

Fitzrovia West Neighbourhood Forum

Comments on WCC's Air Quality Action Plan 2019 – 2024

Introduction

We broadly welcome the publication of the Action Plan and the detail set out in the Matrix. Our comments start with the broad principles and then go on to comment on the details in the Matrix.

Extracts from the Action Plan are in *italics* below. Our comments are in bullet points.

PRINCIPLES

The Council is setting a target as defined by WHO:

Although Westminster is not legally required to meet WHO Guideline levels for air pollution, this Action Plan commits Westminster to working to meet WHO Guideline levels, going above and beyond our baseline legal requirements. This sets us more difficult standards to meet for PM emissions; but as there are no safe levels for these pollutants, it is vital that we continue to work to reduce PM emissions as far as possible.

- This is a very demanding target which we support but we would like more information about the resources available, the priorities and the method of delivery. If it is a corporate approach who is primarily responsible and what level of staffing is available?
- There should be a greater focus on the specific needs of neighbourhoods and areas and encouraging local residents and businesses to set their own standards and monitor air quality impacts.

MONITORING

Current monitoring arrangements only cover the main highways such as Oxford Street and Marylebone Road. We would like to see a much finer grain of monitoring so that an evidence base can be established for side streets which have a higher proportion of residents and retail and commercial units.

Westminster does not currently undertake diffusion tube monitoring. However, this will be changing from 2020 and adopting a new diffusion tube monitoring network is one of the actions that can be found in the action plan matrix of this Plan. Westminster City Council meets all the national AQS objectives other than for the gas nitrogen dioxide (NO₂). We are currently meeting the current objectives for particulate matter (PM₁₀ and PM_{2.5}) but as this pollutant is damaging to health at any level, this remains a pollutant of concern. In recognition that there is no safe exposure limit for particulate matter, this Action Plan commits Westminster to target compliance with World Health Organization Guidelines for PM₁₀ and PM_{2.5} by 2030.

- We welcome the introduction of tube monitoring but which areas will receive the highest priority and how extensive will the coverage be?

- GLA Air Quality Focus Area: Oxford Street is referred to as a GLA Air Quality Focus Area as well as being a WCC Zero Emissions Zone. This appears to be an unnecessary duplication. We suggest the two are merged into one strategy.

AIR QUALITY AS AN ISSUE OF CONCERN FOR RESIDENTS

There is a very high level of concern in Fitzrovia which has been established through consultation in relation to preparing a Neighbourhood Plan. This is particularly the case amongst residents living on heavily congested streets such as Newman Street, Mortimer/Goodge Street, Great Portland Street and New Cavendish Street.

- We welcome the following categories although more detail is needed in places:

As with previous Action Plans, actions to improve air quality are split into five categories: • Monitoring • Reducing emissions from buildings and new development • Reducing emissions from transport • Raising awareness • Lobbying and partnership working

Monitoring

Introducing a new city-wide diffusion tube monitoring network to supplement our existing automatic monitoring stations • Continuing to trial and test new and emerging monitoring technologies, from solar powered sensors to smartphone apps • Creating a new online interactive map of all of Westminster's monitoring locations and data • Committing to extensive pre- and post-project monitoring of the Oxford Street District to evaluate our interventions across this area of the city • Prioritising the provision of PM2.5 monitoring in new automatic monitors Relevant Air Quality Manifesto commitments • We will support residents to monitor air quality in their neighbourhoods

- Information on timescale and extent of coverage is needed, for example in relation to the Oxford Street District and how different standards will apply.

Reducing emissions from buildings

Adopting and implementing the air quality policies in our ground-breaking City Plan 2019 – 2040 • Updating our London-leading Code of Construction Practice for developers • Implement local scale solutions such as greening our markets and reducing emissions from major events and street works • Deliver projects based on addressing indoor air pollution and reducing emissions from buildings with Heritage status • Publish a holistic Carbon Reduction Strategy for the whole city • Investigating the adoption of a city-wide definition of valuable green space, looking at biodiversity, climate resilience, air pollution, well-being and social value.

