



Air Quality Strategy & Action Plan Consultation Responses

March 2017

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Consultation Overview

There were 3 main groups of consultees during the development of the Air Quality Strategy & Action Plan these were:-

- Internal services who will deliver the actions
- Statutory consultees – required by legislation
- The public – due to significant public interest in local air quality

Internal service areas

The draft consultation version of the current document had internal consultation from the action plan delivery service areas as it was being developed. The service areas were consulted again on the post-consultation final draft and all their comments and queries regarding content addressed.

This included the following teams:

- Environmental Protection
- Environment & Leisure Service Development
- Comms
- Public Health
- Transport Policy
- Sustainable Travel & Road Safety
- Procurement
- Facilities Management
- Fleet Services
- Housing Major Projects
- Development Management
- Planning Policy
- Noise & Nuisance
- Joint Enforcement

Statutory Consultees

It is a legal duty under Environment Act 1995 and the London Local Air Quality Management Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following parties were contacted directly by email.

- The Secretary of State/Defra – to ensure that the council's air quality strategy will dovetail with the national air quality strategy
- The Environment Agency – as they are also involved in emissions control and regulating polluting processes
- The Mayor of London – they must approve the London Local Authorities Air Quality Action Plans prior to publication

- Transport for London – who provide a joint response with the Mayor of London
- All neighbouring boroughs – To ensure any actions proposed by one authority do not compromise but compliment actions proposed by the other
- Other public authorities as the borough considers appropriate – the Health & Wellbeing Board, the Clinical Commissioning Group and organisations representing local business interests were consulted – the local BIDs consulted included Better Bankside, Team London Bridge, We Are Waterloo, The Blue and South Bank. We also consulted Southwark Commerce

The Public

Using the Southwark Council Consultation Hub, supported by Facebook posts and items on the council's Twitter feed to raise awareness, the public were asked to give us their comments on the Draft Air Quality Strategy and Action Plan. This consultation ran from the 15th December 2016 – 31st January 2017.

The results of the consultation - Overview

Organisation/Agency/Party	Response
Defra	No
Mayor of London /GLA	Yes – see part A
Environment Agency	Yes – see part A
TfL	No
Lambeth, Croydon, Lewisham, Tower Hamlets, City of London, Bromley	No
Better Bankside	Yes – see part A
Team London Bridge	Yes – see part A
The Blue	No
We are Waterloo	No
South Bank BID	No
Southwark Commerce	No
Clinical Commissioning Group	Yes – approved with broad support – see Part A
Health & Wellbeing Board	Yes – approved with broad support at meeting – no written response provided
Public consultation	34 responses – see part B

Part A – Responses from Statutory responders

GLA response

Comment Number	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 Appendices document
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. See measure 2 – 1
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 to 3 – 3. Could you include specific quantified targets here?	Discussed with the relevant services/teams and quantified targets have been inserted.
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 included
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 much be zero emission capable from 2018.	New measure added to the Action Plan – Measure 4 – 12. The old measures renumbered
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?	Timelines have been included in the Action Plan

Environment Agency response

Comment Number	Comment	Response
13	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.	Noted
14	We note the actions in the plan are not time bound and we suggest that delivery of the plan are reviewed against SMARTT criteria (i.e. Specific, Measurable, Assignable, Realistic, Resourced, Time Bound) in order to support its actions.	Action plan reviewed with timescales and revised targets included for all actions
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> <p>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</p> <p>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.</p>	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 http://www.iaqm.co.uk/text/guidance/air-quality-planning-guidance.pdf</p>	Noted

Comment Number	Comment	Response
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>	<p>This approach will be included in the Authority's Technical Guidance on Air Quality and hopefully in an SPD in future</p>
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 data-bbox="268 533 984 779">1. Ensuring any waste management facilities relocated due to redevelopment master plans, are 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 building. <li data-bbox="268 824 984 1010">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>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>	<p>Noted. This will be included in the Authority's Technical Guidance on Air Quality and dealt with through the planning process</p>
19	<p>We support the ongoing commitment under Section 1 to maintain Air Quality Monitoring capability through continuous and periodic monitoring equipment.</p>	<p>Noted</p>

Comment Number	Comment	Response
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> <ol style="list-style-type: none"> 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. 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>A new measure will be added to Section 6 Regulation See Measure 6 – 12</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 PM₁₀ 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>	<p>An appropriate new measure will be discussed with appropriate services/teams and potentially added to a future update to the plan. Most dust is generated by construction and should be dealt with via the relevant developer via their Construction Environment Management Plans, see Southwark's technical guidance for construction</p>

<p>22</p>	<p>Air Quality Strategy</p> <p>We feel it lacks detail on:</p> <p>Overall objectives of the strategy & plan and how these relate to the borough's Strategic Plan</p> <p>Key partners beyond the GLA in the delivery of the strategy & action plan including Business Improvement Districts (Better Bankside, Team London Bridge, Blue Bermondsey)</p> <p>The expected duration of the plan, how it will be updated when required and how the overall impacts will be measured</p> <p>Who is responsible for overseeing its delivery</p> <p>How other borough plans (e.g. Cycling Strategy) can deliver the objectives of the Air Quality Plan.</p>	<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 will be 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>
<p>23</p>	<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 NO₂ and PM₁₀ in the following locations:</p> <p>Borough High Street (northern section between Southwark Street and London Bridge Southwark Bridge Road junction with Southwark Street, Blackfriars Road junction with Southwark Street/ Stamford Street.</p>	<p>The Authority has planned to increase the number of locations where air quality monitoring occurs, with an increase of Nitrogen Dioxide diffusion tubes in the Air Quality Focus Areas. Locations suggested in the comments will be considered during the review</p> <p>Locations suggested in the comments will be considered during the review of monitoring locations</p>

24	<p>Section 2 – Reduce Emissions</p> <p>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"> Fleet operators Business procurement leads Office managers. <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 measure was aimed at domestic heating fuel type and fuel economy. Measure 2 – 3 has been made explicit to mention heating</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.</p> <p>A new action has been included in section 4 Reduce Emissions from Road Traffic to include a campaign working with BIDs to include Fleets. See Measure 4 – 24</p>
25	<p>Section 3 – Public Health, Education and Awareness</p> <p>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"> Greater promotion and provision of cycle confidence training, including to those working in the borough Work to improve cycle parking provision, both short term and for commuting Provision and promotion of quality cycle routes along roads with lower air pollution. <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 The Low Line.</p>	<p>Noted – comments will be passed to Transport Policy</p>
26	<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</p>	<p>The measures 4 – 4 & 4 – 5 have been 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>

	possible regardless of whether they are using the freight consolidation facility.	
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 & 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 - 13 to 4 - 14 - 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 - 19 - 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 and Bankside wardens have been included in the 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 measures 4 – 29 & 4 – 30 has been added to the plan. The detail of this measure will need to be considered with Transport Policy
32	<p>Section 5 – Reduction of carbon emissions</p> <p>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'. We welcome the offer of match funding from the BID

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 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>We welcome the expressed support and will work with the BIDs to develop best practice or pilot new equipment or methods that further reduce emissions as an extension of the ongoing London Low Emission Construction partnership of which Southwark is a current partner</p>
34	<p>Section 7 – Support the GLA Air Quality Aims GLA Air Quality Focus Areas</p> <p>Action 7 - 1: - 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 Focus Areas</p>
35	<p>Section 8 – Air Quality Projects in the Borough</p> <p>Action 8 - 5: - 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 welcome and explore further opportunities to jointly fund air quality improvement projects with the BID areas</p>
36	<p>Further Actions we suggest should be included in the Action Plan</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"> • Investments in public realm enhancement and maintenance should be assessed against criteria as set out in Transport for London’s Healthy Streets approach. • 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. 	<p>These are very useful suggestions.</p> <p>The ‘Healthy Street Approach’ has been adopted via the Authority’s Draft Kerbside Strategy, currently out to public consultation, and a new measure has been included See measure 6 – 5</p> <p>A new measure 6 – 4 has been inserted to increase the amount of green infrastructure in the borough</p> <p>The rest of the measures have been re-numbered to incorporate new measure 6 – 4 & 6 – 5</p>

