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Dear Mayor Johnson

The Mayor's Draft Air Quality Strategy

We are writing to provide you with our views on your Draft Air Quality Strategy. Environmental Protection UK has considered the draft document, and welcomes the opportunity to comment.

1– About Environmental Protection UK

Environmental Protection UK brings together organisations from across the public, private and voluntary sectors to promote a balanced and innovative approach to understanding and solving environmental problems, through policy development and education. We are a registered charity with 110 years experience of environmental campaigning, public information provision, producing educational resources and policy formulation.

Environmental Protection UK's air quality policy committee has been involved in the development of this response. The committee brings together policy makers, regulators and practitioners from local authorities, consultants, developers, academics, industry, interested NGOs as well as members from Environmental Protection UK's regional divisions.

2 – Summary of Our Views

Environmental Protection UK responded to the previous draft of the Mayor's Air Quality Strategy, and we welcome the production of this further, more detailed draft for public consultation.

As the Strategy suggests, London presents the UK's largest air quality challenges, and urgent, concrete actions are needed to comply with EU limit values (even if the current efforts by DEFRA to secure deadline extensions are successful), and to ensure that public health benefits are secured. The Mayor's role in achieving the EU Limit Values is not simply discretionary, and the GLA Act requires that the Mayor's Air Quality Strategy contain '...policies and proposals - for the achievement in Greater London of the air quality standards and objectives prescribed in regulations made under [the Environment Act].'

In the past London has also acted as a exemplar of good practice in air quality management, with major initiatives such as Taxi Emission Standards, the Congestion Charge and of course the Low Emission Zone. These initiatives have demonstrated to the rest of the UK, and indeed the world, what can be done to tackle poor air quality. Our tests for the success of the Mayor's draft Air Quality Strategy are therefore two – firstly will the strategy deliver compliance with EU air quality limit values across the city, and secondly will the strategy inspire other cities within the UK to take action on their own air quality problems?

The answer to the first question is, as the strategy itself suggests, no, however the new document better clarifies why action in London alone will not ensure compliance with the EU NO_2 Limit Values, and sets out a clear 'ask' of national Government. In this sense it is a far stronger document than the draft that proceeded it, however it still fails to meet the requirement to contain 'policies and proposals - for the *achievement* in Greater London of the air quality standards and objectives' and as such is not fit for purpose.

On the second test the draft strategy is again far stronger than the previous draft. In particular the non-transport policies are innovative, interesting and likely to be examined by other UK local authorities. However, in the area of major transport interventions the strategy is a failure, falling behind many other cities (and indeed some London Boroughs) in its approach to tackling transport emissions. Examples of actions in other cities include the innovative use Low Emission Zones by local authorities such as Cambridge and Reading. Some actions of course need to be implemented at a Borough level, however many actions require real leadership by the Mayor to promote a uniform and complete approach to addressing air quality across the city. This is particularly the case for establishing major interventions such as 'inner' low emission zones, which, if left entirely to the Boroughs to implement, may fall foul of local political and economic concerns.

The draft Strategy also displays greater leadership from the Mayor than the previous version, and in particular it is encouraging to see the lead that Transport for London will take in many areas as detailed in Appendix A. In his forward to the draft Strategy it is also encouraging to see the Mayor grasp the scale of the problem in terms of health impacts, and express his willingness to act to improve this situation.

We understand that there will be more in the way of details of the measures proposed in the strategy to come, and in this way we would welcome a more detailed breakdown of the expected impact of the measures proposed on air quality, and more information on what the expected costs are, and who will be providing the funding. We also look forward to the release of the health impacts study mentioned in the Strategy.

3 - Detailed Comments

We have detailed our comments below on each of the fifteen policy areas put forward in the strategy document. Please note that some comments and recommendations have been carried over from our response to the previous drafts where we feel that these are still valid.

