

## Consultation responses to the Southwark Council Air Quality Strategy and Action Plan (Draft December 2016)

### GLA response

	Comment	Response
1	The plan provides the minimum level of background information, this is not a problem as it focuses on the actions, but it would be beneficial to include some of the mapping and source apportionment charts from the LAEI 2013	The background information and mapping and source apportionment are included in the separate Technical Appendices
2	A particular area for commendation is the inclusion of firm targets for most of your actions.	Noted
3	Measure 2.1 - What is the technical guidance? – will it be a Supplementary Planning Document or a non-statutory document? We'd suggest the former if possible and stephen.inch@london.gov.uk is available to offer advice	This document will be technical guidance for the time being due not being able to resource writing a new SPD in Planning Policy work programme at present as the Southwark Plan is being revised. Will consider timetabling a new SPD when the Southwark Plan review is complete.
4	Measure 2.3 - A campaign focused in this way on fuel type and fuel economy sounds like a really good targeted approach	Noted
5	Measure 3.1 – It would be useful to specify that you mean TfL STARS accreditation.	TfL STARS inserted into the measure
6	Measures 3.1-3.3 – Could you include specific quantified targets here?	Will discuss with the relevant services/teams to produce quantified targets
7	The level of Public Health involvement/leadership in projects is supported.	Noted
8	Measure 4.6 – This is very positive active but requires a timeline for completion.	Timeline to be included in Action Plan
9	Measure 4.11 – We really need your support with regards to charging infrastructure for taxis, to support the Mayor's requirement that all newly licenced taxis must be zero emission capable from 2018.	New measure will be added to the Action Plan
10	Section 5 – Whilst it is supported to have an integrated approach to carbon and air pollutant reduction it needs to be made clearer in the title and the introduction that this is an integrated strategy, otherwise the carbon section doesn't really work/fit.	New sub-header inserted in the title row to explain these air quality actions are extracted from the Authority's Carbon Reduction Plan
11	Section 6 - is very comprehensive	Noted
12	Section 7 – it is very positive that you have included this section. Action/s 7.1 are key – we support all of these aims but they need timelines – for example, when will the monitoring begin and what is the deadline for instigating projects in each of the focus areas?	Timeline/s to be included in the Action Plan table

## Environment Agency response

13	<p>We support the general theme throughout the Air Quality Action Plan (AQAP) of identifying air quality as a strategic factor within local planning policy and through Southwark's Joint Strategic Needs Assessment (JSNA) for public health.</p>	Noted
14	<p>We note the actions in the plan are not time bound and we suggest that delivery of the plan are reviewed against SMARRT criteria (i.e. Specific, Measurable, Assignable, Realistic, Resourced, Time Bound) in order to support its actions.</p>	Action plan reviewed with timescales and revised targets included.
15	<p>We consider the Plan could place more emphasis on spatial planning as a way of implementing the AQAP actions through development.</p> <p>The AQAP is part of a local authority's evidence base required to support its local plan and assess the effectiveness of its development management policies. Policy DM60 of the New Southwark Plan Strategy reflects the need to consider the impact of poor air quality, to minimise air pollutants and reduce residential exposure.</p> <p>This is in line with the London Plan's Policy 7.14 Improving air quality which states that, boroughs should have policies that:</p> <ul style="list-style-type: none"> <li>a. seek reductions in levels of pollutants referred to in the Government's National Air Quality Strategy having regard to the Mayor's Air Quality Strategy</li> <li>b. take account of the findings of their Air Quality Review and Assessments and Action Plans, in particular where Air Quality Management Areas have been designated.' </li></ul>	Noted
16	<p>Policy 7.14 also requires boroughs to ensure that development proposals 'minimise increased exposure to existing poor air quality and make provision to address local problems of air quality (particularly within Air Quality Management Areas (AQMAS)'. Please also refer to Planning for Air Quality Document <a href="http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf">http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf</a></p>	Noted
17	<p>We would suggest that for larger development areas or opportunity areas, an air quality assessment is carried out for the whole area to establish baseline air quality and to assess the impact of the development plan for the area on future air quality, rather than relying on individual developer's assessments as this will miss cumulative impacts.</p>	This approach will be included in the Authority's Technical Guidance on Air Quality
18	<p>We recommend the AQAP includes an action to identify and manage the impact of growth and regeneration on waste management and industrial process regulated under the Environmental Permitting Regulations, by</p> <ol style="list-style-type: none"> <li>1. Ensuring any waste management facilities relocated due to redevelopment master plans, is suitably planned and funded to allow operators to invest in appropriate dust management control infrastructure to minimise the creation and migration of dust from the activities. In certain circumstances, where particular waste management activities occur in close proximity to receptors this may include the provision of a</li> </ol>	This will be included in the Authority's Technical Guidance on Air Quality