Team London Bridge Response

37	<p>TLB has a strong remit from businesses since 2015 to deliver the London Bridge Plan. 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 and welcomed
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 are now specifically referenced in several actions in the 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 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. The locations mentioned in the comments will be included in the review</p> <p>Data for air quality monitoring is available on the London Air Quality Network website and on the Southwark website in the revised Air Quality section and the council is satisfied with the prediction maps in the London Emission Inventory</p> <p>The authority is assisting the MAGIC project – “Managing Air for Green Inner Cities”. This project comprises of three components:</p> <p>(i) a fully resolved air quality</p>

		<p>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;</p> <p>(ii) reduced order models that allow rapid calculations for real time analysis and emergency response; and</p> <p>(iii) a cost-benefit model to assess the economic, social and environmental viability of low cost air quality monitoring options</p>
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 6 – 5 has been included</p> <p>A new measure 6 – 4 has been inserted to increase the amount of green infrastructure</p> <p>The rest of the measures have been re-numbered to incorporate new measure 6 – 4 & 6 – 5.</p>
43	<p>Supportive transport infrastructure (4).</p> <p>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. There are targets in the action plan for more infrastructure to increase active travel. The offer of match funding has been passed to Transport Policy</p>
44	<p>Road pricing Action 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>Noted – suggestion passed to Transport Policy for consideration</p>
45	<p>Freight (4).</p> <p>Activities around reducing emissions from delivery and servicing are very important and these are 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</p>	<p>Measure 4 – 5 will be amended to include the BIDs and to promote the rationalisation of deliveries and servicing in the London Bridge area, where rail and river based options could be explored for some products</p>

	potential for both in the London Bridge area.	
46	<p>Developers (5).</p> <p>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>	The reference to London Plan is not time specified therefore the objective will be applied in accordance with current London Plan at the time of planning application receipt
47	<p>New Southwark Local Plan (5).</p> <p>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>	A new action 6 – 4 has been incorporated into the action plan to increase green infrastructure in the Borough. This comment will be shared with Planning Policy

Response from the NHS Southwark Clinical Commissioning Group

48	<p>The CCG welcomes the focus on air quality especially given the risks and implications to long term health conditions. The communication of such risks to the public and professionals are key. The actions are clear and look to address a number of areas. We offer our broad support to the strategy and action plan.</p>	Noted
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Part B – Responses from non – Statutory responders

Southwark Green Party response

49	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. The council is legally constrained with the actions it can implement but does work with and lobbies other agencies to take more effective action to improve air quality
50	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 for all actions. The means of measuring success will be through the annual ASR reports to the GLA as part of the London Local Air Quality Framework management regime
51	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 Framework management regime
52	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	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 Further actions to improve the uptake of air quality information with schools are being pursued as the authority is currently devising guidance on local air quality to be provided to all schools in the borough. Sadly promoting air quality

	promise (3-5) to promote AirText and Walk-it.	issues to schools and providing them with information does not guarantee participation. 12 schools in the borough have undertaken the Cleaner Air for Schools educational programme and several more have been involved in Clean Air Action Days. That said - noted and we will revise our future approach to hopefully achieve better take up
53	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' 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. AQ/S (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>The authority requires each school to have a travel plan which includes modal shift elements which has ongoing targets to reduce travel to school by private car</p> <p>The target for 2013 – 14 was met and the number of travel to school journeys has been further reduced</p> <p>As grant funding is successfully bid for further projects aimed at parental choice are planned</p>
54	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.	The action plan has been reviewed, updated and when ratified will be considerably stronger than its previous iteration
55	<p>In summary, we propose:</p> <ul style="list-style-type: none"> • 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; • 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; • provision of clear feedback concerning these departments' success, or otherwise, in enabling reductions; • an assessment of the lessons learned from previous air quality plans, and of how this strategy avoids repeating past mistakes. 	Noted
56	<p>1) We welcome these actions:</p> <p>6 - 1 'Enforcement of the Clean Air Acts' by</p>	Noted

	<p>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>	
57	<p>3 - 1 Encourage children to walk or cycle to school'</p> <p>The plan talks only of increasing the number of Gold and Silver accredited schools.</p> <p>How many are there in the borough now?</p> <p>What would be a good level to aim for?</p> <p>How will an increase be achieved?</p>	<p>The number of schools with Gold TfL's Star Accreditation at present is 11 schools</p> <p>The number of schools with Silver TfL's Star Accreditation is 11 schools</p> <p>New targets have been included</p> <p>The increase will be included within the officer work program</p>
58	<p>We would like to see targets along the lines of the following:</p> <ul style="list-style-type: none"> • Every child will participate in cycle training at primary school • 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. • Enforcement of no-idling around schools. The previous plan, AQIS 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 	<p>All Southwark schools are offered Cycle training for Year 5 & 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 become available.</p> <p>At present there is no enforcement of vehicle idling legislation therefore 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 when</p>

	<p>plan?</p> <ul style="list-style-type: none"> • 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? 	<p>the current contract is amended.</p> <p>The target has been changed to increase the uptake of cycles for staff by 5% per year</p> <p>There are 7 pool bikes for the use by Southwark staff. There are currently 110 staff using their own bikes for council business and many more use public transport</p>
59	<p>Promotion of availability of AirText and Walk-it apps’.</p> <p>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 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 Air Text forecast and promote public awareness.</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 Air Text forecast and promote public awareness</p>
60	<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</p>	<p>New measures 5 – 15 to 5 – 16 have been included in the revised action plan</p> <p>The rest of the measures have been re-numbered to incorporate new measure 5 – 15 to 5 – 16</p> <p>Estate regeneration will ensure the project meets current energy requirements during the planning process</p> <p>The installation of motion sensors on estates may not be practical from a community safety aspect in some locations. Low energy bulbs can be considered where light fittings will</p>

	made a priority for investment.	take them
61	<p>3) We want to see additional actions</p> <p>a) Phase out diesel</p> <p>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 council fleet is in the process of 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. We are also currently exploring the viability of differential parking charges and permit fees based on vehicle fuel type and have lobbied government to invest in a diesel scrappage scheme</p>
62	<p>b) Reduce idling</p> <p>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 street based staff to enforce vehicle idling legislation and is considering appropriate locations for School Streets interventions in appropriate locations</p>
63	<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 increased insulation</p>
64	<p>d) Give details of concrete actions to promote walking and cycling</p> <p>These could include:</p> <ul style="list-style-type: none"> reinstating the cancelled cycle loan scheme in order to help people start cycling creating protected cycle lanes the length of the Old Kent Road 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 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 	<p>Southwark has a staff cycle loan scheme for those who wish to commute by cycle. The maximum loan available through this scheme is £1,000</p> <p>This is proposed in the Old Kent Action Plan</p> <p>No resources to support this action, however secure cycle lockers are considered at planning stage for new builds and significant refurbishments</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</p>