Policy 1 – Encouraging Smarter Choices and Sustainable Travel Behaviour
We very much support the measures laid out in this section – providing better information and infrastructure to people and organisations across London will allow them to make informed, sustainable transport decisions, which is crucial if we are to meet air quality and climate change targets. We are particularly pleased to see that the Mayor will be providing public facing information on emissions from the public transport fleet, and hope that this will enable people to get a more holistic sense of the environmental impact of transport choices rather than the narrow carbon metric that currently dominates this area. Current publicity drives such as the Government's 'Act of CO_2' campaign seem to have been founded with the assumption that the general public can only grasp one set of environmental metrics at a time, however in our experience a more complete picture of environmental impacts can be explained providing that the information presented is clear and the messages are unambiguous.

We are, however, concerned that the research base on how 'smarter choices' measures impact on air quality is currently rather sparse, and it is difficult to quantify what contribution each of these measures will make towards meeting air quality targets. Research that is available suggests that smarter choices measures are a very cost effective way of reducing private car journeys, and it would be very useful to have this confirmed and translated into air quality benefits.

Finally we are very pleased to see that the Mayor has confirmed a further £1 million to support car clubs. We're also encouraged to see that there will be a focus on adoption of the cleanest models for new car club vehicles, however we'd suggest that this should cover a wider definition of 'cleanest' rather than carbon emissions alone. Where non-hybrid or electric vehicles are purchased by car clubs the Mayor should use the funding lever to encourage the purchase of high efficiency petrol rather than diesel vehicles, as these are considerably better from an air quality perspective.

Recommendations
- That the Mayor leads further research to better quantify the air quality impacts of measures such as travel plans, car clubs and eco-driving.
- That the Mayor makes car club funding conditional on car clubs using 'clean' vehicles with a definition of 'clean' that covers both emissions of carbon dioxide and local air pollutants.

Policy 2 – Promoting Technological Change and Cleaner Vehicles
The Mayor's vision of cleaner, electric vehicles dominating in London is an admirable one, however he should not underestimate the challenge and likely timescales of affecting a major change in vehicle technology. We believe electric vehicles are likely to have a negligible effect along the timescales needed to ensure compliance with European air quality limit vales.

It is also important that the Mayor does not place all of his 'eggs' in one technological basket. Whilst the Mayor and the UK Government's enthusiasm for battery electric vehicles is commendable, their acceptability amongst the general public remains untested. Electric vehicles were initially popular at the dawn of motoring over 100 years ago, however eventually they lost out to internal combustion engine models due to their poor range and long charging time. Despite advances in technology these problems have not gone away, and the oft heard argument that electric vehicle technology is improving misses a rather crucial point – internal combustion engine technologies are also improving, and the electric car of 10 years time will have to compete against conventional vehicles that are cheaper, more fuel efficient, cleaner

and more comfortable than the vehicles of today. Without a major breakthrough in battery technology it is difficult to see why the mass market will embrace battery electric vehicles.

Whilst the research base on the technical capabilities of electric vehicles is improving, the research base into the public acceptability of electric vehicles is curiously slight. More research is needed to ascertain how the public perceives electric vehicles, and what financial, regulatory and other incentives will be needed for them to achieve mass market adoption. This research should also identify how adoption of electric vehicles can continue once the initial 'carrot' of Government purchase grants comes to an end – the market for LPG vehicles, which collapsed once Government conversion grants and fuel tax incentives were removed, provides a salutatory reminder of why this is important. Finally, identification of niche markets where electric vehicles can be adopted needs further work. Captive fleets and delivery vehicles may, for example, be suitable markets for electric vehicles, however the package of incentives needed to kick start these markets may be very different from those aimed at the mass market. Niche markets also represent low cost opportunity to introduce electric vehicles, for example delivery vehicles are likely to return to base to recharge, and would therefore not need the introduction of costly on-street charging facilities.

We're pleased to see the Mayor's support for further vehicle scrappage schemes (that would benefit air quality), and further development of the Euro standards that would provide better 'real world' emissions performance.

