

Joint Select Committee

Inquiry on Air Quality

London Borough of Southwark Written Submission

November 2017

Foreword

Poor air quality is one of the most immediate and pressing issues facing people in the UK, as it is in the London Borough of Southwark. Research has shown that poor air quality disproportionately affects the health outcomes of the very young, the elderly, the ill and the poor, and Southwark is working hard to improve the air quality in the borough.

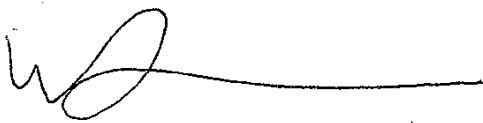
At a local level, the Council has worked hard to ensure that air quality is considered across all departments. This has meant linking up work in environmental health, public health, planning, highways, housing, finance and strategy. We recently updated our air quality strategy to acknowledge the urgent need to tackle the issue and it contains over 133 actions that Southwark Council will undertake to meet the challenge.

I welcome the Government's commitment to tackling this issue; however it is important to note that the Government's plans fall short of addressing the scale of the problem and delivering the most effective solutions in the quickest time possible. Air pollution is not just a local concern, but also a national one. Local authorities across the country are taking ambitious steps to tackle the issue, but there is a lack of national leadership on the issue. There is a distinct role for Government – to show leadership, highlight the most effective measures local authorities can take, and fund initiatives that ensure that no one is adversely affected by the necessary changes that are required to tackle this issue.

Further work also needs to be done to examine the issue on a cross-departmental basis. The work that has been done to link up the Department for Environment, Food and Rural Affairs and the Department for Transport is welcomed, but governmental plans to tackle air quality acutely lacks perspectives from health, taxation, construction and planning. Integrating these issues across the Government will help produce measures that are holistic and effective in tackling the issue.

We also need a new Clean Air Act that is fit for the 21st century and deals with the modern sources of pollution. Further funding is needed to support local authorities in tackling the issue at a local level. And finally, we need a national diesel scrappage fund that encourages increased uptake of low emission vehicles and ensures that no one is adversely impacted by the technology shift.

The Committees' work on this important issue is very timely and needed. Southwark Council would be delighted to meet with the Committees and share any further information that would help with their inquiries.



Cllr Maisie Anderson
Cabinet Member for Public Health & Social Regeneration

Executive Summary

1.1 The London of Borough of Southwark welcomes the opportunity to submit written evidence to the “Joint inquiry on Air Quality” on the following five key questions:

- How effectively do Government policies take into account the health and environmental impacts of poor air quality?
- Do these plans set out effective and proportionate measures to achieve necessary emissions reductions as quickly as possible?
- Are other nations or cities taking more effective action that the UK can learn from?
- Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?
- How can those charged with delivering national plans at local level be best supported and challenged?

1.2 We welcome the inquiry and note that it is unprecedented that four parliamentary committees (Environment Food and Rural Affairs, Environmental Audit, Health, and Transport Committees) are expressing their concerns regarding governmental inaction and lack of effective progress to improve air quality to date.

1.3 In our response Southwark Council is particularly keen to highlight that:

- The Government’s UK Air Quality Plan is not sufficient in addressing the scale of the challenge facing us.
- Several crucial policy areas are excluded from the Plan if we are to reduce air pollution in the quickest time possible. The UK needs a holistic and comprehensive package of actions and policies that work together across health, taxation, transportation, energy, planning and infrastructure development. This will bring air pollution down to satisfactory levels, instead of relying on individual policies of individual local authorities.
- Governmental plans merely show what local government could do and what has been done. There is a clear policy role for national government and there is a need for more concrete actions and targets from government to be included in the national UK Air Plan – the Government should lead by example.
- There is nothing new in the Plan to help the UK achieve compliance faster. The Government needs to produce a case and the resources for step change.
- There is clearly insufficient cross-government department collaboration to set in place effective fiscal and policy incentives.
- The last court judgement stated that bringing levels of air pollution down was so important that Government should disregard expense; however, the Plan considers options and repeatedly disregards them on the grounds of expense. If the best practical environmental option works it should be used. Resources must be invested nationally to achieve the required results in the shortest possible time.
- There is a further need to introduce a new Clean Air Act fit for the 21st century to deal with the modern sources of air pollution.

Question 1

How effectively do Government policies take into account the health and environmental impacts of poor air quality?

