

# London Borough of Merton Air Quality Action Plan 2018 - 2023



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## 1. The Council's Commitment to Air Quality

Air pollution is recognised as a major contributor to poor health with more than 40,000 premature deaths attributed to poor air quality across the UK each year, and an associated annual health cost to society estimated to be £54 billion. Air pollution is associated with a number of adverse health impacts: it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often less affluent.

Air quality has been identified as a priority both nationally and within London, where pollution levels continue to exceed both EU limit values and UK air quality standards. Pollution concentrations in Merton continue to breach the legally binding air quality limits for both Nitrogen Dioxide (NO<sub>2</sub>) and Particulate Matter (PM<sub>10</sub>). The air quality monitoring network run by Merton has shown that the UK annual mean NO<sub>2</sub> objective (40µg/m<sup>3</sup>) continues to be breached at a number of locations across the borough including Colliers Wood, Morden, Tooting and South Wimbledon. In some locations the NO<sub>2</sub> concentration is also in excess of the UK 1-hour air quality objective (60µg/m<sup>3</sup>) which indicates a risk not only to people living in that area but also for those working or visiting the area.

Pollution in Merton comes from a variety of sources. It includes pollution originating outside the borough, and, in the case of particulate matter, a significant proportion comes from outside London and even outside the UK. Obviously the Council has limited control over this, however local sources are primarily from road transport and from development/buildings.

There are a number of UK and London focused initiatives, both ongoing and planned, which will have an impact on air quality within Merton, but it is clear that local action is also required to ensure that the health and wellbeing of local communities is protected. This Air Quality Action Plan identifies a number of measures through which emissions can be reduced at a local level.

In order to achieve the necessary improvement in air quality, there needs to be a firm commitment and continued cooperation across the relevant departments and services within the Council to ensure that actions are implemented effectively and efficiently. We will also continue to work collaboratively with neighbouring authorities, the Greater London Authority and Transport for London in pursuing shared air quality improvement initiatives and responsibilities.

The London Borough of Merton is committed to reducing the exposure of people in Merton to poor air quality. This updated Air Quality Action Plan identifies Merton Council's priorities for tackling air quality over the next 5 years and is supported by the departmental Heads of Service for Environmental Health, Transport, and Planning; the Director of Public Health and Cabinet members.



## 2. Foreword: Councillor Ross Garrod, Cabinet Member for Environment



One of the greatest environmental challenges we face is air pollution. On a daily basis we are reminded of the social and economic cost of poor air quality. Almost 10,000 of our fellow Londoners are dying prematurely each year and it is costing the UK economy £54 billion a year. It is all of our duty whether as individuals, local government or national government to do our bit to improve the air that we breathe.

Merton is one of the greenest boroughs in London with over 100 parks and greenspaces but we too have toxic air. As Cabinet Member responsible for Air Quality I am determined to do everything within my power to introduce measures to tackle this issue.

Already as a local authority we are leading the way through the introduction of the Diesel Levy to target the most polluting vehicles using our roads. We are also providing the facilities such as increased electrical car charging points and cycle pathways to make it easier for people to make the transition to cleaner and greener lifestyles.

The Air Quality Action Plan outlines the steps we as a local authority will be taking to do our bit to tackle this serious issue. But it must be acknowledged that we cannot do it alone and I would welcome ideas from residents, schools and community groups identifying action they can take to compliment the Council's action plan. Together we can help improve the air we breathe.





## Foreword: Dagmar Zeuner, Director of Public Health



Air pollution is recognised as a major contributor to poor health with more than 9,000 premature deaths attributed to poor air quality in London every year. Poor air quality does not just have an adverse impact on health but also on the economy and the environment of our city.

We know that the greatest impact of air pollution is felt by the most vulnerable: the young, the elderly and people with heart and respiratory conditions. Furthermore, people living in more deprived areas tend to be exposed to higher concentrations of air pollution, often because their homes or local schools are located near busy roads with higher concentrations of vehicle emissions.

As with other outer-London boroughs, driving still remains the biggest contributor to air pollution in Merton. Other everyday activities such as heating our homes are also contributors to air pollution, but we can't just stop these activities overnight as they are an essential part of everyday lives. Therefore we must look at innovative ways that we can take action at a local level to reduce air pollution and minimise the risk to our population.