Recommendations

- That the Mayor, working with Government if necessary, commissions further research on the financial and regulatory incentives needed to make electric vehicles acceptable for the mass market, and also identifies niche markets where early introduction of electric vehicles may be possible.

Policy 3 – Targeting Air Quality Hotspots Through a Package of Localised Measures

We're pleased to see more detail in the draft Strategy on both the areas where localised measures will be applied, and what the actual measures will be. Measures such as power washing streets and applying dust suppressants have been used in other EU cities with some success.

However, it is very difficult to comment on these measures without seeing research and modelling of their impacts, and any effects they might have on areas outside the targeted locality. When changes to bus routes, roads and signal timings are put in place there is a risk that emissions may simply displaced to other parts of London, and in the case of 'no safe threshold' pollutants such as particulates the overall health impact on the public may be neutral.

We very much welcome the Mayor's continued opposition to a third runway at Heathrow, and agree that the environmental impacts of this would be unacceptable. We do, however, continue to oppose the Mayor's proposals to scrap the Congestion Charge Western Extension. The congestion charge has been a successful tool for reducing the amount of traffic in the affected areas, and has also helped to drive the accelerated adoption of alternative fuel vehicles. Removing part of the congestion charge zone will make the challenge of achieving air quality targets that much harder.

We have also reacted with concern[1] to suggestions that the congestion charge is to be linked to vehicle CO_2 emissions, as linking charges to such a narrow metric can encourage dirtier, noisier diesel vehicles in the most congested areas of London.

Recommendations

- That the Mayor urgently reconsiders his decision to scrap the Congestion Charge Western Extension, and reviews his proposals to allow low CO_2 vehicles into the charging zone for free.

Policy 4 – Reducing Emissions From Particular Sources in the Public Transport Fleet

In many parts of London emissions from public transport dominate, and, as the strategy makes clear, it is therefore important to take actions to reduce emissions from this sector. Public transport is a sector where major changes can be effected through working with a relatively small number of operators and, in the Mayor's case, one where he has a direct control of much of the fleet through Transport for London. We have set out our thoughts on each of the transport sectors below.

Buses

Changes in bus technology and retrofitting of the existing fleet are, as identified, key to cleaning up the sector. We feel however that the Mayor has missed one particular cost effective technology that could assist here – gas (compressed natural gas or biomethane) buses. Unlike diesel (even hybrids) gas buses are an inherently clean technology, and tailpipe emissions of both particulate and NO_x are very low[2]. Importantly, the 'real world' NO_x performance of CNG buses is very good, whilst the evidence for modern diesel buses having relatively poor 'real world' NO_x performance continues to grow. Gas buses can be run on biomethane – natural gas produced from the decomposition of organic waste. Using biomethane can also enormously reduce emissions of CO_2. Many cities across the world use gas buses successfully, and several use biomethane. We note that biomethane is now mentioned in the strategy document, tucked away in box 15 on page 112, however it is surprising that London has not considered this technology further, especially considering how some other technologies mentioned within the draft Strategy and also the Mayor's Draft Transport Strategy (for example fuel cells) are far from commercialisation, meaning an interim technology is needed.

The Mayor's new proposed new 'bus for London' is an exciting prospect, however we are unclear as to whether the bus will simply meet the relevant Euro standard (for air quality) or whether the intention is to significantly exceed it. We urge the Mayor to ensure that the new bus is significantly cleaner than the required Euro standard, and also, as detailed above, ensure that fuels other than diesel are fully investigated for the new bus.

We support the retrofitting of older buses to higher Euro standards, but feel the Euro IV standard and 2015 timeline suggested is under-ambitious considering the pressing need to meet EU air quality limit values. Considering that the 'real world' performance of Euro V compliant vehicles is currently under some scrutiny, the retrofit of buses to higher standards gives an opportunity for TfL to work with retrofit emissions abatement equipment suppliers to develop solutions that will provide the highest reasonable standard of 'real world' performance that can be cost effectively achieved.

