

**Air Quality Action Plan
Of the London Borough of Richmond
upon Thames**

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1. THE STATUTORY REQUIREMENT FOR AN AIR QUALITY ACTION PLAN

1.1 This Local Air Quality Action Plan (AQAP) is required under Part IV of the Environment Act 1995, following the decision of the Council to declare the Borough an Air Quality Management Area. This was subject to a formal notice dated 31st December 2000. This decision followed a review and assessment of air quality in the Borough. The Review concluded that the National Air Quality Strategy objectives for 2005 would not be met for two pollutants, namely nitrogen dioxide and fine particles. The standards in the objectives are health based.

1.2 Under the Act, local authorities that have declared an Air Quality Management Area are required to undertake a further 'Stage 4' assessment, to refine the detail of the previous assessment and to assist with targeting the action required to improve the air quality. The 'Stage 4' review was completed in May 2002, following a revision of the traffic forecasts and emissions inventory for London.

1.3 The Stage 4 report confirmed the Stage 3 findings that the statutory objectives for both nitrogen dioxide (NO₂) and fine particles (PM10) would still be exceeded in 2005. The areas predicted to exceed the targets are mainly adjacent to the major through traffic routes.

1.4 A risk assessment has been carried out to determine where people would actually be exposed to exceedances of the national air quality objectives over relevant time periods. The number of 'hot spot' areas has increased since 'Stage 3' due to changes in the model's assumptions about vehicle emissions and traffic growth. The map at Appendix 3 shows the locations of the 'hot spots'. The stars represent the critical areas where the success of the AQAP will be tested.

1.5 The purpose of the AQAP is to ensure that the Council takes suitable action to improve air quality within the Borough. It is not a legal requirement to actually achieve the national air quality objectives, however the action must be in pursuit of achieving the objectives.

1.6 The draft AQAP was sent out to Consultees, including the Mayor of London, Transport for London, the Department for Environment and Rural Affairs (DEFRA), the neighbouring West London Alliance Boroughs and local groups. The comments received have largely been reflected in the final version of the Plan.

POLICY CONTEXT

2.1 National Policy

The National Air Quality Strategy Objectives have the purpose of reducing air pollution so that it no longer presents a risk to human health. The air quality in the Borough has been assessed against these objectives, with reference to Local Air Quality Management guidance and National Society for Clean Air guidance on action planning.

A recent Government Consultation proposed tougher standards for particles in England for 2010 and 2015. The current model for 2005, based on the expected traffic fleet for that year, shows that the whole Borough would fail these tougher objectives, not just at roadside locations. If the proposed standard is confirmed, further modeling will be needed to test specifically for 2010 and 2015, including a revised traffic fleet mix, to determine the impact.

2.2 Mayor of London's Strategies

2.2.1 The Mayor's London Plan

The Draft London Plan sets out the Mayor's spatial development policies and has an impact on the need for and means of travel. In particular it gives an important indication of the level and distribution of housing and employment growth, which has a major impact on the need to travel. It also indicates the strategic transport proposals, however none of these are directly relevant to travel within the Borough.

2.2.2 The Mayor's Air Quality Strategy

The Mayor's Air Quality Strategy was published in September 2002. It contains a wide range of initiatives to improve air quality including a commitment to consider the role of a Low Emission Zone in London, to meet national air quality objectives. The impact on the Borough of the initiatives in the Mayor's Strategy has not been quantified. Objectives most relevant to this Plan are:

- *To increase the number of cleaner vehicles;*
- *To support a feasibility study on one or more low emission zones for London;*
- *To minimise emissions at and around Heathrow;*
- *To reduce emissions from vehicles operated by or licensed through the functional bodies;*
- *To use traffic management infrastructure to reduce emissions;*
- *To reduce emissions for freight movements;*
- *To encourage proper vehicle maintenance and more efficient driving;*
- *To reduce emissions from industry and buildings;*
- *To reduce emissions from construction sites;*
- *To enable continued research into London's air quality;*
- *To lobby government to improve national measures to further reduce air pollution.*

The Council broadly supports all the Mayor's key measures above, and will seek to implement them in the AQAP as it is reviewed and developed.

2.2.3 The Mayor's Transport Strategy

The Mayor of London's Transport Strategy was published in July 2001. The Plan gives priority to walking; cycling and public transport and seeks to discourage use of the private cars, particularly in Central London where congestion charging is to be introduced from February 2003. However within Outer London it is expected that car travel will continue to increase.