- 2.1 The Government policies do not effectively take into account the health and environmental impacts of poor air quality. The UK Air Quality Plan (the Plan), does not show that there is a holistic approach being implemented to improve the air quality as quickly as possible.
- 2.2 There is no clear overall environmental policy, instead there are individual strategies and policies which are sometimes working against each other. For example the introduction of grants to install biomass boilers, which was aimed to reduce the carbon emissions, but has caused local air pollution problems around some installed biomass boilers that have been given permission in unsuitable locations.
- 2.3 Southwark Council is taking a holistic approach to improving the air quality in the Borough - by revising our Air Quality Strategy and Action Plan and by including measures that fall within the remit of several departments such as Public Health, Transport and Planning. The Government should adopt a similar 'cross department' approach in order to ensure it can tackle poor air quality in the quickest time possible. For example, there is scope for the Treasury and the Department for Business, Energy and Industrial Strategy – and those corresponding Select Committees – to engage in this debate as there are key issues associated with funding and infrastructure which are left unanswered by the Plan.

Question 2

Do these plans set out effective and proportionate measures to achieve necessary emissions reductions as quickly as possible?

- 3.1 The governmental plans do not meet these criteria. The plans merely show what local government could do and what has been done. There is a clear policy role for national government and there is a need for more concrete actions and targets from government to be included in the national UK Air Plan – the Government should lead by example.
- 3.2 The latest version of the UK Air Plan is weaker than its predecessor and the consultation documents do not constitute an effective action plan to improve air quality. It is not strategic, nor does it demonstrate leadership. Illustratively, the Plan contains no national policy oversight and does not facilitate nor explain how pollution can be de-coupled from growth, which will be crucial to improving air quality across the country. The Plan is partial and narrow in focus; it considers traffic sources in some detail with very limited consideration of other significant policy areas or pollutant sources.
- 3.3 Government policy drivers are largely absent and those that are mentioned are not explored in detail. Fiscal incentives to drive the market for ultra-low emission vehicles are fundamental to delivering success within the terms of this narrowly focussed plan, but they are not sufficiently utilised or recognised in the Plan.
- 3.4 Ultimately, the Plan will not achieve air quality improvements in the quickest time possible, and we do not believe it will not satisfy the courts or legislative requirements, particularly as estimations show that London is not expected to reach full compliance with the air quality standard for NO₂ until around 2030.
- 3.5 Legal responsibility for compliance is also for national government, not merely local authorities (LAs). Government has made little, if any, progress in formulating a plan to protect the health and lives of the thousands of people adversely affected by poor air quality across the country.
- 3.6 There is nothing new in the Plan to help the UK achieve compliance faster. The Government needs to produce a case and the resources for step change. In terms of the public health deficit we cannot afford to wait for effective technological changes to motor vehicles. The lack of awareness by the Government of the time and effort that needs to be expended before road charging policies can be introduced is surprising and appears to be an attempt to obstruct and delay progress to achieving compliance.
- 3.7 The UK needs a holistic and comprehensive package of actions and policies that work together across health, taxation, transportation, energy, planning and infrastructure development. This will bring air pollution down to satisfactory levels, instead of relying on individual policies of individual local authorities.

- 3.8 The last court judgement stated that bringing levels of air pollution down was so important that Government should disregard expense; however, the Plan considers options and repeatedly disregards them on the grounds of expense. If the best practical environmental option works it should be used. Resources must be invested nationally to achieve the required results in the shortest possible time. It is noticed that the Plan requires LAs to provide evidence of a cost benefit analysis - however, it does not apply the principle to government itself.
- 3.9 Following all the delays and time spent on devising an updated UK Air Plan, LAs expected a more considered document. To implement the most efficient actions, LAs expect any finalised plan to contain a clear set of actions for central government, regional authorities and local government, with guidance on how and when to apply them. The government has not accepted that it must produce a sound central policy that makes several strands of policy work towards a coherent set of objectives, accompanied by a basket of measures applied to deliver maximum benefit. For example, there are no details of how it is intended that the Clean Air Acts should be revised and what powers and responsibilities they would likely contain.
- 3.10 It is accepted that traffic is the main source of emissions and that road transport is an integral part of the economy. Clearly the Government has struggled to devise an effective strategy. Much more could be done with simple regulation changes to control point sources, reduce congestion, consider infrastructure to encourage non-road freight movement by increased use of rail and waterways, and to encourage and enable the purchase of ultra-low emission vehicles.
- 3.11 The Plan is clearly affected by both political and financial considerations, both of which the court has deemed irrelevant. The Plan is not linked to health outcomes, only compliance. Despite reductions in smoking and the indoor smoking ban, respiratory health figures are remaining static because of the lack of improvement in out door air quality. Human health is the reason there are environmental standards, this cannot be ignored:
- Air pollution is 10th largest risk factor for mortality and ill-health in England.
 - Poor air quality cost the economy £2.7 billion in 2012.
 - Air pollution affects the health of approx. 9,500 Londoners/year and many more across the UK.
 - Exposure to high levels of air pollution causes:
 - Exacerbation of chronic respiratory conditions.
 - Asthma attacks.
 - An increase in emergency admissions.
 - Contributes to the initiation, progression and exacerbation of disease.
 - Causes a 6 month average reduction in life expectancy – the London average reduction in life expectancy will be much greater.
 - Research has shown that the fraction (%) of mortality attributable to long term exposure to PM_{2.5} in Southwark is 7.3%.
 - Number of deaths attributed to exposure to PM_{2.5} pollution in 2008 in the London Borough of Southwark has been calculated to be 136 deaths/year.

