Ravensbourne Valley Residents

Draft response to Bromley's revised draft Air Quality Action Plan 2020-2025

1. Introduction

The quality of air breathed by residents is of utmost importance and so the production of this Plan is welcomed.

We consider that the Plan represents a comprehensive and wide ranging review of the issues affecting air quality in Bromley and welcome the opportunity given to residents to respond to the consultation with a view to improving it still further.

We have identified a number of general issues and separately a number of specific issues where the plan could be enhanced.

2. General issues

i. In almost all cases, there is no timetable for the delivery of objectives. We believe there should be annual milestones for each objective in order that progress may be assessed

ii. In almost all cases, actual objectives and outcomes are vague or non-existent. We believe it is essential that specific targets be identified in order that meaningful improvements to air quality can be made. For example, Theme 3 Action 13 does not quantify how many Gold, Silver and Bronze accreditations should be achieved to constitute success.

iii. Often, 'evidence' is vague. As listed, the 'evidence' frequently would not provide evidence that the objectives had been met. So, for example, Theme 2 Action 4 states

Require developments with CHP to be air quality neutral as a minimum	Number of developments applied

The 'number of developments applied' is not a measure of how many developments are air quality neutral. Proper evidence could be for example 'all relevant developments are certificated as being air quality neutral as a minimum'.

iv. All quotations, graphics and assertions should be referenced with their source.

The Plan makes a number of quotes there without identifying the source of such quotes. For example on Page 8 it says:-

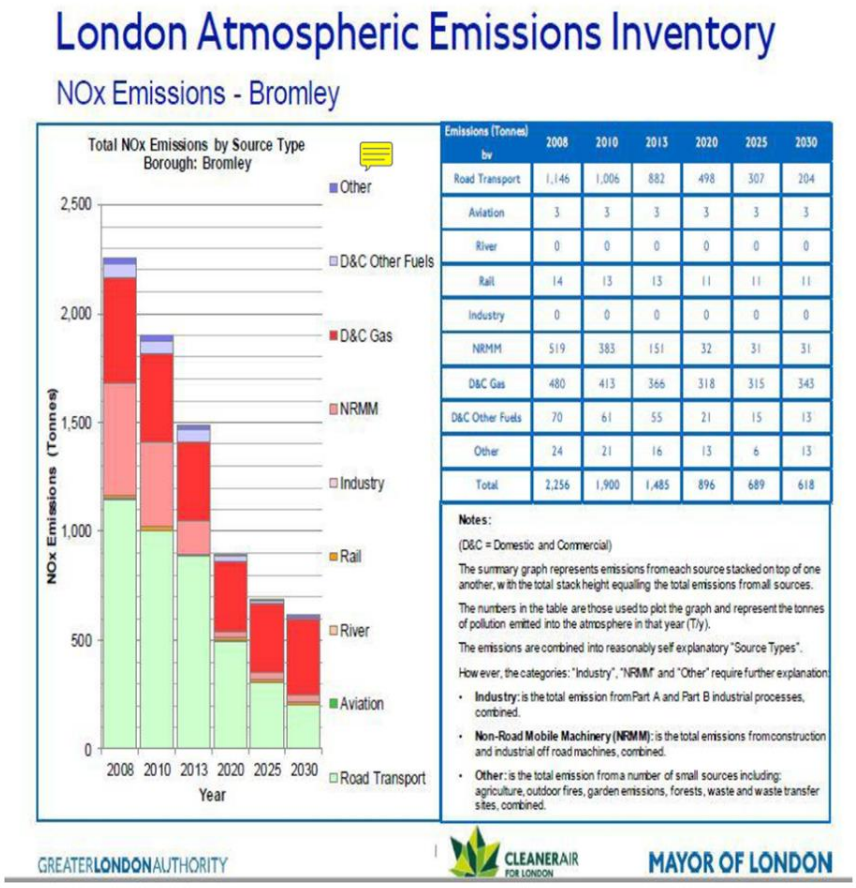
> "According to GLA data, no primary or secondary schools in Bromley are exposed NO2 concentrations that exceed to annual limits".