	<p>building.</p> <p>2. Ensuring that where redevelopment results in bringing receptors closer to existing regulated processes, full consideration is given to whether and how, infrastructure to minimise the impact of those industries need to be improved as receptors have been brought closer to them.</p> <p>Where new residential development is proposed in close proximity to existing regulated processes we recommend the planning process is used to require mitigation measures. These could include quadruple glazing, and storage rooms only facing waste sites, not living rooms / bedrooms.</p>	
19	We support the ongoing commitment under Section 1 to maintain Air Quality Monitoring capability through continuous and periodic monitoring equipment.	Noted
20	<p>We support the recognition of the measures identified under Section 6 (Regulation) of the draft plan and would welcome the opportunity to discuss any potential cross-over with the plans ambitions on the sites we regulate.</p> <p>1. The Environment Agency regulates waste management process in the Borough, some of which have the potential to generate dust. It is our intention to review dust management practices at these operations with a view to ensuring appropriate techniques are being used to minimise the creation of dust and its migration off-site. You are welcome to assign this as an action to us in your plan if you consider it appropriate.</p> <p>2. We would suggest that for larger development areas or opportunity areas that an air quality assessment is carried out for the whole area to establish baseline air quality and to assess the impact of the development plan for the area on future air quality, rather than relying on individual developer's assessments as this will miss cumulative impacts.</p>	<p>A new measure will be added to Section 6 – Regulation</p> <p>Noted</p>
21	<p>We note the source apportionments in Appendix 4 of the Technical Appendices (page 22) identify re-suspension as a significant proportion of PM<sub>10</sub> emissions in the Borough, but that there are no specific targets relating to road sweeping. From our experience of regulating a cluster of waste operations in the Borough, we are aware access for road sweepers can be hindered by parked and / or abandoned vehicles.</p> <p>We would recommend the council considers actions are assigned for both targeted road sweeping, and initiatives that will enable sweeping to be effective.</p>	An appropriate new measure will be discussed with appropriate services/teams and potentially added to the plan

## Better Bankside response

22	<p>Air Quality Strategy</p> <p>We feel it lacks detail on:</p> <ul style="list-style-type: none"> <li>• Overall objectives of the strategy &amp; plan and how these relate to the borough's Strategic Plan</li> <li>• Key partners beyond the GLA in the delivery of the strategy &amp; action plan including Business Improvement Districts (Better Bankside, Team London Bridge, Blue Bermondsey)</li> <li>• The expected duration of the plan, how it will be updated when required and how the overall impacts will be measured</li> <li>• Who is responsible for overseeing its delivery</li> <li>• How other borough Plans (e.g. Cycling Strategy) can deliver the objectives of the Air Quality Plan.</li> </ul>	<p>This document will be part of the Authority's Sustainability Plan which will link all the plans together.</p> <p>Will include BIDs by expanding the bullet points in paragraph 2 of the Air Quality Strategy</p> <p>The Air Quality Action Plan is a fluid document and will be reviewed every year when the Annual Progress Report is compiled. Out of date measures are deleted and new measures added to keep the document current</p> <p>Cabinet Member for Public Health, Parks and Leisure will be overseeing delivery</p> <p>The Strategy aims to ensure that local air quality policy is co-ordinated with other relevant local policy documents including the Cycling Strategy.</p>
23	<p>Section 1 – Management of Air Quality: Monitoring Air Quality</p> <p>There only two continuous monitoring stations in Southwark at the moment. Modelling data from Kings College London and the GLA Focus Area designation indicates that parts of our Bankside consistently experience poor air quality. However, without any kind of monitoring we are unable to accurately measure air pollution or assess the impact of any measures.</p> <p>We note the general commitment in Action 7.1 to ensure that local air quality in the GLA Air Quality Focus Areas is monitored and that one of these areas is 'London Bridge at Borough High Street'.</p> <p>We would therefore strongly endorse including in the plan the commitment to install some kind of roadside monitors that can measure both NO<sub>2</sub> and PM<sub>10</sub> in the following locations:</p> <ul style="list-style-type: none"> <li>• Borough High Street (northern section between Southwark Street and London Bridge</li> <li>• Southwark Bridge Road junction with Southwark Street</li> <li>• Blackfriars Road junction with Southwark Street/ Stamford Street.</li> </ul>	<p>The Authority has planned to increase the air quality monitoring in the Borough, with an increase of Nitrogen Dioxide Diffusion tubes in the Air Quality Focus Areas. Locations suggested in the comments will be included.</p> <p>In July 2017 there is an opportunity to move the air quality monitoring station situated on Tower Bridge Road, the new location is yet to be finalised.</p> <p>At present the station is monitoring Nitrogen Dioxide, we will be exploring whether we can include PM<sub>10</sub> or PM<sub>2.5</sub> monitors on re-location.</p>

