

## **Feedback from Lambeth Air Quality Action Plan 2017-2022 Consultation**

### **1. Introduction**

Lambeth held a consultation from 15 September until 15 November 2016 regarding its draft *Air Quality Action Plan 2017-2022* (AQAP). Feedback from the consultation with recommended changes to the plan are summarised in this document. As per [London Local Air Quality Management](#) policy guidance, Lambeth contacted all statutory consultees to invite them to comment on the plan. The GLA has final approval for the Plan, so special attention has been paid to its comments.

#### **A. How was the consultation advertised?**

- On the Council's website
- An article in [Lambeth Talk](#)
- A letter was sent to households living in air quality hotspots
- Posters were displayed around estates in air quality hotspots
- An email was sent to all Lambeth councillors
- Various articles in the weekly Green Champion newsletter
- An email was sent to Lambeth CCG to pass to doctors' surgeries in the borough
- An email was sent to all statutory consultees (the Secretary of State, the Environment Agency, TfL, the GLA, neighbouring boroughs and local BIDs)
- Through Yammer, which is an internal communications platform for Lambeth staff
- Regular tweets from @lambeth\_council
- An article in a newsletter sent to all Lambeth schools
- A reminder email was sent out to all statutory consultees and councillors

#### **B. How could citizens give feedback?**

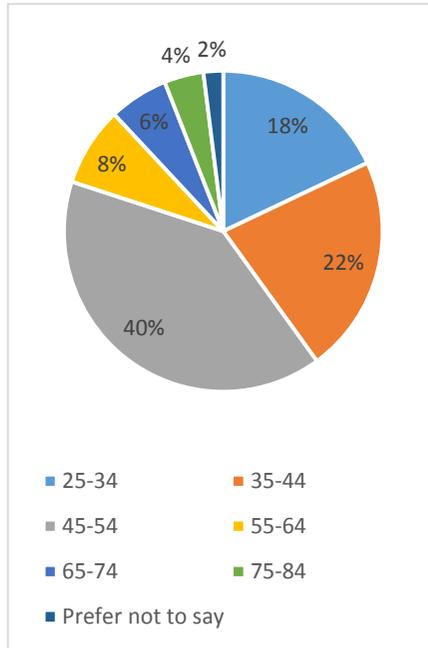
- Completing Lambeth's online feedback form
- Emailing [Sustainability@lambeth.gov.uk](mailto:Sustainability@lambeth.gov.uk)
- Visiting a library in Lambeth to fill in a paper feedback form
- Attending an open evening on 15 or 28 September
- In January 2016 we met with residents who had expressed an interest in air quality to gather ideas for the plan. We met with this group again during the consultation to hear their views on the plan
- We visited an Age UK event on 12 October

#### **C. How many responses were received?**

- 63 people completed the online feedback form
- 4 residents sent emails with comments
- 1 Lambeth officer emailed comments
- 7 organisations sent letters with comments