Transport for London (TfL) - has responsibility for: London Regional Transport, guidance to the Rail Franchising Director, the functions of the Public Carriage Office, the highway and traffic authority functions for the Transport for London Road Network, and the powers of the Traffic Control Systems Unit.

2.2.4 The Mayor's Energy Strategy

The Mayor's Strategy (Consultative Draft to be issued December 2002) will also be relevant particularly in relation to domestic and commercial premises which produce air pollution as a waste product from the use of energy. Many of the measures to reduce the climate change 'greenhouse gases' will also reduce air pollution, and vice versa.

2.3 Sub-regional Strategy

2.3.1 The Borough is a member authority of the South London Partnership and of SWELTRAC, and contributes to the West London Alliance working group, who are preparing a sub-regional AQAP. The Council will use the information from the sub-regional groups to help inform the Council's decision-making process, in the continuing development of the Borough's AQAP.

2.4 Local Policy

2.4.1 Relevant policies of the Council are contained in the following;

The Community Plan, 2002 -2005

The London Borough of Richmond upon Thames Unitary Development Plan, First Review, 2001

The Interim Local Implementation Plan (Transport), 2001

The Borough Spending Plan, 2003 - 2004

The Heath Improvement and Modernisation Plan, 2002 - 2003

The Economic Development Strategy, 2001 - 2003

3. ASSESSMENT OF AIR QUALITY IN THE BOROUGH FROM THE 'STAGE 4' REPORT

- 3.1 The map at Appendix 3 summarises the outcome of the Stage 4 assessment. This assessment identifies more 'hotspots', which are more widely distributed across the Borough than the Stage 3 assessment. The reason for the increase is that the traffic predictions for the year 2005 have been revised. It is now expected that a greater percentage of older vehicles will still be on the road than was originally predicted. Another reason for the increased number of predicted air pollution 'hotspots' is the use of revised emissions factors which, are based on higher pollution emission rates than were previously estimated.
- 3.2 An assessment was made, at ten locations and shows the proportion of the pollution coming from heavy goods vehicles, light goods vehicles, and cars and from the general background. The relative proportions of these vary from road to road. It is useful to know this breakdown in order to target the best action needed to improve air quality at any specific location. Generally speaking, the results show that about half of the pollution at roadside sites comes from road traffic and half from background air. For dust particles, the background can contribute as much as 90% of the total, with the bulk of the rest coming from heavy goods vehicles.

4 AIR QUALITY ACTION PLAN

4.1 Guiding Principles for Air Quality Action Plan

4.1.1 The following are the guiding principles for the Plan:

- Good air quality is important for the health of individuals, communities and the economy.
- Richmond upon Thames Council will seek to influence the policy of other London Boroughs, the Mayor of London and BAA (at Heathrow) to take action to reduce emissions occurring outside of Richmond upon Thames but which affect air quality in the Borough.
- Richmond upon Thames Council will act within the powers available to reduce air pollution and will lobby for a change or the introduction of new legislation where it identifies a need
- Richmond upon Thames Council will discourage new activity where there is clear evidence that the activity will lead to a significant increase in air pollution
- Richmond upon Thames Council will assess the social and economic costs of any action proposed to improve air quality
- Richmond upon Thames Council will not pursue any action where it is clear that the benefits gained do not merit the costs involved. Specifically it will not take action that risk damage to the Borough's economy
- Any action Richmond upon Thames Council takes to improve air quality will be consistent with the aim to maintain the mobility of its residents
- Richmond upon Thames Council has consulted the relevant Council departments on the draft of this Plan. It will monitor the progress of the plan and develop a greater dialogue with both internal and external stakeholders. The Borough is required to conduct a further statutory review and assessment by the end of 2004.
- Richmond upon Thames Council will act in partnership with others in the delivery of actions set out in this plan
- Richmond upon Thames Council will actively co-operate with other organisations' Air Quality Action Plans and will incorporate appropriate actions into this Plan as necessary
- Richmond upon Thames Council will periodically review the actions in this Plan to assess their effectiveness in improving air quality

4.2 The Plan is based on actions at three levels;

Londonwide measures – Action in relation to Londonwide matters will mainly be through seeking to influence the Government, the Mayor of London, Transport for London and other London boroughs. Aims will be to encourage cleaner vehicles and cleaner fuels, in order to produce lower emissions and to promote a wider travel choice to provide alternatives to the car. The Council will also seek action in relation to the strategic road network to address the ‘hotspots’ which are mainly along the through routes where the Council does not have the power to act directly. Similarly, background air pollution from Central/Inner London and Heathrow are also matters outside the Council’s direct control. A key Londonwide initiative is the evaluation of a London Low Emission Zone (LEZ) which would potentially restrict access by vehicles, which produce higher levels of pollution. The Stage 4 model included some assumptions in relation to the impact of a LEZ however the level of improvement in air quality was insufficient to achieve the level of improvement required and therefore even if such a scheme were introduced further measures would still be required.