<p><b>24</b></p>	<p>Section 2 – Reduce Emissions  Action 2-3: We welcome the commitment to an annual campaign to raise awareness of the role of fuel type and fuel economy can play in reducing emissions. We would be keen to work with the Council to see how this messaging could be tailored to relevant business decision makers including:</p> <ul style="list-style-type: none"> <li>• Fleet operators</li> <li>• Business procurement leads</li> <li>• Office managers.</li> </ul> <p>This campaign would be most effective if combined with communications more generally on behaviour change that can have an impact on improving air quality (Action 3-8).</p>	<p>The authority would welcome working with the BID's to set up work programme/s to provide a wider campaign in the Borough. New action to be included.</p>
<p><b>25</b></p>	<p>Section 3 – Public Health, Education and Awareness  Actions 3-3: Better Bankside has a long track record in promoting commuting trip by cycle or on foot. We will continue to do this, guided by targets set every 5 years following a comprehensive Employee Travel Survey. We are focusing on trips made during the working day and suggest that this should also be focus for this Air Quality Plan.</p> <p>We would welcome further collaboration with the Council on measures such as those consistent with the 2015 Southwark Cycling Strategy. These include:</p> <ul style="list-style-type: none"> <li>• Greater promotion and provision of cycle confidence training, including to those working in the borough</li> <li>• Work to improve cycle parking provision, both short term and for commuting</li> <li>• Provision and promotion of quality cycle routes along roads with lower air pollution.</li> </ul> <p>We understand that an updated Walking Strategy is still preparation. This should also focus on measures that promote walking trips along low emission routes, such as <a href="#">The Low Line</a>.</p>	<p>Noted – comment will be passed to Transport Policy Section.</p>
<p><b>26</b></p>	<p>Actions 4-3 to 4-5: We fully endorse efforts to consider how best freight consolidation could be applied for Southwark, partnership with neighbouring boroughs. We suggest that it would be helpful to include a reference to the borough's Business Improvement Districts as potential partners in ensuring that a solution is used by the maximum number of employers.</p> <p>As well as FORS accreditation, we would welcome the inclusion of the commitment to ensuring that suppliers are using the lowest emission vehicles possible regardless of whether they are using the freight consolidation facility.</p>	<p>The measures will be amended to include the BID's and it will be included in the contract requirements that suppliers will be required to lowest emission vehicles</p>

27	<p>Section 4 – Cleaner Transport Reducing Emissions from Delivery and Servicing</p> <p>We welcome the inclusion of Action 4-5 with the specific reference to our area, but again suggest that this could be strengthened by a specific reference to joint working with Better Bankside and our neighbours Team London Bridge.</p>	Measure has been amended to include BIDs
28	<p>Reducing emissions from vehicles and Taxies &amp; Private Hire Vehicles</p> <p>Action 4-11: - We fully support lobbying TfL to ensure that PCO licensing includes a Smarter Driving training elements. We would like to see this go further and would welcome the Council's support in calling for all taxis and PHV's within the Central Activities Zone to be zero or very low emission vehicles.</p>	The Council supports the Mayor of London measure to require all new PHV and Taxis to be zero emission capable.
29	<p>Actions 4-12 to 4-13: - We fully support working with TfL to reduce emissions from buses and the proposed extension of the Ultra-Low Emission Zone to the South Circular</p>	Noted
30	<p>Action 4-18: - Our Bankside Wardens service is provided in partnership with Southwark Council's JET teams. We welcome action on anti-idling enforcement and look forward to working together to ensure that this is targeted in areas and at times of day where it is most needed.</p>	We welcome co-operation on this measure
31	<p>In addition to these actions, we would welcome the inclusion of a new Action that commits Southwark Council to partnering with Business Improvement Districts and other relevant stakeholders in commissioning research into what would be the most effective measures to reduce motorised traffic in the north of the borough.</p>	New measure will be considered with Transport Policy and potentially added to the plan.
32	<p>Section 5 – Reduction of carbon emissions          Actions 5-1 to 5-6: We fully endorse the requirement for major developments to be both zero carbon and Air Quality Neutral. We would like to see more detail in due course of how this can be enforced.</p> <p>We suggest that the 'off-setting funds' be made fully transparent and able to be accessed to fund a range of projects that have a positive impact on local air quality. For our area, the Bankside Neighbourhood Forum could have a role in helping to decide where funds should be allocated. We would welcome the opportunity to explore how Better Bankside could add value through match funding.</p>	This will subject to Planning regulations regarding the 'off-setting of carbon funds'
33	<p>Section 6 – Regulation          Emissions from construction equipment</p> <p>Actions 6.5 to 6.6:- We support the commitment to sure all strategic and major construction sites comply with GLA SPG criteria. We would welcome the</p>	We welcome the exopressed support and will work with the BIDs to develop best practice or pilot new