	<ul style="list-style-type: none"> 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. Ambitions to increase the numbers of people cycling in the borough must be linked to air quality policy and therefore given a high priority. 	<p>about 55 parking bays whilst encouraging local, rather than distant, shopping. Evaluation studies show there are already low levels of car use facilitating shopping in Southwark</p> <p>This is outside the scope of this action plan. Comment will be forwarded to Transport Planning for consideration as part of the Cycling Strategy</p> <p>The Authority ran campaigns to increase people cycling in the Borough throughout 2016. This was linked to air quality. The link between air quality & active travel is in place</p>
65	<p>e) Give details of transport alternatives that could be promoted to residents</p> <ul style="list-style-type: none"> 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? 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. publicise car-sharing schemes for longer journeys that use social networks (e.g. Blablacar) 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. 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. 	<p>A new measure 4 – 31 has been included in the plan</p> <p>Noted</p> <p>We promote car-sharing schemes on the Southwark air quality web-pages.</p> <p>This could be included within future air quality and cycling promotional campaigns</p> <p>Noted. Will publicise when relevant to future modal shift and air quality campaigns</p>

Comments from a responder using an on-line form - responses

66	<p>Web Ref No: 22712</p> <p>AQSAP-clear-and-easily-understood: Useful-non-tech-summary?: Understand-AQSAP-objectives:</p>	<p>Yes Yes Yes</p>	Noted
67	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
68	Are-measures-suitable-for-Southwark:	Yes they are relevant but relatively ineffectual	Noted
69	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 ₂ neutral anyway	Noted
70	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 as the TRN roads are not managed by Southwark
72	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 4 – 24 & 4 – 25 have been 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
73	Agree_with_enforcing_law_to_stop_idling_engines?:	Yes	Noted
74	Any_vehicles_that_should_be_concentrated_on	Diesel of course	Noted
75	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. Kerbside strategy to improve environment for walking and cycling currently under consultation

76	Agree that developers should actively improve air quality	Of course	Noted
77	Info_for_website:	<ul style="list-style-type: none"> • Air pollution levels • Advice on how you can reduce your own impact on air quality • Information on the health effects of poor air quality • Information on initiatives that Southwark is taking 	All this information is currently on our AQ webpages
78	Priority_locations_for_monitoring_air_quality?:	Outside schools for education purposes. Monitoring is pointless generally if you don't act on the results	Current monitoring is used to check the efficacy of AQ modelling and policy formulation
79	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
80	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 – awareness and behaviour change actions are included

	Comment	Response
R1	I live close to the dual carriage way on Dog Kennel Hill. The air quality inside my flat frequently exceeds 3.5 ppm during the day. What steps are the local authority taking to reduce this to levels that fall within the EU's guidelines for domestic spaces?	Reducing the external concentrations of pollutants will help to reduce the internal levels. Internal sources of pollution (cooker/boiler) also contribute significantly to internal pollutant concentrations
R2	Hi. My opinion and additions to your plan. To "Discourage and prevent bonfires and open burning 6.8 ", will only help if Southwark can monitor the Scrap Dealers in Ilderton Rd. No mention of the waste incinerator based at Surrey Canal Road, nor the one in the Old Kent Road, which in my opinion of having lived in the area for over 30 years are major polluter and releaser of carbon particulates. The large building site near Decathlon, Surrey Docks is also not inferred directly. This site has been churning out dust and noise for many years now, and the dust it generates coats our windows, and can make breathing difficult, especially on warm days with low cloud	<p>If there are commercial premises burning waste and dust from construction sites, then the Authority's Noise & Nuisance Team can be contacted to investigate</p> <p>SELCHP is a process regulated by the Environment Agency. A new measure to include Environment Agency has been included, see measure 6 – 11</p> <p>The Integrated Waste Management facility on the Old Kent Road does not incinerate on site</p>
R3	I agree with the premise of the air quality and strategy and action plan. My only comment is in relation to encouraging more walking and cycling in the borough there needs to be more investment in infrastructure to support these aims and it makes it safer for people to walk and cycle - with dedicated and separate cycle lanes, better crossing facilities with longer crossing times and priority for pedestrians crossing and diagonal crossing to traverse box junctions.	The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. We are currently consulting on the Kerbside Strategy
R4	<p>It seems that there are a number of ways that a Local Authority can influence road transport based emissions and overall Southwark is failing to make the most of them in this strategy. There is little recognition in the strategy in relation to road transport that the dominance of the public realm by motor vehicles has a major impact of suppressing journeys by cycle and on foot and that to encourage active forms of travel, reasonable financial sticks and carrots can and should be used to reduce the impact of motor vehicles and Southwark has control over some of these levers. Three suggestions are made:</p> <p>1. Using pricing mechanisms to encourage the use of less polluting vehicles. A number of London boroughs (Merton, Camden and Islington) have used differential pricing for parking to discourage the ownership and usage of more polluting vehicles. The most obvious ideas are a) to increase the costs of resident parking for more polluting vehicles, b) to increase the costs of parking at shops etc. for more polluting vehicles and c) to increase the coverage of resident parking regime to cover the whole of the borough (as in Islington) so that these disincentives for high polluting vehicles apply to the whole of the borough and neighbourhoods are not left out of improvements.</p> <p>2. Procurement and Management of Contracts. To go further than is proposed and for no diesel vehicles to be purchased (other than for</p>	<p>Timeline has been included in the Action Plan</p> <p>New Measure 4 – 22 and 4 – 23 added to the Action Plan to review the charges for parking in the borough to promote use of less polluting vehicles</p> <p>The Authority's fleet contracts are being reviewed as they are renewed and controls can be considered for</p>

	Comment	Response
	<p>operationally critical reasons) by Southwark from now on and for all contracts with suppliers and agents (e.g. Housing Maintenance) and in other areas where Southwark has influence (e.g. vehicles used in relation to the delivery of planning applications) to stipulate the types of vehicles that will only be acceptable after a certain date (e.g. 2019) if a contractor wants to be considered in relation to a tender.</p> <p>3 Encouraging walking and cycling. The journey to school appears to be the most obvious example of increased travel being associated with a specific time of the day. In school holidays traffic levels are typically far lower at the start and end of the day. Concerted policies are needed to encourage children to travel to school on foot, cycle or by public transport. We know that they want to do that. There is enormous latent demand for cycling (far more would like to cycle than do now) and there are significant learning benefits from an active journey to school both from the exercise itself and the companionship that is gained with conversations en-route (to parents, carers and friends). As always a carrot and stick approach is needed. Walking and cycling can be made easier and more likely by having less traffic on the roads – the closure of Liverpool Grove at Lytham Street has resulted in far fewer vehicle movements in the area in the morning and a far safer environment around St Peter’s School. Some boroughs (Camden) are experimenting with closing streets adjacent to schools to make the environment around the school be and feel far safer. A wider neighbourhood approach could be taken to reducing through traffic as has been done in the mini-Holland scheme in Walthamstow Village thus removing much of the danger and intimidation associated with walking and cycling to school. LB Hackney has trialled giving incentives for people who walk to school (http://news.hackney.gov.uk/walking-is-literally-rewarding) which is a carrot approach that has had a positive impact. If Southwark finds a blanket approach too daunting, locations could be chosen for such an approach to be trialled such as Dulwich where the Safer Routes to School group is already well established and keen to implement projects. A more deprived area should also be chosen in order to assess what strategies work best amongst children and parents with lower levels of income.</p>	<p>council procurement contracts. There are limits to what the council can require of private developments through planning condition</p> <p>New measures 4 – 24 & 4 – 25 added to the plan to reduce parent & carer parking close to primary schools</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily</p> <p>We are currently consulting on the Kerbside Strategy</p> <p>The authority will be participating in the GLA Air Quality Audit at primary schools and is currently shortlisting schools for a ‘School Streets’ pilot</p>
R5	<p>I welcome the aim to extend the ULEZ to the south circular; it will reduce emissions and congestion within the central areas of Southwark. It would be great to see any money made from the ULEZ being used to reduce pollutants in central London.</p> <p>The report mentions but does not expand on the switching to alternative fuels for transport. Does this apply to upgrading the underground trains combustion engines? Surely the confined and underground nature of the station spaces is a highly</p>	<p>Noted. The finance from the ULEZ scheme is administered by TfL, so the authority has no direct influence on the spending of the charge</p> <p>Underground trains have electric lines</p> <p>TfL is the governing authority for London Underground, the comment</p>