And on Page 12 it states:-

> "The Council is meeting the current objectives for Particulate Matter (PM10 and PM2.5)"

It would be helpful to know the source/justification of such assertions.

Similarly, this graphic, as an example, is not sourced: -



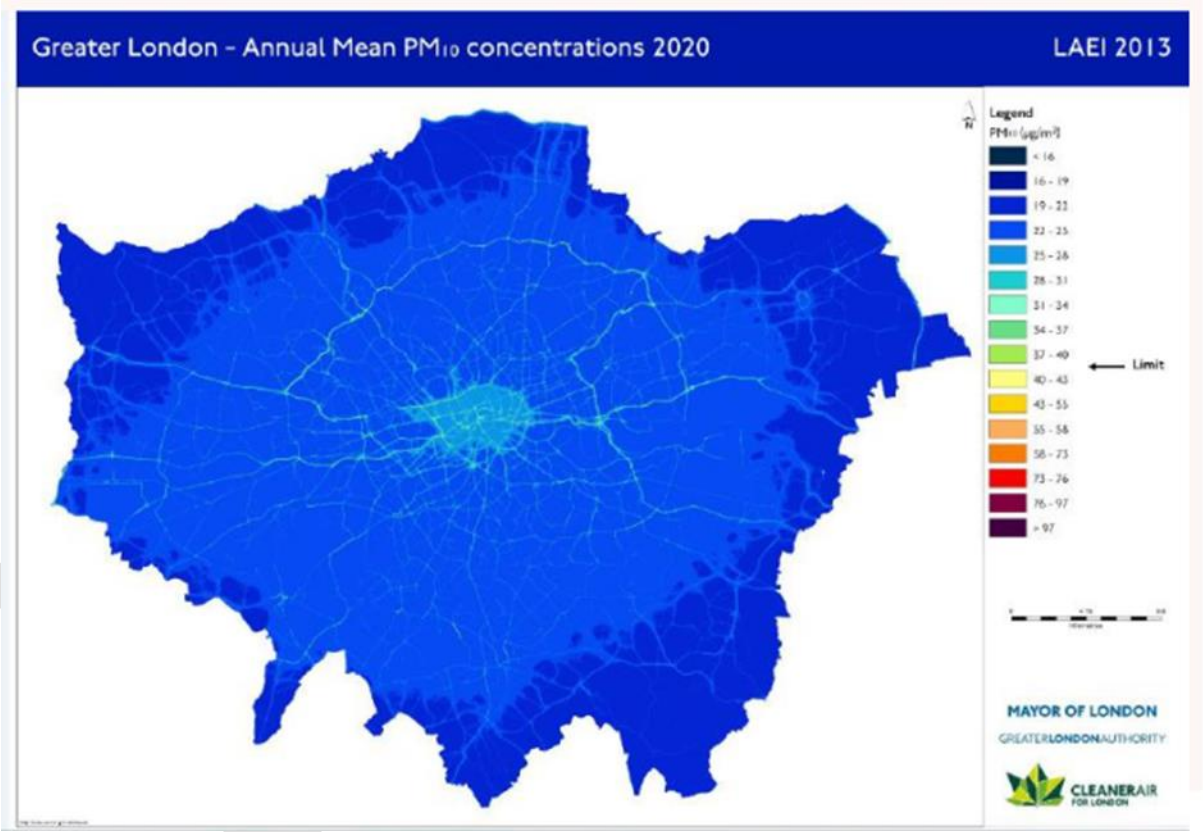
Emissions (Tonnes) by	2008	2010	2013	2020	2025	2030
Road Transport	1,146	1,006	882	498	307	204
Aviation	3	3	3	3	3	3
River	0	0	0	0	0	0
Rail	14	13	13	11	11	11
Industry	0	0	0	0	0	0
NRMM	519	383	151	32	31	31
D&C Gas	480	413	366	318	315	343
D&C Other Fuels	70	61	55	21	15	13
Other	24	21	16	13	6	13
Total	2,256	1,900	1,485	896	689	618

v. The Plan is not an impartial document and should be redrafted to be so. For example, on occasion, it highlights and gives prominence to specific 'good news' whilst ignoring relevant 'bad news' thus failing to provide an impartial view of the situation. For example on page 9 it states: -

> "Bromley meets all air quality objectives for hourly and 24 hour concentrations"

The report does not highlight in an equivalent way that *annual* air quality objectives were *not* so met.

vi. There are a number of graphics which appear to relate to both 2020 and 2013 which is confusing. Eg:-



vii. Weirdly, the AQAP document has the whole of Theme 5 Actions splitting Theme 4 Actions in two – this can't be right! In addition, there are numerous typos.