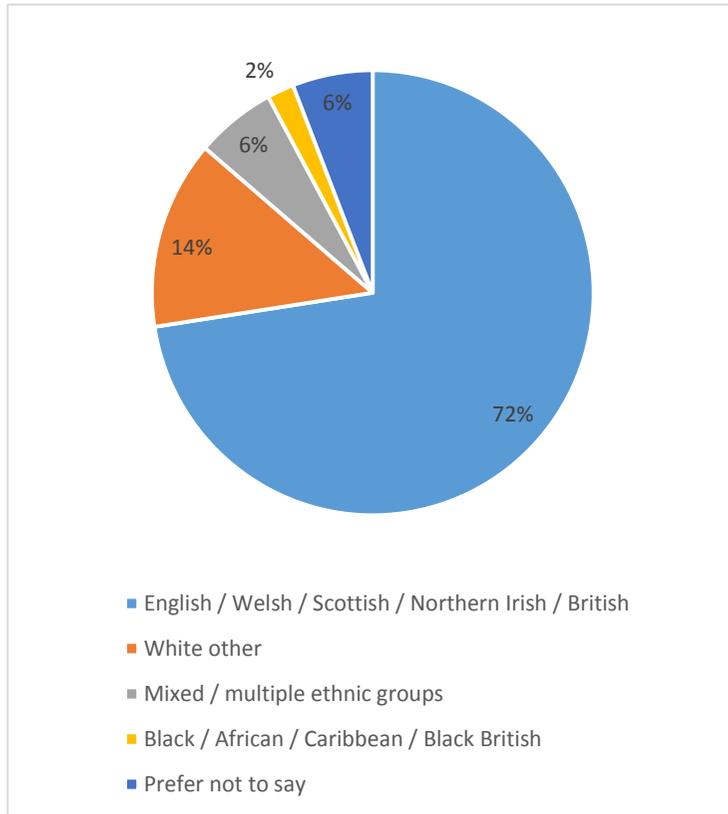
## 2. Demographics

### A. Age



- Unfortunately no responses were received from 16-24 year olds, even though young people are at a higher risk of suffering poor health from air pollution. To engage with young people (including those under 16) to discuss how to reduce their personal exposure to pollution and how to help reduce emissions it is recommended that:
  - The wording in Action 17 is amended to specify not only primary, but also secondary schools, colleges and universities in the borough are included; and,**
  - A new action point is created to work closer with [Lambeth Youth Council](#).**
- Some residents wrote they were responding to the consultation, as they had small children. It is therefore considered that this group was represented in the consultation.
- Similarly there was only a small response from citizens aged 55+, despite this group also being at a higher risk of suffering poor health from air pollution, with the risk increasing with age. To engage with older people it is recommended that:
  - A new action point is created to work closer with colleagues in Adult Social care and Housing to identify vulnerable citizens; and,**
  - A new action point is created for Lambeth officers to work closely with Age UK and other relevant organisations to produce tailored leaflets for older citizens and to visit future events aimed specifically at older citizens.**

## B. Ethnicity



- The majority of respondents were white, despite some evidence suggesting that Black and other Minority Ethnic citizens are at more risk from the effects of poor air quality. It is therefore recommended that **a new action point is written to work with [healthwatchlambeth.org.uk](http://healthwatchlambeth.org.uk) and other relevant organisations to engage with the BME community to promote health and wellbeing regarding poor air quality**

### 3. Summary

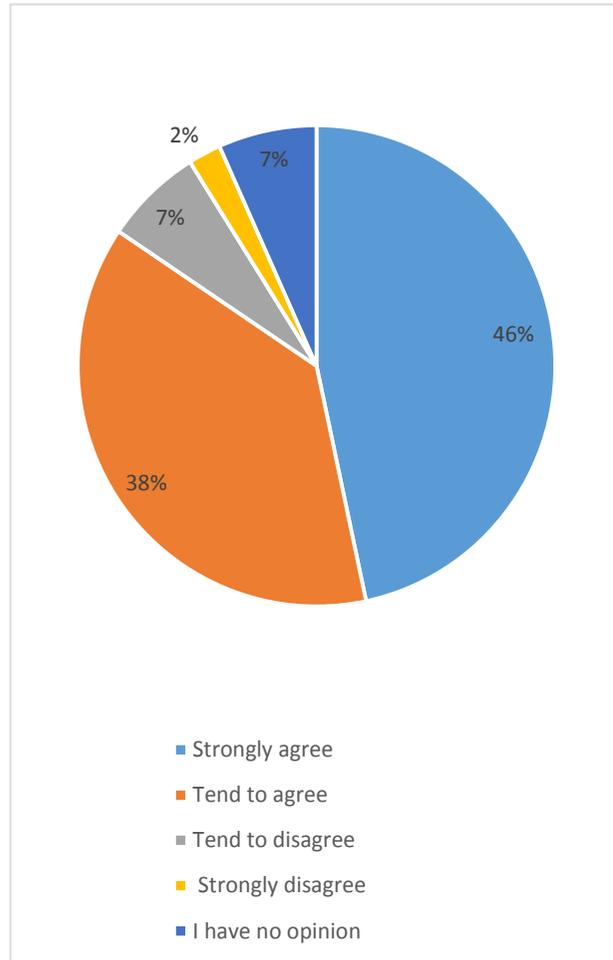
- Unfortunately there was a technical fault with the online feedback form and a small amount of citizens submitted comments, but this information was not recorded. Fortunately anyone affected submitted their name and contact details, so officers were able to notify them and ask them to resubmit their comments.
- A lot of responses to the consultation asked questions instead of giving feedback. In some cases the Council needed more information from the resident to understand what they wanted to know to be able to answer the question; in other cases the question was very specific to a particular street; etc. Therefore it is recommended that **a new action point is written that every year there is an air quality conference to allow citizens to talk and ask questions to council officers.**
- In some cases citizens had misunderstood information in the draft AQAP. Again the air quality conference suggested above would help raise awareness and understanding amongst residents. This was highlighted during the AQAP consultation open evenings when residents often used the time to ask questions about air quality in general instead of giving feedback on the plan.
- Some responses said the plan needed to do more and aim higher. Lambeth would like to do more, but the current plan is everything that can be achieved with current budget. However, it is possible that further funds will become available, such as through Defra or the Mayor's Air Quality Fund. **The plan will also therefore include a wish list of future projects in case funding becomes available.** This wish list will be written using information from the consultation, but citizens will be able to add to it by submitting ideas to the steering group.
- Lambeth is limited in what it can do as a local authority. A number of questions asked and feedback in the report were for Central Government, TfL, the GLA, etc. Therefore at our annual air quality conference suggested above, representatives from TfL, the GLA, the Environment Agency, etc. will be invited to attend.
- There was feedback, including from the GLA/TfL that the timescale for some actions were too far in the future. Therefore, **wherever possible deadlines to complete actions will be brought forward.** Furthermore, the dates listed in the document are the deadline for actions to be completed; wherever possible actions will be finished earlier.

