

# Wandsworth Society

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David Kennet  
Team Leader, Environmental Initiatives, Wandsworth Council  
The Town Hall (sent by e-mail)

Dear David,

## **Wandsworth Society Response to Draft Air quality action plan 2015**

### The need for a strategy and better PR

It is welcome that our Council recognizes the importance of improving air quality. This is of course not just a local or borough-wide issue, but a London, national and, indeed, global problem. Recent scientific evidence – some of it published since your document was produced – suggests that the problem may actually be “worse than we thought” not long ago. This Society is therefore keen to see our Council, now responsible for local public health (in one of London’s largest boroughs), **take a lead in dealings with TfL and the Mayor of London on air quality issues**, as well as with the borough’s communities and businesses.

2. The air quality challenge in London requires collective action, but actions by individual councils can have a powerful effect. We applaud the Council’s role in the campaign for ‘cleaner’ buses and its determination to address air pollution by measures such as improved delivery lorry regulations. But these may have only a marginal effect on NO<sub>2</sub> levels. The considerable **risks to public health will remain indefinitely without further radical action and changes in people’s behaviour**.

3. The Council needs to think carefully about specific anti-pollution measures and the associated PR. It should, we suggest, **actively involve local community groups**, such as amenity societies (including this one), as well as reaching out to the wider public. A lot **more public education is needed**. Actions such as promoting ‘Boris bikes’, using the Wandsworth Mayor’s electric car and the publicity won for ‘Formula E’ can have powerful PR effects and influence behaviours and perceptions. We should like to see the Council’s PR efforts continuing and expanding (although that is not a vote for continuing to use Battersea Park for Formula E!).

4. The Draft document is, frankly, not an easy read (at times a fog of scientific and 'bureaucratic' information seems to descend, although other parts are clear enough). Where is the punchy summary of proposed changes to existing plans? Details of how the plan is being put together are useful, but could have been confined to annexes. The overall presentation of the issues suggests, we fear, **insufficient clarity about priorities, processes and monitoring of targets and timetables**. It is good to note, however, that Councillors and officers have been fully involved in debating and initiating new measures: the efforts put into that will need to continue.

5. It is also encouraging that work on the action plan has been led by a specialist consultant whose oral presentations at Town Hall meetings were illuminating, especially perhaps the 2013 meta-analysis that forms the basis for current thinking. The Society's members who attended the public meetings – not given enough publicity, in our view, so we were grateful that a second one was organised – found them educational and constructive, and deserving of larger audiences. There should be **no hesitancy in giving debates on air pollution much wider public exposure**.

#### Specific actions to improve air quality

6. The action plan needs to distinguish between 'semi-passive' statements, such as "we will ensure...", "we will continue to...", "we will lobby for..." and specific actions already completed or in hand (eg longer trains), and **planned new actions**. That said, we recommend that the Council include in its plan commitments and actions to:

(a) **Press TfL to 'clean up' its whole bus fleet and ensure buses passing through the borough are made as low pollution, accessible, and attractive as possible** – prioritising bus routes through town centres and shopping streets, where there is more risk from air pollution.

(b) Publish details about the **effectiveness of TfL's 'Low Emission Zone' (LEZ)** in terms of lower emissions and penalties exacted. We see merit in the suggestion by others that the widening of the current LEZ should be accelerated.

(c) Consider **reducing loading times** in streets with a heavy volume of traffic and pedestrian presence (eg Wandsworth Town centre) and introducing higher parking charges for diesel vehicles.

(d) Plan for a **shift away from diesel** in the Council's own vehicle fleet and ensure that outsourcing contracts, eg for parks, transport and refuse collection, reflect that policy. Ensure, too, that diesel trucks have particulate traps properly connected.

(e) **Enable, support and encourage a 'mode shift' to more 'benign' modes of travel**, such as walking, cycling and public transport. It should be a strategic aim to make Wandsworth's streets more inviting for walkers and cyclists. The Council's cycling strategy (on which we shall also be commenting) will also be relevant here.

(f) **Work in partnership with local community groups**, including amenity societies (to which we spotted no reference in the document). They can play helpful roles in eg taking forward the 'active travel' plans, suggesting practical measures to enable 'mode shift' and helping follow up the Mayor of London's Air Quality Plan. This Society is planning to follow the example of others in local air pollution monitoring.

(g) Produce a more detailed **education and awareness plan**, with incentives for schools/colleges and corporations to participate, including proposals for influencing individuals' actions, eg when buying a new car - showrooms should display prominent "emission guidance" in layman's terms (not just the 'ratings').

(h) Include information on risks to cyclists from road pollution in **safety guidance**, eg about passing lorries 'on the inside'. (Should masks be worn and calibrated for effectiveness, as industrial face masks are?) And inform motorists about the research that suggests poor air quality inside cars is a health hazard.

(i) Provide detailed **monitoring measures** as necessary. For example, we have noticed that new 'stop/start' buses don't always do so (an issue that needs more emphasis in bus driver training?). There also needs to be a published framework of sanctions against transgressions and regular reports on enforcement.

(j) Consider **incentivising industrial buildings** over a certain roof area, such as bus stations and vehicle depots, to **install solar panels**. Instead of panels in fields, why not create a roof of them over train sheds and sidings at Clapham Junction?

(k) In **building development regulations, require measures to reduce public exposure to road pollution at the design stage** (including pavement width, shop/home entrances filters etc). New research findings on wind dispersal of particulate matter and other toxins on tree-lined streets should be assessed: the 'tunnel' effect of roadside trees may reduce the benefits of their toxin absorption. New property development could worsen the 'canyon effect' that traps air pollution at street level.

(l) Save energy locally by **banning digital advertising** hoardings across the borough, especially ones that distract motorists at road junctions.

(m) Continue to **oppose the expansion of Heathrow**.

Yours sincerely,

David Kirk  
Chair, Wandsworth Society

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Chair, Battersea Society  
Chair, Putney Society