Boroughwide measures – It will be important to translate many of the Londonwide measures into a Boroughwide programme. These will include actions that the Council can take through its planning and transport roles to ensure that land uses which attract large numbers of visitors are accessible by public transport; to minimise commuter parking; and where practicable ensure the free flow of vehicles. The Council can also take more direct action through seeking to reduce pollution from its own activities. Initiatives include a continual review of its own fleet of vehicles and subject to cost effectiveness the introduction of low emission and alternative fuelled vehicles; and implementation of a Travel Plan to encourage alternative means of transport.

In combination with most other London Boroughs, the Council proposes to take part in an emission-testing programme, provided suitable sites are identified. The programme is still under development, and awaiting allocation of funds. It would involve the testing of vehicle exhausts to ensure that they are operating within the legal limits.

Local measures – there may be some local measures such as improvement of roads or junctions or providing pedestrianisation, which will eliminate some ‘hotspots’. Improvements in these areas will be reviewed on a site-specific basis.

A full list of the proposed actions is contained in the Action Plan at Appendix 1.

4.3 In order to deliver this Plan with its partners Richmond upon Thames Council will:

- Work with other authorities to promote clean air initiatives, especially a low emission zone (dependent on the recommendations of the joint London Low Emission Zone Feasibility Study) and vehicle exhaust emissions testing
- Continue to consult on the implementation and review of this Plan
- Integrate the policies in this Plan with the UDP and the LIP
- Develop the working relationship with the Department for Transport and other Government Agencies to implement policies and initiatives, and lobby for the introduction of new policies, including operational and fiscal policy, where a need is identified
- Work with the Environment Agency on point sources of emissions and the co-ordination and implementation of relevant air policy areas

- Work with small businesses through the Chamber of Commerce and the Federation of Small Businesses
- Work with employers, employees and schools, to implement Travel Plans.
- Continue to consult and communicate with residents through local groups, the local newspapers and any other appropriate methods
- Develop liaison with voluntary organisations to assist in the development of walking, cycling and use of public transport
- Review and develop its existing systems to inform the public and specific audiences about the quality of air in Richmond, including the development of its website

5.0 Conclusion

5.1 The benefits of clean air are many. Although the assessment has been based mainly on the need to protect human health, the benefit of less traffic congestion and benefits for the local economy are also important aspects.

5.2 Many of the pollution ‘hotspots’ identified are situated on the TfL road network within the Borough indicating a clear need to work with the TfL network management, surrounding Boroughs and the Mayor of London

5.3 On the local road network, there are also a number of ‘hotspots’ that need to be considered. Efforts to improve air quality will be assisted if there is sufficient public awareness of the issues. If people understand where pollution comes from, they will be able to take greater personal responsibility for their contribution to clean air.

5.4 The Council seeks the support of residents and other stakeholders to help it develop an Action Plan, which will result in cleaner air in the Borough. Hopefully the actions proposed in this document will achieve that goal. The main initiatives, which directly engage sections of the community, are the publicity campaigns for ‘Don’t Choke Richmond’, Environment day, and encouragement of Travel Plans with businesses and schools by way of publications, talks and initiatives.