	<p>opportunity to see how major developments in our area and in particular members of the Bankside and London Bridge Logistic Group could develop best practice or pilot new equipment or methods that further reduce emissions.</p>	<p>equipment or methods that further reduce emissions.</p>
34	<p><b>Section 7 – Support the GLA Air Quality Aims GLA Air Quality Focus Areas</b></p> <p><b>Action 7-1:</b> - We note the provisions made here to develop specific projects in the GLA Air Quality Areas. In the absence of any further detail at this stage, we would strongly urge that discussion on those projects start as soon as possible for the London Bridge / Borough High Street area, in collaboration with us here at Better Bankside and our colleagues at Team London Bridge.</p>	<p>We will discuss any proposals with all relevant organisations when the specific projects are being considered for the GLA Air Quality Areas.</p>
35	<p><b>Section 8 – Air Quality Projects in the Borough</b></p> <p><b>Action 8-5:</b> - Better Bankside is already collaborating with Southwark Council in the delivery of projects related to air quality, notably the Clean Air Mini-Neighbourhood funded via the Mayor’s Air Quality Fund. We bring both capacity and match funding and would be happy to explore further opportunities to jointly fund air quality projects that meet our members’ objectives.</p>	<p>The Authority will continue to explore further opportunities to jointly fund air quality projects with the BID areas.</p>
36	<p><b>Further Actions we suggest should be included in the Action Plan</b></p> <p>We very much regret that references to increased urban greening and green and healthy streets are not picked up in the action plan. We very much believe that to support the aims of the action plan that the importance of the quality of our streets and public spaces, in terms of pedestrian and cycle comfort, and green infrastructure needs to be considered.</p> <p>We suggest that these further actions should be included include in a section called ‘Clean and Healthier Streets:</p> <ul style="list-style-type: none"> <li>• Investments in public realm enhancement and maintenance should be assessed against criteria as set out in Transport for London’s Healthy Streets approach.</li> <li>• Targets should be set for increasing the quantity and quality of on-street urban greening to help reduce exposure to air pollution. This could include street tree planting, on-street rain gardens, green walls or other on street planting.</li> </ul>	<p>These are very useful suggestions.</p> <p>The ‘Healthy Street Approach’ has been adopted with the Authority’s Draft Kerbside Strategy and a new measure will be included</p> <p>A new measure increase the amount of green infrastructure in the borough will be included.</p>

## Team London Bridge Response

37	<p>TLB has a strong remit from businesses since 2015 to deliver the <a href="#">London Bridge Plan</a>. Our mission is to ensure London Bridge excels as a leading place for global commerce and continues to develop as a pioneering local centre for enterprise, culture and entertainment.</p> <p>As a place, there are clearly issues around poor air quality – whether along the Tower Bridge Road or Borough High Street, or as shown through image in the media of the Shard surrounded in polluted fog. Poor air is a real issue and affects our reputation as an attractive place to do business. We shall be promoting measures to improve air quality alongside the borough, so will be an active and supportive stakeholder</p>	Noted
38	Health impact. The strategy indicates poor air quality affects health outcomes of 9,500 people. This should read that this number have died	Death due to poor air quality is not recorded on death certificates and the methodology to calculate these figures are based on life-years lost, which are then translated to the equivalent deaths at typical ages
39	<p>Partnership.</p> <p>In general, the strategy and action plan cover a broad number of agendas, and shows strong joint action across council departments, including health. We think this is very positive. However, we would like to see explicit indication of working in partnership with other borough and non-borough stakeholders to achieve better air. This should include BIDs</p>	BIDs will be specifically referenced in the Air Quality Strategy & action plan
40	<p>Targets.</p> <p>There are no targets indicated in the strategy. It is important to have this so that as partners we can strive to deliver outcomes – for example a reduction in the number of focus areas</p>	The Strategy gives the overall of aims and objectives of air quality in the Borough The targets are included in the second part of the document, the action plan
41	<p>Monitoring.</p> <p>There is insufficient monitoring in Southwark of main roads, and particularly Transport for London roads, and it is unclear if there is sharing of data between partners with data. TLB is working with University College London on the Fresh Air Square to monitor air quality through a AQ Mesh monitor – which can monitor every 15 minutes. The Diffusion tubes used by the Council are accurate at the point the data is collected, but this may not pick up the peaks of poor air.</p>	<p>The Authority has planned to increase the air quality monitoring in the Borough, with an increase of Nitrogen Dioxide Diffusion tubes in Air Quality Focus Areas. The locations mentioned in the comments will be included.</p> <p>In July 2017 we are planning to move the air quality monitoring station situated on Tower Bridge Road to a new location At present the station is monitoring Nitrogen Dioxide, we will explore if it is possible to monitor PM at the new location.</p> <p>Data for air quality monitoring is available on the London Air Quality Network website and on the</p>



