



This is the submission of Climate Action Lewisham, a local environmental group, to the council air quality action plan consultation. Submitted in September 2021.

Congratulations on achieving a downward trend in pollution levels in Lewisham. The draft strategy is promising and CLIMATE ACTION LEWISHAM welcomes these measures. Given that tyre/break wear accounts for 60-70% of particulate pollution, we have general concerns that the plan is too focussed on switching to electric vehicles rather than promoting a switch to active transport and the plan will therefore not achieve the new WHO PM guidelines . <https://www.emissionsanalytics.com/news/pollution-tyre-wear-worse-exhaust-emissions>

We recommend that the action plan include the further measures below:

#### MONITORING

- Adopt the new lower WHO guidelines for Nox and Pm2.5 issued on 22.9.21. Quote the most recent guidelines in the report and change the strategy accordingly.
- Treat 2020 AQM results as an anomaly due to the pandemic: for example NO2 rates declined at roadside by **25%** from 45.3 to 34.0 between 2016-2019, rather than the quoted 43% from 45.3 – 23.5 between 2016-2020 which gives an overly optimistic picture.
- Lewisham monitoring currently complies with standards which involves looking at annual mean data. In addition to this, because risk to health is cumulative, Lewisham should also look closely at the daily highs and lows to give a more detailed picture to residents about actual exposure and times and when to avoid roads e.g. what is risk of exposure at rush hour/school pick up times when people are out and about. Share this data in strategy and reports.
- Consider partnering with Dustbox to undertake "citizen science" community science monitoring (University of Cambridge/Goldsmiths) to improve picture of PM 2.5. They have already undertaken monitoring in Forest Hill and Deptford/New Cross.  
<https://dustbox-logbook.citizensense.net/>

#### TRANSPORT

- Work with TFL to ensure the provision of regular train services which have declined since the pandemic. If people have to wait double the time for trains (e.g. the

Catford/Orpington Train & Victoria Loop Line) they will inevitably drive instead. This is devastating for people who do not drive and rely on these services.

- Prioritise rolling out clean buses on the busiest roads e.g. A2 and A205, A21.
- Assess how successful enforcement of idling has been since 2020.
- Consider council Tax reduction or a bonus or other financial incentives for households choosing to give up existing cars. This could be sponsored by car hire schemes or ULEZ income.
- Idling – Educate council staff and Lewisham homes drivers and public services staff such as police, who can be idling offenders.
- Roadworks- consolidate roadworks and make them more efficient to reduce standstill/idling traffic. Fine companies who do not complete work on time. Consider the effect on air quality when issuing work permits.

## **ULEZ**

- Push for London Mayor to implement expansion of the ULEZ to outer London
- Be clear and transparent about where money raised from ULEZ is going.
- Produce a strategy on how to reduce air pollution south of the A205 if monitoring demonstrates that the ULEZ leads to short or long term increases in that area.
- Phase in charges for SUVs and larger vehicles which produce the most particulate matter.
- Initiate other road user charges: price per journey.

## **SUVs (electric/euro 6/which meet ULEZ standards)**

- Don't let tyre break wear become the diesel scandal problem of the future.
- Run or contribute to a campaign with London Mayor to make SUVs an unfashionable choice in Lewisham/ London –“Car obesity”.
- Stop the sale of poor quality tyres.

## **WALKING AND CYCLING INFRASTRUCTURE**

- Prioritise walking and cycling over electrification as this is more important in reducing PM pollution because of the tyre break wear issue. Run a public awareness campaign on this as it is a little-known fact.
- Publish a list of improvements required for cycling and walking infrastructure across the borough and put an action plan in place to implement them. Some planning has been on the table for a very long time with no progress.
- Enact more enforcement of existing 20mph zones; 20MPH on *ALL* Lewisham roads.

## **LTNS**

- Some LTN measures were retracted in 2020/21. As the council's main strategy to increase active transport, and improve walking infrastructure they should be reinstated and rolled out further. If there are no plans for more LTNS, CAL would like to know the Council's alternative strategy for reducing traffic, making the streets slower and safer and encouraging the switch to active travel?

## **SCHOOLS, NURSERIES, CARE HOMES**

We are very pleased with the success of the excellent School Streets programme and heartily commend the Council on their leadership and successful implementation. It has improved the lives of countless families around the borough. We recommend that the Council:

- Produce a more detailed Strategy for mitigation for schools on main roads unable to join school streets programme (money for air filters/green screens).
- In high areas of pollution, offer monitoring and mitigation advice for care homes and more Nurseries.
- Organise "Walking bus" groups for school travel.

## **GREENING**

- Resolve bottlenecks for schemes like Street Trees for Living by funding and recruiting more Council Tree officers.
- Undertake a council led (alongside the volunteer led) initiative to do more greening- this could be funded privately by crowdfunding/sponsorship from estates agents etc but undertaken by council to fast-track and support projects like parklets. The waste strategy, open for consultation until mid-October, has also highlighted parklets and

planters as being a possible deterrent to fly tipping, and we gave two brief case studies of micro-community groups keen to implement parklets but who have blocks of resources, permission or organisation.

### **MAIN ROAD RESIDENTS, EMPLOYEES AND USERS**

- Address the concerns of people living on main roads. Communicate the theory behind LTNS better, including the time required to see results. Devise a strategy to address pollution on main roads to compensate for any short term/long term, additional traffic from LTNs.
- Find out at-risk groups and have a strategy to protect vulnerable workers who spend a lot of time on the road e.g. Bus drivers/delivery drivers.
- Offer green screens for homes facing main roads.

### **DEVELOPMENTS**

- More robust regulations for developers to enforce not “encourage” change. e.g. Remove all car parking in new developments apart from electric/exemptions for disabled use. Ensure *all* developments are subject to air quality conditions, not “almost all”.

### **INSULATION/BUILDING IMPROVEMENTS:**

We applaud Lewisham’s progress improving council buildings but more is needed for private residences. We suggest:

- A new scheme within Lewisham to inspire home owners to undertake improvements to their private residences. The last national scheme had very low uptake. There is general confusion about whether it is still available.
- Produce A “How to” guide/one stop shop on your webpage for private homeowners- e.g publish average costs, endorse trusted providers in Lewisham. Make it easy for the people who can afford it to make improvements/ boiler switches.

### **BURNING:**

- Communicate Burning Restrictions better.
- Enforce the ban better.

### **FUNDING**

The problem with implementing all of these initiatives will be a lack of money, as stated in the summary plan. We suggest:

- Consider introducing voluntary environment contributions for businesses and residents to enable the council to start implementing more popular measures like greening, freeing up council money to be spent on less visible measures.

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