



LEDNet/ADPH London joint position statement on air quality targets, in response to Defra's environmental targets consultation

May 2022

Executive Summary

We welcome the fact that the UK government is reviewing national air quality targets with a view to strengthening them.

However, our professional recommendation is that the targets and timelines proposed in Defra's consultation are **not sufficiently ambitious or comprehensive** to drive the change we need in air quality, both to protect Londoners' health and support our climate ambitions.

We instead recommend that London authorities call for:

1. Instating a more ambitious overall target of 5 $\mu\text{g}/\text{m}^3$ for $\text{PM}_{2.5}$ by 2040
2. Bringing forwards the timescales for delivery, including an earlier target of reaching 10 $\mu\text{g}/\text{m}^3$ $\text{PM}_{2.5}$ by 2030
3. Introducing a NO_2 concentration reduction target of 10 $\mu\text{g}/\text{m}^3$ by 2040, with an earlier target of 30 $\mu\text{g}/\text{m}^3$ by 2030
4. A clear monitoring, assessment and compliance framework, with clearly defined responsibilities and accountabilities for national government and local authorities
5. Strong collaboration mechanisms between local and national governments, supported by relevant powers and resources for local government to deliver

This brief position paper summarises the environmental and public health rationale for these recommendations.

Section 1 covers our concerns around the targets, timescales and related outcomes for health and climate, which underpin recommendations 1-3.

Section 2 highlights some implications for London authorities around how these new targets are set, monitored and implemented. It therefore underpins recommendation 4-5, and highlights some further considerations we would call on Defra to consider as they finalise these targets and develop related implementation strategies.

1. Implications for London's Air: targets & timescales

Recommendation 1: A more ambitious overall PM_{2.5} target of 5µg/m³, in line with latest WHO guidelines

For health:

Latest World Health Organisation (WHO) guidelines recommend a PM_{2.5} target of 5µg/m³. WHO recommendations are clear that “no threshold has been identified below which no damage to health is observed” and that this target is therefore based on achieving the lowest concentrations of PM_{2.5} possible.

Poor air quality causes the premature deaths of approximately 4,000 Londoners each year, and nationally air pollution costs the NHS up to £3.7 billion annually.

For climate:

Air pollution emissions are a key contributor to climate change, and the largest emitter of PM_{2.5} (transport) is also a major contributor to emissions of CO₂ and greenhouse gases. Improving air quality will therefore deliver critical climate co-benefits and support delivery of the net zero targets set by London local authorities, the GLA and national government.

Defra's impact assessment indicates that 72% of the social value delivered by stronger air quality targets would stem from reduced greenhouse gas emissions and the associated contribution to climate goals, indicating just how closely these two agendas are intertwined.

To achieve real change:

The proposed target of 10µg/m³ for PM_{2.5} by 2030 does not represent a sufficient shift from business as usual.

The 2021 annual mean PM_{2.5} concentration measured at Euston Road (generally regarded as London's most polluted monitoring location) was 11µg/m³, indicating that a 10% reduction over 18 years would be sufficient to meet the new targets. This gives a good indication of how insufficiently ambitious the targets are to support the public health and environmental outcomes London needs.

The proposed target of 10µg/m³ PM_{2.5} by 2030 also arguably downgrades ambitions stated elsewhere in national government policy. Defra's own 2019 report on the UK Clean Air Strategy showed that PM_{2.5} concentrations of below 10µg/m³ are achievable for most areas of the UK by 2030 even under business-as-usual.

To support local authorities in meeting citizens' expectations and legal liabilities:

78% of Londoners think improving air quality should be a priority (London Councils, 2019) and we are increasingly seeing local authorities being held to account for air quality and environmental outcomes in their areas. We need a joined-up national regulatory framework, with appropriate powers and resources, to support local action on this.

The 2021 coroner's report after the death of Ella Adoo Kissi-Debrah highlighted the need for action by her home borough (Lewisham) and, by implication, all local authorities. In 2019 Client Earth wrote to 100 England authorities (including 11 London boroughs) highlighting the potential for legal action if their local plans did not set appropriate emissions targets.