[1] Please see our separate response to the Mayor's proposals for congestion charging
[2] See www.biogasmax.eu/media/5t4_manuel_lage__073402300_0657_30092009.pdf

Taxis and PHVs
The Mayor's Taxi Emission Strategy was a pioneering document, and we fully support efforts to strengthen it. It is encouraging to see that the minimum Euro standards for new taxis entering the fleet and the maximum age of taxis have been toughened up over the previous draft of the Strategy. We would question, however, why the standards for Taxis and PHVs are not aligned, with PHVs earmarked for a slacker Euro 4 standard for new PHV entering the fleet, yet a 10 year age limit introduced earlier than for taxis.

Rail
Railway locomotives represent some of the oldest, most polluting diesel vehicles accessing central London, and whilst it is encouraging to see the Mayor recognise this in the draft strategy, more needs to be done to kerb emissions from this sector. Electrification is a key long term strategy for reducing emissions, and also has many other benefits in term of running cost and reliability. The Mayor now has direct control of the London Overground services, and can influence other train operators in London. The Mayor should work with Network Rail to ensure all opportunities to electrify London's remaining diesel lines are taken.

Electrification represents the best way to reduce emissions from the railway sector over the medium to long term. In the shorter term air quality improvements can be secured by deploying newer, or re-engined, diesel trains on non-electrified routes. In recent years First Great Western installed new engines in their the High Speed Train fleet operating from London Paddington, and we understand that this delivered significant fuel savings as well as emission improvement in the region of[3]:

- Carbon monoxide (CO): 64% reduction
- Nitrogen oxides (NO_x): 20% reduction
- Hydrocarbons (HC): 46% reduction
- Smoke: Virtually no visible smoke
- Particulates: 16 > 75% reduction

The structure of the railway network, where train operating companies rarely own their engines, creates problems of split responsibilities in these kind of projects, however the Mayor, together with the UK Government, could usefully intervene to ensure that opportunities to use cleaner diesel trains were taken.

Recommendations

- That the Mayor instructs Transport for London to investigate CNG/ biomethane buses as a suitable bridging technology to a future commercialisation of fuel cell vehicles.
- That older buses are retrofitted to the highest standard that can be cost effectively achieved (rather than simply Euro IV), with a focus on 'real world' performance.
- That taxi and PHV standards are aligned, with a minimum Euro 5 for new vehicles entering the fleets after 2012 and a rolling ten year age limit from 2012.
- That the Mayor uses his position of influence to ensure that as many railway lines using diesel trains as possible are electrified, and also for train operating companies on non-electrified lines to use cleaner diesel trains.

[3] Source - First Great Western. Some figures available at www.firstgreatwestern.co.uk/NewsItem.aspx?id=438, others were provided in a presentation by FGW's contractor

Policy 5 – Emissions Control Schemes

Low Emission Zones (LEZs) are a crucial tool for improving air quality and, along with incentives for cleaner vehicles and retrofit of older ones, LEZs are the main proven, practical means for meeting EU limit values. The London LEZ was a pioneering and successful scheme, however we believe that a number of 'inner' LEZs with more demanding standards are now necessary if London is to stand any hope of complying with the EU limit values for NO_2. Experience from Europe, particularly Germany, demonstrates some innovative, low cost methods for how these inner LEZs may be implemented[4].

Unfortunately the actions listed under this policy in the document show only partial support for the strengthening of the LEZ system. We have previously voiced our disappointment about the Mayor's decision to delay or scrap phase 3 of the existing LEZ. The delay in implementation confirmed in this draft Strategy is a major disappointment, and will have a significant negative impact on public health and compliance with EU limit values. In order to play a full part in helping to meet the PM_{10} daily limit value (by 2011) Phase 3 needs to be in place, at the very latest, by June 2011.

