

Response of the RBKC Labour Group of Councillors to the RBKC Draft Air Quality and Climate Change Action Plan 2016-2021

Introduction

The Labour Group of councillors in the RBKC has a long track record of raising concerns about both the issues of air quality and the impacts of climate change upon the lives of the residents of our borough. This has been led by work done by both Cllr Pat Mason, as the former Spokesperson for the Group on PRSC and Cllr Emma Dent-Coad. Cllr Dent-Coad has consistently raised the awareness of the seriousness of the issues that face us, in particular by organising leafleting at tube stations on days on which high pollution warnings have been issued. Cllr Dent-Coad's advocacy was recognised in her Clean Air for London Award of 2014.

Such work has arisen because the Labour Group has long asserted that the quality of the atmospheric environment in which we live, and the health of all of those of us who live in RBKC is very intimately connected. Further we are highly conscious, of the impact of our very polluted roads, in all parts of our borough, on the health of our residents. Because the wards that we represent are all in the north of RBKC this arises for us in particular with concerns from our residents over the impact of pollution from the A40 flyover. 'Heat maps' indicating pollution hotspots also highlight that the use of diesel engines in our railway stock is also highlighting significant for the lines that dissect the top of the north of the borough. It is from this background of historical advocacy for robust measures to tackle the quality of our air and improve the health of all our residents that our response to the Draft Air Quality and Climate change Action Plan 2016-2021 arises.

In general we as the Labour Group of councillors welcome much of the construction and content of the Draft Plan which we set out in **Section 1: WELCOME EMPHASES OF THE PLAN.** However we also believe that the Draft Plan needs to be made more robust to reflect the real urgency that arises from our present environmental challenges. We hope that in this response we will indicate ways in which the Draft Action Plan can be strengthened and made more

far reaching in both its objectives and specific actions. **Section 2** will therefore set out ways in which we feel the **AIMS, OBJECTIVES AND VISION** could be bolstered. This is further fleshed out in **Section 3: SPECIFIC RECOMMENDATIONS**.

The quality of air within both London as a whole and the borough in particular has, as the document rightly states, not improved since 2005. It's a situation which kills 10,000 Londoners prematurely each year, as well as causing chest and respiratory difficulties for 2 million people including many children and babies in the metropolitan area. In the borough carbon emissions have increased by 8% since 2005 whilst they have decreased by an average of 18.8% elsewhere in London. Some of the most dangerously-polluted and unhealthy roads in the UK and Europe are to be found in RBKC.

We are particularly concerned about the problem with particulates. PM10, PM5 and PM2.5 are the particles that enter our system. PM2.5 can penetrate any face-mask and even through human skin, go directly into the bloodstream. Vehicles which run on diesel contribute significantly to increased particulate levels. This means that the many construction sites in our borough are badly affected, especially those with onsite electricity generators if powered by diesel.

For these urgent reasons we believe the strengthening and augmentation which we indicate is necessary so that the Plan can be made fit to meet the present environmental crisis and have a real, effective, and meaningful impact on the quality of our air and the health of our residents.

SECTION 1: WELCOME EMPHASES OF THE PLAN

The Labour Group welcomes:

- 1) The integration into a joint plan of our targets for improving air quality and mitigating climate change. Such joined up thinking is necessary and overdue.
- 2) The stress in the Draft Plan on the need to tackle these environmental issues for reasons of public health. It is good to see a joint forward to the document from both Cllr Ahern, The Cabinet

Member for Environment, Environmental Health and Leisure and Cllr Weale, the Cabinet Member for Adult and Social Care and Public Health.

3) Many of the specific objectives and actions that are outlined in the Plan. For example:

- Discouragement of burning of logs and house coal.
- Support for vulnerable residents to reduce energy consumption and bills.
- Installation of ultra-low NOX boilers in Council housing.
- Raising awareness on air quality & climate change issues amongst council tenants.
- Improving walking & cycling access to White City.
- Increasing public awareness of vehicle emission controls.
- Increasing public awareness to reduce engine idling.
- Encouraging residents to choose low emission vehicles by raising diesel surcharge.
- Increasing on-street charging points for electric vehicles.
- Encouraging car clubs to go electric.

SECTION 2: AIMS, OBJECTIVES AND VISION

The Labour Group believes:

a) That the Plan must be clearer that the Environmental and Public Health gains are its main aims.

In the Introduction to the Air Quality & Climate Change Action Plan 2016-2021, it states that:

“Since 2010 the UK has been in breach of the EU objective for N02 particularly across central London, and the Government is now likely to be fined until the levels are reduced. Using the Localism Act, the government has suggested that some of the fines may be passed on to regional and local authorities. The Council’s role is to minimise any financial risk which could occur if the Royal Borough is seen as failing to implement measures to address the excessive pollution levels. The carbon footprint of the Borough has not decreased since 2005. This is disappointing news, but there is much more that the Council, the residents and those who work here can do together to

start reducing the carbon footprint in a sustainable way". And later on we are told that "the damage being done by air pollution to Londoner's health is costing the NHS an estimated £2bn".

We believe that the Plan should be clearer that it is the Public Health and environmental gains that are the main objectives of the Action Plan, above the need "to minimise any financial risk". Keeping the Public Health and environmental objectives as the main focus, along with meaningful action to reduce air pollutants to target, will then automatically save RBKC money. Cllr Daniel Moylan told the 14th October Council Meeting that the estimated £300m fine that could be levied on to London, with a proportion to be paid by the Borough if we consistently fail our N02 target, "would be restricted unless the Council wilfully failed to take action". Since both the GLA and Defra have written to the Council asking us to deal with our non-compliance with annual air pollution targets, we need urgently to create a robust, and effective Plan that proves that we aren't wilfully neglecting to take the necessary action, and thereby save us from being fined.

b) That the proposed Action Plan is too similar to and does not sufficiently improve the previous 2009-2014 Action Plan.