**Question 1:**

Looking at **Topic 1: Emissions from developments and buildings** on pages 17-19 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with the proposed actions

**Question 2:**

Looking at individual actions listed in **1: Emissions from developments and buildings** on pages 17-19 of the draft Air Quality Action Plan what, if anything, would you say is missing, should be removed or should be amended, and why?

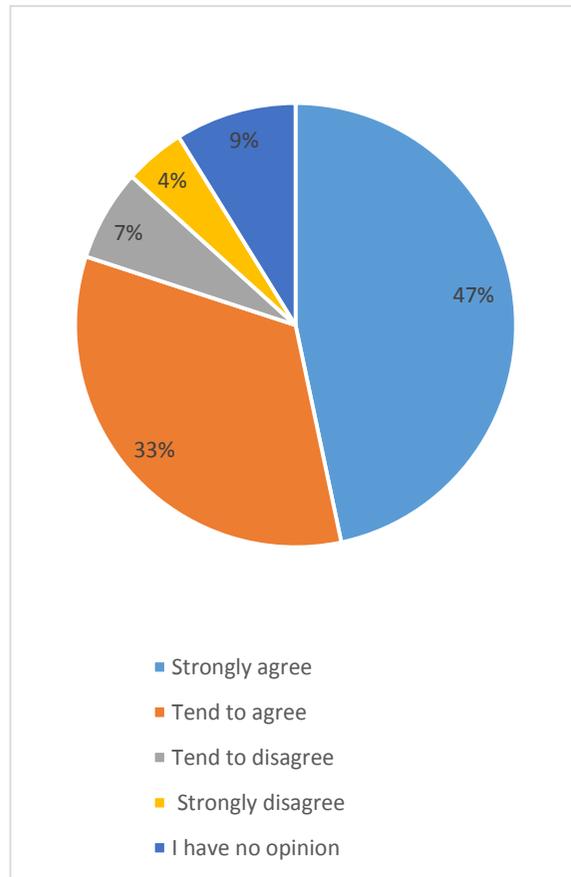


- The majority of responses strongly agreed or tended to agree with the proposals.
- Individual comments included:
  - i. There was widespread support for the Council to use S106 and CIL money;
  - ii. It was suggested by the Environment Agency that an action should be added to the Plan to identify and manage the impact of growth and regeneration on waste management and industrial process regulated under the Environmental Permitting Regulations; and,
  - iii. The Environment Agency also said an action should be added to review and enforce emissions management control techniques at facilities the Council regulates under the Environmental Regulations.