The Mayor's proposals to introduce a NO_X standard for the London Low Emission zone is very welcome, as is his support for a national certification and testing scheme for NO_x retrofit equipment and a national LEZ framework. London is perhaps the only city in the UK with the size and status to lead these very necessary actions, and leadership from the Mayor, including pressure on the UK Government, would be a great assistance here.

As we outlined above, we believe that additional inner Low Emission Zones will be needed to effectively tackle London's air quality problems, perhaps based on a simple, low cost model such as the German example. We are therefore disappointed that there are only weak commitments within the strategy to the concept of inner LEZs, with the decisions being pushed into the future and largely delegated to the London Boroughs. If we are to have any hope of meeting EU limit values preliminary actions to establishing inner LEZs are needed now, and the Mayor must take a strong lead, as was the case with the current London wide LEZ. The establishment of inner LEZs is not at all suited to the London Boroughs – the likely shape of inner LEZs will range across Borough boundaries, and a piecemeal approach is likely to lead to a fragmented, chaotic regime that will greatly hamper compliance.

Looking to the future London will need to comply with European $PM_{2.5}$ limit values by 2020, and also meet the target for 'exposure reduction'. The existing PM_{10} LEZ represents one of the most effective means of reducing levels of both PM_{10} and $PM_{2.5}$, however in order for it to continue to have an impact the criteria need to be progressively strengthened. We therefore urge the Mayor to introduce a clear timetable for tightening the standards of the existing PM_{10} LEZ - leaving this until later in the decade will mean that many of the problems we currently face with compliance with PM_{10} and NO_2 Limit Values will simply be repeated, and the opportunity to improve the health of millions of Londoners will be missed.

Recommendations

- That the Mayor abandons his proposals to delay implementation of Phase 3 of the current LEZ.
- That the Mayor commits to leading the development of 'inner' LEZs, rather than devolving responsibility down to Borough level.

[4] See www. lowemissionzones.eu

- That the Mayor provides a timetable for tightening the criteria of the current PM_{10} LEZ.

Policy 6 – Air Quality Action Days and Special Measures
As the proposals in this section are still relatively undefined pending the outcome of TfL's feasibility study, we will reserve comment until more substantive plans are available.

Policy 7 – Reducing Emissions From Construction and Demolition Sites
The London Best Practice Guidance discussed in this section was a landmark document. We were heavily involved in the preparatory work for the guidance through the work of our PRECIS (Partnership in Reducing Emissions from Construction Industry Sites) group. Like the Mayor we are concerned that the BPG has not been fully implanted across London, and we commend these suggestions to speed its implementation, and develop the guidance further in coming years. We were appalled that the Olympic Delivery Authority did not commit to using the guidance, which greatly undermines their claims to be hosting the 'greenest ever games'. The Mayor should place pressure on the ODA to start implementing the guidance in their plans as soon as possible as there will still be significant impacts from construction activities, and also demolition following the games.

One approach that the Mayor should consider is a 'low emission zone' style concept for implementation of the BPG. This would allow demanding standards for emissions from construction and demolition to be set where air quality was poor, and less demanding standards in locations were air quality was less of a concern.

The retrofit of exhaust abatement equipment to non-road mobile machinery has been something of a stumbling block to fuller roll out of the BPG, however we understand that these pressures are starting to ease with the greater availability of ultra low sulphur fuels and product advances from the emissions abatement industry. We look forward to seeing the results of the field trials highlighted in the draft Strategy.

Recommendations
- That the Mayor places pressure on the Olympic Delivery Authority to urgently adopt the London Best Practice Guidance for Construction and Demolition for works proceeding and following the 2012 Olympic Games.
- That the Mayor investigates the feasibility of a 'low emission zone' style approach to construction and demolition emissions.

Policy 8 – Better Use of the Planning Process
The work of the Low Emission Strategies (LES) Partnership[5], and pioneering local authorities such as the London Borough of Greenwich, has helped to demonstrate how new development and work to improve air quality can be combined. It is encouraging to see the Mayor pick up these concepts and aim to spread their use across London.