		<p>Southwark website in the revised Air Quality section.</p> <p>The authority is assisting the MAGIC project – “Managing Air for Green Inner Cities”. This project comprises of three components:</p> <ul style="list-style-type: none"> <li>(i) a fully resolved air quality model that interacts with sensor data and provides detailed calculations of the air flow, pollutant and temperature distributions in complex city geometries and is fully coupled to naturally ventilated buildings, and green and blue spaces;</li> <li>(ii) reduced order models that allow rapid calculations for real time analysis and emergency response; and</li> <li>(iii) a cost-benefit model to assess the economic, social and environmental viability of options and decision.</li> </ul>
42	<p>Green infrastructure and clean routes.</p> <p>We would like to see greater emphasis on the role greening can play, whether along clean routes or on buildings – either retrofitted or as part of the design. Wording from the Mayor’s ‘A City for all Londoners’ document mentions that new buildings should be “air quality positive”, with greening a key element, and the GLA is also promoting Healthy Streets, which can be an aspiration (with funding attached) in the borough.</p>	<p>The ‘Healthy Street Approach’ has been adopted with the Authority’s Draft Kerbside Strategy and a new measure will be included</p> <p>A new measure will be inserted within the latest version of the Air Quality Strategy and Action Plan to increase the use of green infrastructure in the Authority.</p>
43	<p>Supportive transport infrastructure (4). There is a focus on information, but very little information about funding of infrastructure to support cleaner transport – for example cycle parking, cycle routes, clean routes for walking and cycling (particularly related to purposes of education, commuting or visiting), EV charging points or supporting Santander cycle hire points – all relevant in the London Bridge area, and to which we can potentially provide matched funding.</p>	<p>The funding for the Air Quality Action Plan is from existing Authority resources or from successful grant bids.</p>
44	<p>Road pricing Action 4-13. Now 4.14</p> <p>It is positive that Southwark can have a voice to push for ULEZ. We suggest that Southwark also play a stronger role demanding the GLA look at road charging up to the South Circular as stronger policies are clearly needed to limit traffic and congestion.</p>	<p>Southwark support for an increase to the congestion charge zone will be considered as part of the GLA consultation process for both the CCZ and ULEZ.</p>
45	<p>Freight (4).</p> <p>Activities around reducing emissions from delivery and servicing are very important and these are</p>	<p>Measure 4.5 will be amended to include the BIDs and to promote the</p>

	<p>detailed. The Action Plan mentions a number of activities through freight, which is very positive – and we hope to be able to work with Southwark to deliver this work. There is no mention of exploring more delivery and servicing via river or rail – with potential for both in the London Bridge area.</p>	<p>rationalisation of deliveries and servicing in the London Bridge area, where rail and river based options could be explored.</p>
46	<p>Developers (5). Does the zero carbon objective based on the London Plan go as far as the current Mayor's plans for the new London Plan – if not then this should be updated alongside any new policy – as mentioned in 7-4.</p>	<p>The reference to London Plan is not time specified therefore the objective will be in accordance with current London Plan at the time of planning application.</p>
47	<p>New Southwark Local Plan (5). We are supportive of the use of robust planning polices in the New Southwark Plan being used to deliver air quality benefits, and a strong and constantly evolving design and construction SPD to support this, encouraging innovative and effective measures. However, having contributed to a first draft of the new Local Plan Area Visions and site allocations (not the Development Framework), there is very little emphasis on greening or air quality positive development</p>	<p>A new action will be incorporated into the action plan to increase green infrastructure in the Borough. This comment will be shared with Planning Policy.</p>

## Southwark Green Party response

48	The strategy acknowledges the severe impact of air pollution on the health of Southwark residents, noting in the introduction that 'poor air quality disproportionately affects the young, old, ill and poor' (page 5). But this recognition of the serious public health challenge is not matched by actions.	Noted
49	The plan is not strong or bold enough, and it does not provide enough detail of those actions the council does propose to take. We are dismayed that so many items lack clear targets, timescales, objectives and means of measuring success. This is particularly noticeable in comparison with Southwark's previous plan which included timescales and indicators for each planned measure (Air Quality Improvement Strategy 2012-2017 and Action Plan 2012-2017 (AQIS 2012)).	The Air Quality Strategy and Action Plan has been reviewed to include clear targets and timescales and means of measuring success
50	The introduction states that 'Southwark is committed to integrating our Air Quality and Climate Change policies'. We welcome this fundamental insight that the two areas are interlinked. Given the council's responsibility for public health, we feel that it is important that all council staff are aware of how actions their departments take will affect residents' health. We note the ambition to 'maintain a cohesive suite of policies by co-ordinating local air quality policy' with other areas such as the Kerbside Strategy and Tree Planting, Parks and Green Spaces, but would like some detail of how this will happen. We would like to see more evidence of how council departments such as Housing, Regeneration, Education and Public Realm will be delivering infrastructure and services that support reductions in carbon consumption and polluting emissions. How will they be made aware of the air quality strategy? How frequently and in what way will they report back on their success in delivering reductions?	Other service areas will be made aware of the AQ strategy through the senior management team and will be required to report back annually as part of the London Local Air Quality management regime
51	We are concerned that this action plan does not refer to the success or failure of actions in previous air quality plans. For example, increasing registration for AirText alerts was an action point (Measure 17) in May 2012 (AQIS, 2012). In a deputation to the council in July 2012, Southwark Green Party called for information on airTEXT to be sent to all head teachers as a minimum step in increasing awareness of how parents and teachers can reduce children's individual exposure levels. We have been informed that only three Southwark schools have signed up for alerts by January 2017. Clearly, this makes us very doubtful about whether the council will deliver on its new promise (3-5) to promote airTEXT and Walkit.	<p>The success of previous action plans are recorded in the annual progress reports, which can be found on the Southwark webpages in the Air Quality section.</p> <p>Further actions to improve the uptake air quality information with schools with are being perused,</p>
52	Alerts are only a tool to reduce individual exposure, and it is more important to enable behaviour change to reduce overall pollution levels - for example, to reduce the number of car journeys to take children to school. The most publicised recent air pollution work with Southwark schools was the 'Clean Air 4 Schools' project run by LSx. But this was an 'awareness project'	<p>The authority requires each school to have a travel plan which includes modal shift elements.</p> <p>The target for 2013 – 14 was met, the number of children being driven to school has decreased by 2%.</p>