Public Health Merton works across the Council with colleagues in Planning, Education, Leisure and Regulatory Services to demonstrate the links between health and wellbeing, and how working together we can find better solutions to complex problems like air quality. Merton's new Air Quality Action Plan (AQAP) is a good example of how we seek to ensure that health and wellbeing are embedded into all Merton Council's plans and strategies.

The AQAP sets out a framework to improve the health and wellbeing of local residents, people who work in the borough and those who visit the borough by way of a number of measures. These include promoting sustainable travel, providing guidance to developers on the impact of new development on air quality and looking at enforcement measures that could be taken by the Council in order to minimise emission from vehicles around key locations such as schools.

We are committed to reducing the exposure of people in Merton to poor air quality, in order to improve health and wellbeing for all of those who live, work or visit the borough.



### 3. Introduction

This Air Quality Action Plan (AQAP) has been produced as part of our duty under the London Local Air Quality Management statutory process and in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995. It outlines the action we will take to improve air quality in the London Borough of Merton between 2018 and 2023 and replaces the previous action plan which ran from 2004 to 2017. Highlights of successful projects delivered through the past action plan are included in Appendix C.

Air quality monitoring and dispersion modelling data which provides information on the nature and extent of the air pollution problem in the borough is presented in Appendices D and E. This includes information supplied from the London Atmospheric Emissions Inventory and includes maps of pollution concentrations for NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> for the borough, together with source apportionment charts which can be used to identify the relative proportions of local emission sources.

This report outlines the actions that Merton Council will deliver over the period 2018-2023 in order to reduce concentrations of pollution, and exposure to pollution, thereby positively impacting on the health and quality of life of residents and visitors to the borough. We recognise that there are a large number of air quality policy areas that are outside our influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and so we will continue to work with and lobby regional and central government on policies and issues beyond Merton's influence.



### 4. Merton's Air Quality Priorities

This AQAP is updated in line with new GLA guidance to reflect changes in local air quality management (LAQM) and to ensure that local measures are current, effective and sufficiently targeted to address the GLA air quality focus areas and any other air quality 'hotspots' identified within the borough.

There have been a number of significant air quality actions implemented at both local level and by the Greater London Authority and Transport for London since publication of Merton's first AQAP, including implementation of the Low Emission Zone; the introduction of the Sustainable Design and Construction and Control of Dust and Emissions Supplementary Planning Guidance; highway and public transport improvements and investment in a wide range of sustainable transport initiatives. Many of these are likely to have

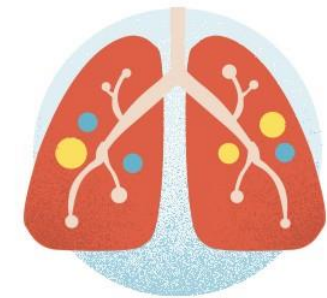


had an impact on air quality within the borough, however despite these improvements air quality in Merton remains poor in a number of locations.

The Local Air Quality Management system for London (LLAQM) acknowledges that boroughs cannot solve the problem of air quality alone but says they do have a central role to play in improving air quality through the use of key levers such as parking, planning and local roads together with very specific knowledge of the communities that they serve.

The GLA Technical Guidance (LLAQM.TG16) states that it is important that the updating process focuses on the effective implementation and delivery of measures developed to address the specific local air quality issues, and are part of an integrated package of measures linking with other key policy areas, notably:

- Land-use planning and sustainable development;
- Transport Planning, promoting sustainable transport, local transport management, integration with Local Implementation Plans (LIPs);
- Climate change policies in relation to carbon management and reduction of greenhouse gas emissions;
- Low Emission Strategies providing an integrated approach to promoting emission reduction strategies covering both air quality and climate change;
- Public Health Outcomes (PHO) policy areas to promote health and wellbeing; and
- Education programmes to promote health and wellbeing and also the principles of sustainability.



The source apportionment data identifies road transport as contributing more than 50% of the overall emissions of NO<sub>x</sub> and particulate matter within the borough. The dispersion modelling and Focus Area maps (Appendix D) also identify the areas experiencing the highest concentration of pollutants where there is relevant exposure. In the majority of cases these areas extend along the key transport links where there are high volumes of traffic, both local and through traffic.

