



Barbican Association

The Barbican Association is a Recognised Tenants Association representing the interests of over 4,000 residents of the Barbican Estate

Comments on the City of London Air Quality Strategy 2019

Air Quality is a major concern for residents of the Barbican. This is evidenced by the high levels of participation in the year-long air Citizen Science Air Quality Monitoring project in 2013/14; the work of residents in support of the LEN and the on-going commitment of individual residents participating in the Idling Engines campaign.

We strongly support the objectives of the Strategy towards delivering healthy air in the City of London. We would, however, encourage the City to move faster and more decisively towards 100% of the Square Mile to complying with WHO Guidelines for NO_x and PM₁₀ and PM_{2.5}. Whilst we understand the City's preference to achieve targets by good example and persuasion, we consider the City should take a tougher approach with enforcement to curb undesirable behaviours (such as engine idling).

We appreciate that the Air Quality Strategy is closely linked with the City's Transport Strategy. The latter is ambitious in scope and will take considerable funding, officer time and corporate determination to achieve the goals that have been set. We would urge the City to be determined and focus on those options that will deliver cleaner air in the shortest time.

The health risks to residents and City workers from poor air quality are well understood by residents and are of great concern. Long term exposure to air pollution carries significant health risks, particularly to young children living and going to school in the City as well as older residents, whose health may already be compromised. Time is of the essence to improve air quality and the life chances of people living and working in the Square Mile.

Page 3.

NO_x

We are pleased to note that the City aims to meet the health-based Limit Values of the WHO but we question why only 90% of the City will meet these Guidelines by 2025. What parts of the City will not meet these Guidelines? On **page 18** it suggests that 'the remaining areas are likely to be at very busy road junctions and in some heavily trafficked streets with narrow carriage ways and tall buildings that act to trap air pollutants.' This suggests that streets such as London Wall, Aldersgate Street and Beech Street will still have levels above WHO Guidelines – unless there is a radical reduction in motor traffic. We would like to see this happen.

We also question how this would be measured, since there are only three sites measuring NO_x in the City, one of which is measuring background levels. This leaves two monitoring stations, albeit in two of the most polluted areas of the City to measure

whether WHO Guidelines have been achieved. We note that there is the intention to introduce other monitoring equipment and that there are also diffusion tubes but they are not capable of measuring hourly average concentrations of NO₂. The Strategy should be clearer and also more ambitious with the objective to make 100% of the City compliant by 2025.

PM₁₀ and PM_{2.5}

We would like to see levels for particulate pollution meet WHO Guidelines before 2030. We accept that currently only 25% of these pollutants originate in the Square Mile, however, we hope that the City will use its influence as a 'leader for air quality policy and action and inspire[s] collaboration across London.'

Page 5. Source of Air Pollution

We welcome the projected reduction in air pollution arising from road sources, however, we believe the City will need to be more prescriptive about building standards (construction and operation) to reduce pollutants arising from buildings by 2020.

Page 9. Reduction in concentrations of NO₂ at Walbrook Wharf due to Cycle Super Highway

This improvement in air quality is compelling evidence that reducing the number of motor vehicles through reduction in the size of the carriageway and installing protected cycle lanes is a strategy that works. We would like to see more of this, with traffic reduction measures in Aldersgate Street, London Wall and of course Beech Street with safer accommodation for cyclists and pedestrians and hopefully substantial improvement in air quality.

Page 17. PM_{2.5}

We are concerned to note that 'there is very little that can be done by the City Corporation in isolation that will have a significant impact on concentrations of this pollutant' and that by 2020 the whole of the City will be in breach of WHO Guidelines of 10µg/m³.

Page 19. Leading by example

We welcome the City's proposed measures for setting a good example, however, we question how this will be monitored and what will be the penalties for non-compliance. We would like to see milestones and reporting on whether they have been achieved. For example, no idling policy on large contracts (**page 20**) is an admirable intention but there is no mechanism for ensuring that this is complied with (maybe use Client Earth to monitor this as well as the voluntary sector organisations (**page 21**)). The supply chain should be tied into measurable targets and monitored for compliance with penalties for non-compliance.