	<p>rather than a 'modal shift project'. Data on behaviour change was only collected from two schools. This is completely inadequate. We call on the council to actively pursue modal shifts for journeys to school and to collect sufficient information to assess what works. AQIS (2012) states: 'Incorporated within the Council Plan is a target to reduce the number of children being driven to school from a baseline of 15.7% in 2010-11 to 13% by 2013-14. In the past 5 years a 5% decrease in numbers has been achieved.' Was this target achieved? And what is the target for 2017-19?</p>	
53	<p>Finally, we believe that Southwark residents are very concerned about the impact of air pollution on their health and would welcome a stronger action plan. We want to see real actions to cut emissions of nitrogen dioxides and particulate matter in the borough.</p>	<p>The action plan has been reviewed, updated and when ratified will be considerably 'stronger ' than it's previous iteration.</p>
54	<p>In summary, we propose:</p> <ul style="list-style-type: none"> <li>• measurable actions and targets to help monitor progress, and on a scale equal to the seriousness of the public health challenge – with monitoring indicators to include data on behaviour change;</li> <li>• transparency concerning the delivery by council departments such as Housing, Regeneration, Education and Public Realm of infrastructure and services that help reduce carbon consumption and polluting emissions;</li> <li>• provision of clear feedback concerning these departments' success, or otherwise, in enabling reductions;</li> <li>• an assessment of the lessons learned from previous air quality plans, and of how this strategy avoids repeating past mistakes.</li> </ul>	<p>Noted</p>
55	<p>1) We welcome these actions:</p> <p>6-1 'Enforcement of the Clean Air Acts' by ensuring that all retail premises selling wood and coal are aware that the whole of the Borough is a Smoke Control Area.</p> <p>6-2 'Discourage burning of logs and house coal in the Borough' through a communication campaign.</p> <p>4-2 'Develop a freight consolidation solution for Southwark' and 'All Southwark Council suppliers to use the proposed freight consolidation solution where possible'. We are pleased to note that these items have dates and targets.</p> <p>4-18 Train all Joint Enforcement Team (JET) officers in Road Traffic Act anti-idling enforcement. We note that idling is an increasing problem on side streets near major junctions such as Elephant and Castle, both by delivery drivers and Uber drivers, as well as outside schools. We welcome both education and enforcement</p>	<p>Noted</p>
56	<p>3-1 Encourage children to walk or cycle to school'</p>	<p>The number of schools with Gold</p>

	<p>The plan talks only of increasing the number of Gold and Silver accredited schools.  How many are there in the borough now?  What would be a good level to aim for?  How will an increase be achieved?</p>	<p>TfL's Star Accreditation at present is 11 schools  The number of schools with Silver TfL's Star Accreditation is 11 schools  New targets have been included</p> <p>The increase will be included within the officer work program.</p>
57	<p>We would like to see targets along the lines of the following:</p> <ul style="list-style-type: none"> <li>• Every child will participate in cycle training at primary school</li> <li>• Sessions of individual transport planning will be offered at every primary school to help families shift away from using cars on the school run. Volunteer parent champions for clean transport will be trained to cascade advice to other families.</li> <li>• Enforcement of no-idling around schools. The previous plan, AQ/S 2012, included an indicator for this: 'The number of idling vehicles owner requests to turn off engines and percentage of FPN issued' (Measure 4). Why is there no such indicator in the current plan?</li> <li>• Provide access to cycles for staff This is not a new action so the target should involve increasing uptake. How many Southwark staff currently use pool bikes/their own bikes for council business? How can this be increased? How might the provision of non-standard cycles such as trikes and cargo bikes allow more staff to benefit?</li> </ul>	<p>All Southwark schools are offered Cycle training for Year 5 &amp; 6, some schools do not accept the offer. The authority also offers Holiday Club Cycling Training.</p> <p>There are no resources available for this at present, but will be considered if resources are found.</p> <p>At present due to lack of resources, FPN's are not issued. There is now a new measure for Parking Enforcement Officers (PEO) to be authorised to serve FPN's in the Parking Enforcement contract as and when the current contract is amended.</p> <p>The target has been changed to increase the uptake of cycles for staff by 5% per year.  There are 7 pool bikes for the use by Southwark staff There are 110 staff using their own bikes for council business.</p>
58	<p>Promotion of availability of airTEXT and Walkit apps'.  3-5 We are told that a 'plan for awareness raising programme to be devised by April 2018'. This is a ludicrous delay, given that the tools already exist and only need to be promoted, and that this item has been in the previous action plans. The council's communications department could instead be tasked with increasing awareness by (say) 50-80% by the end of April 2017. The makers of the app may be able and willing to share anonymised information about the locations of users registered in Southwark which will provide evidence for increased use. We would like to see a target minimum proportion of the population that is aware of episodes of high pollution, and minimum proportion of local population aware of chronic high pollution in their area, with an indication of how this will be</p>	<p>The target has been changed to September 2017. The implementation plan for this measure will explore methods to encourage other services and points of public contact such as local shops and amenities, sports centres, GP practices and community centres to register for the airTEXT alerts and promote public awareness.</p>