One of the key measures to reduce emissions from traffic in the Air Quality Focus Areas and 'hotspots' is the proposed 'Detailed assessment of traffic management solutions'. This will require a detailed local review of key traffic routes and analysis of traffic data to evaluate the benefit of potential junction improvements, re-routing options, improved signalling, and new parking/ loading restrictions in the boroughs' Air Quality Focus Areas and 'hotspots'. The assessment will use air quality modelling assessment methods to prioritise appropriate traffic management scenarios based on air quality benefit, feasibility and cost-effectiveness in close liaison with the Transport department and TfL.



Merton is limited in how much it can achieve directly in reducing traffic on the TfL red routes through the borough, but there is potential to include AQAP measures to identify and address local causes of congestion and to lobby GLA and TfL to extend the principles of the planned Ultra-Low Emission Zone to the GLA focus areas and local pollution 'hot-spots' within the borough.

The updated AQAP is linked to the Merton Council Sustainable Transport Strategy and Local Implementation Plan (LIP2) which covers the period 2011 – 2031. The plans include measures to improve cycling/walking infrastructure and generate associated promotional events, additional electric vehicle charging infrastructure and car club facilities. A number of major projects for delivery through LIP2 include a scheme to re-route heavy goods traffic around South Wimbledon, with additional schemes to improve traffic flows, transport linkages, cycle facilities and pedestrian access for Mitcham, Colliers Wood and Morden.

Merton is keen to encourage the uptake of low emission vehicles and will be promoting this through a range of measures including the introduction of an emissions-based parking levy for residents living within the borough. The AQAP also explores opportunities to reduce emissions from delivery and service vehicles and to enhance/optimize new and existing electric vehicle charging infrastructure through the Local Implementation Plan and Supplementary Planning Guidance.

It is recognised that the predicted increase in population across London and the requirement for additional housing and infrastructure across the region is likely to have an impact on traffic growth and air quality. To manage and minimise the impact of these changes the updated AQAP includes adoption of Supplementary Planning Guidance to inform developers on the impact of development on air quality, and ensure that approved schemes include effective mitigation and maximise the opportunity to improve infrastructure for sustainable transport.

Merton will also be working in partnership with 14 other boroughs to develop a Non-Road Mobile Machinery (NRMM) 'toolkit' to enable contractors to evaluate and minimise emissions from NRMM sources.

It is also important to build on existing successes generated by the previous AQAP. Emissions from school traffic and the benefits of active travel for school children has been the focus of the existing STARS project and the CleanerAir4Schools project funded through the Mayor's Air Quality Fund. The updated AQAP includes a package of measures designed to continue the work with schools, parents and pupils with the objective of further improving awareness of air quality and optimise parents' and children's desire and opportunity to adopt sustainable travel options.





## 4.1 Priorities for the Updated AQAP 2018 - 2023

- Establish and maintain an effective air quality group to ensure that the implementation of AQAP measures is coordinated effectively between relevant Council services;
- Encourage the uptake of low emission vehicles and review and consider the introduction of an emissions-based parking levy, and review the effectiveness of such a measure over the next two years;
- To identify the key causes of traffic congestion within our Air Quality Focus Areas and pollution 'hotspots' and to determine effective measures for improving traffic flow through those areas using detailed air quality and traffic management modelling tools;
- To evaluate the air quality benefits and feasibility of introducing 'mini' Ultra-Low Emission Zones in the areas of the borough identified as having the poorest air quality;
- To provide guidance to developers on the impact of development on air quality and ensure that approved schemes include effective mitigation and maximise the opportunity to improve infrastructure for sustainable transport options;



- To formalise anti-idling enforcement in order to minimise emission from vehicles around key locations such as schools, taxi-ranks, Air Quality Focus Areas and hotspots;

- To continue to work with schools, parents and students to improve awareness of AQ and to optimise parents' and children's desire and opportunity to adopt sustainable travel options;

- To review Merton's air quality monitoring network to ensure that it effectively identifies areas of poor air quality, and provides accurate data to enable us to evaluate air quality trends and the impact of AQAP measures.