We have undertaken a significant amount of work on the air quality impacts of biomass combustion over the past two years, and have produced guidance for local

[5] See - www.lowemissionstrategies.org

authorities in partnership with LACORS[6]. The new proposals in the draft Strategy are sound, and ones that are likely to be picked up by local authorities outside of London. There is still however a significant policy tension between local renewable energy targets (or 'Merton Rules') and restrictions on biomass on air quality grounds. Biomass is often one of the few suitable technologies for space constrained city development sites. Local authorities currently have no tools for directing renewable energy provision 'off site', or pooling developer contributions to fund large renewable energy installations.

The UK Government's Renewable Heat Incentive is likely to entrench this situation by making biomass heat more economically attractive, and even with the conditions set in the draft Strategy this will send air quality in the wrong direction. Further thought is needed on how planning policy and funding structures such as the Community Infrastructure Levy can be used to encourage larger biomass installations on the less polluted suburban fringe rather than smaller city centre installations

Finally we have informed the Mayor's team that our well used guidance document 'Development Control: Planning for Air Quality' has now been updated for 2010[7], and we hope that this will be of use in the development of the checklist and SPD templates mentioned in the draft Strategy.

Recommendations

- That the Mayor together with the London Boroughs and the UK Government urgently investigates and implements suitable planning conditions to encourage larger biomass boilers in less polluted locations, and discourage the installation of numerous small biomass boilers in city centre locations.
- That the Mayor uses of the 2010 update of 'Development Control: Planning for Air Quality' when developing planning documents.

Policy 9 – Energy Efficient Buildings

Energy efficiency is an intelligent choice for both improving air quality and reducing greenhouse gas emissions. We fully support the actions laid out in this section. In common with the Mayor, we were pleased to see the introduction of a boiler scrappage scheme – since high efficiency boilers became mandatory under building regulations there have been few incentive schemes available to replace old gas boilers with new ones, despite the considerable CO_2 and NO_x benefits available through bringing forward the replacement of these boilers. In common with the Mayor we would like to see this scheme extended and also developed to cover commercial boilers.

The Mayor's commitment to providing 25% of London's energy supply through decentralised energy is laudable, however the research base on what impact this will have on air quality is far from complete, as the draft Strategy suggests. In principal CHP brings further combustion of fossil (and renewable) fuels into urban areas when compared to existing decentralised systems. More research and guidance is needed in this area to allow CHP to be delivered in a way which minimises any potential air quality impacts.

Recommendations

[6] Biomass and Air Quality Guidance for Local Authorities (England and Wales), see www.environmental-protection.org.uk/biomass/

[7] See www.environmental-protection.org.uk/aqplanning/

- That the Mayor, together with the UK Government, supports research and guidance on the air quality impacts of CHP, and implements its recommendations.

Policy 10 – A Less Polluted Public Realm

We strongly support actions to create a greener city, however the air quality benefits of planting vegetation remain unclear. Projects such as the Dutch IPL[8] study are helping to improve our knowledge here, but it is unlikely that vegetation will make a significant impact on air quality within the timescales for compliance with EU limit values. Green spaces do, however, provide vital public amenity and can also act as a buffer zone, separating people from sources of air pollution. We therefore strongly urge the Mayor to protect and enhance London's parks and other open spaces. Environmental Protection UK will soon be publishing a 'Quietening Open Spaces' report aimed at London, and we hope that this will be of assistance in providing high quality, quiet and tranquil open spaces in London.

Waste burning causes air pollution as well as nuisance issues; bonfires and associated issues are one of the main themes of enquires from the general public to Environmental Protection UK. Greater powers for local authorities to restrict the burning of waste are to be supported – we would also raise the issue of people burning waste in internal fireplaces and wood burning stoves, this is largely a matter of education, awareness and enforcement that we will return to in Policy 12.