	Comment	Response
	<p>polluted and toxic atmosphere. The emissions from the underground above ground are also not mentioned, these are uncontrolled and hazardous, one near St. George's Circus emits copious amounts fumes and blows them onto nearby pedestrians.</p> <p>I would also mention that nowhere in your strategic aims does it mention encouraging or promoting other forms of transport. I believe it is the case that the main contributors of air pollutants in central London is cars and other vehicular traffic particularly those idle or in traffic. Reducing vehicular traffic in central London should be a priority of this strategy.</p>	<p>will be passed to TfL</p> <p>There are several measures within the Action Plan to reduce emissions from vehicles</p>
R6	<p>There doesn't seem to be a lot of actions aimed at reducing emissions from vehicles specifically.</p> <p>Actions to lobby TFL etc. regarding low emission and electric vehicles is welcome but I think more can be done, within the Council's powers, to reduce road traffic. As a cyclist I wonder if I am more healthy inside a bus than cycling on the road and if the air quality gets worse I will reconsider cycling. I think more measures to directly limit the use of cars and other polluting vehicles is needed to make a noticeable difference to air quality.</p>	<p>There are several measures within the Action Plan to reduce emission from vehicles</p> <p>the most polluted space is within vehicles in the flow of traffic. Air quality when cycling is markedly better</p>
R7	<p>It suggests some good things, but in my opinion it doesn't really go far enough, or have the necessary level of urgency. A few points:</p> <ul style="list-style-type: none"> • as I understand it, diesel vehicles are the key contributor to air pollution. If this is not correct, please let me know. The council could strongly endorse plans for tighter emissions charging scheme. The council should lobby for this to come in as soon as possible and communicate to residents on why it is taking this stance. Once the scheme is in place, the council should monitor what impact it has. For example, I imagine older taxis and large trucks are the most significant contributors. • it is necessary to encourage walking and cycling solutions, and to actively discourage use of diesel vehicles. Such actions should be focussed around schools - this will help with communications and persuading residents.- information schemes are useful, but only insofar as they build support for more material initiatives. I do not believe that informing people about bad air days, or encouraging people to switch off their engines, will have any real impact on pollution levels or health impacts. • it is key that the council walks the walk, and removes diesel vehicles from their own fleet. They should also encourage action among their suppliers, by setting procurement requirements. • the council should set a quantitative target for acceptable air pollution levels. A council 	<p>The London Mayor's Low Emission Zone (for HGVS & PSVs) and the Ultra-Low Emission Zone (for all vehicles), Taxi Strategy and bus Strategy are all aimed to reduce the number of polluting vehicles in the Greater London area</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. New measures 4 – 24 & 4 – 25 added to the plan to reduce parent & carer parking close to primary schools</p> <p>The Authority's fleet is being reviewed at present, with a view to increase the number of alternative fuel vehicles and the purchase of diesel vehicles, on operational requirement only.</p> <p>The strategy states that the authority</p>

	Comment	Response
	<p>member should take on responsibility for meeting this target, and progress should be regularly reported on. Without senior ownership of the issue, little is likely to take place.</p> <ul style="list-style-type: none"> urgency is key. Concrete actions should be taken as quickly as possible. 	<p>will be working towards to meet the national Air Quality Strategy objectives. The Cabinet Member for Public Health, Parks and Leisure will be overseeing the delivery of the plan</p> <p>Noted</p>
R8	encourage electric cars, more charging points, subsidised home charging sockets	Measure 4 – 1 is promoting the use of alternative vehicle fuels
R9	Re-instate the roundabout at "Elephant and catastrophe" for starters	This was a TfL project, this comment will be passed to them
R10	<p>I am pleased to see the plan covers a wide range of issues and is fairly specific about how they will be addressed.</p> <p>I am not so clear about how the council will be accountable to the Southwark population on its implementation of the plan, and I hope that communication will be open and not just serve to promote any successes. I'm particularly concerned that good data is collected on pollution trends, as those in the appendices appear to be quite patchy (and unaccompanied by explanations of methodology).</p> <p>Personally, I am very worried about air pollution. I live on Southampton Way, which has become very much worse in terms of traffic and pollution in the last few years, with commuting motorists using it and Parkhouse Street as a rat-run and spending quite a lot of time idling outside my flat when this causes congestion. This seems particularly unfair as few people living here run cars of their own. I myself do not and could not afford to if I wanted to.</p> <p>Finally, I would like to suggest that council employees are strongly encouraged to become ambassadors for the air quality policy. It is disheartening for residents to see council vehicles sitting with their engines running, or large numbers of employees taking the bus a single stop from the Tooley Street offices to London Bridge station. The real effects of these actions on pollution will of course be negligible, but if we want to improve our environment I really feel there will need to be a collective will to do so, and behavioural change from all of us. This can easily be undermined by anger towards 'the council' or a perception of unfairness.</p>	<p>The Council has a legal duty to report its progress against its air quality action plan. This report is submitted to the GLA every April for peer review and is published on the Authority's webpage</p> <p>This comment will be passed to Transport Policy</p> <p>The running of engines whilst parked is not in accordance with policy if the details of the vehicle are reported to the authority, appropriate action will be taken against the driver</p>
R11	Disappointing. This is a weak document focussing in behaviour change that will have limited impact. I would suggest that after a 6 month educational campaign FPNs must be issued to all drivers with idling engines and numbers recorded. I cycle past numerous schools every day and this is a massive problem, especially outside schools (including my son's school and private and state schools). The issuing of FPNs will make it more socially	Several measures with the action plan (measure 4 – 19 to 4 – 21) deal with idling of vehicles and new measures 4 – 25 to 4 – 28 have been introduced in respect of air quality around schools