Changes to be made to Emissions from Developments and Buildings		
Suggestion	Action	Responsible
To identify and manage the impact of growth and regeneration on waste management and industrial process regulated under the Environmental Permitting Regulations	To add action to Plan	Planning
To review and enforce emissions management control techniques at facilities the Council regulates under the Environmental Regulations	To add action to Plan	Sustainability

Question 3:

Looking at **Topic 2: Public health and awareness raising** on pages 20-23 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with the proposed actions



Question 4:

Looking at individual actions listed under **Topic 2: Public health and awareness raising** on pages 20-23 of the draft Air Quality Action Plan what, if anything, would you say is missing, should be removed or should be amended, and why?

- The majority of responses strongly agree or tend to agree with the proposals.
- Individual comments included:
  - “The final column of point 15.1 gives details of some sensible actions in relation to episodes of high pollution. However, it is important that Lambeth residents do not regard pollution as a problem that occurs every now and then, and by extension requires only occasional mitigation—rather, it’s an ongoing problem requiring permanent changes in, for example, travel behaviour”.* There will be no change to the plan based on this comment, as education on the effects and seriousness of air pollution will be addressed in action points 11.1 and 11.2;
  - “The Plan fails to involve the local GP surgeries. Medical professions are in regular contact with the most vulnerable people who are also the primary sufferers of air pollution. Nurses and doctors are best placed to implement effective measures and report health issues”.* Action point 9 says an update will be provided to the Health & Wellbeing Board every 6 months, which includes representatives from the CCG and healthcare organisations, which will cascade information to other medical professionals, including GPs; and,
  - “The plan is extremely limited in terms of monitoring actual air pollution levels in Lambeth. Residents have a right to know the level of air pollution they are exposed to. In particular, plans should be made to assess air quality scientifically around nurseries, schools and care homes as young people and the elderly are among those that suffer the greatest health consequences as a result of poor air quality”.* This suggestion has been added to the wish list on page 15 in case additional budget becomes available.

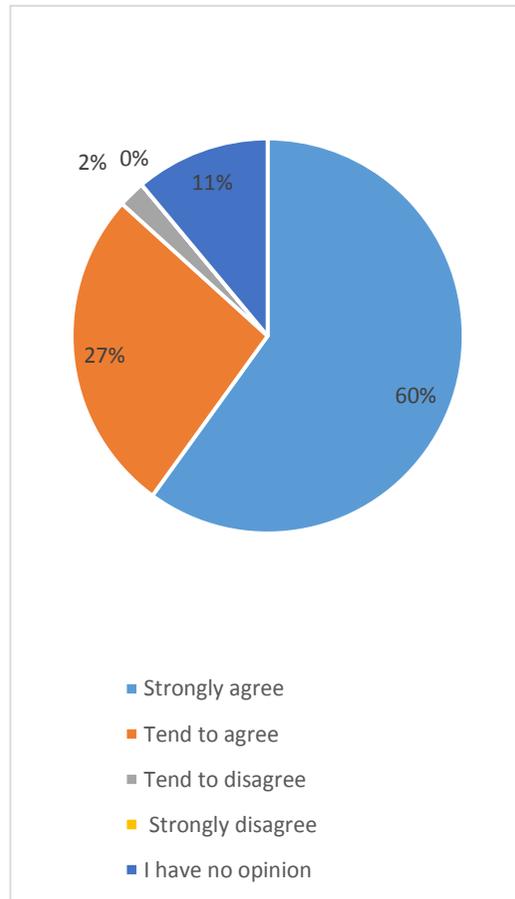
**No changes to Public Health and Awareness Raising**

Question 5:

Looking at **Topic 3: Delivery servicing and freight** on pages 23-24 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with the proposed actions

Question 6:

Looking at individual actions listed under **Topic 3: Delivery servicing and freight** on pages 23-24 of the draft Air Quality Action Plan what, if anything, would you say is missing, should be removed or should be amended, and why?