Action Table

Item	Key Actions of the Air Quality Action Plan.	Details and programme	Estimated Cost	Air Quality Benefit
	Londonwide measures			
1	Participate in the development of a low emission zone (LEZ) in London, to restrict access by the most polluting vehicles, subject to feasibility and assessment of any local emission impact. The measure will target heavy goods vehicles and vans.	London Low Emission Zone Feasibility Study, report due in Autumn 2002	Subject of feasibility study (TfL funding would be sought)	Has the potential for a major impact on fine particle emissions
2	Encourage TfL to take action to reduce through traffic on the A316 and A205 but not to disadvantage Borough residents or neighbouring Boroughs.	To work with TfL to reduce emissions from the network and at identified 'hotspots'.	Dependent on identification of acceptable measures.	Potential for significant impact subject to identification of suitable measures.
3	Encourage BAA to take action to reduce emissions at Heathrow from surface access traffic, site traffic, aircraft and other sources.	Continue to pursue actions through Heathrow Airport Consultative Committee, the Heathrow Area Transport Forum, SWELTRAC and the mayor of London	No direct cost to the Borough	Will help reduce background pollution levels in the Borough
4	Lobby the Mayor of London to ensure that, as a minimum buses and taxis meet LEZ criterion	The Mayor's policies and proposals for reducing emissions from buses and taxis are now set out in the Mayor's Air Quality Strategy	No direct cost to the Borough	Benefits will in relation to fine particles and to areas where there are concentrations of these vehicles e.g. Richmond town centre.

5	Lobby the Mayor to achieve Londonwide improvements for pedestrians, cyclists and public transport where there will be local benefits.	On going. Policies and proposals are outlined in the Mayor's Transport Strategy. Seek additional commitment to public transport improvements through the London Plan (September 2002 and on-going)	No direct cost to the Borough	Benefits will be dependent upon level of improvements achieved.
6	Work with the South London Partnership and West London Alliance local authorities, to develop co-ordinated AQAPs across the region.	Joint Action Plans are being prepared.	No direct costs to the Borough	Benefits will be dependent upon level of improvements achieved.
	Borough-wide measures			
7	Continue to pursue land use policies within the UDP to encourage travel choice with the aim of reducing emissions and to ensure that major new developments are accessible to public transport.	UDP: First review proposed modifications to be agreed by Council December 2002. Aim for adoption December 2004.	Staff costs only	Dependent upon longer term processes, so very little impact on 2005.
8	Managing HGV movements will be undertaken by developing Freight Quality Partnerships with businesses and Town Centres. These are supported in the revised UDP.	On-going SWELTRAC/Borough development/Businesses	Staff costs only	Heavy good vehicles are a major source of fine particles therefore a significant benefit.

9	To ensure new buildings are energy efficient.	On going function of Planning and Building Control. UDP: First review proposed modifications to be agreed by Council December 2002. Aim for adoption December 2004 Design Checklist spg to be implemented from January 2003	Staff costs only	Dependent upon the redevelopment/refurbishment process, therefore longer term and very little impact on 2005.
10	Encourage businesses to take forward additional air quality measures including: cleaning emissions from their vehicle fleets; making maximum use of schemes to switch to alternative fuels where appropriate	On-going	Staff costs only	Dependent upon level of success achieved
11	To improve domestic energy efficiency across the Borough by doing surveys, giving advice and grants (where applicable) in order to comply with the Home Energy Conservation Act. Encourage businesses to adopt purchasing policies that reduce emissions and energy use	On going On-going advice provided by REIC	Staff costs only	Dependent upon level of success achieved
12	To continue to press for and promote travel choice through improvements for pedestrians, cyclists and to public transport in terms of increased capacity, reliability, accessibility and quality	On going	Costs dependent upon schemas identified, funding primarily through TfL	Dependent upon level of success achieved

13	<p>Continue travel awareness campaign to promote a diversity of travel choice.</p> <p>The main umbrella action is the 'Don't Choke' campaign. The actions include the 'Environment Week'; 'National Bike Week'; 'Transport Week'; Richmond Walking Week' and the 'Walk to School' initiative. Promotional activity will take place in one town centre of the Borough per month.</p>	Green Transport Co-ordinator for SWELTRAC will strengthen the commitment to Travel Awareness campaigns.	Staff costs only	Dependent upon level of success achieved
14	Promote the Council Travel Plan for the Council employees and actively promote Travel Plans to businesses, schools and others to encourage their development and implementation;	The Travel Plan Officer has a full programme of exhibitions and visits to businesses and schools, promoting travel choice Production of publicity and promotion material	Staff costs only	Dependent upon level of success achieved
15	Compiling a database of all travel Plans in the Borough for the Council, businesses and schools, so as to monitor progress	Database is ready and now needs data input.	Staff costs only	Dependent upon level of success achieved
16	Develop the 'Walking Strategy' with travel pattern surveys and promotional campaigns in schools such as 'Walking Bus'; also a 'Safe Houses' campaign (safe places for children to wait before going home)	A significant initiative to promote travel choice. Travel Plan Officer and Safety Education Advisor Joint action with St Mary's college	Staff costs only	Dependent upon level of success achieved
17	Use of monitors in schools to promote the importance of air quality and health.	Programme for schools	Staff costs only	As above

