

Response to EGRA invitation to comment/input on local air quality manifesto

10th Jan 2016

The Council recognises the serious impact that poor air quality has on health and is actively working to improve air quality within the borough. The borough's Cycle Strategy is an example of an area of work that the Council is committed to undertaking and which acts to improve air quality. Other area of focus include work to improve public transport, other active travel initiatives including with schools, fleet replacement programmes, open space and tree planting programmes and strict controls on major new developments. However there are, of course, limits to both what is feasible and to the powers the council has available. A table has been provided below which provides a commentary against each of the proposals in the manifesto.

Enhance Public Understanding	
Better monitoring and publicity of (especially Background) AQ, and the impact of major developments	<p>RBG has an extensive air quality monitoring system that measures both background and roadside air quality. The Council also ensures that the data from this monitoring is publicly available through a variety of mediums. Details of this are set out below:</p> <ul style="list-style-type: none">- In RBG there are 10 strategically located automatic monitoring stations that measure particulate matter and nitrogen dioxide (NO2) levels, plus 58 passive diffusion tube monitors located across the borough which are used to calculate average NO2 levels in the air on a monthly basis.
Public electronic displays of AQ at selected points (e.g. Greenwich Square, Trafalgar Road)	<ul style="list-style-type: none">- Data from the monitoring stations is uploaded on a daily basis to the London Air Quality Network website at http://www.londonair.org.uk/LondonAir/Default.aspx. This website is publicly available and data can be viewed or downloaded either on a borough wide basis or for an individual monitoring station. There is a link to this website from the Council's own website at (http://www.royalgreenwich.gov.uk/info/413/pollution_control-air_quality/580/air_quality).- All diffusion tube data is publicly available on the council website at http://www.royalgreenwich.gov.uk/downloads/download/183/air_quality_reports.

<p>School-based sample monitoring projects</p>	<p>- The airTEXT website http://www.airtext.info also provides forecasts of air quality for Greater London. Royal Greenwich was involved with the setting up of this facility together with other Beacon Authorities in 2008.</p> <p>The impact of major developments on air quality is rigorously scrutinised as part of the planning application process. RBG's Core Strategy Policy E(c) sets out the requirements that major developments are required to meet.</p>
<p>Traffic-free day(s) for Woolwich/Trafalgar Roads</p>	<p>Woolwich and Trafalgar Roads (the A206) are part of the Strategic Road Network (SRN) for which the Council is the Highways Authority, but for which TfL have to be in agreement over any proposed changes (temporary or permanent).</p> <p>In order to help manage the volume of large vehicles using the A206 there is already a lorry ban in place at Romney Road. This effectively stops heavy goods vehicles using it as a strategic route; the ban was introduced by the Council in the face of strong opposition, and was subject to a public enquiry before it could be implemented. Any proposals to completely close an area of this road – even on a temporary basis - would be exceptionally difficult and would require detailed modelling of the effect of vehicle displacement – which would very likely impact on local residential streets, and their associated air quality.</p> <p>In previous years the Council ran Car Free Days (with permission and funding from TfL) by closing the Greenwich Town Centre Gyratory over an agreed weekend or Sunday. As part of the Low Emission Neighbourhood bid development, this is something which will be considered.</p>
<p>Improve Public and Active Transport</p>	
<p>Cleaner buses, taxis and PHVs</p>	<p>RBG agrees that it is an important factor and support TfL's plans to reduce the emissions arising from public transport and taxis.</p>

	In relation to RBG's fleet, in 2014/15 the vehicle replacement programme saw 313 vehicles procured, all inclusive of cleaner engines and lower emissions e.g. Euro 6 technology. Where possible, fleet vehicles are decommissioned. In 15/16 46 vehicles are being taken out of the fleet. The Council also has two electric vehicles and is investigating the potential to increase this further.
smarter rescheduling of bus routes to match demand changes (eg Sainsbury relocation)	The Council undertakes ongoing reviews of the borough's bus routes in conjunction with TfL. This work takes into account new development and other demand changes.
review the future of public transport links	This is also an ongoing piece of work that the Council undertakes both independently and on a sub-regional basis. This includes lobbying for better north/south links and orbital rail routes.