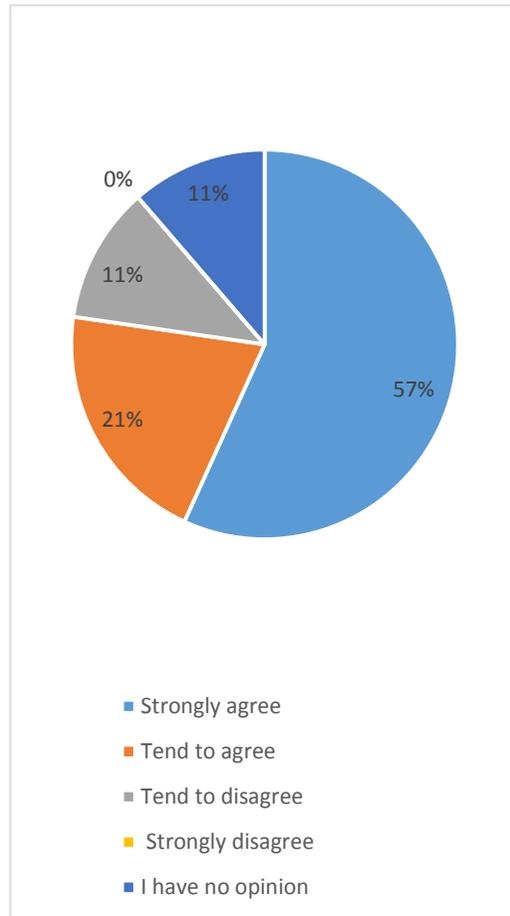


- The majority of respondents strongly agree or tend to agree
- Individual comments include:
  - i. There was concern about the increase in online deliveries and what this meant for air pollution. Lambeth is already managing the [Low Emission Logistics](#) project to reduce pollution from deliveries. In addition, other policies within Lambeth, such as the Local Plan and work from our Regeneration team, encourage citizens to shop locally which reduces the amount of deliveries.

**No Changes to Delivery Servicing and Freight**

**Question 7:**

Looking at **Topic 4: Borough fleet actions** on pages 24-25 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with the proposed actions



**Question 8:**

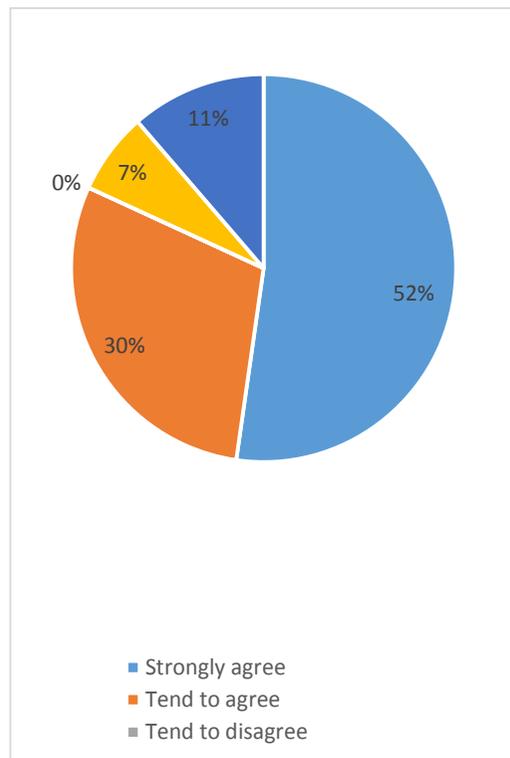
Looking at individual actions listed under **Topic 4: Borough fleet actions** on pages 24-25 of the draft Air Quality Action Plan what, if anything, would you say is missing, should be removed or should be amended, and why?

- The majority of responses strongly agreed or tended to agree.
- Individual comments included:
  - The GLA said for actions 22 and 23 “The entry in the final column needs amending so that it reflects more detail on what would be done to achieve the action? It is unclear how adding it to the Procurement Policy will help with this action, this need to be elaborated on”; and,
  - “The Council should stop investing in diesel vehicles and favour low emission technologies”

Changes to be made to Borough Fleet actions		
Suggestion	Action	Responsible
The entry in the final column needs amending so that it reflects more detail on what would be done to achieve the action? It is unclear how adding it to the Procurement Policy will help with this action, this need to be elaborated on	To amend action points 22 and 23	Procurement and Health & Safety
The Council should stop investing in diesel vehicles and favour low emission technologies	To amend action point 23 to say a report is currently being written for Cabinet to decide whether the Council should only purchase and lease low emission and electric vehicles. However, in some circumstances it may be necessary to buy a diesel vehicle if no alternative exists	Procurement