3.12 It is therefore disappointing that the Government has no plan for the reduction in the incidence of respiratory and lung disease within its proposals, which ought to be considered in conjunction with other measures to improve air quality.

Question 3

Are other nations or cities taking more effective action that the UK can learn from?

- 4.1 The causes of air pollution are complex. Historically legal controls focused on point sources and solid fuel. Now the Government is overly focussed on traffic. New York made significant improvements to local air quality by addressing point sources and minimising the use of fossil fuels in the urban area. The Plan should therefore also consider all atmospheric pollutant sources (transport, heating, energy, etc.) and all related policy areas (housing, health, planning, industrial strategy, energy strategy, air, rail and road strategies, etc.). By approaching the issue in that way, the Government can come up with a coherent, comprehensive, effectively funded plan in any revised document.

Question 4

Is there enough cross-government collaboration to set in place the right fiscal and policy incentives?

- 5.1 There is clearly insufficient cross-government department collaboration to set in place effective fiscal and policy incentives.
- 5.2 For example; it is only recently that Defra and DfT created a joint air quality unit. This unit should be expanded to include staff who are dealing with strategic and policy work on energy and health. The result of this is that many key areas are not acknowledged in the Plan. For instance, there is no mention of the challenges in respect of the lack of the appropriate infrastructure to enable the increase in low emission vehicle ownership. Appropriate planning guidance should be produced.
- 5.3 The fact that air pollution is mainly addressed through transport and environmental aspects means that the Plan does not provide a holistic picture of the challenge, excluding health implications and other efforts that are crucial in tackling air pollution. All these areas should come together in any relevant national strategy/s. In Southwark, the Council has taken a holistic approach to improving air quality in the Borough when we revised our Air Quality Strategy and Action Plan, where measures fall within the remit of several departments and encourage cross-departmental cooperation.

Question 5

How can those charged with delivering national plans at local level be best supported and challenged?

- 6.1 In London LAs local air quality has risen up the political agenda. We are looking to a wide range of services and teams to deliver real change. Guidance on how the government sees the management of cross-cutting air quality issues would be helpful to ensure some consistency of approach and effective coordination between different service areas undertaking delivery within an authority, between adjacent authorities and across regions.
- 6.2 If all duties as suggested in the Plan are to be enacted by LAs, more staff will be required as new duties cannot be absorbed into current resources. There will be a significant skills gap and education and training need, and this is not addressed. Further funding is required to achieve the Government's aim to improve the air quality in the shortest time possible.
- 6.3 The Government proposes local authorities make changes to planning policy and the development control system to deliver improved air quality in Opportunity Areas. However, due to the Government's recent de-regulation of the planning process, it will be difficult for LAs to achieve the improvements in the air quality needed in all the areas of the borough that will require it. Development standards need to be improved across the board, not just in Opportunity Areas.
- 6.4 Embedding local air quality improvement concerns across all council decisions and service areas will require changes to administrative systems and internal governance processes. Increased staff will be required across all relevant service areas to manage, implement and deliver compliant local air quality. It is very unlikely that an increased workload to improve local air quality could be sustained without further staff and/or budget resource.
- 6.5 Air pollution is a national problem; it is not prudent or sensible to make it the responsibility of local government without appropriate support and resources being put in place.
- 6.6 There is a further need to introduce a new Clean Air Act fit for the 21st century to deal with the modern sources of air pollution. The following topics should be included/addressed by any revised legislation:
- Address the anomalies within the current Clean Air Act to deal with the purchase of unauthorised fuels in Smoke Control Areas. The selling of unauthorised fuels in a Smoke Control Area should be banned and bonfires and chimneys as should also be included; not just smoke from 'chimneys'.
 - The introduction of a new testing regime for exempted fireplaces could include PM emission standards.
 - Lock-in the environmental standards for atmospheric pollutants and maintain the legal privileges to enable challenge.

- The introduction of real world NO_x / NO₂ emission tests within the MOT test.
- Explore the use of rolling roads to conduct the emissions section of the MOT test.
- The control of NRMM on construction sites by the introduction of emission standards - e.g. all NRMM to be required to meet Stage IV of the Directive as a minimum, in central London, by 2020.
- Consolidate the regulators on the River Thames to enable the greater use of waterways for logistics.
- Introduce a National Diesel Scrappage Fund, and reform VED to be directed towards Local Authorities. Restructure the way it is levied to make it possible to tackle air pollution by incentivising cleaner vehicles and invest VED revenue to improve air quality.