## 5.1 Monitoring and Reporting of Air Quality

### Why we monitor air quality



We monitor air quality to comply with our responsibility as an Air Quality Management Area (AQMA). By monitoring air quality around the borough, we can assess our compliance with the air quality objectives and evaluate the effectiveness of policies and projects. This can also help to provide information and alerts for residents, workers and visitors when pollution levels are high.

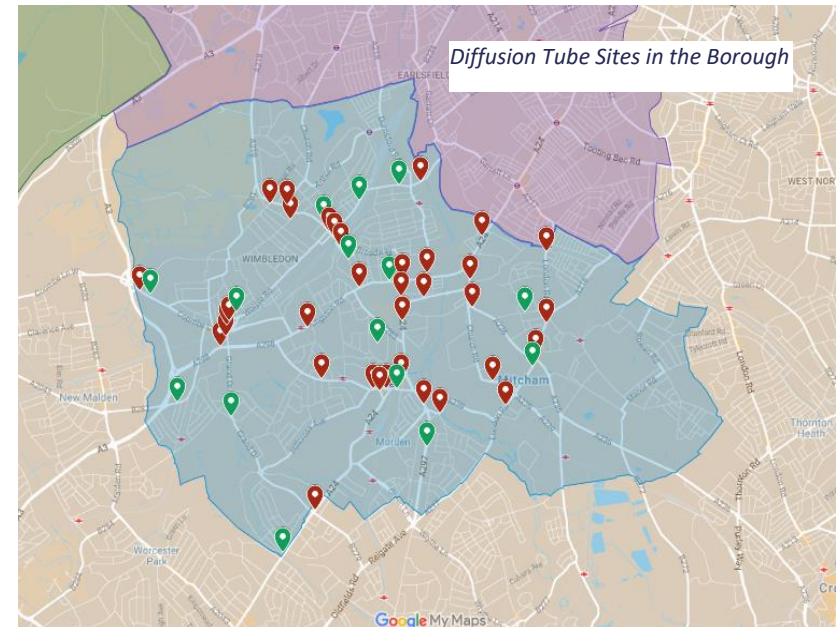
Monitoring also provides information on long-term trends in pollution levels, as well as more detailed and complex information. As well as collecting data on our own air quality levels, sharing this information beyond our borough is important to identify national and regional trends.

As part of an established London-wide network of monitoring, we provide pollution data in 'real-time' to inform the public and help them reduce their exposure to potentially harmful air pollution, particularly during episodes of very poor air quality.

### What is already being done

We measure air pollution in a number of ways in our borough. We have recently established one of the most comprehensive diffusion tube networks in London and have two automated monitoring stations that measure priority pollutants, and a number of hand-held analysers used for specific projects. In 2017 we also invested in new automated monitoring of NO<sub>2</sub> in the Civic Centre.

As part of the controls around some large construction sites, we are modelling the impact and contribution of non-road plant and equipment. We sometimes require site specific monitoring from developers to ensure they are minimising their impact on neighbours.



## What we will do

Monitoring and reporting of air quality is a vital function of the Local Authority. We will continue to ensure that our monitoring regime is fit for purpose and reflects the needs of the borough. We will make all monitoring data available on the Council website, in an accessible form every year, ensuring good links are available for real-time monitoring results from our automatic monitoring stations.

We do recognise that there is a real desire in the borough from both groups and individuals to become involved in air quality monitoring and reporting. Not only does this type of 'citizen science' generate interest and awareness, it can add real value when focusing on area specific problems, and also taps into valuable sources of local knowledge.

This type of citizen science will be supported, encouraged and where possible funded by the local authority. We will also allow groups access to monitoring equipment and where possible offer expert guidance, where these efforts positively contribute to tackling poor air quality.

