

WRITTEN EVIDENCE SUBMITTED BY THE CITY OF LONDON CORPORATION (EB15)

ENVIRONMENT BILL – PUBLIC BILL COMMITTEE SUBMISSION ON AIR QUALITY MEASURES

INTRODUCTION

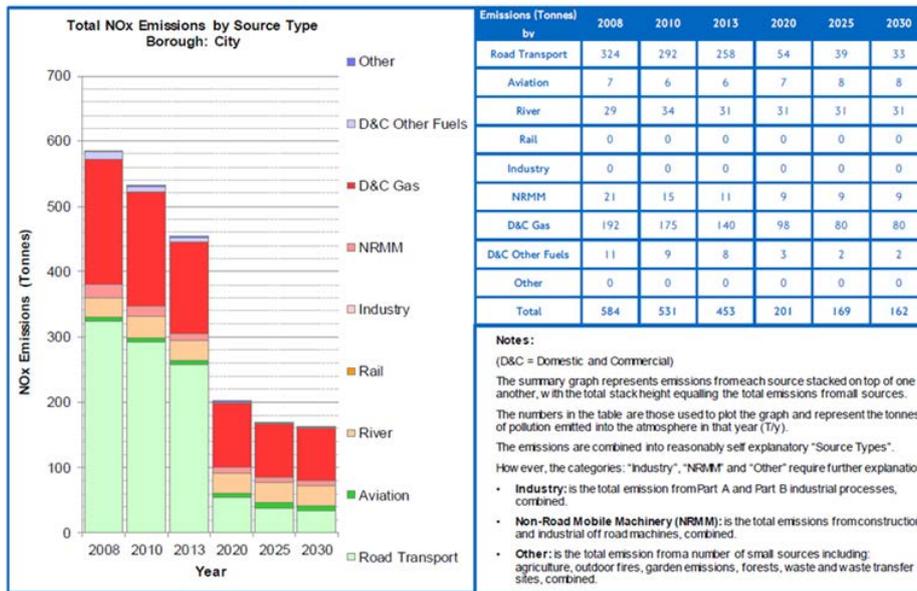
1. Like the central London boroughs which surround it, the City of London experiences higher than average levels of air pollution. Owing to its central London location and the density of development, poor air quality—and its attendant health risks—are serious issues for the City.
2. The Clean Air Act 1993, which has historically been used by local authorities to deal with sources of air pollution other than road traffic, is outdated, not fit for modern fuels and technologies, and offers very few powers to local authorities that are of practical use today.
3. While concentrations of nitrogen dioxide have been falling in the City in recent years, they remain over twice the annual average limit at busy roadsides. Standards for fine particles are also breached adjacent to busy roads in certain weather conditions. Air quality in the City should benefit from the Mayor of London's Ultra-Low Emission Zone and the wider package of measures being implemented by the Greater London Authority. It is likely, however, that concentrations of annual average nitrogen dioxide across the Square Mile will not meet the current limit value until beyond 2025 without significant additional intervention, such as further regulatory powers or targeted financial support.

LEVELS OF AIR POLLUTION IN THE CITY

4. The table below is taken from the Greater London Authority's Atmospheric Emissions Inventory 2016. It shows that from 2020 in the Square Mile, the percentage of NO_x pollution from non-road sources will be twice that from road sources. It does not appear that any of the measures in the Environment Bill will address the sources of non-road NO_x emissions within the Square Mile. This disparity will continue to grow and will be unabated by the Environment Bill. The City Corporation, therefore, believes that urgent powers targeted at non-road emissions are required.