- More information is needed on how the City Plan will require and enforce high environmental standards in building over and above national Building Regulations.
- How will existing buildings be retrofitted?
- There is no mention of encouraging net zero particulate and CO_c heating systems

- There should be a commitment to providing more green space in areas of green/open space deficiency. We have proposed closing and greening local/residential streets where traffic can be redirected using Healthy Streets principles.

Reducing Emissions from Transport

Continuing to be the leading London local authority for the provision of Electric Vehicle Charging Infrastructure • Investigate changes to our resident parking permit structure to encourage modal shift away from private vehicle use and discourage the use of older more polluting vehicles • Updating our own procurement and green fleet policies to ensure that emissions are reduced from our own fleet and our major contractors' fleets • Investigating the potential for major changes to parking and the use of parking bays across the city following our Parking Occupancy Survey 2018 • Implement innovative projects to reduce emissions from non-road sources of transport, including those from rail, river and canal.

- We strongly support an increased emphasis on co-ordinating deliveries and use of logistics hubs and electric vehicles to reduce journeys for deliveries.
- We commend the NWECC evaluation report on the East Mayfair commercial vehicle reduction programme and would support the introduction of a similar approach across the whole of the CAZ area.
- Off-street parking should not be permitted in new developments in CAZ and residents should be encouraged not to own (petrol/diesel) vehicles through a progressive charging structure for on-street parking, and overall reduction in parking permits.
- Provide targets for the provision of more electric charge points.
- There should be a commitment to improving walking and cycling provision as an alternative to the motor car.

Lobbying and Partnership Working

- We strongly support these priorities and would like to see support for a nationally funded scrappage scheme for heavily polluting vehicles.

Working with schools to deliver our £500,000 schools air quality audit programme followed by our £1m Schools' Clean Air Fund • Working closely with businesses and business groups to tackle emissions from deliveries and vehicle fleets • Leading innovative projects with academic institutions such as King's College London to support and then put into practice research across a range of air quality issues • Lobbying central Government for vital policies that will help reduce emissions from road transport, including changes to vehicle excise duty and the introduction of a national diesel scrappage scheme • Continuing to press the Mayor of London and TfL for greater action to reduce emissions from black cab taxis.

Zero Emission Zones (ZEZs) are areas that prohibit vehicles that do not meet stringent exhaust standards. The term 'Zero Emission Zone' is taken from the Mayor of London's Transport Strategy and [subsequent guidance](#). ZEZs are identified in the Mayor's Transport Strategy as being crucial in encouraging the move towards zero emission transport, reducing congestion, improving air quality and encouraging more sustainable modes of transport. A number of ZEZs have been delivered or are planned for central London including a commitment in the Mayor's Transport Strategy to deliver a Central London ZEZ between 2025 – 2030. More specifically to the Oxford Street District area, a variety of options are being explored for Zones of varying sizes and standards; the fact that Zones of differing sizes are being scoped out is reflected in the use of 'Oxford Street and district' in the Action Plan. It is envisaged that the AQ Plan is to be a 'living document' so there will be an annual updating (and summary reports of progress) where some of the wording in actions can be tightened as work progresses.

- A separate, detailed strategy with resources identified needs to be prepared for the Oxford Street ZEZ with a clear timescale;
- Regular consultation should take place with forums and business organisations on the proposed sub-zones for the OSD ZEZ.

ACTION PLAN MATRIX

Broadly welcomed but clear priorities and available resources need to be identified.

No. 60: add reference to GLA policy of 'Healthy Streets' – a comprehensive approach to air quality, greening and traffic management.

No.62: Not clear why Dean Street is identified for the ZEZ approach. Earlier text refers to the whole Oxford Street Project area.

No's 65 and 66: businesses should be encouraged to consolidate deliveries and to use electric vehicles as advocated by NWECC and others.

No. 67: We welcome the commitment to achieving WHO standards.

Nick Bailey
Secretary
baileyn@westminster.ac.uk