

## PUTNEY SOCIETY RESPONSE TO WANDSWORTH AIR QUALITY ACTION PLAN 2021 – 2025

1. We welcome many proposals in the AQAP, but we fear that they will, taken together, deliver only slight improvements, falling way short of what is necessary. Much more ambition is needed.
2. We must all recognise that air quality is dreadfully poor throughout the borough, and is especially dangerous on many of the borough's main roads. This pollution is causing the premature deaths of over 100 borough residents each year, and serious health problems for a great many more – adding to the burdens on the NHS in our area. Put simply, the air in Wandsworth is dangerous.
3. Since the Council approved the draft AQAP, the World Health Organisation has published new, and greatly changed, guidance on what levels of air pollution are dangerous to human health. While this has not yet been reflected in UK legislation, the new WHO guidance reflects careful analysis, over many years, of a large body of scientific research on the damage to human health caused by levels of pollution well below the current UK legal limits. The WHO guidance cannot be ignored.
4. We do realise that it would be impracticable to achieve full compliance with the new WHO recommended limits by 2025, especially on heavily polluted streets such as Putney High Street (PHS). But this shows just how bad the problem is, and that the draft AQAP is totally inadequate. The table below compares the new WHO recommended limits with the estimated current levels of pollution on PHS (all figures are annual means expressed in micrograms per cubic metre of air):

	<u>NO2</u>	<u>PM2.5</u>	<u>PM10</u>
UK objective value	40	25	40
WHO recommended limit	10	5	15
PHS actual level 2021	65+/-3 <sup>1</sup>	13+/-1 <sup>2</sup>	21+/-2

The figures for NO2 are the most alarming: the current levels on PHS are around six times higher than the limits recommended by the WHO, and 60% above even the UK legal limit.

5. We note that the AQAP includes a statement that the UK legal limits will be met throughout the Borough by 2025, which gives the impression of this being a certain fact. But we have subsequently discovered that the Council do not have any solid evidence for this claim. In any case, merely meeting the current UK legal limits is nowhere near adequate. And if the UK legal limit for NO2 is in fact met, it will very largely be due to actions by others, rather than as a result of the AQAP. Tellingly, the AQAP makes no attempt to assess the impacts of the measures proposed in the plan, either individually or taken as a whole. This is a serious failure in a consultation, and reflects a general aversion to quantification in the draft AQAP – applying to inputs, outputs and outcomes.
6. In our view, the Council should start by considering what will be needed in order to achieve the WHO recommended limits, at the earliest possible date. We think there is only one way to reduce NO2 pollution on the most polluted streets, such as PHS, to the WHO recommended level, or anywhere near that level: namely, by the removal of virtually all petrol- and diesel-engined vehicles from the street. And the only publicly acceptable way of achieving this will be by a wholesale switch to zero emission vehicles (pure electric or hydrogen powered), and to more cycling and walking.

---

<sup>1</sup> Putney Society estimate of likely annual level after adjusting for impact of COVID lockdowns

<sup>2</sup> Estimated from modelling; do WBC have data on actual levels?

7. Fortunately, such a switch is already UK Government policy, car buyers are very rapidly switching to electric cars (and away from diesel cars in particular, which is also good), and car manufacturers are investing very heavily indeed in new electric models. And the Mayor of London has recently announced that all new buses purchased by TfL will be zero emissions.

8. But there is one big problem: this switch to zero emissions is going to take a long time (2034 for all TfL buses, and probably even longer for private cars). The most crucial need, therefore, is to ensure that the switch to zero emission vehicles on the most polluted streets, such as PHS, is as rapid as possible, and certainly way ahead of progress across the UK generally.

9. We acknowledge that the most important relevant powers lie with TfL and the Mayor. We have already urged the Mayor to prioritise the most polluted streets in London, including PHS, for the earliest possible introduction of **zero emission buses**, starting by replacing the elderly pure diesel buses currently used on the 93 route. We very much welcome the Council's public support (press release, 2/12/21) for our campaign on this.

