



## ADPH London and LEDNet joint response to stage 3a of the Mayor's Air Quality Consultation

This is a joint response on behalf of the Association of Directors of Public Health (ADPH) for London, which represents Directors of Public Health in London local authorities, and London Environment Directors Network (LEDNet), which represents Directors of Environment in London local authorities.

Air pollution continues to impact negatively on the health of all the people of London, disproportionately affecting the most vulnerable and deprived within our communities. This burden is preventable, and urgent, far-reaching action is needed to have a meaningful impact on this important public health issue. We therefore welcome the Mayor's dedication to addressing air pollution within the capital and support ongoing efforts to raise the profile of the agenda at a regional and national level.

We strongly endorse instituting all proposed actions as early as possible while minimising exemptions and the length of time these exemptions are applicable. We welcome the inclusion of particulate matter (PM) emissions into the standards for diesel vehicles as, although London is currently compliant with legal limits for concentrations of PM emissions, of note, there are no safe limits of PM below which no adverse health effects would be expected to occur. We wish to highlight that the success of the proposed initiatives in helping to address air pollution is dependent upon the benefits gained from vehicles meeting higher EURO standards. However, there remains a disparity between the levels measured in the laboratory versus real-life settings.

We are aware that the final stage of the Mayor's Air Quality Consultation will be held later this year regarding the expansion of the ULEZ. We feel that there needs to be greater clarity regarding the costs and benefits to residents and local businesses both inside and outside of the proposed zone. Such information is needed by stakeholders within the affected boroughs to allow for an informed response to the consultation and should be provided as soon as possible.

We wish to take this opportunity to emphasise the importance of taking action that has beneficial impacts for both air pollution and the health of people living in, and visiting, London. Acting to address air pollution while maximising the health co-benefits presents a great opportunity to improve the health of Londoners, and reduce inequalities. To achieve this, a multifaceted approach that is centred around creating a city where walking, cycling and the use of public transport are the most accessible and attractive choices is needed. Such an approach supports simultaneously improving air quality while helping to reduce obesity and physical inactivity, poor mental health and social isolation, for example. This is epitomised by the "Healthy Streets" approach which should be implemented throughout London. A transition to the use of zero emission vehicles is essential, however, this needs to be considered in parallel with concerted efforts to ensure motorised vehicles are used for essential journeys only. In support of this modal shift, funding raised through the implementation of the ULEZ should be ring-fenced for ongoing improvements to walking and cycling infrastructure. Similarly, air pollution, health and sustainability also need to be woven deeply into planning policies. Policies that minimise emissions during the construction phase (e.g. through consideration of machinery and transport materials and the canyon effect) while maximising the beneficial

health impacts of developments once in use (e.g. walkability, active transport links, green spaces, efficient energy use) need to be adopted throughout London.

The Mayor should prioritise the timely evaluation of initiatives taken to improve air quality and health. This evidence will support efficient and effective use of funding and resources and all measures must be taken to promote shared learning across the capital and cross-borough collaboration. This is a city-wide problem that requires a whole city approach. We also recommend fostering partnerships with other global cities to learn from their successful initiatives, and work together to address this shared issue affecting most of the world's cities.