We strongly support the Mayor's proposals to educate homeowners about the legal use of fireplaces and wood burning stoves. However, in addition to encouraging compliance with legal standards it would be useful for the Mayor to develop a position on how 'green' technologies are promoted across the GLA's environmental functions. For example biomass stoves are more suitable for less polluted suburban areas, whilst in city centre locations the direct and indirect (from fuel deliveries and ash disposal) air quality impacts make wood burning a less suitable technology. It would be useful for these wider considerations to be integrated into the promotion of low carbon technologies, rather than just considered in separate leaflets and sections of websites.

Recommendations

- That the Mayor develops and implements a common GLA position on the appropriate use of low carbon technologies such as wood burning.

Policy 11 – Encouraging Innovation

London has previously been a centre of innovation for action on air quality, and has acted to disseminate best practice to the rest of the UK and beyond. As the UK's largest city, and the city that suffers the UK's worst air quality problems, it is essential that London continues to act in this role. The Mayor's support for innovation is therefore very welcome.

The language in this section of the strategy is, however, vague and weak. On page 110 the Mayor will 'seek to ensure' that the LAEI and air quality monitoring networks are maintained and enhanced rather than 'ensure', whilst the proposal in the previous draft that the Mayor will 'consider the creation of an air quality innovation fund' appears to have been dropped. We hope that greater commitment is provided in the final version of the Strategy.

[8] See - www.ipl-airquality.nl

Many proposals in the Strategy document are, however, innovative, and Environmental Protection UK would like to help document the impacts and promote the outcomes of these measures through channels such as our newsletters, and national and divisional events.

Policy 12 – Raising Public Awareness and Encouraging Behavioural Change
Raising public awareness is a key area of work, both to engage the public with the air quality issue and also to justify the physical measures that are implemented. This is particularly necessary at the current point in time, as the public perception of environment is increasingly focused on climate change. The issue of broader environmental impacts needs to be communicated in a way that does not dilute the importance of climate change.

The new central information website mentioned in the strategy is a welcome development, however it would be useful to tie this in to existing websites covering air quality in London (such as www.londonair.org.uk and www.airtext.info) to ensure that it does not simply cover the same ground as existing web resources. It is very good to see that the Mayor will be taking a lead on communicating the health impacts of poor air quality to London residents – health is the primary reason for acting on poor air quality, and a better public understanding of the impacts of poor air quality on their health can be a leading catalyst for action as well as helping people to manage their exposure to polluted air.

The airTEXT scheme in London has been a tremendous success – although this is not a service that actively improves air quality, it has been an innovative tool to help vulnerable individuals manage their exposure to polluted air. The aim of achieving 250,000 subscribers is a very laudable one, however at this level the costs of running the scheme will significantly increase and the Mayor and his partners need to ensure that the scheme is adequately resourced.

Policy 13 – Working With Central Government
This section effectively sets out the Mayor's 'ask' of the UK Government, setting out what is needed at a national level to improve air quality. This is a very useful section, and will help other local authorities and groups such as Environmental Protection UK to align their own asks of central Government with those of London, increasing the pressure to act.

Policy 14 – Working With Boroughs
As this section identifies, the role of London's Boroughs in improving air quality is crucial. The Mayor's leadership role in co-ordinating and assisting the role of the Boroughs is a very important one, and the Mayor needs to take a leading role in the development of measures such as 'inner' LEZs rather than leaving the establishment of these purely to the Boroughs.

Policy 15 – Monitoring Progress and Reporting
Clear progress reporting is an essential tool for ensuring that measures taken are effective, and to identify any need for further actions. In addition to the London Atmospheric Emissions Inventory, accountability studies of key measures taken in the Strategy would be very useful to ensure that actions taken are effective, and to help other cities in the UK and beyond to learn from London's lead.

Recommendations

- That annual progress reports include studies of the individual impacts of key measures.

4 - Contact Us

If you require any further information on the views expressed in this response please contact:

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