	<p>measured. The information about air pollution episodes and about how individuals can reduce their exposure by changing route or mode of travel should be diffused as widely as possible. The Plan could encourage other services and points of public contact such as local shops and amenities, sports centres, GP practices and community centres to register for the airTEXT alerts and promote public awareness.</p>	
59	<p>5-14 'Promote the use of renewable energy and minimise the energy demand of Southwark Housing'. We would be pleased to see the council 'explore the opportunity of installing renewable energy technologies and retrofitting insulation and energy efficiency measures'. We would like to see a target along the following lines: 'all estate regeneration schemes and proposals to carry out major works to the roofs of properties (both street properties and blocks of flats) must include an assessment of the cost and potential income from installing solar panels at the same time. Residents should be offered the opportunity to set up community energy schemes on estates.' Similarly, all plans for major repairs to lighting on estates should include an assessment of low energy alternatives and motion sensor systems. Where the energy savings will pay for themselves within 5 years, these should be made a priority for investment.</p>	<p>Further measures will be considered</p>
60	<p>3) We want to see additional actions a) Phase out diesel There is no mention of diesel in the document. This fuel has been identified as a carcinogen by the WHO and there have been calls for a London-wide ban on diesel. Please include in this plan details of how you will reduce pollution from Southwark Council's activities by changing the fleet to diesel-free and electric vehicles; training drivers (both of fleet vehicles and contractors) to turn off engines when stopped; and enforcing anti-idling legislation for members of the public and delivery vehicles. We would like to see Southwark Council commit to ending all new purchases of diesel vehicles for its fleet within the life of this plan.</p>	<p>The fleet is being replaced with alternative fuelled or petrol based vehicles. Presently there are some specialised vehicles are not available with non-diesel engines. There is an instruction to Council drivers to switch off the engine when parked.</p>
61	<p>b) Reduce idling 4-18. Train all JET officers in Road traffic Act anti-idling enforcement. Please give a target date for the training. We would like to see targets and timetables such as: reduce idling outside schools to 0% through a combination of education and enforcement by June 2017.</p>	<p>Due to the resources required the authority will not be able to reduce idling outside schools by June 2017. The Authority is working towards authorising staff to enforce idling legislation and is considering appropriate locations for School Streets interventions in appropriate locations.</p>

62	<p>c) Insulate council blocks</p> <p>Please include in this plan details of how you will insulate council properties to reduce fuel consumption and consequent emissions from domestic heating.</p>	<p>There is a 'Decent Homes' programme within the Housing and Modernisation Department to deal with the council residential properties, which includes increasing insulation.</p>
63	<p>d) Give details of concrete actions to promote walking and cycling These could include:</p> <ul style="list-style-type: none"> <li>• reinstating the cancelled cycle loan scheme in order to help people start cycling</li> <li>• creating protected cycle lanes the length of the Old Kent Road</li> <li>• supporting private landlords in providing cycle parking for shared houses and blocks of flats by setting up a bulk buy scheme for approved designs of cycle lockers</li> <li>• replacing the Christmas season waiver of 'pay and display' car parking fees with a temporary cargo bike delivery scheme to encourage people to shop on foot in local high streets</li> </ul> <ul style="list-style-type: none"> <li>• making sure that new Quietway routes are suitable for age 8-80 and are safe to access 24 hours a day. This could mean, for example, removing some car parking spaces on Wells Way to create a link in cycle route Quietway 7 that doesn't involve cycling through Burgess Park.</li> <li>• Ambitions to increase the numbers of people cycling in the borough must be linked to air quality policy and therefore given a high priority.</li> </ul>	<p>When resources are available.</p> <p>This is proposed in the Old Kent Action Plan No resources at present to support this action</p> <p>The support for 'Small business Saturday' and the waiving of on-street parking fees in the North of the Borough and in Peckham, through December, costs the council little in revenue and effects only about 55 parking bays. All studies carried out in Southwark on our high streets in Peckham and East Street show low levels of car use to shop in Southwark already.</p> <p>This outside the scope of this action plan. Comment will be forwarded to Transpot Planning for consideration as part of the Cycling Strategy</p> <p>The Authority recently ran a campaign to increase people cycling in the Borough and this was linked to air quality. The link is acknowledged and in place.</p>
64	<p>e) Give details of transport alternatives that could be promoted to residents</p> <ul style="list-style-type: none"> <li>• promote local car clubs. There is no mention of car clubs in the current plan, whereas AQ/S 2012 stated: 'Southwark will continue to encourage the use of the car club schemes, monitor and report on uptake and allocate additional spaces should demand warrant'. Why is this not in the current plan?</li> <li>• where membership of a car club is provided to purchasers of flats in car-free developments, this should be publicised and promoted to surrounding residents to increase uptake and supply of shared vehicles in the area.</li> <li>• publicise car-sharing schemes for longer journeys that use social networks (e.g. Blablacar)</li> </ul>	<p>A new measure will be added to the current plan</p> <p>Noted</p> <p>We promote car – sharing schemes on the Southwark air quality web-pages.</p>

