

Westminster City Council Air Quality Action Plan Consultation Response by The Northbank BID

Please take this response into consideration in addition to the on-line survey

Consultation information: <https://www.westminster.gov.uk/air-pollution>

The Northbank BID represents the local business community, we welcome and support Westminster City Council's actions to create a robust and ambitious Air Quality Action Plan. Air pollution ranks as one of the most important issues to our businesses, local residents and the thousands of people who visit Northbank every day. We all share responsibility to tackle air pollution.

The Northbank area is one of the most congested traffic spots in the capital, with poor air quality, and this has led to the Northbank Business Improvement District (BID) being at the forefront of work in recent years to address the challenge. In 2019, Strand was London's First location to breach NO₂ limits. The impact is compounded by the high numbers which visit and work in the area.

Since the BID was established we have been working closely with Westminster City Council and private sector partners and developed a number of programmes to both lower air pollution and encourage behaviour change so that people can make healthier choices. The Northbank is one of the capital's first Business Low Emission Neighbourhoods (BLEN), supported by the Mayor of London. The BLEN street interventions are providing greener zones and cleaner, more inviting walking and cycling routes for the 30m people who visit the area annually. We work closely with public sector partners to take the worst polluting vehicles off the roads.

The ULEZ has had a positive impact on significantly reducing pollution but more needs to be done for buses, taxis, PHC's. This also demonstrates that policies with enforcement are able to deliver results. The BID is collaborating with Westminster (WEP) and the estate teams in neighbouring areas of Covent Garden, Shaftsbury to consolidate deliveries. This shows a desire to unite and invest in innovative projects which cross boundaries and districts.

Suitable resource is needed, as developing solutions that work for different sectors is detailed work. The BID has been successful in securing funding (MAQF, Defra) and working with partners to make a difference but more needs to be done. Clear guidance and leadership from Westminster City Council is essential. The BID and our member businesses are aware that we must not be complacent and we all have a role to play in addressing air pollution – small changes in behaviour can make a big difference.

One of our recent studies done in collaboration with King's College London showed that by taking a quieter, greener route on their commute Londoners can reduce exposure to pollution by 47%. Also, opting for Click&Collect rather than having parcels delivered at work could reduce central London traffic – and resulting air pollution – by at least 10%.

Our current work to improve sustainability and reducing our environmental impact tackles air quality:

- Communications to raise awareness and encourage behaviour change are being developed in a 'Do Your Bit' campaign to share the message of simple environmental choices which can be adopted in 'Business as usual'. Partners Capco's '#AirWeShare' pavilion was innovative and thought provoking demonstrating new creative ways to engage with our central London community.
The BID recognises the excellent work of Westminster's 'Don't be Idle' campaign which could have more visibility as a quick and simple message for behaviour change this will deliver improved air.
- Public realm regeneration, making our local area healthy to visit and enjoy is a priority with street greening and encouraging walking important for our members. The process for this needs to be quicker and also encourage trails and innovative solutions.
 - Street schemes of Strand Aldwych and Villiers Street. Air quality for our member organisations has been highlighted as a concern throughout the design process and we are working with WCC officers to bring area specific actions which will be exemplar and replicable.
 - Our future projects to improve the Strand and Victoria Embankment/Riverfront will need to incorporate solutions for air pollution sources.
- Collaborative working with partner BIDs in south Westminster and others in Westminster and across London with experts from Kings College and health organisations.
- Air pollution London underground so this also needs to be included in actions.
- Our members value accurate monitoring and there needs to be a way of measuring real improvements and target improvements especially as many parameters are changing at the same time (ULEZ extension, Bus numbers and regenerations schemes).

Through our work we are demonstrating that everyone can make a difference and that the key to solving London's air pollution challenge is leadership and partnership.

We look forward to working with Westminster City Council and our partners to deliver creative and effective air quality actions.

Contact for future communication:

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Action	Air Quality Action Plan	Northbank comments
1	Monitoring	Our members are keen to see effective monitoring particularly for the Strand Aldwych area to evidence the public realm scheme will improve local air quality
4	Diffusion tubes	We are keen to be involved as it's a great way for businesses and the community to be involved and understand the local issue.
5	Map	An online map exists with London Air Quality Network.
7	Project monitoring	Public realm enhancement projects a good way of getting local engagement for behavior change
9	PM 2.5 monitoring	The BID supports PM 2.5 monitoring
11	Funding	The BID is delighted to contribute and partner for funding applications and for project delivery
14, 15	SPD & COCP	The SPD and updated COCP (Action 15) should be mutually reinforcing.
19	Planning applications for their air quality impact	Buildings generate a significant amount of pollution.
		Air quality and environmental impact for the construction, build fabric, systems and operational use should be part of the planning requirements.
20	CHP & air quality neutral	The BID supports this however many buildings with CHP see the financial gain as the overarching benefit.
25	Control permitted processes by inspections and enforcement	The BID support this but has a concern of the availability of suitable resources to fulfil it.
28, 29	Indoor AQ	Indoor pollution is a frequent concern from our businesses so more information and support is welcome.
30-34	Generators	Construction needs to be encouraged to reduce local impact in all practical ways with best practice shared and awarded

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35	Carbon Reduction Strategy	This is welcomed and should include timescales, resources and ambitious targets.
38	Electric vehicle charging points within the city	Westminster's public realm scheme should include charging and alternative transport infrastructure to future proof the city.
		EV charge points and in particular 'rapid' charge points are unsightly so suitable designs need to be developed.
41	Trial idling in hotspots	Enforcing idling in congested streets such as the Strand is not easy but our member businesses support this and would welcome a trial in the Northbank area
		The income generated needs to be ring fenced for Air Quality mitigation projects.
42	Green fleet policy	The BID supports green fleets
43	Green procurement policies	The council should have ambitious targets and lead by demonstration for all environmental impacts.
50	Parking occupancy surveys	The BID is working with WCC to install street greening and would welcome local sites for reallocation for cycle parking, parklets and other low emissions interventions.
55-56	Complete behavioural insight work related to parking	The BID would welcome more information on the results of the study and work with WCC to encourage behaviour change in our area informed by best practise from other European cities.
57	Trial for 'sensitive streets', in AQ Focus Areas	The BID would welcome early engagement for identifying 'sensitive streets' in the Northbank area to ensure appropriate comms and preparations for our members.
60-61	Public realm schemes	Strand Aldwych and Villiers Street schemes are a high priority for the Northbank area which local stakeholders all keen to see local air quality improvements.
		Air Quality Action plan is being developed for Strand Aldwych and should be done for all regeneration projects.
66	Assist local businesses and BIDS to consolidate services such as deliveries and waste collection	<p>We would like to see strong direction and leadership from WCC in taking actions in the strategy to consolidation and deliveries. Assistance and resource (land and funds) is needed to consolidate deliveries, services and waste collections. Resources is needed to implement strategies that were developed collaboratively with partners in the West End Partnership Freight & Servicing Strategy (May 2018), A Freight & Servicing Strategy for the West End.</p> <p>Delivery & Service plans which are submitted as part of planning permissions are an effective way to provide continuous improvements and need to have greater attention and priority from WCC and the Northbank BID look forward to working collaboratively with our business members and WCC.</p>