### Question 9

Looking at Topic 5: Localised Solutions on pages 25-26 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with the proposed actions



### Question 10

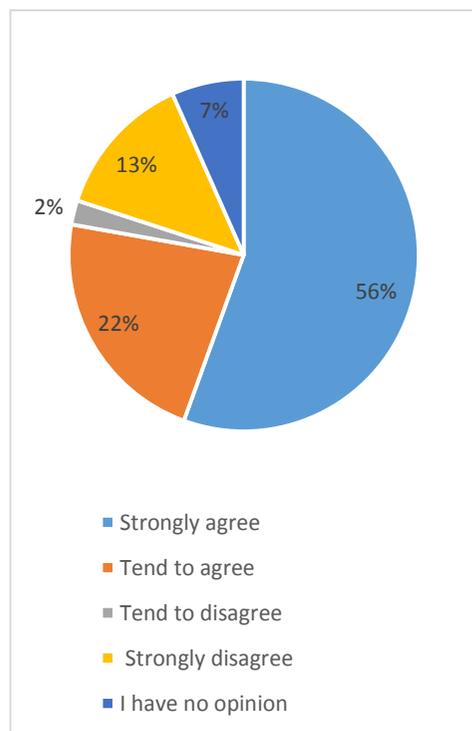
Looking at individual actions listed under **Topic 5: Localised solutions** on pages 25-26 of the draft Air Quality Action Plan what, if anything, would you say is missing, should be removed or should be amended, and why?

- The vast majority of respondents strongly agreed or tended to agree.
- A high number of respondents asked for more green infrastructure for their local area, especially trees. Action point 27 already addresses this by saying green infrastructure will be added to projects whenever possible. Furthermore when carrying out action point 28, we will look at how more green infrastructure can be added to our town centres as part of a series of LEN measures. Also in action point 5 we have written that green space will be included and protected in new developments. However, we will also add to the wish list that if more funds become available, we will build more green infrastructure independent of any other scheme. It should also be remember that green infrastructure is already being added to our streets, as we build Sustainable Drainage Schemes (SuDS).
- A resident suggested that Lambeth should adopt the [Wandsworth Tree Wardens scheme](#).
- *“Brixton tube station, at the end of the Victoria line is crying for bike infrastructures, with the few bike rakes there are constantly overcrowded”*. This will be considered by the Council when looking at building a LEN in Brixton, as per action point 28.
- *“We recognise that an attraction of Low Emission Neighbourhoods are that they may be a way to lever in TfL/GLA funding for schemes that would otherwise not be delivered. However it has to be said that air quality problems tend not to be particularly local in nature and in fact are either spread over a wide area, as in the north of the borough, or along corridors, such as Brixton Road and Streatham High Road. There is a risk that mini Low Emission Zone could be perceived as tokenistic if most of the emissions in that zone originate from large roads just beyond it”*. There are no guidelines on how big or small a LEN can be; therefore the LEN could stretch along the whole of the A23 if it was felt necessary

Changes to be made to Localised Solutions		
Suggestion	Action	Responsible
Investigate whether Lambeth should replicate the Wandsworth Tree Warden scheme	To add action to Plan	Parks and Open Spaces

**Question 11:**

Looking at **Topic 6: Transport & Highways** on pages 26-28 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with the proposed actions



**Question 12:**

Looking at individual actions listed under **Topic 6: Transport & Highways** on pages 26-28 of the draft Air Quality Action Plan what, if anything, would you say is missing, should be removed or should be amended, and why?

