAQM including clear roles, responsibilities and commitments from each tier of Government, and additional funding and support for targeted projects in hot-spot areas.

One of the most important tasks facing central and local government is to raise public awareness of the health impact of poor air quality. The shift of public health responsibilities to local authorities offers a new opportunity to highlight the health impact of air pollution and combine expertise. There is some support for the proposal in the consultation for a more public facing local air quality report that provides an annual review of action taken, providing that this is kept short and focused and is rolled into the annual progress report requirement. However, on its own, a public report is unlikely to significantly increase awareness and smarter awareness-raising activity is needed at both national and local level.

Please note that a number of the London local authorities are submitting responses covering all the consultation questions, which provide further details on the areas outlined above.

Yours faithfully,

A handwritten signature in black ink that reads "Catherine West". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Cllr Catherine West
Chair of the London Councils' Transport and Environment Committee