	<ul style="list-style-type: none"> <li>• offer opportunities to try cargo bikes, child seats, tag-along bikes, trikes and non-standard bikes that may be suitable for older people or those with disabilities.</li> <li>• publicise car-shares, cycle loans and supermarket delivery schemes as part of a package that will enable residents to give up a private car and make financial savings and health improvements.</li> </ul>	<p>This could be included within future air quality promotional campaigns</p> <p>This will included within future air quality promotional campaigns</p>
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## Comments from responders using on-line form - responses

65	Web Ref No: 22712  AQSAP-clear-and-easily-understood: Useful-non-tech-summary?: Understand-AQSAP-objectives:	Yes Yes Yes	Noted
66	Agree-with-AQSAP-objectives	I think they are far too conservative and avoid tackling the key causes i.e. transport and the volume of the wrong sort of traffic	Noted
67	Are-measures-suitable-for-Southwark:	Yes they are relevant but relatively ineffectual	Noted
68	Do-measures-go-far-enough-or-need-more-development:	Much further. I would like to see much more road space reallocation to reduce the volume of traffic. Which, by the way, is no longer considered economically significant. Maybe public transport, but this should all be CO <sub>2</sub> neutral anyway	Noted
69	Other-measures-to-be-included?	Banning of diesel vehicles. Total ban of all vehicles on certain days, maybe Sundays, to allow cycling to take more hold and for pedestrians to experience what not having pollution is like. To say you cannot act because you are just one borough in 32 is just not good enough. Southwark is an inner London borough and should therefore take more of a strategic role	Noted, possibly will be able to undertake actions in some neighbourhoods but closure of bus routes and main routes unlikely to be possible
70	Initiatives_to_reduce_pollution_near_schools	Vehicle bans at peak arrival and drop off times. They have done this in Scotland I believe. A ban of parents dropping off children at school by car. Imposition of penalties for persistent offenders.	New measures will be added. The authority will be participating in the GLA Air quality Audit at primary schools and is currently shortlisting schools for a School Streets pilot.
71	Agree_with_enforcing_law_to_stop_idling_engines?:	Yes	Noted
72	Any_vehicles_that_should_be_concentrated_on	Diesel of course	Noted
73	Any_areas_to_be_tackled_first?	All areas. Blanket action. There may be hotspots but everyone knows how serious this issue is. You cannot expect people to be less car dependent if you cannot improve the environment for walking and cycling.	Noted, However GLA require Southwark to work in the designated Air Quality Focus areas as a priority.
74	Agree_that_developers_should_actively_improve_air_quality	Of course	Noted

75	Info_for_website:	<ul style="list-style-type: none"> <li>• Air pollution levels</li> <li>• Advice on how you can reduce your own impact on air quality</li> <li>• Information on the health effects of poor air quality</li> <li>• Information on initiatives that Southwark is taking</li> </ul>	All this information is currently on our AQ webpages
76	Priority_locations_f_or_monitoring_air_quality?:	Outside schools for education purposes. Monitoring is pointless generally if you don't act on the results	Current monitoring data is used to as part of process for checking the efficacy of AQ modelling and policy formulation.
77	Worthwhile-change-from-AQSAP	Not really. It is the elephant in the room. I am very concerned about it, for everyone. I cycle in London and teach people to cycle and think the quality of the air we breathe is on the whole pretty awful	Noted
78	Comments:	I think an analysis of journey purpose by vehicle would be an enormous education. We do not discriminate against non-essential vehicle travel and we should. I think people expect it now with the horrifying air quality figures for London	Noted