10. We also welcome the Mayor's recent extension of the **Ultra Low Emission Zone (ULEZ)** out to the South Circular Road. It is too soon to know how big an impact this will have. However, we are concerned that the ULEZ exempts diesel cars which purport to comply with the Euro VI standards, despite it now being clear that the great majority of such cars emit massively greater quantities of pollutants in real life driving conditions than in the laboratory tests used for their certification. We have therefore urged the Mayor to consult in the near future on a tightening of the ULEZ standards. We accept that it would be fair to give car owners 2 to 3 years notice of the tighter standards.

11. Because there are very large numbers of these highly polluting vehicles using PHS, and this will continue to be the case for many years if nothing is done, we consider that a tightening of the ULEZ standards is likely to have a larger beneficial impact on the pollution levels on PHS than any other feasible measure. In fact, we consider that without such action it is quite likely that even the current UK NO<sub>2</sub> legal limit of 40 micrograms per cubic metre will not be achieved by 2025. And it is absolutely certain that without such action, the pollution levels on PHS will continue to be many times the WHO recommended limit for a very long time to come. **We therefore call on the Council to support our call to tighten up the ULEZ standards, and to do so vigorously and publicly.**

12. We also call on the Council to do everything it possibly can to help deliver the current central Government policy to ensure that "**half of all journeys in towns and cities will be cycled or walked by 2030**", with more physically separated cycle routes, low traffic neighbourhoods, and school streets.<sup>3</sup>

13. Given the unusually high preponderance of young adults in Wandsworth's population, and the Borough's high population density, it should not be difficult for the Borough to be a leader in delivering or exceeding this objective. We note that 43% of journeys in Wandsworth are already by cycling or walking. However, the 2021 Healthy Streets Scorecard results show Wandsworth to be one of the lower scoring Inner London Boroughs, as a result of inaction compared to other Boroughs, with only 14% of roads within an LTN, only 4% of roads having protected cycle track, and only 61% of roads having controlled parking. The 2030 target of 47% of journeys, set in the Council's draft Walking and Cycling Strategy, is pitifully slow progress, contravenes central Government policy, and is disappointingly weak. This is a big lost opportunity for reducing air pollution.

---

<sup>3</sup> UK Government Net Zero Strategy, published 19 October 2021

14. We urge the Council **to do much more to encourage residents to choose to walk or cycle** wherever possible. As well as improving infrastructure, this should be the focus of a large scale communications effort, aimed at making far more residents aware of the local air pollution problem and the steps they themselves can take to help solve the problem.

15. We do warmly welcome and endorse the intention to introduce **differential parking charges** (DPC), for which this Society has been pressing for many years. This is probably the only one of all the measures contained in the draft plan which has real potential to accelerate the shift towards less polluting vehicles. But we say “potential” advisedly, because much will depend on the details.

16. We strongly urge that the charging levels should be related to the quantity of pollutants emitted by the vehicle, not the scale of its contribution towards global warming. The DPC scheme will, overall, still help considerably to reduce emissions of greenhouse gases; but the key difference is that diesel vehicles should not be favoured over petrol-engined ones. We suggest that the scale should, broadly, be:

a) zero emissions vehicles – low charge

b) hybrids – fairly low charge

c) petrol and diesel complying with Real Driving Emissions Step 2 standard – moderate charge

d) petrol and diesel complying with ULEZ standards – quite high charge

e) petrol and diesel not complying with ULEZ standards – very high charge.

17. The differentials between the levels of charges need to be large enough to give drivers a real incentive to switch to a less polluting vehicle (learning from the experience of more advanced Boroughs). It should also be made clear from the start that the differentials will increase over time, and especially for the more polluting vehicles. We also suggest that if, after the first year, a resident purchases a different vehicle which falls into class (e), the charge should be even higher. And a similar surcharge could be applied to any vehicle in classes (d) or (e) purchased from 2024. Households with more than one car should also continue to pay more for the extra car(s).