18	Encourage the use of alternative fuel vehicles in the Borough and encourage the development of an appropriate refuelling infrastructure, provided that specific sites meet the health and safety criteria.	Consider changes to UDP to seek appropriate refuelling infrastructure 'TransportEnergy' and others are identifying new sites for refuelling of alternatively fuelled vehicles.	Staff costs only	Long term cumulative benefits
19	The Borough has now purchased an electrically powered car for Council business. This will help raise the profile and promote the use of electric cars.	The London Clean Fuel Vehicle Working Group is promoting electric refuelling	Potentially significant cost to the Borough	Limited number of vehicles therefore overall minor impact.
20	The Council awaits the outcome and recommendations of the London-wide review of alternative fuels, to guide its future purchases of vehicles. The policy is to purchase the most cost-effective vehicles possible, which also achieve the lowest practicable emissions. The Council has purchased an electric vehicle (19 above)	On going A register is being compiled for the Council fleet, including an assessment of emissions. The newest vehicles are powered by petrol/LPG and electricity. Grants from the Energy Saving Trust's 'PowerShift' and 'CleanUp' programmes will be sought if appropriate	High	Limited number of vehicles therefore overall minor impact.
21	Concern for low emission vehicles to be used on Council business extends to the use of vehicles by contractors. The Council seeks to control emissions from contractor's vehicles by checking that their environmental policy includes specifically its use of transport.	On going	Dependent upon impact on cost of contracts	Limited number of vehicles therefore overall minor impact

22	To work with other London Boroughs to establish roadside vehicle testing of exhaust emissions and levy fixed penalties.	The Borough awaits the decision of the Secretary of State to grant powers to operate a roadside vehicle-testing scheme.	DfT funding being sought as part of London-wide bid through the ALG).	Although limited number of vehicles will be tested will raise more general awareness.
23	Consider implementation of traffic management policies to reduce traffic at the pollution 'hot spots', subject to there being suitable alternative routes.	On-going	Costs dependent upon schemas identified, funding primarily through TfL	Limited benefits for air quality
24	Consider use of parking concessions to encourage the use of alternatively fuelled and more fuel efficient vehicles	Needs further assessment	Cost of some loss of revenue	Dependent upon level of success achieved
25	To continue to promote the Council's 'Smoke Control Zone'	On going	Staff only	Maintain established benefits
26	To continue to promote composting in preference to bonfires	On going	Staff only	Benefit limited to pollution 'hot spots'
26	To continue to inspect and enforce clean air requirements at 'schedule B' processes in the Borough.	On going	Staff only	Maintain established benefits
28	To improve the indoor air quality of workplace environments	On going Health and Safety work	Staff only	Limited importance at pollution 'hot spots'.
	Local Measures			
29	Where practical, undertake changes at congestion hotspots to seek to avoid tailbacks of queuing vehicles.	Dec 2005 Hot spots identified from Stage 4 model. Review of congestion points by end 2002	High (TfL funding would be sought)	Dependent upon identification of improvements

30	Refuse planning consent for activities, which are likely to lead to a significant worsening of air pollution in 'hot spot' areas.	On-going	Staff costs only	Long term process to enable 'hot spots' to improve
31	Assess possibilities for carrying out local environmental measures that seek to reduce localised air pollution.	Assessment required participating in environmental management schemes	High but TfL funding would be sought	Dependent on proposals brought forward.
32	Consider controls for coach parking in Kew and Hampton Court, to protect residents, workers and visitors from the impact of vehicle emissions	On-going	No direct cost to Borough	Significant local benefit
33	To consider ways to further reduce the impact of road traffic and parking problems on Twickenham RFU days.	On-going	No direct cost to Borough	Local benefit – days of major events only
34	Continue to use parking controls particularly to manage commuter parking	On-going	Staff costs only	Dependent upon redevelopment/refurbishment therefore very long-term
35	Support the development and use of 'Car Share Clubs' in new residential developments, by station interchanges and in town centres.	Sub-regional initiative SWELTRAC seeking funds to develop these actions.	Staff costs only	Dependent upon level of success achieved