Page 21. We welcome the initiative for the first UK fully electric dustcarts.

We also welcome the Proposal for New Regulatory powers to control combustion plant.

Page 25. We welcome more research to evaluate the effectiveness of mitigation measures. We would like to see research into the effectiveness of urban greening and an evaluation of different types of vegetation and vegetation structure on levels of particulates.

Page 26. Combustion plant

We are concerned with the number of MCP in the City and their potential to pollute.

Page 31. Taxis and PHV

We note the City Corporation will ‘support TfL’s efforts to reduce the number of PHVs operating in central London and work with the taxi industry to reduce empty running’. We support measures to reduce empty running – which is a major contribution to vehicle traffic around the Barbican. However, the strategy does not set out how this will be done. We have observed what seems to be a rapid take up of electric taxis since their introduction and question whether there is sufficient rapid recharging capability in the City.

Page 32. We note the intention to seek a phased introduction of ZEZ restrictions with the aim of ensuring that 90% of motor vehicles entering the Square Mile are zero emission capable by 2030. But would like to see this happen more quickly. We welcome the aim to introduce local ZEZs covering the Barbican and Golden Lane Estates and City Cluster by 2022.

We note there is a commitment to support small businesses to accelerate the transition to zero emission capable vehicles but question how this will be done and whether resources will be made available to achieve this.

Car free days

We consider the City should be bolder with this initiative and set a schedule/timetable of days throughout the year to be car free – starting with Clean Air Day on 20th June [though provision will have to be made for disabled people to remain mobile].

Pages 33-34. Freight

All the actions listed on page 34 are too weak. Rather than ‘considering’ and ‘encouraging’ we feel the City should be ‘requiring’ and ‘facilitating’ with milestones, a budget and regular evaluation against objectives. In particular, we note the intention to establish a freight consolidation service. This has been an objective of the City for many years – and no progress appears to have been made. Setting clear milestones that are adequately funded against which progress is evaluated would help to make this happen.

Page 34. Cycling

If cycling is to be adopted by all age groups – (children going to school, residents doing shopping) rather than just commuters and office workers, then cycling needs to be made safer. This requires the much greater use of segregated cycle lanes and safer

junctions and we support the intention to do this. Again, we would like to see clear milestones that are adequately funded against which progress is evaluated to help make this happen.

Page 34. EVC Infrastructure

We welcome EVC points in resident car parks provided as part of the LEN funding and support expansion of the scheme to more resident car parks. The plan to install EVC in public car parks is welcomed but needs to be rolled out quickly. The seemingly fast increase in numbers of electric taxis suggests that installing rapid charging at Noble Street and Baynards House car park should be expedited and other additional sites considered.

Page 35. Idling vehicles

Whilst the City's emphasis on awareness raising and other soft measures and the use of volunteers to help through regular Action Days has been successful, we believe it is now time to increase the amount of enforcement. There is a resistant core of drivers who pay no attention to these efforts – particularly amongst utility companies and construction vehicles. We welcome the incorporation of no idling into the Construction and Street Works code of practice but this will not work unless there is regular enforcement.

We understand that the number of City officers who can enforce these regulations is limited and suggest that the City uses additional resources, such as the on street parking enforcement team to help undertake this task – with operatives given training, clear targets and evaluation.

Page 39. NRMM

The pollution and noise from NRMM is of great concern to residents. We support measures to reduce the use of diesel equipment on construction sites and are particularly critical of the use of diesel generators used to power site offices or sales suites. We would like to see the mandatory connection of construction sites to the electricity grid to power on site equipment and facilities.

Page 41. Heat and energy plant

Residents are most at risk from pollution by emergency generators as they are often tested and used at weekends. As this seems to be an area about which the City has had little control or knowledge, we would support the City in researching and controlling these sources of air pollution as a matter of priority, particularly as the proportion of pollution arising from this source is set to increase as the proportion of traffic emissions reduce.