	Comment	Response
	<p>unacceptable than an educational campaign as it is so hard to get the message out there.</p> <p>In addition, all Southwark contractors must sign up to a pledge (similar to the London Living Wage) and be fined if contractors are issued with FPNs (an Interserve van sits with an idling engine for an hour every lunch time on Dulwich Wood Avenue and Interserve have not responded to my complaints). They don't take it seriously even though they have a contract with Southwark, there is nothing to stop them polluting unnecessarily and making the air so toxic.</p>	<p>The running of engines whilst parked is not in accordance with policy if the details of the vehicles are reported to the authority, the appropriate action will be taken against the driver if the Interserve employee is associated with a Council Contract</p>
R12	<p>The Air Quality Strategy is too timid, and the Action Plan is not fit for purpose:</p> <p>Objectives – There are no overarching objectives and targets to reduce NO₂, PM_{2.5}, PM₁₀ and greenhouse gas emissions;</p> <ul style="list-style-type: none"> • Action Plan: some actions do not have due dates, and/or fully defined targets against which achievement or otherwise of the action and objective can be truly assessed; • Action Plan: some actions do not have any indication of resource requirements, against which an assessment of likelihood of effectiveness can be made; • Monitoring Air Quality: lacks an objective regarding a 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; • Reducing Emissions from Delivery and Servicing: FORS Gold Standard should be set; • Reducing Emissions from Delivery and Servicing: deliveries during daytime should be restricted or banned on chronically polluted streets, and should be applied during episodes of high pollution; • Reduction of carbon emissions: targets should be 100% (zero carbon). On-site minimum reduction should 80%. 	<p>The proposed Air Quality Action Plan is comparable to other leading Local Authority Air Quality Action Plans. The overarching objective to meet the air quality standards is in the Strategy</p> <p>Targets have been included in the Action Plan</p> <p>The air quality action plan has been reviewed to ensure that the measures can be achieved where resources are available</p> <p>Measure 3 – 6 is aimed to increase public awareness of air quality forecasting and information regarding air quality in their area is available via our website</p> <p>Measure 4 – 5 is promoting the combination and rationalisation of deliveries using low or zero emission vehicles and local distribution hubs in the north of Southwark</p> <p>The authority is presently consulting on its Kerbside Strategy and is exploring a freight consolidation solution for the Borough</p> <p>The reduction of carbon emissions are a national standard and measure 5 – 19 promotes best practice for the design to reduce emissions to air</p>
R13	<p>Congestion at Rotherhithe tunnel pollutes my neighbourhood. You should apply a toll for using the tunnel at any time and high occupancy vehicle rule, requiring at least 2 passengers per vehicle, at peak hours, there and to cross other bridges in London.</p>	<p>The Rotherhithe Tunnel is the responsibility of TfL, comments to be passed to TfL</p>
R14	<p>All good ideas, but how about introducing traffic free days on Sundays on main roads. They have done this in Bologna and other cities throughout Europe.</p> <p>Also free transport days - I think Paris did this</p>	<p>Noted. GLA control the TRN main road network</p>

	Comment	Response
	recently.	
R15	<p>I live on Consort Road, very close to the A202, and a busy road into Peckham town centre. I do not own a car, and yet am forced to breathe illegal air produced in large part by car drivers (both individuals and those in private hire vehicles). It's unfair and frankly disappointing. A minority of people in Peckham own cars, and yet we all suffer from car users' desire to drive them around. This strategy is frankly disappointing, in that it doesn't tackle one of the key sources of air pollution. In my view, there are two key areas in which the strategy could be strengthened:</p> <p>Reducing car trips</p> <p>The data shows that cars, especially diesel, are a significant contributor to atmospheric pollutants. Yet there is nothing in this strategy about reducing the number of car trips - both private individuals and private hire - in the borough. Warm words about 'encouraging' active travel and 'reducing emissions from transport' are frankly worthless without Southwark council taking action to make driving more difficult. Councils such as Waltham Forest have lobbied TfL for Mini Holland schemes, which are already proving successful in reducing the number of car trips. Southwark council should take visionary action to clean up the air in Peckham by banning free car parking, enforcing the speed limit (which is routinely exceeded), and closing roads to through traffic wherever possible. The fact that it is possible to drive a private vehicle down an extremely busy stretch of Rye Lane is frankly ridiculous, and contributes to wilfully poisoning many Southwark residents.</p> <p>Investing in proper walking and cycling infrastructure</p> <p>The roads around Peckham town centre are a disgrace. No separated cycle tracks, no enforcement of the speed limit, limited cycle parking, bad road surfaces, a lack of safe crossings on major roads. All of this adds up to making cycling into Peckham town centre an unattractive prospect. No amount of 'promotion' of cycling will overcome the fact that it is not a very nice experience. It is within Southwark's gift to improve this situation. More walking and cycling trips = less air pollution.</p>	<p>Noted</p> <p>The authority cannot directly ban diesel vehicles as this a national Government function, however the authority will be reducing the number of diesel vehicles in its fleet, with the procurement contract, reviewing the charges for on-street and estate parking to promote the use of less polluting vehicles (New measures 4 – 22 and 4 – 23). Reducing parent and carer parking close to primary schools (New measures 4 – 25 and 4 – 26) and promoting the use of car clubs.</p> <p>The most significant source of pollution on Rye Lane is the buses and delivery vehicles</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. We are currently consulting on the Kerbside Strategy</p>
R16	<p>The pollution levels are very high. Car Drivers going to the Grafton Dance Centre on Village Way sit outside waiting with their car engines running creating pollution.</p> <p>Village Way is a safer route to school and with 8 local schools the pollution level like the rest of</p>	<p>Measures 4 – 18 to 4 – 21 are dealing with vehicle idling thorough campaigns and enforcement</p> <p>New measures 4 – 24 & 4 – 25 has been included to reduce parent &</p>

	Comment	Response
	<p>Southwark very bad.</p> <p>The action plan is a good thing. There was an Air Pollution monitor attached to a lamp post on Village Way but this has now been removed?</p>	<p>carer parking close to primary schools</p> <p>The NO₂ Diffusion tube on the lamp post in Village Way is still present</p>
R17	<p>We live near a shopping centre and would like to see much more intervention from SC to protect residents in our block (directly opposite Butterfly Walk Arcade and the loading bay) from the constant traffic entering the loading bay serving Butterfly Walk. Juggernaut trucks, traffic from 5.30-midnight , management facilities/ services operating on the buildings often park outside our building with engines running for lengthy periods which impacts detrimentally on our health especially in the summer when windows are open mere metres from the running engines.</p> <p>A robust system needs to be in place to address this issue. We need to be more protected by SC.</p>	<p>Measures 4 – 18 to 4 – 21 are dealing with vehicle idling thorough campaigns and enforcement</p> <p>If there is excessive fume from t commercial premises the Authority's Noise and Nuisance team can be contacted to investigate</p>
R18	<p>Good detailed plan, however it is vital to turn the points into action as soon as possible. I am afraid a lot of the points will take time to get implemented. In particular removing diesel vehicles from the already congested zone 1 (congestion charge zone) is critical. Another important point is to create more areas without (or minimal) through traffic to improve the air quality around. This is something that can be done through significantly more aggressive traffic management, such as implementation of Quietways, removing through traffic in different areas and making it more difficult for motorized traffic to get around.</p>	<p>The London Mayor is introducing the "£10 T-Charge" for pre 2006 vehicles to enter the congestion zone from 23rd October 2017, the authority is supporting the London Mayor to extend the proposed Ultra Low Emission Zone to the South Circular road with a view to extend it to the M25 in the future.</p> <p>The authority is committed to the cycling Quietways in the Borough</p>
R19	<p>There doesn't seem to be anything about planting extra trees and air filtering plants. The regeneration has concreted over so many previously planted areas, and the replaced trees are building friendly not nature, and environmentally friendly ones. If you were serious about making air quality better you would be adding grass verges not putting down box parks. St. Georges Circus wouldn't have lost all its plants. The Elephant roundabout would still be grassy and have privet hedges on it. The area by the new Pret would have grass and leafy green plants. It is long past, but the old Elephant roundabouts and the area by Pret used to be massive flower beds.</p> <p>You wouldn't be building solidly along roads that were previously open, creating corridors of traffic fumes, as you did along Wyndham Road with the new school building, which now concentrates exhaust fumes into the living rooms and bedrooms of ALL the flats opposite it... which had been there decades before the new school plans were drawn up.</p> <p>Just a few simple things you could easily have thought about already and I am pretty sure were pointed out at times where a fix would have been simple and at least some bad health prevented.</p>	<p>New measure 6 – 4 Increase the amount of green infrastructure in the borough, has been included</p> <p>The authority is involved with the MAGIC project – "Managing Air for Green Inner Cities" this is a research project with South Bank University regarding the migration of pollutants from outdoors into buildings to better. The aim of our involvement is to better inform planning controls & policy in the future</p> <p>Noted</p>
R20	<p>There is quite a lot I agree with, BUT the strategy lacks specificity and daring.</p>	<p>Noted</p>

