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Elizabeth Fonseca
Environmental Quality Manager
Mathieu Mazenod
Climate Change Programme Manager
The Royal Borough of Kensington & Chelsea

Via e-mail

7th October 2015

Dear Elizabeth and Mathieu

Air Quality and Climate Change Action Plan 2016-2021 Consultation

Many thanks for highlighting the consultation on the Royal Borough of Kensington and Chelsea's Action Plan for Air Quality and Climate Change.

Air quality and climate change are interrelated, as the emissions that impact on air quality and may also contribute to climate change, generally arise from the same sources such as vehicles, buildings, power generation and industry. PHE supports the closer integration of air quality and climate change policies, (which is also supported by the Government) as the combined benefits are likely to support improvements to public health.

To achieve the greatest benefit for public health, an integrated holistic approach is required when attempting to tackle climate change and poor air quality in a sustainable manner. The combining of climate change and air pollution objectives should ensure that actions to combat climate change are not at the expense of improvements in air quality and vice versa.

Policies to reduce greenhouse gas emissions may have beneficial effects on public health (co-benefits) such as reduced particulate air pollution as a result of reduced coal combustion, or increased physical activity as result of reduced private car use in urban centres. However, some policies may have adverse health effects, for example sealing buildings to increase their energy efficiency could lead to increased exposure to indoor air pollution unless ventilation control is simultaneously improved (HPA, 2012).

The development of integrated policies and action plans for climate change and air quality should reduce the potential for unintended harms, whilst maximising the co-benefits.

I hope this is helpful, and PHE London will provide more detailed comments in response to the consultation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Yvonne Doyle'.

Dr Yvonne Doyle
Regional Director
Public Health England London
Yvonne.doyle@phe.gov.uk

Consultation on the Draft Air Quality and Climate Change Action Plan 2016-2021

Please complete the following questions. You will need to refer to the Draft Air Quality and Climate Change Action Plan which can be found at www.rbkc.gov.uk

Q1 Do you agree or disagree that more integration between climate change and air quality policies is the right way forward?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Q2 Do you agree or disagree that it is appropriate to join climate change and air quality action plans together in one plan?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Q3 If you have any comments relating to the above questions, please make them here:



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The development of integrated policies and action plans for climate change and air quality should reduce the potential for unintended harms, whilst maximising the co-benefits.

Q4 Do you agree or disagree with the proposed policy on climate change and air quality? (see Section 1 of the consultation document: Air Quality and Climate Change Policy)

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Proposed Policy

- Use every effective means to raise awareness of the issues;
- Take decisive action to reduce emissions of greenhouse gases and air pollutants from its

own activities, buildings and road vehicles;

- Engage with business, schools and the wider community to promote less polluting technology and modes of transport, and more energy efficient buildings in the borough;
- Collaborate with other London boroughs, the Mayor of London and central government departments to achieve substantial reductions of harmful emissions across London;
- Take actions to increase the resilience of the borough, residents, visitors and workers to anticipate and address the main risks related to the change of climate and decrease exposure to pollutants;
- Lead by example and actively encourage responsible environmental practice amongst staff, contractors, suppliers and residents. Raise awareness and empower local communities to start taking actions and implement local air quality and carbon reduction projects.

Q5 Do you agree or disagree with the aims for the next five years? (see Section 4 of the consultation document: Aims)

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Proposed Aims:

1. Reduce emissions:

- **Reduce Pollution:** physical measures and requirements to lower Nitrogen Dioxide (NO₂) and Particulate Matter (PM) emissions.
- **Reduce Greenhouse Gases:** physical measures to reduce greenhouse gases – mainly carbon dioxide – which contribute to climate change.

2. Reduce exposure and increase resilience:

- **Provide information on or otherwise make residents, visitors and workers in the borough aware of ways in which they can avoid exposing themselves to poor air quality and extreme weather events.**
- **Manage climate change risks from extreme weather events through sustainable adaptation measures, in particular for more vulnerable people.**

- Mitigate public exposure to poor air quality by installing green infrastructure and other physical measures.

3. Influence change

- Raise public awareness of the sources and effects of poor air quality and climate change in order to empower individuals and businesses to take their own action to reduce emissions.
- Urge the Mayor of London, central government and external bodies to introduce radical measures to reinforce local authority actions on emissions.
- Act as a champion and lead by example in tackling poor air quality and climate change.

Q6 Do you agree or disagree with the objectives for the next five years?
(see Section 5 of the consultation document: Objectives)

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

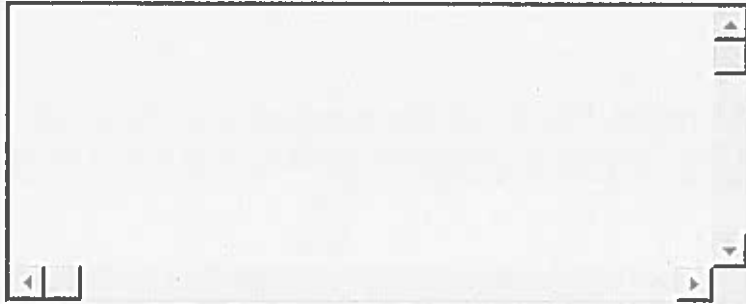
Policy benefits for public health

Increase community awareness of the potential local impacts of air quality and climate change and support vulnerable groups through appropriate adaptation measures.

