

26<sup>th</sup> July 2020

Dear Sir,

Thank you for opening up the draft Air Quality Action Plan 2020-2025 for comment. Bromley Liberal Democrats welcome the Council's desire to improve air quality across the borough, but have concerns that some claims made are unsubstantiated, that there is inadequate monitoring to measure progress, and that the planned actions are lacking in detail and ambition.

### **We welcome the new plan**

We support the need for a new Air Quality Action Plan in the borough; the last was produced in 2010 and boroughs are expected to update every five years. We support the council's desire to improve the air quality and tackle air pollution in all parts of the borough and are ready to offer support with those ambitions.

### **Claims**

The document makes several very generalised statements without providing evidence. For the plan to be effective, it must clearly state the source of data so that progress can be monitored, and that the current air quality in the borough is represented accurately.

Examples of these claims include:

- 1) It is stated that "Bromley meets all air quality objectives for hourly and 24 hour concentrations" and "Bromley has met all of the AQO's other than the annual mean objective for the pollutant NO<sub>2</sub>". Can citations or data be provided to confirm this? There is only one automatic monitoring station that can provide hourly data and hourly particulate matter data has not been published for long periods. **Is this geographical coverage, frequency of measurement and detection of different species sufficient for these claims?**
- 2) It is stated that "According to GLA data, no primary or secondary schools in Bromley are exposed to NO<sub>2</sub> concentrations that exceed annual limits". Given the importance of air quality around schools and the concerns of parents, **monitoring of air quality at schools** rather than the use of modelled data with limited resolution **is vital** and would confirm that hourly and 24 hour limits are not breached in addition to annual limits.
- 3) "Bromley is the greenest and least polluted of all London Boroughs". This kind of broad and unsubstantiated statement is out of place in a document like this. If it is to be used at all it must give the source for both the quotation and the data the statement is based on.

### **Monitoring**

We believe that there is insufficient monitoring in the borough. We need reliable data as a starting point for the action plan and regular data to track progress against targets. The source of the data should be clearly stated, fully transparent and consistent during the period of monitoring.

Referring to specific points in the plan:

- 1) It is noted that diffusion tube monitoring will be increased to cover the extended Air Quality Management Area. **We support increased monitoring of air quality** but this method will not provide hourly or daily data and so cannot be used to determine if Air Quality Objectives are met. **Can the choice of measurement techniques be justified?**
- 2) It is also stated that additional monitoring for PM<sub>2.5</sub>, PM<sub>10</sub> and ozone will be sought at Biggin Hill. While we support the additional monitoring at Biggin Hill, we do question why Biggin Hill (outside the extended Air Quality Management Area) should be the main beneficiary of this additional investment. **New or improved monitoring stations in all our main population centres and areas with known air quality issues should be prioritised.**
- 3) As stated above, **monitoring of air quality at schools** rather than the use of modelled data **is vital.**

## **Actions**

Our comments cover traffic pollution and ways to tackle it, and specific action required for schools.

### Traffic Pollution

The report states that "... the main areas in our borough that experience exceedances are along our busy 'A' roads, the majority of which are the responsibility of TfL. This being the case, we will continue to work with and lobby regional and central government on policies and issues beyond Bromley's control, whilst tackling action in those areas within our sphere of influence."

The council must accept that exceedances **on all roads in Bromley** can be mitigated by local actions. Key examples include:

- 1) Promotion of active travel (making pedestrian and cycle travel easier and safer) should be a main theme of actions in the plan, and targets set for it. Initiatives include:
  - a) Introduction of 20mph speed limits to make active travel safer and more appealing.
  - b) Provision of cycling infrastructure
  - c) Provision of more pedestrian crossings, especially on routes to schools, shops and public transport infrastructure.
- 2) Encouraging use of Ultra-Low Emission Vehicles e.g. making electric vehicle charging infrastructure available and mandatory for all new residential and commercial parking spaces.
- 3) Run regular and specific campaigns to raise awareness in the borough, e.g. clean air day, car-free days and anti-idling campaigns

The report states the council will lobby regional and central government but doesn't specify what they will be lobbying for. We ask that:

- The council lobbies for an extension of the Ultra-Low Emission Zone (ULEZ) to include the borough.
- Bromley works with TfL to ensure the best public transport is provided to minimise private car use.

### Schools

Children are particularly vulnerable to the effects of air pollution and it is therefore no surprise that parents are anxious about the air quality inside and around the schools the children attend. There are several parts of the plan that address schools and we comment as follows:

- 1) **We ask that School Streets Initiatives<sup>1</sup>, where traffic is restricted outside schools, are trialled in Bromley** and their impact on air quality measured. They have been successfully introduced in many London boroughs including Lewisham<sup>2</sup>, Camden<sup>3</sup> and Greenwich<sup>4</sup>.
- 2) It is stated that “The Borough is currently undertaking a trial of a green screen around Valley Primary School”. We are glad to hear of this initiative. **It is vital that air quality data both with and without green screens be collected and published** in order to validate the use of such techniques and justify the cost of their rollout across schools in Bromley.
- 3) As stated above we consider the accurate monitoring of air quality outside all Bromley schools should be an early ambition of the plan.

Finally, we note that the consultation period has been short and not widely publicised. We ask that future consultations improve on this to ensure Bromley residents can engage and inform.

We hope that the comments received during this consultation are taken on board and look forward to seeing a revised Air Quality Action Plan.

Yours sincerely,



Dave Marshall  
Chair, Bromley Liberal Democrats

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<sup>1</sup> <http://schoolstreets.org.uk/>

<sup>2</sup> <https://lewisham.gov.uk/myservices/roads-and-transport/closing-roads-to-traffic-at-school-drop-off-and-pick-up-time-school-streets>

<sup>3</sup> <https://www.camden.gov.uk/healthy-school-streets>

<sup>4</sup> <https://www.royalgreenwich.gov.uk/info/200259/transport-and-travel/2047/school-streets>