

Department for Environment, Food and Rural Affairs
LAQM Review - Atmosphere and Industrial Emissions Team
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21 January 2016

Dear Madam / Sir

Healthy Air Campaign consultation response: Review of Local Air Quality Management: Changes to guidance and reporting

The Healthy Air Campaign is a broad coalition of health, transport and environmental organisations that support the need for urgent action to improve air quality. This is a joint response by the undersigned organisations representing shared concerns about the proposals contained in this consultation. Individual partners will make separate and detailed responses where appropriate.

Air pollution is the biggest mortality risk after smoking in the UK.¹ It contributes to the equivalent of tens of thousands of early deaths each year across the UK.² It reduces quality of life – in particular for children, older people and people made vulnerable by some chronic health conditions – and contributes to health inequalities. It also has a damaging effect on ecosystems and wildlife. Taking action on air pollution will not only deliver numerous health and wellbeing benefits but can form part of an holistic strategy to tackle climate change, due to the potential co-benefits for each from tackling the other.

Roles and responsibilities

All levels of government and public authorities need to work together and take more ambitious action to tackle air pollution. This is needed in order to comply with legal limits of air pollution in the shortest time possible. However, the UK Government should also move towards meeting the stricter World Health Organization guideline levels,³ as research shows that air pollution causes illness and death at levels well below current legal limits.^{4,5}

¹ PHE, 3 November 2015, Blog: [Understanding the impact of particulate air pollution](#)

² COMEAP, 2010, "The mortality effects of long-term exposure to particulate air pollution in the United Kingdom: A report by the Committee on the Medical Effects of Air Pollutants" and Defra, December 2015, "Improving air quality in the UK: Tackling nitrogen dioxide in our towns and cities. UK overview document"

³ WHO, 2014, Ambient (outdoor) air quality and health factsheet: <http://www.who.int/mediacentre/factsheets/fs313/en/>

⁴ WHO REVIHAAP study press release: http://europa.eu/rapid/press-release_IP-13-72_en.htm

As with the UK Government's new air quality plans for tackling nitrogen dioxide, we are concerned about the lack of clarity on the role of the national government in the Local Air Quality Management (LAQM) process. This is in terms of the scale of support and funding the UK Government will be providing to local authorities, as well as how the LAQM process will be monitored and enforced.

Streamlining

In principle, we welcome the aim of streamlining the LAQM process in order to help local authorities focus on taking action to improve air quality. However, this cannot come at the price of losing valuable information currently required from local authorities in their monitoring, assessment and reporting activities. There is still a risk that local air quality monitoring could be reduced and that any resource savings could be used for purposes other than to take action on air quality. This is worrying given the urgent need to minimise the impact of air pollution on people's health.

Public information

The Healthy Air Campaign has been calling for the provision of better public information on air pollution.⁶ We therefore support the idea of a public-facing executive summary to help increase the transparency and accessibility of local air quality issues. However, it is important to note that this information will only be of use if it is made publicly accessible and kept up-to-date by all local authorities, for example on their websites. Further impact would be achieved if this information was proactively disseminated to the general public.

One important element missing from the summary is local information on the health impacts. This is important to increase understanding of air pollution and can help in obtaining support for proposed measures. Public Health England already produces information on the mortality impacts of PM_{2.5} at a local authority level. We would welcome production of the same information for the other key pollutants, in particular nitrogen dioxide and ozone, as well as information on their morbidity impact. This information should then be presented in comparison to national and regional averages, as well as in relation to other public health risks, to illustrate the magnitude of the problem.

PM_{2.5}

We support efforts to bring control of PM_{2.5} into the LAQM process. PM_{2.5} is the most commonly used metric for assessing the chronic health impacts of exposure to air pollution, so its absence from the LAQM currently impedes action at the local authority level. Further, it is widely acknowledged that the current EU objectives for PM_{2.5} – particularly the limit value of 25µg/m³ – are wholly inadequate to protect human health, as has already been discussed.

We agree that imposing firm obligations on local authorities to achieve certain PM_{2.5} levels would be inappropriate given that many sources of PM_{2.5} are outside local authority control. However, there should be clear and legally binding obligations on local authorities to exercise powers they do have in such a way as to reduce emissions of and human exposure to PM_{2.5}. We are concerned that it is still unclear, as recognised in the impact assessment, whether the proposed guidance will lead to any additional action by local authorities.

⁵ Cesaroni et al, *BMJ* 2014;348:f7412 <http://www.bmj.com/content/348/bmj.f7412>

⁶ Healthy Air Campaign policy calls: <http://documents.clientearth.org/download/3763/>

In addition, it should be clear that such obligations apply to all local government functions, especially health, planning, public health and transport. Limiting the scope of the guidance to air quality functions will only hinder the development of the more cross-cutting approach this review aspires to improve.

Conclusion

Whilst the stated goals of the proposals set out in this consultation are to be applauded, they do not go far enough to ensure a clear and robust process is put in place to deliver much needed improvements to air quality at a local level. Streamlining the LAQM process to enable more action by local government and authorities should not allow for a loss in the quantity and quality of the monitoring, assessment and reporting requirements. Roles and responsibilities need to be strengthened with clear and legally binding obligations on all levels of government and related public authorities to reduce air pollution and the health impacts. In particular the UK Government needs to commit to providing the much needed resources, and in particular funding, to support local government and public authorities to take an ambitious and effective approach to reducing air pollution.

Please do not hesitate to contact us if you would like any further information on any of these points. We would be very happy to discuss this further and look forward to your response.

Yours faithfully,



Joint response by partners of the Healthy Air Campaign:

- British Heart Foundation
- Chartered Institute of Environmental Health
- Chartered Institution of Water and Environmental Management
- Clean Air in London
- ClientEarth
- CTC
- Environmental Protection UK
- Friends of the Earth
- Greenpeace UK
- Living Streets
- London Sustainability Exchange

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