Address fuel poverty by improving heating and energy efficiency in residents' home.

Keep residents with heart and lung conditions and vulnerable to heat stress in their homes and not in hospitals

Q7 *If you have any comments relating to the above questions, please make them here:*



PHE supports the development of a fluid list of objectives and actions, so that as the scientific evidence develops and different issues are brought to light, the Council will have the capability to adapt the action plan to address these new concerns.

Q8 Do you agree or disagree that the Council should keep a 'live' list of actions that can be added to as new actions are identified?

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Q9 Do you agree or disagree with the actions? (see Section 6 of the consultation document: Action Plan)

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Q10 If you have comments relating to the above questions, or if you have ideas you would like the Council to consider, please note them here:

PHE ideas for Consideration

1. The Council may wish to consider wider natural resource use reduction/conservation awareness campaigns. With fewer natural resources being consumed by the local population less energy will be required to process the resources that are required within the borough. This has the added benefit of local actions having a wider influence regionally, for example with water use and conservation across the south, south east of England. Less energy used for treatment of water leads to less CO₂ emissions, and less water extracted out of wild habitats etc. While not a localised improvement, this may still be important on a regional scale.
2. The action plan does not mention ozone (O₃) as a pollutant of importance, as the action plan is to be fluid, with actions added as and when opportunities/challenges arise, the Council may wish to keep O₃ in mind as O₃ may become a bigger issue in terms of air quality in the summer months as the UK expects more hot and sunny days, key factors in the photochemical reactions which produce ground-level O₃.

Q11 If you have any further comments about the Draft Air Quality and Climate Change Action Plan please make them here:

- Within the action plan the three main pollutants referred to are NO₂, PM and CO₂. These are key pollutants of concern due to their prevalence in the urban environment from man-made sources, their potential impact on local health and of global significance in terms of climate change. It is assumed that PM referred to in the action plan refers to total particulate matter, which incorporates both PM₁₀ and PM_{2.5}. Clarification may be of benefit.
- It is unclear for some of the action numbers how they will be evaluated as to their effectiveness and contribution to any reductions in emissions seen.
- Action 5 – Produce policy guidance on the use of e-cigarettes in the work place – PHE have recently commissioned and published the report 'Electronic cigarettes' which examines the evidence base on the health risks associated with electronic cigarettes which may be of use

when producing the councils policy guidance. The section below taken from the report may be of particular use:

"Electronic cigarettes do not produce smoke so the well-documented effects of passive exposure of others to cigarette smoke are clearly not relevant. Exposure of non-smokers to electronic cigarette vapour poses a concern, though laboratory work suggests that electronic cigarette use in an enclosed space exposes others to nicotine at levels about one tenth generated by a cigarette, but little else. The health risks of passive exposure to electronic cigarette vapour are therefore likely to be extremely low."

The full PHE electronic cigarettes document can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/311887/Ecigarettes_report.pdf

- Actions 24 & 25 – Raise awareness on air quality and climate change issues amongst council tenants and explore the opportunity to install renewable energy technologies in the councils social housing (e.g. solar panels). – The London Boroughs of Hackney and Lambeth have experience in delivering projects such as these by working with community benefit societies/co-operatives to deliver:
 - Local finance for local projects,
 - Provide technical expertise in the design, installation and incorporation of renewables into existing social council housing
 - Designing the financial mechanisms that re-invest any profits made from selling excess energy produced back into the national grid, back into the community in which the power was generated (improvement in insulation/energy efficient appliances etc)

The council may wish to gain further information from other London boroughs regarding how this was achieved and any lessons learned from their experiences.

- Action 48 - Understand better the sources and quantities of greenhouse gas emissions across the borough – Utilising monitoring equipment operated by Kings College it is possible to explore sources of PM (e.g. primary PM or secondary PM – transport/power generation etc.) from the molecular composition of PM detected in specialist air quality monitoring stations. This may be an approach that the council wish to investigate.
- Actions 65 & 69 – Install at least one green roof (or comparable green infrastructure) and investigate whether targeted greening of areas may reduce poor air quality exposure – If green infrastructure/greening of areas includes the planting of trees as a means to improving local air quality the council may wish to consider the type of trees/plants to be planted, as different species are known to emit biological volatile organic compounds (BVOC) at varying rates. BVOC's can ultimately influence ozone creation under the right conditions, which may impact on air quality.

About you

The information you provide will be used to keep you informed about the Air Quality and Climate Change Action Plan and to make sure that responses are received from a range of residents and organisations. Please note that your response to this consultation will be available to

the public including your name, who you represent, and the company/organisation (where these have been provided). Your personal contact details such as address or email will never be published and will be treated in the strictest confidence. The following questions are optional.

Q12 Your name:

Q13 Your address:

Q14 Your postcode:

Q15 Your email address:

Q16 In what capacity are you responding to this consultation?

- As a resident
- On behalf of a business
- On behalf of public organisation
- On behalf of a community group or voluntary organisation
- Other

(please specify)

Q17 If you are responding on behalf of an organisation, please tell us the name of the organisation you represent?