London Atmospheric Emissions Inventory

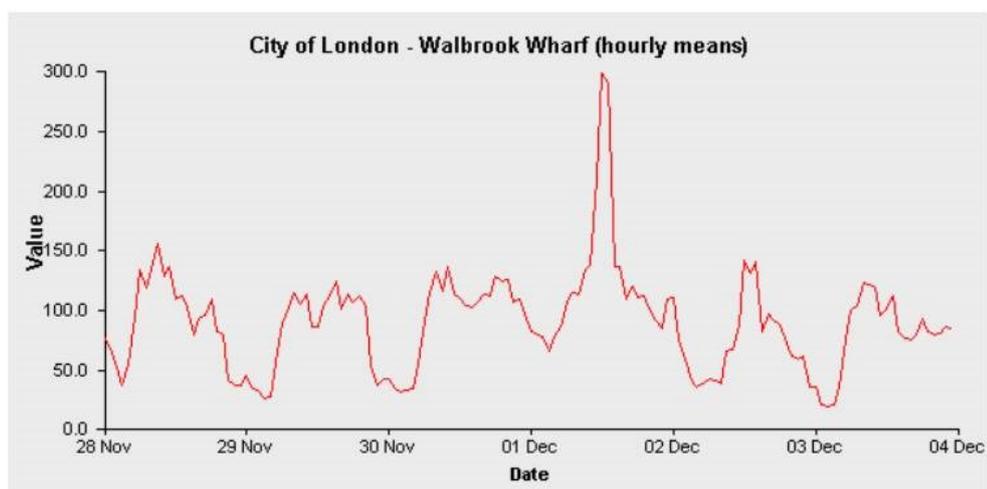
NOx Emissions - City of London



5. The table below breaks down the emissions from Non-Road Mobile Machinery, by sector, within the Square Mile (*Options to minimise emissions from non-transport sources in the City of London*, June 2018).

Summary of Emissions (2017) by Sector	NO _x (Kg)	PM (Kg)
NRMM (Construction)	38,594	924
NRMM (Events)	528	28
NRMM (Road Works)	Unknown	Unknown
CHP/Boilers	87,700	-

6. The graph below shows hourly average levels of nitrogen dioxide measured at a busy roadside in the City of London. The very large peak on 1st December 2018 was due to a small generator being used for road works. This demonstrates the need for clear, practical controls to deal with this source of air pollution.



7. Under the provisions of the Environment Bill, the current legal duty on local authorities to assist the Government in achieving air quality standards would become a duty to ensure that air quality standards are achieved and maintained. Owing to the City's location in the centre of London, without the support of neighbouring boroughs this may prove challenging. The City Corporation supports the devolution of responsibility to local authorities. The City Corporation believes, however, this should be accompanied by additional powers, which are necessary to enable local authorities to achieve the air quality standards, which they would have a statutory duty to achieve and maintain.

THE CITY CORPORATION'S APPROACH

8. This gap between responsibility and meaningful powers to control emissions is why the City Corporation and London Councils jointly supported the introduction of a Private Members Bill in the House of Lords on 13th January 2020 – the [Emissions Reduction \(Local Authorities in London\) Bill](#). This Bill would allow the capital's borough councils to designate 'Air Quality Improvement Areas' in the most polluted zones, where levels of air pollution exceed World Health Organisation air quality guidelines. As a consequence of the opt-in nature of the designation, this would provide a local democratic buy-in for the introduction of the controls and encourage public support for the measures.
9. The Bill would enable additional regulatory powers to control emissions from appliances such as gas and solid fuel boilers, combined heat and power plants, construction machinery and standby diesel generators, which did not meet strict nitrogen oxides (NOx) and particulate matter (PM) emissions standards set by the Secretary of State.
10. The City Corporation believes that the Emissions Reduction (Local Authorities in London) Bill provides an apt Bill to tackle pollution from non-road sources of emissions. As may be expected, it was drafted with a London, and in particular, a central London focus. The provisions, however, are capable of wider application.

ASSESSMENT OF THE ENVIRONMENT BILL

11. The air quality measures in the Environment Bill can be described as making small amendments to existing controls. The City Corporation believes that new bolder measures are required.

- 12.** The City Corporation has carried out monitoring and commissioned research, which shows that there can be a significant impact on local air quality from combustion plant. The City Corporation believes there is a need for emission controls on the operation of non-road mobile machinery and stationary generators in central London. Such bold new measures are absent from the Environment Bill.
- 13.** Air pollution plainly does not respect administrative boundaries and the City Corporation is, unable, therefore, to deliver sufficient improvements in local air quality without significant support from local, regional and national government. The City Corporation, therefore, welcomes the proposed duty in the Environment Bill for air quality partners, including the Mayor of London, to propose measures for inclusion in the action plan that they will take to contribute to achievement and maintenance of air quality standards.
- 14.** Domestic wood burning is not a direct contributory factor towards poor air quality within the Square Mile. It is, however, acknowledged that this is an issue elsewhere and has the potential to impact on background levels of air pollution. The City Corporation, therefore, supports the measure notwithstanding that this power is of no relevance to locally generated emissions. Additionally, the City Corporation supports the prohibition on the sale of controlled fuels within a smoke control area.
- 15.** Additionally, the City Corporation welcomes the introduction of civil penalty notices for breaches of smoke control ordinances and the ability to include inland waterway vessels within the ambit of smoke control areas, which is of relevance to City Corporation's role as the London Port Health Authority.
- 16.** Barring the enactment of the Emissions Reduction Bill, the City Corporation believes that measures to address pollution from NRMM and stationary and mobile generators should be included within the Environment Bill. The City Corporation in liaison with London Councils will seek to engage further on this matter.