As the climate emergency intensifies, there is an ethical, reputational, legal and financial risk to local government if we do not deliver continuous environmental improvements and contribute appropriately to international recommendations and frameworks. We can only do this if supported by appropriate national frameworks, including both appropriately ambitious targets and the powers and resources to deliver against them.

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Recommendation 2: More ambitious timescales, to reach 5µg/m³ PM_{2.5} by 2040 with an additional target of 10µg/m³ by 2030

To drive change now and in future:

We believe that any new target should drive further ambition and action in both the short and longer term. We therefore call for a more ambitious target for reaching 10µg/m³ by 2030, but also for retaining a longer-term target of 5µg/m³ by 2040, to bring us towards WHO guidelines on ambitious but deliverable timescales.

This target framework would support the immediate and sustained action required to drive the improvements we need for health and climate outcomes.

Recommendation 3: Inclusion of NO₂ targets within the new air quality legislation, bringing us towards WHO guidelines by 2040

To address the whole problem:

The two main air pollutants of concern from a health perspective are PM_{2.5} and NO₂. However, the Environment Act and current consultation only address PM_{2.5}.

WHO guidelines recommend a NO₂ limit of 10µg/m³, meaning that regardless of the level of ambition expressed in new PM_{2.5} targets the UK will retain a legal limit for NO₂ which is four times higher than the WHO guideline limit.

We would therefore recommend calling for a new ultimate NO₂ target for the UK to reach 10µg/m³ by 2040, again with an additional target of 30µg/m³ by 2030 to drive immediate and continued delivery.

Further considerations:

London's ambition:

Although London has the biggest air quality challenges in the UK, as London authority directors we have high collective ambitions to tackle this and reach the most ambitious possible targets, for all the reasons outlined above.

Defra's consultation documents include specific reference to London's air quality challenges, implying these are a reason not to set more stringent targets. However, we feel that WHO targets should be adopted for all residents in the UK, and the government should not to use current air quality levels in London and other big cities as a reason to set less ambitious targets for the UK as a whole.

2. Implications for London Authorities

Recommendation 4: A robust and fair monitoring, assessment and compliance framework including detail on specific accountabilities

To robustly support impact:

The Defra consultation documentation suggests that monitoring and enforcement of targets would be based on meeting the targets three years out of every four.

We believe that this allows for an unacceptably high threshold, where local communities could still be exposed to highly dangerous particulate matter on a semi-regular basis.

We would also like to see more details of how air quality will be assessed and monitored. There is a suggestion it will be based on models, which depending on the models used could again allow for high community exposure in areas where targets are technically met. It also opens up the possibility of responsible bodies being held to account for not meeting the targets according to a model rather than the reality on the ground.

To ensure clear accountabilities, responsibilities and enforcement:

It is not clear from the consultation documents how the new targets will be enforced, or which tier of government will be held accountable for performance against them. The consultation documents simply note that the role of local authorities “is being considered”. The consultation therefore asks us to comment on legal air quality targets without knowing who will be held accountable and how.

It is key that, as targets are fixed and implementation plans developed, the framework is clear which actors are ultimately accountable for performance against the targets.

Recommendation 5: Appropriate collaboration between local and national government, and sufficient powers and resources for local government to help deliver the change we need

To support effective collaboration:

Whatever the ultimate formal accountabilities for the targets, there will be key roles for national government, regional authorities, and local councils to each play in consistent delivery of air quality improvements.

It is therefore key that implementation of new targets is supported by a clear joined-up framework and a coordinated pathway towards delivering air quality improvements. Different local actors already collaborate on this across London (notably local authorities, GLA and TfL) but mechanisms for collaboration between local and national government are less clear. We would welcome more channels for collaborating with central government to map and deliver our pathway to the new targets.

Local authority powers and resources:

Again, wherever ultimate accountabilities sit, local authorities will have a critical role to play in delivery of local air quality improvements. It is therefore essential that we are equipped with the relevant levers, powers and resources to support meaningful air quality improvements. We would welcome the opportunity for local authorities to have further conversations with Defra about this and input into detailed proposals for powers and resources, as accountabilities for the new targets are fully defined and implementation plans are developed.