

Response to the draft Clean Air Strategy 2018

August 2018

ABOUT US

Collectively, we represent each of the Business Improvement Districts (BIDs) in the City of Westminster through our seven constituent organisations:

- Baker Street Quarter Partnership
- Heart of London Business Alliance
- Marble Arch Partnership
- New West End Company
- The Northbank
- PaddingtonNow
- Victoria BID

Our BID areas cover a significant proportion of London's Central Activities Zone and make a larger contribution to the UK economy than Wales. They encompass a huge range of sectors and attract millions of visitors. Our organisations represent both businesses and property-owners in Westminster, all of whom share a common interest in the capital's future and prosperity.

On behalf of our members, we are making a joint response to the draft Clean Air Strategy 2018.

SUBMISSION

Air quality is a serious reputational threat to London. The underlying improvements of recent years are tempered by increasing awareness of the consequences of poor air quality on public health and the existence of pollution hotspots. We welcome the evolution in the government's approach over the last year, which has improved the synergy with the Mayor of London's own strategy, although some questions remain about how they will interact. The inclusion of measures on non-road mobile machinery, red diesel and waterway-based emissions are all positive, as is the government's willingness to legislate.

We also welcome the work already completed on tackling roadside nitrogen dioxide concentrations, and await with interest the Road to Zero strategy on reducing exhaust emissions. Likewise, given London's unique exposure to emissions from aircraft, we hope to see air quality addressed properly in the forthcoming Aviation Strategy, while recognising the constraints imposed by international agreements.

Whilst we broadly welcome the draft strategy we are concerned that there is a lack of funding commitment as part of it. We hope this will be addressed as the strategy is developed and implemented.

Air quality monitoring

We support DEFRA's move to look at utilising citizen science; this would be a valuable additional dataset in the debate. DEFRA's consultation document notes that, 'these different data sources require careful interpretation due to variability in data quality, location and technology type' (p18). To increase efficiency and reduce time required to interpret the data, the key issue will be calibration to ensure consistency; this is likely to be challenging and the additional data set is therefore likely to be supporting evidence rather than primary. We therefore support moves to provide a calibration standard for citizen science equipment.

It is unclear how the measures on enhanced air quality monitoring relate to the London Atmospheric Emissions Inventory and the LLAQM (London Local Air Quality Management) framework. There is a danger of conflicting with existing GLA schemes, when it makes obvious sense for systems to be combined to avoid confusion and improve efficiency.

For example, would the personal air quality messaging system provide an alternative to the airTEXT service, or replace it? Any new service should seek to enhance existing options, without unnecessary duplication. In the same way, work with media outlets to improve public access to the air quality forecast should seek to build on the Mayor of London's own work with King's College London. Conflicting alerts or warnings would, at minimum, be counterproductive. In this context it would be valuable to have a full review of the alert systems in place and those proposed to ensure that there is one efficient, simple and cost effective mechanism in place.

Vehicle and domestic emissions

The measures outlined are all welcome, although may not go far enough. The recognition of microplastic particles as an additional concern about Particulate matter (PM) is a good evolution in policy, but new international standards on tyres and brakes would take many years to have a direct impact. Where the government could act sooner (e.g. regarding the microplastic content of road paint) we urge it to do so.

Our major concern is the absence from the draft strategy of boiler and vehicle scrappage schemes, with no mention of any scrappage or retrofitting programmes. Unless schemes of this kind are funded centrally, ambitious air quality targets are unlikely to be met. The lack of a diesel scrappage scheme would also exacerbate challenges around the implementation of the Mayor of London's Ultra Low Emissions Zone. We note that the Road to Zero strategy is imminent and hope that this will be used to address vehicle scrappage.

We welcomed the Mayor's Transport Strategy's commitment to increasing the number of rapid and non-rapid charging points in London. The Mayor however only has control of 5% of London's roads. Without a

sizeable increase in the number of charging points, consumers will continue to suffer from 'range anxiety' and the uptake of electric vehicles will be suppressed. We would urge DEFRA to make support for additional charging points across London boroughs a priority to reduce air pollution.

A key contributor to vehicle emissions in London is waste and freight collections and deliveries. Many of our BID areas are successfully trialing freight and waste consolidation schemes to reduce the frequency of journeys in Central London, and make those journeys that take place more sustainable. However, we are only able to consolidate on a small scale. There is a lack of support for these schemes on a national level. We know from our experience and research that many businesses are open to taking part in consolidation schemes, and the seismic impact that this can have on air quality. We ask for national support to produce larger scale schemes over a three year trial period to get the programme set up, working efficiently and get businesses involved. It is crucial to have this time period as businesses will not be enticed by short term or under-resourced projects.

If fewer people take vehicle journeys, there will be fewer emissions. We support the Mayor's Healthy Streets for London initiative to encourage walking and cycling over vehicular journeys. We believe that this would be further strengthened with greater publicity of walking and cycling routes throughout London, focusing on journeys through waterways and green spaces. This approach should be combined with an encouragement for local authorities to add greater protections to their green spaces, such as designating sites as Metropolitan Open Land. This will further support sustainable travel whilst protecting valuable clean air spaces.

New local powers

As the draft strategy notes, non-road mobile machinery accounts for 7% of NO_x emissions in London. We strongly support new powers to impose minimum emission standards, although the GLA should set the standards for London as part of its overarching strategy, not local authorities. Councils remain the most appropriate body to enforce standards and undertake compliance checks. We also support a clear emissions labelling scheme for non-road mobile machinery so that consumers know the emissions of the machinery they are purchasing/renting.

We welcome the commitments in the consultation document for a cross-departmental review of biomass's role in future policy, as well as the Government's review of fuel duty rates on diesel to reflect their impact on air quality. We would look to also include a review of Combined Heat and Power systems in this assessment.

As wood-burning accounts for around 30% of the PM_{2.5} produced in London, we welcome any new powers to control domestic fires and stoves, which should apply across the capital. Again, the ability to set standards should rest with the Mayor of London, including the power to designate 'no burn days' and 'no test days' for backup generators. Consideration should also be given to a new power for a complete ban on domestic burning in London, as part of the new statutory framework for Clean Air Zones. Tougher product standards on solid-fuel suppliers need to apply nationally.

Air pollution hotspots are better addressed by local authorities. The powers for local Clean Air Zones should therefore be given to London's boroughs, within a wider framework for transparency and standards. We urge the government to note the unique circumstances that apply in London, given its size

and devolved functions, and strengthen the links between different parts of the system, promoting measurable outcomes.

Conclusion

As Business Improvement Districts, we know there is a significant role for businesses to play in improving air quality. This role is underexplored in the strategy, although it does feature in other, complementary aspects of the government's approach. From our own experience in central London, freight consolidation is one of the most important potential contributions, and we hope the government will do more to make ambitious consolidation schemes possible.

We broadly welcome the draft strategy, subject to the concerns raised above. Perhaps inevitably, the largest omission in the government's approach concerns funding. Where enforcement of standards falls to local authorities, there needs to be adequate, hypothecated resource available for this to happen, given the wider financial pressures under which they are operating. We hope this will be addressed as the strategy is developed and implemented.

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