In the Introduction to Draft 2016-2021 Plan it states that although the Council had worked hard to reduce air pollution levels in the Borough, and had been working hard to reduce pollution levels since the first Action plan in 2003, "monitoring data shows objectives in Kensington and Chelsea are still not being met, highlighting the need for new and more effective measures".

The Draft Action Plan is however too similar to the the present one. The 2009-2014 Plan, itself, stated that the previous plan had failed to reduce air pollution levels to target. In the Draft Action Plan, there is no assessment, from monitoring stations and other local sources, describing what the Borough's annual pollution map looks like. Nor is this then linked to adequate and substantial measures that are necessary to meet the gravity of the situation.

c) That we need to have an overall vision of *Living Streets and Active People* to create an environment in which the necessary changes become embedded in our consciousness.

The impact of the Draft Plan upon Public Health could be radically strengthened and given focus if we as a Borough adopted an overall vision for our Air Pollution and Climate Change strategies. Two of the areas identified in the plan, Transport and Greening Measures need to be taken together and integrated further into an overall vision to create a borough in which we have Living Streets and Active People.

In relation to transport the main aim of reducing levels of motor traffic and increasing walking and cycling is absolutely essential. But we also need to make sure that we have an environment in which people are able and willing to step out of their cars and cycle or walk in the first place. The public health necessity of trying to allow us all to make that switch means that the very good actions outlined in the Draft Plan need to be taken more urgently and augmented by others. To create such a climate we need to get up to speed with other London Boroughs by:

- introducing a 20 mph speed limit.
- creating more dedicated cycle lanes.
- having a more positive attitude towards the Mayor of London's cycling infrastructure plans.

The installation of further greening measures and the creation of healthy outdoor spaces and green infrastructure, as outlined in the Plan, are also absolutely essential to getting people on their feet and on their bikes. Members of the Public Realm Scrutiny Committee were able to read the extremely positive results on the impact on air quality of the erection of a green screen at St Cuthbert and St Matthias's School. This wonderful project needs to be replicated both urgently and extensively, not only in places where our children are educated, but throughout the borough, and especially near the most polluted roads.

Section 3: SPECIFIC RECOMMENDATIONS.

The Labour Group believes that the following specific **extra** actions will help to strengthen the Draft Plan and make it more effective to be an agent for real change in our air quality.

They are grouped under the main areas of the Draft Plan:

a) Public Health:

- That the overall vision of ***Living Streets and Active People*** be introduced to give the aims clarity and direction.
- That awareness be raised of ***indoor*** air quality, and how residents can monitor and address that.

b) Buildings and New Developments:

- Require all Council developments to install individual renewable energy generation, and to require this via the Planning process in all private Borough developments.
- Require, as part of the planning process, that green roofs and walls be incorporated into every major development.

c) Transport:

- Prioritising the least polluting forms of transport by re-designing the Borough's road space to give priority to buses, cycling, disability vehicles, taxis, business vehicles and walking.
- Introducing a 20mph speed limit to create a more cycling and walking friendly environment.
- Responding more positively to the Mayor of London's vision for dedicated cycling infrastructure by supporting the creation of Superhighways through the Borough.
- Introducing measures, via road design and traffic management, to limit through-traffic in the Borough.
- Introducing on-road vehicle emissions testing for all vehicles, and especially for VW vehicles, banning vehicles that fail the manufacturers official exhaust emissions levels.

- Requiring council/Tri/Bi-Borough contractors, and their sub contractors, to only use vehicles that emit manufacturer-stated levels of pollutants from their exhausts.

d) Business and Community: nothing to add.

e) Greening Measures and Local Improvements:

- Raise the target for the installation of one green roof to 10 over the 5 year period. These could be on existing council and private properties and on new developments.
- Install 25 more green screens over the 5 year period, like the successful scheme at St Cuthbert and St Matthias's School. These should target the most polluted areas and help the most vulnerable: The Westway, Cromwell Road, school sites for example.

f) Lobbying and Partnership:

- Re-Affirm the Council's opposition to a third runway at Heathrow that would drastically increase pollution from approx 240,000 extra flights and a significant surface traffic increase.

g) Special measures for High Pollution days:

The Labour Group also believes that following the example of other cities, most notably Paris, that on days of high pollution specific measures need to be taken to address the acute presenting problem. We believe that this should form another section of the Plan and should consist of the following actions:

- Closing to traffic dangerously-polluted roads such as Cromwell Road, and roads near schools and hospitals, for example.
- Lobbying the Mayor of London to close TfL roads on days when they are dangerously polluted or Defra notifies high pollution days in London.

- Allowing all, except essential Council staff, to work from home.
- Allowing buses, low-emission vehicles, bicycles and emergency vehicles only to use Council controlled roads.
- Lobbying the Mayor of London to allow free Bus, Underground and Overground travel on such days.

Conclusion

The Labour Group of Councillors on RBKC welcome many of the emphases of the Draft Plan. We believe however that the Plan can be strengthened and made more extensive to better meet the very acute challenges of both air pollution and climate change and help promote better public health for all of us who live the borough. We hope that these reflections are helpful in making that Draft Plan more robust and able to create ***Living Streets for Active People***.

Cllr Robert Thompson

Labour Group Spokesperson on Public Realm Issues