The revised Air Quality Action Plan (AQAP) is required by the government because RBK is exceeding safe limits set in the [National AirQuality Objectives](http://uk-air.defra.gov.uk/assets/documents/National_air_quality_objectives.pdf) for NOx and PM10s in various locations in the borough, primarily close to busy roads, pollution that exacerbates respiratory diseases in our residents\*. We welcome the opportunity to comment on this important document.

1. The AQAP needs to contain a comprehensive set of actions that together will both reduce pollution and our exposure to it. The decision to exclude the 'business as usual' measures (6.2) and instead list only the new initiatives in the table following undermines this and removes the ability of members and residents to comment on these existing actions. For example: 'provide an extensive low emission vehicle charging infrastructure throughout the borough' is among those existing measures listed, implying that that is being successfully rolled out already, yet the number of electric vehicle charging points is clearly still minimal.

* We would like to see the revised AQAP list all initiatives in the table so that they can be assessed and, ultimately, tracked.
* Similarly we would like to see the mini Hollands' programme incorporated into the AQAP: mini Hollands aims to improve facilities to secure a substantial 'mode shift' i.e. for people to choose sustainable modes of transport (cycling and walking) thereby reducing motor vehicles on the road.

2. The revised AQAP refers to 'Kingston Futures' and the anticipated growth (population and housing) the borough will experience in the coming decades (4.1). It is perhaps with this in mind that the AQAP talks of identifying 'measures that can prevent deterioration or improve airquality.' Surely the absolute goal should be to improve air quality and not just stop it getting worse? After all, a 'key element of Kingston Futures' role is to 'maintain the wellbeing of its residents during this time of great expansion'. (4.2)

* We propose that the AQAP should aim to reduce pollution levels, not 'prevent deterioration'.

3. We welcome the formation of a Steering Group including Public Health and Sustainable Travel representatives but believe this group should be expanded:

* We suggest adding a representative from the mini Hollands programme team, resident reps and a rep from the Kingston Environment Forum (part of RBK's Kingston Strategic Partnership.)

4. Comments on the new actions (table):

* 9 of the 12 actions on the table are low cost and the remaining medium cost. Whilst saving expense in times of austerity is laudable, perhaps a situation that affects the health of our residents merits more investment?
* We suggest adding a column with the Difficulty Rating - for example, Action 2 to introduce a Low Emission Zone in key areas requires negotiation with TfL and other stakeholders and detailed planning.
* Action 1: improving bus priority will make this mode of transport more attractive and tempt more people away from their cars. This should be spelled out in the Benefits column. It's important not to impinge on the safety of cyclists though.
* Actions 3/4/5: Cycle parking and support for cycling (such as maintenance courses) is important but much more important are safe routes for people on bikes.
* Action 8: we need to increase the number of charging points.
* Action 9: reducing congestion is important as local pollution increases as cars idle. However it's an acknowledged fact that reducing congestion (e.g building extra lanes on the M25) only relieves congestion temporarily as the clear road tempts other s to drive. Consider also reducing convenience for motorists (reduce parking, reduce lanes) which alongside other measures (better bus lanes / protected cycle lanes) mean that people will naturally shift to sustainable modes.
* How will the success of the actions be measured?

5. Additional actions that should be considered:

* Demand more support from DEFRA / DECC and DfT to install many more additional monitoring stations so that we are able to pinpoint pollution hotspots.
* Encourage [Citizen Science projects](http://mappingforchange.org.uk/projects/citizen-science-used-to-map-community-air-quality/) to observe monitoring stations meaning that local people understand the problems and on seeing the results of the monitoring feel empowered to make and / or or lobby for changes in their area. People are discouraged from making behaviour changes if the problem feels too distant and they don't feel empowered so this kind of involvement can be very positive.
* Get schools involved and install monitors in school playgrounds by busy roads.
* Ensure decisions on planning applications, especially regarding children's facilities and schools should take account of local airquality levels (this will be more easy to achieve if we have more monitoring stations).
* Arrange that planning for high-rise developments includes investigations into how the high rise buildings trap particulate matter, which is particularly harmful to children.
* Air quality measurement carried out by independent contractors as a compulsory part of planning consent.
* Where new builds do have to happen in polluted areas, enforce more rigorous air quality mitigations in theplanning system (air filters etc.)
* Ensure the same sort of provision (protected space) as planned via the 'mini Hollands' scheme is rolled out to other parts of the borough, particularly areas like the South of the Borough which is badly served.
* [Fining vehicles that are idling](https://www.westminster.gov.uk/idling-vehicles-0), as in the Borough of Westminster.
* Push Surrey CC and TfL for deployment of low emission buses in the borough.
* Require freight deliveries in the borough to use electric vehicles for the ['last mile'](http://freightinthecity.com/category/last-mile-deliveries/page/2/).
* The proposed developments such as those around Tolworth roundabout (*Tolworth Towers site, Former MoD site, Lidl's HQ, Premier Inn)*will significantly add to air pollution on A3 and A240 which are already identified as exceeding the limits. Contribution towards improving public transport facilities, cycle parking (and see above for cycle routes) and planting trees should be encouraged through the planning system.
* Similarly Crossrail 2: whilst in many ways it should be a contributor to reducing emissions, it is likely to attract more vehicles carrying people who want to access the new improved service, particularly from Surrey on to the A243, where pollution is already high. We should start to plan ways to encourage sustainable travel and to mitigate additional emissions.
* Discourage idling by cars for example by schools and by taxis at ranks as proposed in [Hackney's AQAP](https://consultation.hackney.gov.uk/chief-executives-office/air-quality-action-plan-2014-2018/supporting_documents/Air%20Quality%20Action%20Plan%20%20Consultation).
* RBK could run an information campaign about cars idling, similar to the cleaner Kingston campaign - 'air quality, everyone's responsibility'.
* RBK to reconsider 30 minutes free parking as it is likely to encourage people to drive for short visits when they could use other modes of transport.
* Introduce [20mph zones](http://www.20splentyforus.org.uk/BriefingSheets/pollutionbriefing.pdf) which will encourage more people to walk and cycle and in turn ease congestion.
* Plan more tree planting because of the trees' [capacity to remove air pollution](http://laqm.defra.gov.uk/laqm-faqs/faq105.html).

Overall the revised AQAP could be more ambitious - and needs to be if we are going to meet this challenge. Behaviour change will be a key element and, in the same way that the mini Hollands has acknowledged its importance, behaviour change measures will need to be built into our planning for reducing air pollution.



\* There's [evidence that pollution is a factor in deaths from respiratory disease](http://www.independent.co.uk/life-style/health-and-families/health-news/air-pollution-reduces-life-expectancy-by-six-months-for-every-briton-9251260.html) and there appears to be some correlation between the [prevalence of COPD in parts of the borough that are close to busy roads](http://www.londonhp.nhs.uk/wp-content/uploads/2011/06/COPD-profile-Kingston-upon-Thames.pdf).