

Waltham Forest Air Quality Action Plan 2018

26 February 2018

<https://walthamforest.gov.uk/airqualityactionplan2018>

About the London Cycling Campaign

London Cycling Campaign (LCC) is a charity with more than 40,000 supporters of whom 12,000 are fully paid-up members. We speak up on behalf of everyone who cycles or wants to cycle in Greater London; and we speak up for a greener, healthier, happier and better-connected capital.

LCC is a member of the Healthy Air Campaign (www.healthyair.org.uk), a coalition of household-name health, environment and transport organisations co-ordinated by Client Earth, that campaigns to clean up London's and the UK's air.

This response was developed with input from the LCC's Borough Group in Waltham Forest.

General Comments

LCC supports the Waltham Forest Air Quality Action Plan. It is a bold and welcome plan to improve air quality alongside many other actions the council is taking already. However there is much the council could do to go further still in reducing the borough's illegal air quality levels.

Specific points about the scheme:

- "Ensuring emissions from construction are minimised" should include embracing innovative approaches (such as those being developed by TfL) to reduce motor vehicle movements associated with construction. For instance, major developments should include provision for lorry parking to ensure HGVs do not circle the site while waiting for space on it to load/unload, and/or have facilities for concrete crushing on-site to ensure that rubble and other material is not removed to be crushed off-site only to then be brought back into London/ Waltham Forest. Such an approach not only reduces pollution and other emissions from HGV movements, but reduces congestion and risk to vulnerable road users.
- "Ensuring adequate appropriate and well-located green space and infrastructure is included in new developments" should include explicit reference to requiring developments to be designed such that they are permeable to walking and cycling (but not through motor traffic). This will increase the mode share of active travel modes and ensure new developments do not act as a barrier to such modes.
- Rather than simply briefing officials such as "Directors of Public Health" (DoPH), this document should do more to encourage such officials and the councils to be leading on air quality etc. from the front. Performance-related bonuses and other measures of job performance ("key performance indicators") could be tied to metrics around air quality for instance – i.e. DoPH and Air Quality Officer performance could be assessed on motor vehicle mode share of journeys, use of car parking vs other modes at healthcare sites etc. This

would far better ensure such officials “take responsibility for delivery on air quality” than simply briefing them.

- Similarly, the borough’s, Primary Care Trust (PCT), specialist healthcare settings, hospitals, GPs etc. have shown at times fierce resistance to schemes likely to be positive to air quality and to encourage active travel. Too many healthcare professionals seem not only wedded to car use, but to car provision at the centres they run. The council should be working more proactively with the PCT and healthcare professionals in the borough to enable and encourage far more “active travel” to their sites by staff, users, patients etc. and as part of their jobs wherever possible. In particular the council should engage the PCT and all local healthcare professionals to help them fully understand the physical and mental health risks associated with inactivity and pollution, so that they become strong promoters of active travel and reduced car use to reduce these risks as well as reduce pollution.
- “Engagement with businesses” – businesses shouldn’t just be encouraged or enabled to take “small steps”: they should be encouraged and enabled to take large, positive ones. Freight consolidation schemes, to reduce the volume of deliveries and servicing vehicles using our roads, should be a priority for the borough beyond just the council –. Urgent consideration should also be given to introducing a workplace parking levy and other methods, to encourage a shift of motor vehicle for businesses to use of more sustainable modes.
- Several of the above points count double for the council and its associated businesses (contractors etc.) as the council must show leadership to encourage and enable others to follow. Workplace parking should be robustly challenged among internal stakeholders and staff and reduced progressively, as should subsidies to parking. All council activity should be assessed for its contribution to pollution and health. And this should be across all sites, not just the Town Hall.
- The council must help educational establishments in the borough to go beyond TfL’s STARS travel planning programme for schools, and do much more to enable their pupils, parents and staff to travel more actively. All too often, local educational establishments have been active opponents of active travel schemes that reduce emissions and congestion around their establishments and/or active travel mode share to and from them. The council should use all levers it has to incentivise increasing active travel mode share by both staff and students, and disincentivise private motor vehicle journeys.
- As part of this, the borough should build on the success of its “mini-Holland” “villagisation” schemes as well as its new main road cycle tracks by rolling similar schemes out across the borough, and adding “School Streets” as other boroughs have done around schools specifically. The “school run” should no longer be tolerated as a fact of life for schools, and nor should through motor traffic on residential streets. In order for the huge proportion of children who say they want to walk, cycle and scoot to school to be able to do so, streets need to feel safe and comfortable for them to do so to and from their homes to schools.

- FORS accreditation should be gold, not silver standard.
- As well as virtual loading bays, the council should be rigorously promoting reducing bays where possible among businesses, particularly swapping front retail visitor/delivery bays for side streets or reducing/removing, in order to enable more of our main roads to be places where people can walk, cycle and linger.
- Motor vehicle brakes and tyre wear create a large proportion of particulates pollution. Therefore, as well as shifting to and promoting low emissions vehicles the borough should actively seek to move as much cargo as possible from motor vehicles to cargo bikes, e-assist bikes etc. And it should be promoting the same approaches to businesses and individuals too, ideally with an e-cargo bike loan scheme.
- The council should be campaigning for the Ultra Low Emission Zone to be extended to the edge of the borough, not stop at the north circular.
- For the same reason the council should be promoting active travel by residents and visitors wherever possible alongside promoting a shift to electric vehicles where car use is unavoidable.
- It is surprising that the council's document rates "ease of delivery" for "reallocation of road space" as 3 ("medium") while magnitude of air quality benefits as 2 ("medium"), and the "provision of infrastructure to support walking and cycling" as 5 ("most difficult") given the fact it is already achieving such changes, notably via its Mini-Holland project, and the data from its "Enjoy Waltham Forest" mini-Holland schemes not only demonstrates the results, but shows the council can do it. The council must continue to back and roll out such schemes as a very high priority, based on the results thus far.
- The council's promotion of on-street secure cycle parking and other such cycling promotion measures should be increasingly ramped up, with such measures (as well as wider pavements, more public realm enhancements, etc. which will promote walking as well as cycling) increasingly aimed to replace, remove and reduce business and resident car parking. Car club bays also are far more useful than traditional parking bays. Over time, private car parking should be reduced wherever possible through a combination of measures to reduce private car ownership and use and enable alternatives.