Green Greenwich

plant (permanently or in planters) more appropriate trees; one tree for every death attributable to air pollution since 2010 would be a start	RBG currently ensures that adequate, appropriate and well located green space is included in new developments through its Local Plan and planning conditions. The Council also has extensive tree planting regime which encompasses both its parks, highways and housing land. This has included the recent planting of 2012 trees as part of an Olympic legacy scheme.
protect (the few) remaining green spaces and pocket parks	<p>There are over 1,400 hectares of open space of different types in Greenwich; about 30% of the Borough's total area. As part of this there are 455 hectares of public parkland, equating to nearly one third of all open space. The majority of residents have good access to public parks. The other open spaces in the Borough include:</p> <ul style="list-style-type: none"> · 379 hectares of natural green space · 280 hectares of woodland (including the ancient Oxleas Wood)

	<ul style="list-style-type: none"> · 19.7 hectares of allotment space · 62 separate open spaces with outdoor pitch and sports provision. · In total there are 249 sports pitches across the Borough, or 46,000 sqm of total play space. <p>Areas of open space deficiency are also mapped as part of the borough's Core Strategy and where possible these are addressed through the borough's planning policies.</p>
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Update the Clean Air Framework

stop the use of diesel generators to supply the grid	Whilst the Council believes that the best way to supply electrical power is via the National Grid, the Council does not have the power to ban the installation of such plant. In due course large generators will be covered by the Medium Combustion Plant Directive – see below.
ban biomass and waste burning	Biomass has environmental benefits in the right circumstances. The Council's planning, permitting and enforcement regimes ensure that biomass is sited only in appropriate locations and that illegal waste burning is prevented.
ban incinerators	Whilst the Council would not necessarily support an incinerator in the Royal Borough, the Council does not have the power to ban waste incineration. Any incinerator would need an Environmental Permit issued by the Environment Agency who would insure that any incinerator is compliant with the Industrial Emissions Directive. The Council also considers that there would be significant issues arising from such a policy e.g. huge increase in waste to landfill and therefore that the banning of incinerators is not currently feasible.
ensure any power generation or district heating use ultra-low nitrous oxides treatment	The Council supports the principle of district heating schemes particularly when installed as part of a combined heat and power scheme. District heating is more efficient in the use of fuel and therefore produces less pollution than equipment supplying individual premises. Major combustion plant (>50MW thermal input) are controlled by the Environment Agency who set limits

	<p>on pollution to air. The Medium Combustion Plant Directive is due to be transposed into UK law in stages between 2018 & 2030. This will set pollution levels for combustion plant between 1 to 5 MW. The Council will use any powers granted through this Directive to ensure all combustion plant is compliant.</p>
<p>use European Union grants to help install onshore power supply for berthed ships</p>	<p>The Council has investigated the possibility of requiring the installation of on-shore power at the proposed cruise liner terminal. The consultant's report suggested that the installation of on-shore power would not be practicable.</p> <p>The Council is in discussion with the government as to whether the Medium Combustion Plant Directive (see above) would apply to auxiliary power units on cruise ships. The Council is also investigating the possibility of the installation of a new air quality monitoring station in the vicinity of the cruise terminal to assess the impact of the terminal on local air quality. The Council is not aware of any EU grants for on shore power supplies.</p>

Civilise Road Traffic

<p>declare East Greenwich (or the Borough) an Ultra-Low Emissions Zone</p>	<p>The Royal borough of Greenwich in its response to the GLA's consultation on the Ultra Low Emission Zone (ULEZ) recommended a 'whole London' ULEZ and is part of a working group with other London boroughs and TfL looking at ways to expand the current ULEZ proposals. The Royal borough believes that a London wide ULEZ is the most effective way to improve air quality throughout London.</p>
<p>reduce weight limit on Romney Road and extend to Woolwich/Trafalgar Roads</p>	<p>A lorry ban already exists on Romney Road. This was the first lorry ban implemented in London. It is not feasible for the borough to further restrict traffic in this area as Woolwich/Trafalgar Roads are part of the Strategic Road Network and are vital for local businesses. However the council will consider the logistics in this area as part of the work it is doing on a proposal for a low emission neighbourhood in Greenwich that is being submitted for funding to TfL.</p>

charge more for diesel vehicle parking	Any changes to parking charges would developed as part of RBG's Parking Strategy Action Plan. This will include consideration of various incentives to promote the use of zero emission vehicles.
make all East Greenwich a 20mph zone (City Report)	20 mph zones are being rolled out borough-wide on residential streets. This is being done on a prioritised basis over a number of years as part of the Local Implementation Plan and associated transportation spending plan.
launch a rolling replacement of Council diesel vehicles where appropriate	This is already happening – where possible, fleet vehicles are decommissioned. In 15/16 46 vehicles are being taken out of the fleet. Over 70% (27 out of 37) of RBG's refuse collection vehicles are now at 'Euro V1' standard, and RBG will continue to invest in its fleet to ensure further compliance with the standard. The Council already runs two electric vehicles and is looking to put in the infrastructure at the Council's depot to support a further 20 electric vehicles which will be purchased over the next two years.
enlist citizen involvement in policing idling vehicles	The Council will consider the potential for a communications campaign on this issue.
call for better policing of all traffic rules	The Council agrees that whilst this is the police's remit, this is important, and will use its partnership relations with the police to promote this agenda.

Thank you again for the opportunity to input into your manifesto.

Danny

Cllr Danny Thorpe

Cabinet Member for Regeneration and Transport