	Comment	Response
	<p>I cannot see anything about (a) reducing the total volume of motorised traffic in the borough or (b) about developing a network of free/low pollution footpaths and cycle ways for those of us (e.g. the elderly with heart conditions), who need to move around the borough.</p> <p>Boris Johnson's strategy was to advise us to walk on the inside of the pavement. I accept that this strategy goes much further, but I there is insufficient detail about geographical priorities e.g. Borough High Street, Rye Lane, Camberwell, Rotherhithe Tunnel.</p> <p>In addition, too many of the current cycle ways use existing roads: you need to be blocking off as many roads as possible as part of the policy of developing a completely new network of cycle ways/footpaths right across the borough (and London).</p>	<p>The action plan encourages resident to walk and cycle in the Borough. The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy and make Southwark an Age Friendly Borough to enable older people to access a broad range of affordable and accessible transport options to get around the borough easily. We are consulting on the Kerbside Strategy currently</p> <p>Measures 7 – 1 to 7 – 5 target the improvements in the GLA Air Quality Focus Areas, which cover the areas mentioned</p> <p>The comment will be passed to Transport Policy</p>
R21	<p>The plan is not strong enough. It does not give details of the actions the council will take. It does not give timescales, goals or details of how improvements will be measured. I am gravely concerned this is mere lip service to the issue - the council need to have goals that are objective and they can be held accountable to.</p> <p>I live in an area that is breaching the limit for pollution. The fact that that is allowed to occurred is ludicrous. I cycle, and I cannot see enough being done to improve cycling infrastructure. Whilst cycling, I encounter pollution from cars - you don't appear to have mentioned diesel emissions - this needs to be tackled.</p>	<p>Time targets have been added to the revised action plan</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy. Diesel emissions are being addressed though measures regarding parking, idling and support for the ULEZ</p>
R22	<p>This consultation response is on behalf of the London Cycling Campaign, the capital's leading cycling organisation with more than 12,000 members and 40,000 supporters. The LCC welcomes the opportunity to comment on plans. The response is in support of the response from Southwark Cyclists, the borough group, and was developed with input from the co-chairs of LCC's Infrastructure Review Group.</p> <p>LCC is a member of the Healthy Air Campaign, a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London and the UK's air.</p> <p>London's air quality not only continues to breach EU legal limits, it's much worse than the standards called for by the World Health Organisation. Almost</p>	<p>Noted</p> <p>Noted</p>

	Comment	Response
	<p>10,000 Londoners die prematurely every year as a result of air pollution. Almost a quarter of primary schools are sited in areas that breach the legal limit for nitrogen dioxide (NO₂). Doctors report that children spending their early years in parts of the city are suffering serious, long term or permanent impacts to their health and development. London's dirty air also costs the economy £3.7 billion. It's an unacceptable situation.</p> <ul style="list-style-type: none"> • LCC generally supports Southwark's strategic aims of: <ul style="list-style-type: none"> ○ Management of Air Quality ○ Reduce Emissions from Buildings ○ Public Health and Awareness ○ Cleaner Transport ○ Reducing Carbon Emissions ○ Regulation & Enforcement ○ Support the GLA Air Quality Aims ○ Support Public Health <p>However the current Strategy and Plan does not go far enough. Given that motor vehicles are a major source of pollutants, the promotion of shift to active travel (cycling and walking) must be given greater priority and be one of Southwark's Strategic Aims. Creating an environment where cycling is a choice for any Londoner, who wants to ride the streets conveniently and without fear, is critical to improving air quality.</p> <p>Key actions to achieve this are:</p> <ul style="list-style-type: none"> • Creation/completion of a network of high-quality, direct routes separate from high volumes and/or speeds of motor vehicle traffic to/from all key destinations and residential areas in an area. This network will include both physically-protected cycle tracks on main roads with safer junction designs that separate those who cycle from turning motor vehicles etc. It will also likely include quieter routes along streets or through areas that feature low traffic volumes and speeds. Schemes should be planned, designed and implemented to maximise potential to increase journeys – with links to nearby amenities, residential centres, transport hubs considered from the outset. • The planned cycling and walking networks should be developed based on demand/potential for both modes and new planning applications should be required to be compatible with this. • Quality of all Highways work (not just cycling schemes) should be assessed via TfL's London Cycling Design Standards (LCDS), with an aim for a Cycling Level of Service (CLoS) rating of 70 or above, with all "Critical Fails" eliminated. And all Highways work should be designed both to 	<p>Noted</p> <p>Noted</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy. We are consulting on the Kerbside Strategy currently</p> <p>This comment will be passed to Transport Policy</p> <p>This comment will be passed to Transport Policy</p> <p>This comment will be passed to Transport Policy</p>

	Comment	Response
	<p>accommodate growth in cycling and not to increase motor traffic. Providing space for cycling is a more efficient use of road space than providing space for driving private motor vehicles, particularly for journeys of 5km or less. In terms of providing maximum efficiency for space and energy use while minimising impact on air quality, walking, cycling, then public transport are key.</p> <ul style="list-style-type: none"> • On certain streets in areas of high congestion, motor vehicle traffic should be removed some or all of the time (although the default should be to continue to enable cycling). As well as this, restrictions to certain types of vehicles should be considered to restrict their route choice. • Reducing parking, waiting and loading areas, and road capacity and through routes will encourage modal shift and create more space for cycling and walking infrastructure. • As well as encouraging modal shift for private motor vehicle use, commercial motor vehicle movements should be reduced wherever possible. And wherever possible, companies should be encouraged to operate outside of peak hours to reduce congestion. For instance, occupiers of large commercial buildings should be should generally be required to only accept deliveries outside peak periods (including potentially at night); medium-sized commercial buildings should be required to provide off-street servicing areas and the feasibility of shared service areas for smaller businesses should be considered; enforcement against illegal waiting, loading, idling etc. should be maximised; consolidation should be encouraged (including by cooperating with neighbouring boroughs to create consolidation centres); personal/internet deliveries to offices should be discouraged in the borough, with consolidation alternatives (“click and collect” etc.) encouraged; “last mile” alternatives to commercial motor vehicles should be explored and encouraged (cargo bike, river freight etc.). • New residential developments should be ‘no car’ as a default. And Section 106 and CIL funding from new developments should be used to improve conditions for cycling and walking. Planning for new developments should consider and prioritise space for cycling and walking within the development. • Requirements for cycle parking in developments should be increased above London Plan (consideration for cycle 	<p>This comment will be passed to Transport Policy</p> <p>The authority is currently consulting on the Kerbside Strategy</p> <p>As an extension to Measure 4 – 2 Developing a freight consolidation solution for Southwark, the current Low Emission Logistic project, of which the authority is a partner is working with business’s to explore the opportunities to use the consolidation solution</p> <p>Depending on the location of the development, planning policy determines the parking provisions. Many locations in central areas and good public transport are no car by design with minimal parking for those with disability</p> <p>This comment will be passed to</p>