18. The implementation of a DPC scheme is of both high importance and high urgency. We were therefore puzzled and dismayed that in the Action Matrix there are (bafflingly) two entries for it – at 5.11 and 8.4, with differing priorities and differing timescales – one of them for “2025-2030”, which would be totally unacceptable. We call on the Council to consult on the DPC early in 2022, and to introduce the scheme in 2022, as scheduled in the original WEES document.

19. We also warmly welcome the planned “further roll-out” of **School Streets**. But this is too vague. Children exposed to pollution are likely to suffer life-long harm, so we consider the Council should commit to giving all state primary schools the benefit of a School Street by 2025 at the latest.

20. Where a school’s entrance is on a major road, a ban on stopping or parking within 100 or 200 metres of the entrance could be imposed during the critical hours, and a “City Tree” or a British-made equivalent, should be installed near the entrance, following evaluation of the effectiveness of the available products.

21. The Council should also strongly encourage private schools to protect their young pupils through the introduction of a School Street and/or measures as in para 20 above. Private schools should pay for either all or most of the costs.

22. We also welcome the enhanced programme of **tree planting**. But the Council needs to be much firmer in protecting existing mature trees (which improve the air quality much more than young saplings do), except where a tree is diseased and dangerous. In particular, developers should not be allowed to fell mature trees, and all developments should be planned around existing trees. The Council's approval of the felling of large numbers of trees along the edge of the B&Q site was disgraceful, and this must never happen again.

23. We were also dismayed by the case on York Road where planning approval was given for a development, with trees to be planted between the new flats and the road; but this was later revised to allow the flats to extend right up to the highway boundary, so no space for any trees, replaced by a condition that the flats' front windows should be sealed shut. A clear admission of failure! Why did the Council allow such a retrograde amendment?

24. We support the Council's use of Civil Enforcement Officers to tackle unnecessary **idling by stationary vehicles**. But no indication is given of the scale of this initiative, or of its effectiveness; we would like to see much more information on both these points. This enforcement by CEOs should be focussed on streets such as PHS where the pollution is the worst in the borough, and stationary vehicles make a substantial contribution to the problem. And the campaign of enforcement should be widely publicised, to encourage stationary motorists to switch off their engines.

25. We agree that much more priority needs to be given to reducing **particulate pollution**, especially the very small particulates (PM2.5), which are particularly damaging to human health. We do recognise that this is a London-wide problem (much more so than with NO<sub>2</sub>, which is much more localised), and that the Mayor's ability to act is being hamstrung by central Government's refusal to give him the powers he needs to take effective action.

26. We welcome the Council's intention to start monitoring levels of particulate pollution. We would also like to see **much more extensive monitoring, of both NO<sub>2</sub> and particulates**, across the Borough, so as to create a much better evidence base of where the problems are, and on how much improvement is generated by different initiatives.

27. In order to reduce particulate pollution, the two things most needed are to reduce NO<sub>2</sub> pollution (see above) – since NO<sub>2</sub> is a significant precursor to particulate formation – and to reduce the burning of things – anything from bonfires to gas boilers. In particular, the Mayor needs the powers he has been seeking to tackle the huge amount of pollution caused by **wood-burning stoves**. We would like to see a coalition of all London Councils actively and vocally supporting the Mayor on this, which is essential for the health of London's population, and is certainly not a party political matter. It would be good if Wandsworth could play a leading role in building a cross-party coalition, utilising the data which the new monitors will (soon, we hope) start to provide.

28. The Council should also do everything it can to **improve the standards of insulation** in all types of property in the Borough, not least in the Council's housing stock and in other Council buildings. The Council should also require the highest possible insulation standard for all new developments by others, and should never subsequently back-track to allow a poorer standard. By subsequently weakening, the Council gives the impression that they attach a higher priority to appearing a soft touch for developers than they do to reducing pollution and global warming (which may reflect the truth of the matter). We call on the Council to include in the final AQAP a firm statement that such retrospective weakening will not happen again.

