

CIEH Position Statement

Improving local air quality

Background

Public and political focus on local air quality has increased in recent years, spurred by the publication of epidemiological estimates of the mortality burdens of fine particles nationally¹ and in each local authority area² and, especially, in London³. A similar estimate was recently attempted for the first time for NO₂⁴, the other main pollutant of concern, in London. Work is continuing by COMEAP to quantify the wider geographic association of mortality and long-term average concentrations of NO₂⁵.

Adding to the awareness generated, in 2014, the European Court of Justice ruled that the Supreme Court had authority to ensure that the UK Government complied with EU air quality limit values in respect of NO₂ in certain geographical zones. Subsequently, Defra was ordered to bring forward new, compliant air quality plans for those zones by the end of 2015⁶ which, following a series of related consultations from the department⁷ including drafts of those plans, it did⁸.

Meanwhile, air quality has also been a debating point in early hustings for this year's Mayoral election in London and Mayor Johnson has released his own draft of a plan⁹ intended to take effect in London in place of Defra's.

¹ *The Mortality Effects of Long-Term Exposure to Particulate Air Pollution in the United Kingdom*, Health Protection Agency, London, 2010 at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/304641/COMEAP_mortality_effects_of_long_term_exposure.pdf

² *Estimating Local Mortality Burdens associated with Particulate Air Pollution*, Public Health England, Chilton, 2014 at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf

³ *Understanding the Health Impacts of Air Pollution in London*, Kings College London, 2015 at:

http://www.london.gov.uk/sites/default/files/HIAinLondon_KingsReport_14072015_final.pdf

⁴ *ibid*

⁵ See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/485373/COMEAP_NO2_Mortality_Interim_Statement.pdf

⁶ *R. (on the application of Clientearth) v Secretary of State for the Environment, Food and Rural Affairs* [2015] UKSC 28

⁷ Including *Review of Local Air Quality in England*, Defra, London, 2013 at:

https://consult.defra.gov.uk/communications/https-consult-defra-gov-uk-laqm_review and *Review of LAQM: consultation on regulatory and guidance changes*, Defra, London, 2014 at:

<https://consult.defra.gov.uk/communications/laqm-review-next-steps/>

⁸ See <https://www.gov.uk/government/publications/air-quality-in-the-uk-plan-to-reduce-nitrogen-dioxide-emissions>

⁹ *Draft London Local Air Quality Management Framework*, Greater London Authority, London, 2015 at:

https://www.london.gov.uk/sites/default/files/LAQM%20Framework%20Summary%20and%20Consultation%20Questions_13th%20July_Final.pdf

Against this backdrop, the CIEH has adopted a series of recommended steps to bring cleaner air to the non-compliant zones and beyond which, drawing on our views over a number of years, conveniently provide the concise expression of our position on the improvement of local air quality below:

Europe-wide

- While the European Commission's proposal for a revised National Emission Ceilings Directive¹⁰ contains no new legally binding targets until 2030, we believe that **a new EU air quality package is needed containing stricter national emission targets** to restrict man-made pollution at source, reduce trans-boundary effects and deliver tangible improvements faster than those currently proposed.
- Though the European Commission has no current plans to revise the Ambient Air Quality Directive of 2008 despite the disparity between the limit values¹¹ in that and guidelines published by WHO (Euro) in 2005¹² and reviewed in 2013¹³, we believe that **stricter air quality objectives are needed for the longer-term**, taking account of evolving evidence of the adverse effects of pollutants on health.

Nationally

- **A new National Air Quality Strategy needs to be developed** drawing together the responsibilities of all the relevant government departments – Defra, DH, DfT and DECC - as well as local authorities at every tier, to replace the strategy adopted in 2007¹⁴ and which has proved insufficient.
- Focussing on the transport sector, **additional tools including changes to fuel and car taxation and the creation of more Low Emission Zones are needed to bring about a reduction in diesel pollution** where, encouraged for their lower CO2 emissions, diesel-fuelled vehicles now comprise more than a third of the national fleet¹⁵ and, since 2010, have outsold petrol-fuelled versions. They nevertheless produce higher amounts of Nitrogen oxides and, especially, fine particles while abatement technologies have fallen short of promised performance.

¹⁰ At: http://eur-lex.europa.eu/resource.html?uri=cellar:5fbb1091-77a9-11e3-b889-01aa75ed71a1.0021.04/DOC_1&format=PDF

¹¹ Directive 2008/50/EC on ambient air quality and cleaner air for Europe at: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2008:152:0001:0044:en:PDF>

¹² WHO Air quality guidelines for particulate matter, ozone, nitrogen dioxide and sulfur dioxide - Global update 2005, WHO (Euro), Copenhagen, 2005 at: http://www.euro.who.int/__data/assets/pdf_file/0005/78638/E90038.pdf?ua=1

¹³ Review of evidence on health aspects of air pollution – REVIHAAP Project, WHO (Euro), Copenhagen, 2013 at: http://www.euro.who.int/__data/assets/pdf_file/0004/193108/REVIHAAP-Final-technical-report-final-version.pdf?ua=1

¹⁴ The Air Quality Strategy for England, Scotland, Wales and N Ireland, Defra, London, 2007 at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf

¹⁵ Vehicle licensing statistics 2014, DfT, London 2015 at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/421337/vls-2014.pdf

Locally

- Diesel vehicles are not the whole problem though and, by a variety of measures appropriate to different localities, from improving perceived safety in urban streets to providing better rural bus services and from building dedicated city cycle routes to supporting village shops, and more, **a shift to more than the current 40% of local trips made by walking, cycling and public transport needs to be encouraged**, reducing overall levels of traffic, total emissions¹⁶, and bringing benefits from increased physical activity too.
- Even where air quality objectives are being met, **consideration should be given to controlling, mitigating and reducing airborne pollutants** through the use, for example, of planning powers, 'natural' means such as tree-planting, 'green walls' etc. and energy-efficiency programmes.
- To help people reduce their personal exposure and to encourage wider behaviour change, **better and more accurate public information on air pollution needs to be provided** and given both more general prominence through the mass media and, targeting the most vulnerable, issued through tailored channels such as SMS messaging¹⁷.
- Local authorities are key both to identifying the extent of poor air quality and to improving it but for them to continue to do that, **expert capacity needs to be retained**, reversing reductions in the monitoring infrastructure and in the expert personnel¹⁸ who interpret and apply the results to plan for better air quality.

Past and future activity

Past activity by the CIEH in this field has consisted of engagement with government, partner organisations and members through, for example, consultations, membership of IPCLAG, the Healthy Air Campaign, PHE's Air Pollution and Health Group and the Partnership for Active Travel, Transport and Health. That engagement will continue within our capacity to promote this position and, in particular, the role and capacity of our local authority members in this field whose support it also aims to encourage in their own work.

¹⁶ In 2013 approx 18% of PM10s and 1/3rd of NO_x emissions, most of which came from diesel vehicles, arose in the UK from road transport: Defra, 2014 at: http://naei.defra.gov.uk/overview/pollutants?pollutant_id=6

¹⁷ See eg airAlert run by Sussex AQ Partnership at: <https://www.airalert.info/Splash.aspx>

¹⁸ Respondents to the *Environmental Health Workforce Survey 2014/15*, CIEH, 2015 at: <http://www.cieh.org/Environmental-Health-Workforce-Survey-2014-15/> reported the service area most affected by budget cuts has been environmental protection and identified air quality in particular as an area of work 'at risk.'