	Comment	Response
	<p>parking should include residents, workers, visitors to both ground floor and upper floor businesses, and include provision for a wide range of cycles e.g. hand cycles, cargo bikes). Requirements for showers and changing facilities where appropriate should also be implemented. And incentives such as rate rebates should be considered for businesses that achieve high levels of cycling by employees and/or suppliers.</p> <ul style="list-style-type: none"> • More public cycle parking is required across Southwark also – and Southwark should plan for this. <p>Southwark should set ambitious and measurable targets that it then strives to achieve (and can be held to account on) for all major commitments within the plan – with deadlines etc. attached. As examples, these targets should include: a percentage reduction in the children driven to school and correlated increase in the percentage that walk or cycle to school; a percentage decrease in council staff parking and car use; and also a percentage decrease in all-borough car parking spaces and car use/“modal share”.</p>	<p>Planning Policy</p> <p>This comment will be passed to Transport Policy</p> <p>Time targets have been added to the Action Plan. The plan has been reviewed to ensure there are measureable outcomes</p>
R23	<p>Totally inadequate, indeed illegal:</p> <ul style="list-style-type: none"> * According to 2015 Defra figures, Southwark has the highest numbers of death from air pollution overall in London. * The consultation draft is just a rehash of a previous, inadequate plan that has not been effective. * The measures proposed are not SMART (Specific, Measurable etc.), so there is no prospect of checking progress and adopting more ambitious measures if needed. * Proposals to encourage walking and cycling - without locking in demand - will lead to more not fewer deaths from poor air quality. In a congested city like London, any space freed up will induce additional motor traffic, unless it is reallocated to zero emission travel. Although measures proposed by the Mayor of London would reduce NO_x - though still not enough around areas like London Bridge with high exposure - they would fail to have a significant impact on particulates. The majority of vehicle related particulates in central London come from tyre and brake wear. <p>Additional measures are needed including:</p> <ul style="list-style-type: none"> * adopt motor traffic reduction targets for whole borough, to feed into the New Southwark Plan and Local Implementation Plan * restrict through private motor traffic during peak hours through filtered permeability measures (e.g. Portland St, Camberwell Grove and through Bellenden area) and lobby TfL to do same on Borough High St and Tooley Street, following example of City of London scheme at Bank being 	<p>Noted</p> <p>Timelines have been added to the Action Plan and reviewed to ensure it is SMART.</p> <p>The Authority has recently announced that over the next five years we will be investing over £30m and launching the Southwark Cycling Strategy</p> <p>These comments will be passed to our Traffic Policy and Highway teams</p>

	Comment	Response
	<p>introduced from April 2017</p> <ul style="list-style-type: none"> * introduce parking permit schemes on 100% of borough roads, with fees graded according to pollution levels. * remove free parking and increase fees to fund better conditions for walking & cycling. * introduce access only areas (e.g. through pedestrian zone signage), where deliveries can only be made by permit holders, with permit holders required to use zero emission vehicles. * restrict use of road humps, instead use wider range of traffic calming measures: Southwark currently plans to increase road humps, e.g. on Quietways, increasing air pollution contrary to EU law. Road humps double air pollution by encouraging braking. * educate owners of wood burners about ways to reduce particulates from better usage techniques. 	<p>New measures (4 – 22 and 4 – 23) have been included to review the car parking charges to promote use of less polluting vehicles.</p> <p>This could be a proposal as part of the new research to reduce motor vehicles in the north of the Borough sees measure 4 – 29 to 4 – 30</p> <p>Comment will be passed to the Highways</p> <p>A campaign is being designed as Measure 2 – 3</p>
R24	<p>"Ensure all sectors of the population in the Borough have awareness of the anti-idling legislation." Raising awareness is fine, but how are you going to enforce the legislation? I live next door to a fleet of 50+ diesel vans (not by choice - they moved in on a short-term lease after I bought my property). They routinely leave vans with the engine idling. When I challenged them, their argument was that it's cheaper to leave an engine running than to turn it off then on again! They'll continue to do it unless there's some sort of penalty.</p> <p>"Encourage residents to walk or cycle in the Borough - Promote active travel through relevant public health work streams and services including physical activity and healthy weight." This is allocated to your public health team. But I think you need some joined-up thinking - surely this involves other teams, because you need to deal with cycling infrastructure. For example, how about setting a target to provide more on-street bike lockers? Finding space to store bikes in small inner-London homes is a challenge. I've been trying to get one installed in my road, but making no progress.</p> <p>More broadly, I hope the strategy and plan are properly rolled out across all your departments, and that staff are briefed about their importance and relevance. I recently asked the council about air quality monitoring in my area (because of my concerns about the diesel fleet next door). After chasing repeatedly for a response, my request eventually ended up with the planning team rather than the environmental team, and seems to have disappeared into a black hole.</p>	<p>A campaign is being designed as Measure 4 – 18. Vehicle idling legislation is only applicable on the public highway. It's not cheaper to keep a vehicle engine running. A visit to the company will be made from an officer of the Environmental Protection Team</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy</p> <p>The authority is presently consulting on its Kerbside Strategy, the comment will be passed to the Transport Policy Team</p> <p>A visit to the company will be made from an officer of the Environmental Protection Team</p>
R25	<p>The plan is rather too general & timid, lacking details, time table, imagination and commitment.</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures. Timelines have been</p>

	Comment	Response
	<p>I would like to see :</p> <ul style="list-style-type: none"> • wider provision of protected cycle lanes and quiet-way routes throughout Southwark, • offering cycle training for all primary school children, • phasing out diesel, • increasing speed of eliminating diesel by converting council fleet to Liquefied Petroleum Gas (LPG) and by providing full/partial grants to conversion to LPG for cars bought by qualifying borough users during last 3-5 years • enforcing no-idling, • more street trees, shrubs, green walls and roofs, • insulate all council properties including schools and estates and promote the use of renewable energy by installing renewable energy technologies • insist that all new buildings and constructions are carbon neutral and equipped with renewable energy technologies • use new technologies to improve air quality, such as <ul style="list-style-type: none"> ○ Catalytic Clothing surfaces used by Sheffield University (http://www.airqualitynews.com/2014/05/14/giant-simon-armitage-poem-used-to-cut-no2-pollution/) ○ Air-purifying billboards used by UTEC Lima, capable of purifying 3.5 million cubic feet of urban air daily, especially suitable at construction sites, (http://innovatedevelopment.org/2014/05/19/perus-innovative-air-purifying-billboard) ○ Rooftop outdoor 'vacuum cleaners' by Envivity Group, capable of pulling in 80,000 cubic meters (2.8 million cubic feet) of air per hour, reaching 300 m (984 ft.) around it and 7 km (4.3 miles) directly upwards (https://envivitygroup.com/). 	<p>added to the Action Plan</p> <p>Comment will be passed to Authority's Transport Policy and Highway sections</p> <p>Cycle training in offered to all Year 4 & 5 primary school students, the offer is either accepted or rejected by the school</p> <p>This is a Government policy decision</p> <p>The Council fleet is being renewed with the preferred new vehicles either being electric or petrol if the operational requirements are met, The Government provide full /partial grants for alternative fuel vehicles.</p> <p>Measures 4 – 18 to 4 – 21 deal with enforcement of anti-idling</p> <p>New measure 6 – 4 “Increase the amount of green infrastructure” in the borough has been included.</p> <p>Measures 5 – 7 to 5 – 17 deal with energy saving and renewable energy sources in Council properties</p> <p>Measures 5 – 18 and 5 – 19 ensure new developments minimise their impact on local air quality and climate change.</p> <p>Noted</p>
R26	<p>We strongly believe that the plan does not do enough for air quality. There are no details of the actions the council will take and there are no timescales, goals or details of how improvements will be measured. So it is not a plan but an apology for not having one.</p> <p>We are concerned about the early deaths (more</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures. Timelines have been added to the Action Plan</p>