29. The Council should also encourage the fitting of **solar panels** wherever they could be beneficial, including on properties in Conservation Areas. Solar panels are not intrusive, and reducing

emissions is more important than a slight detriment to the visual appearance of roofs; and people will soon get used to the appearance of solar panels.

30. **Community monitoring initiatives.** The Putney Society has initiated three citizen science projects (all self-funded): one in 2011, the second in 2016 and the third in 2018. We were able to talk to council officers about the results in 2011 and 2016 and the publicity we generated was one of the factors in persuading TfL to introduce less polluting buses in Putney High Street. In 2018, we submitted the data to the re-organised Environmental Health department (now based in Merton) with absolutely no response that this information was of any use. How can we be convinced to invest money and time in any further monitoring projects?

31. We hope that the relevant officers concerned with community action will contact all the relevant groups (member organisations of the umbrella group, Wandsworth Environmental Forum, would be a good start). Many would be keen to help with campaigning as well as getting involved in citizen science projects. On page 8 of the consultation document “Cleaner Air for Wandsworth”, it states that a local fund will be provided to support community monitoring ideas and activities – how will this work?

32. **Transport in the Borough** – the emphasis in this section is overwhelmingly on the Council’s own vehicles or those of their staff. The council has power through its contracting process to at minimum encourage and at best enforce the use of electric or minimally polluting vehicles by its contractors. For example, for residential and commercial refuse collection and by maintenance companies in the parks. The Putney BID is encouraging the collection of commercial waste from smaller businesses by e-cargo bike for consolidation at a single site where a commercial waste collection company can collect it. It would be good to see this initiative copied in other town centres. Dennis Eagle, one of the major manufacturers of refuse collection trucks, have developed a 26-ton battery powered refuse truck - the eCollect. Several local authorities have already ordered some of these trucks. When the refuse collection contract is renewed in 2024, will Wandsworth be stipulating the use of electric trucks? Will Wandsworth encourage the current subcontractor to trial an eCollect?

### **Conclusion**

33. We will conclude by acknowledging that a large part of this response is focussed on the pollution problems we experience on just one street, Putney High Street, and we do realise that there are many other streets in the Borough where pollution is also a problem. But the fact is that, thanks to an unfortunate combination of circumstances, the pollution on our High Street is exceptionally bad, and one of the worst in the whole of London. And our proposals will deliver benefits more widely.

34. Moreover, the High Street is our town centre, and the Council is currently spending large sums of money in an effort (which we support) to attract more people to this High Street. But that effort brings with it a moral responsibility to ensure that the Council is not attracting people into danger. And unfortunately the air pollution is currently so bad as to be dangerous for many people.

35. This moral responsibility is, of course, in addition to the legal responsibility which the Council has to ensure that at least the UK legal limits are met as soon as possible. These twin responsibilities mean that the Council needs to be much more vigorous in its efforts to reduce pollution than is evidenced in the current draft of the AQAP.

36. We consider that the impact on levels of air pollution, from the whole package of measures proposed in the draft AQAP, is likely to be very small. We know that the Council’s powers are limited, but we have set out in this response a range of actions which we believe the Council can,

should, and indeed must, take in order to deliver a more rapid reduction in the unacceptable toll of mortality and morbidity which is currently being exacted by air pollution both in Putney and throughout the Borough.

37. If the final AQAP is little or no improvement on the current draft, please be assured that we will not just give up. Rather, we will take action in every way open to us, and if our current approach of private constructive engagement with the Council turns out to be unproductive, then we will have no choice but to adopt a more public and adversarial approach.

38. We will of course be very happy to discuss our concerns and our proposals with Councillors and Council officers. We would very much prefer to work together, collaboratively and constructively.