3. Specific issues

i. Theme 1

a) We believe the objectives should include a **commitment to install PM2.5 monitors to a given timetable**

b) Action 1 includes:-

> "Borough review of Part B processes to ensure all relevant process are captured"

But there is no indication what 'Part B' actually is.

c) We believe that the Plan should commit the Council to seeking to meet the 'Air quality guideline' (an annual mean concentration guideline for particulate matter) from the World Health Organization. The guideline stipulates that PM2.5 not exceed 10 μg/m³ annual mean, or 25 μg/m³ 24-hour mean; and that PM10 not exceed 20 μg/m³ annual mean, or 50 μg/m³ 24-hour mean. There should be a further commitment to meet new guidelines should these be introduced during the lifetime of the Plan.

We believe the Plan should state specific actions (it currently does not) that will enable these targets to be met.

ii. Theme 2

a) Action 2: We believe that the Plan should require real-time $\boldsymbol{PM_{2.5}}$ monitoring at high risk sites, not just PM10. Further we believe controls should be applied to *all* sites, not just major sites, which in any event should be defined (ie how big is 'major').

b) Action 2: If Construction Environmental Management Plans are not required at a site, then we believe Planning Conditions must be used to control air quality. For example, this could include measures to minimise dust from the cutting concrete and other hard materials.

c) Action 2: With regard to developments, we believe that Planning Conditions should be applied to prevent bonfires on construction sites completely. It is disappointing that the proposed actions have diluted the aspiration contained in the AQAP 2010 which stated: -

> Bromley prefer to set conditions that prevent any bonfires on site. Taking into account the Clean Air Act 1993 and nuisance

legislation, i.e.
Environmental Protection Act 1990, this Best Practice Guidance recommends that:

- No burning of any material is permitted on site.
- All excess material should not be wasted, but used or safely removed from site according to appropriate legislation.

d) Action 3: we believe $PM_{2.5}$ should be controlled, not just PM_{10} as $PM_{2.5}$ are more dangerous than PM_{10}. With regard to NRMM, it is not clear why the Plan does not require NRMM to be compliant irrespective of the size of the development (See page 18 which only refers to compliance on major sites). In addition, there is no definition of what a 'major' development is.

e) Action 4: there is no action to ensure that ultra-low NOx boilers are used.

iii. Theme 3

a) On page 18 it says:-

'we will promote campaigns on cleaner smoke-free fuels for heating'

It is particularly concerning that in the detailed list of Actions for Theme 3, there is no specific action detailed regarding smoke free fuels for heating even though the above quote is referred to as a 'Key Action from Our Action Plan'

We believe it would be better if the Plan envisaged a campaign to persuade people not to use wood-burning stoves at all (and indeed bonfires)

We would note that the AQAP 2010 stated: -

> "…increasing number of residents installing wood burning stoves to supplement their heating costs and as such smoke nuisance from domestic properties continues to be an issue."

Thus it is particularly disappointing that the proposed action does not directly address the problem of wood burning stoves which was identified over 10 years ago!

iv. Theme 4

a) We believe that an appropriate Action would be for the Council to consider the possibility of seeking an extension of the ULEZ to cover north-west Bromley.

b) Action 22: There is no mention of how School Streets might be used to improve air quality, although Play Streets are mentioned. We believe there should be an Action to achieve a certain number of School Streets per year for the each of the 5 plan years.

v. Theme 5

a) Where Planning Conditions include landscaping conditions, we believe an appropriate Air Quality objective and thus Action would be to ensure that such Planning Conditions are enforced.

4. Other

a) Generally, do systems exist to capture all the data needed to supply evidence that this plan is effectively implemented?

Yours sincerely

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