	Comment	Response
	<p>than 9,000 a year) and the ill health caused by exacerbated asthma, heart and lung disease.</p> <p>And we are disgusted by the thought that a whole generation of Southwark cyclists and their children are going to suffer life-long consequences of growing up in a soup of nitrogen dioxides and particulate matter. A 10% permanent reduction in children's lung development will cause them to find cycling more difficult and complex health problems later in life.</p> <p>Why should health advice suggests that children and older people reduce their physical activity? Generally the fitter you are the less damage pollution does to you.</p> <ul style="list-style-type: none"> You should be taking real, measureable substantial steps to cut air pollution - and soon. 	<p>Noted</p> <p>Noted</p> <p>The health advice during pollution episode is balanced to take account the benefits of physical activity against the effects of air pollution on the vulnerable and those with compromised health</p> <p>Noted</p>
R27	<p>The plan is not strong enough. It does not give details of the actions the council will take. It does not give timescales, goals or details of how improvements will be measured.</p> <p>I am very concerned about the early deaths (more than 9,000 a year) and the ill health caused by exacerbated asthma, heart and lung disease.</p> <p>I am horrified at the thought that a whole generation of Southwark children are going to suffer life-long consequences of growing up in a soup of nitrogen dioxides and particulate matter. A 10% permanent reduction in children's lung development will cause complex health problems later in life.</p> <p>I am angry that health advice suggests that children and older people reduce their physical activity. This may be the right response to the immediate emergency of a pollution episode but it is disastrous in terms of wider public health goals to reduce obesity and promote physical and mental health.</p> <p>I call on Southwark Council to take real, substantial steps to cut air pollution</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures. This action plan is comparable. Timelines have been added to the Action Plan</p> <p>Noted</p> <p>Noted</p> <p>The health advice during pollution episode is balanced to take account the benefits of physical activity against the effects of air pollution on the vulnerable and those with compromised health</p> <p>Noted</p>
R28	<p>Great that Southwark is developing a strategy and action plan but given the impacts I would like more to be done.</p> <p>Based on a word search for example, the word 'diesel' doesn't even appear in the document. But action on diesel is surely the most important thing. Why not follow Westminster and institute differential pricing on parking etc.</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered for new measures</p> <p>New measures 4 – 22 and 4 – 23 have added to review variable vehicle parking charges to promote use of less polluting vehicles</p>

	Comment	Response
	<p>And at the least commit to phasing out all diesel vehicles from Southwark's fleet.</p> <p>On cycling and walking, I would like to see more too, e.g. on unsafe junctions and quiet ways.</p> <p>And what about specific , building on the mayor's recent initiative (tackling idling, illegal parking, closing off streets to traffic etc.)</p> <p>When you focus on "encouraging" people to walk and cycle, rather than addressing infrastructural barriers and tackling model shift issues, I think you are unlikely to deliver the results needed . Plus pollution indices regularly warns against exercise, so I think this points to starting the other end, by reducing the factors that cause the pollution</p>	<p>The Council fleet is being renewed with the preferred new vehicles either being electric or petrol if the operational requirements are met</p> <p>Comment passed to Transport Policy & Highways</p> <p>There several measures within the action plan supporting the London mayor's initiatives and enforce anti-idling legislation</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy</p> <p>Only the vulnerable and those with already compromised health are advices to reduce physical activity during poor air quality episodes. We are currently consulting on the Kerbside Strategy</p>
R29	<p>The council needs to outline the steps it intends to take – the current plan lacks any details of its targets or programme of action.</p> <p>This is a public health emergency. High levels of pollution in the borough are particularly damaging to children's health, affecting lung development and potentially leading to serious health problems in later life. With obesity on the rise, it is unacceptable for the council to advise that children should be discouraged from physical activity.</p> <p>On a personal level - as someone who has been diagnosed with mild persistent asthma since living in Southwark - I would like the council to act now to reduce vehicle emissions, by installing free charging points for electric vehicles, launching a public information campaign to promote the use of car clubs, creating more car-club parking, and ending any provision of additional parking for private, non-commercial use (except for disabled drivers). Developers (for example, at Elephant Park) should not have been allowed to add new car-parking spaces in breach of the council's own planning policies - the council needs to learn from past mistakes.</p>	<p>Timelines have been added to the action plan</p> <p>The health advice during pollution episode is balanced to take account the benefits of physical activity against the effects of air pollution on those who are most vulnerable</p> <p>Measure 4 – 1 is promoting the use of alternative fuels, and a new measure 4 – 31 has been added to promote the use of car clubs in Southwark</p> <p>Noted</p>
R30	<ol style="list-style-type: none"> 1 Great news, making Southwark own vehicles less polluting 2 Communication campaigns will cost too much money the council does not have. Volunteers should be used to spread the word 3 Air focus areas are spaces of very high pollution. Area of focus should be more widespread! 	<p>Noted</p> <p>The campaigns will be resourced from existing departmental budgets or from grants</p> <p>The action plan covers the whole Borough, however there is a requirement to reduce the pollution concentration in the air quality focus areas</p>

	Comment	Response
	<p>4 Boiler impact: The effect of boilers is so marginal. Gas heating is an economic way of heating a house or a flat. Changing this will be put at a disadvantage poorer families or old people who will not have the money to pay for a more expensive source of fuel. This should not be in scope</p> <p>5 What other source of fuel will be used? Electric cars and vans? Electric radiators? Electricity is far from being green, since there is a high reliability for electricity on nuclear power stations. Also, with Brexit, and UK leaving Euratom, there are talks this will be delaying nuclear power station construction. This means reduced electricity supply, for an increased consumption. There will not be enough electricity for all (businesses, councils and residents).</p> <p>6 Consolidation of deliveries. That sounds good in theory, but in practice, this will not work. With less cars and people cycling and walking more, this change in behaviour will multiply the number of home deliveries. Not from same courier. Consolidation will be unmanageable.</p>	<p>The efficient of the gas boilers is reduced with age of the boiler, but also depends on the maintenance of the boilers, the installation of the ultra-low NO_x boilers will help residents to reduce their energy bills, because the boilers are more efficient</p> <p>The authority is committed to reducing fuel poverty in the Borough.</p> <p>The sourcing of electricity is outside the scope of this Action Plan</p> <p>The measure 4 – 5 is promoting sustainable logistical measures in the north of the Borough by using low or zero emission vehicles. If successful this can be expanded to the rest of the Borough in future. WE have already run campaigns to encourage click and collect rather than home delivery for on-line shopping purchases</p>
R31	<p>I'd like to see more action overall; and I'd like to see you suggest / help Southwark residents lower their emissions.</p> <p>Increasing and improving bike infrastructure and helping get people on their bikes would be a great way of doing the latter!</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered and this action plan is comparable</p> <p>The Authority has recently announced that over the next five years they will be investing over £30m and launching the Southwark Cycling Strategy</p>
R32	<p>The targets in the plan are not nearly strong enough. There is no sense of a belief that the actions listed will achieve very much. Why, given that this is a health emergency that needs to be tackled, is there no sense that emergency action needs to be taken?</p> <p>Why not a commitment to move all of your fleet to electric vehicles, for example? And a requirement that contractors do likewise, if they want to be contracted by the Council?</p>	<p>During the preparation of the Air Quality Action Plan, other leading Local Authority Air Quality Action Plans were considered and this action plan is comparable</p> <p>The Council fleet is being renewed with the preferred new vehicles either being electric or petrol if the operational requirements are met, The Government provide full/partial grants for alternative fuel vehicles</p>

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