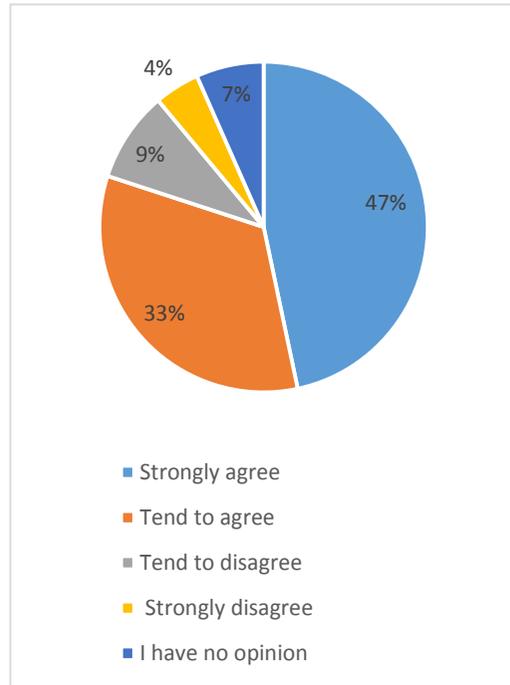
The majority of responses strongly agreed or tended to agree with the proposed actions:

- Based on a suggestion from a local environmental charity we will add another action to the Plan: When Lambeth approves road closures for street parties and the Play Streets Scheme, we should also highlight air quality benefits to help raise awareness amongst residents.
- *“While promoting cycling use is necessary, it will remain inefficient if cycling is not made safer and more accessible. The plan makes no commitment to develop the much-needed cycling infrastructure to encourage the modal shift”.* This will be addressed in the new Transport Strategy, which is currently being prepared by Lambeth.
- There was criticism that the Plan does not reference other Lambeth strategies, namely Lambeth Transport Plan 2011-31, the Cycling strategy and also the Transport Strategy, which is currently being updated. We understand the need to cross reference and ensure continuity across the council; we will therefore create an action point to highlight that these strategies must be supported and their actions delivered.
- *“Trade in scheme for children bikes”.* This will be added to the wish list in case further funds become available to start up the scheme.

Changes to be made to Highways and Transport		
Suggestion	Action	Responsible
When Lambeth approves road closures for street parties and the Play Streets Scheme, we should also highlight air quality benefits to help raise awareness amongst residents	To add action to Plan	Events team
To read through Lambeth Transport Plan 2011-31, the Cycling Strategy and also the Transport Strategy and add any relevant actions in to AQAP. To be completed by March 2018	To add action to Plan	Transport

Question 13

Looking at our **three main priorities listed** on page 15 of the draft Air Quality Action Plan do you, generally speaking, agree or disagree with them



Question 14

Is there anything else that you would like to add to the feedback you have given us so far

- The majority of responses strongly agreed or tended to agree
- The GLA has written that our first priority isn't very clear and should be reworded or separated into two separate action points. Therefore **the first priority will change to:**

**To continue to encourage sustainable travel and construction**

## Wish List and Ideas from Consultation

Response from Consultation	Council comment
Additional air quality monitoring around nurseries, schools and care homes	Lambeth is already carrying out a project to enable citizens to monitor air quality, please see <a href="http://love.lambeth.gov.uk/love-lambeth-air/">http://love.lambeth.gov.uk/love-lambeth-air/</a> . Anyone was allowed to request a diffusion tube to monitor air quality, including nurseries, schools and care homes. Furthermore, we are carrying out a schools project in partnership with Sustrans, which includes monitoring. If additional funding becomes available, we will continue these projects after 2016/17 and encourage nurseries, schools and care homes to work with us
TfL has previously talked about a trial to use electric bikes in a cycle hire scheme in Alexandra Palace. It is unclear whether this trial took place, but the challenging gradient of Brixton Hill might make this an excellent place for a similar trial	This is a very interesting idea and will be considered in point 28 when looking at measures to build a Low Emission Neighbourhood in Brixton and/or Streatham
We think that Clapham Common and Herne Hill would make natural extensions to the existing cycle hire scheme	This idea will be considered in point 28 when looking at measures to build a Low Emission Neighbourhood in Clapham and Herne Hill
We support efforts to reduce engine-idling. If there is any funding available, we suggest that Actions 34 should be complemented by local advertising and perhaps direct messages to permit holders	Lambeth is part of a Mayor's Air Quality funded project to reduce idling ( <a href="http://idlingaction.london/">http://idlingaction.london/</a> ) and therefore believe the advertising should be London wide and paid for by the GLA. Regarding permit holders, we believe this is a good idea and will produce promotional material if funds become available
More green infrastructure	Whenever additional funding becomes available we will build more green infrastructure
Trade in scheme for children's bikes	Create and manage this scheme if funding becomes available.