### *Action measures associated with monitoring*

Monitoring Air Quality	What we will do	Responsibility for delivery	Timetable
Action 1	Make available on the Council website all monitoring data in an accessible form.	EH Pollution Team	Ongoing
Action 2	Continue to annually review our diffusion tube network and identify additional priority locations.	EH Pollution Team	Ongoing
Action 3	Positively encourage and support citizen science activities where these actively contribute to identify and tackling air quality in the borough.	EH Pollution Team	Ongoing
Action 4	Invest in hand-held monitoring equipment that can be used by citizen science groups and schools.	EH Pollution Team	April 2018 – then annually
Action 5	Seek additional funding for a refresh and update of our monitoring network including grant funding, Section 106 and Community Infrastructure Levy.	EH Pollution Team	September 2018 and annually.
Action 6	Produce and update an interactive map of diffusion data that can be contributed to by groups and citizen science activities.	EH Pollution Team	September 2018
Action 7	Assess and incorporate new technology in the world of air quality.	EH Pollution Team	Annually
Action 8	We will commission modelling of air quality in the borough up to 2022, by Kings College London, including predicted trends and contributing sources.	EH Pollution Team	April 2019
Action 9	Map Focus Areas & air quality 'hotspots' on planning GIS mapping to ensure these areas are highlighted.	EH Pollution Team/IT	April 2019





## 3.2 Reducing Emissions from Buildings and New Developments

### Why this is important

Domestic and commercial heating is one of the main sources of NO<sub>2</sub> and a significant source of Particulate Matter (PMs) emissions. Therefore, minimising emissions from gas boilers and energy use can contribute significantly towards reducing poor air in the borough.

Emission reductions from gas consumption can be achieved in a number of ways, including the use of newer low NO<sub>x</sub> boilers, improving heating management and increasing thermal insulation.



New developments are important to social growth and the economic stability of our borough. These can sometimes prove beneficial to air quality by replacing old, polluting and inefficient buildings with modern energy-efficient structures and state of the art heating systems. Furthermore, there is an opportunity for the Council to request measures to help tackle air quality through the planning process, including cycling infrastructure, electrical charging points and green planting.

The construction phase of any new development can produce high levels of localised pollutants, including PMs and NO<sub>2</sub>.

As well as our statutory environmental powers, the Land-use Planning system plays a central role in managing the environmental impacts of new development, during both the construction and use phases, to help deliver improvements in air quality.

This is achieved by requesting that measures or 'conditions' be placed on applications for new developments as part of the planning process. This helps ensure that these developments do not have a negative impact on local air quality, and that exposure to air pollutants for new occupiers do not breach air quality standards.



We recognise that this can be difficult to achieve with some large scale developments. Often social/economic need can seem to take precedence, however a scheme of mitigation can be requested where direct pollution reductions cannot be achieved locally but will improve air quality in the borough as a whole. Alternatively, the Council does maintain the right to refuse a planning application on the basis of air quality.





## What is already being done

There are requirements on new developments to meet all best practice planning guidance available, including the GLA's 2014 Control of Dust and Emissions during Construction and Demolition SPG, and the GLA's 2014 Sustainable Design and Construction SPG, which requires new developments to be 'air quality neutral'.

We realise that the Council's policies need to reflect our responsibilities and desire to tackle air pollution. We are embedding a strong statement around air quality into our New Local Plan. This measure will provide officers with greater authority to challenge developers wishing to build in the borough, and request mitigation and/or payment towards tackling air quality.

We are leading on delivering cleaner construction throughout the south of London, involving 14 local authorities. This project is funded by the Mayor of London and supported by South London councils. It directly tackles non-road construction equipment by removing the most polluting equipment from sites and working with the construction industry to ensure that less polluting equipment is used. We have currently inspected around 400 major sites and are delivering around 85% compliance rates.

The Non Road Mobile Machinery or (NRMM) project is now considered an important part of the Mayor of London's Environment Strategy and the London Plan. The Council was also nominated by the National Air Quality Awards 2017 for its work in this area.

The information gathered by this project around equipment used on sites in London and their impact on air quality will help influence policy for many years to come.



We have developed a new Code of Practice for the Construction and Demolition Industry. This provides simple and easy to use guidance, incorporating new air quality initiatives such as Construction Logistics Planning to minimise impact on traffic around large sites, and sets requirements for plant and equipment emissions.

This is now being adopted across a number of London boroughs and helps council officers in providing clear and simple planning conditions for controlling emissions from developments.



## What we will do

We will create a new Supplementary Planning Document (SPD) built on national and regional guidance and good practice, and bespoke to our own ambitions to improve long-term air quality in the borough.

This will provide information to developers and Council planners on what we expect of new developments and how they must contribute to tackling air quality.

We will continue our industry-leading work in the area of delivering cleaner construction by influencing policy regionally and nationally, and working with DEFRA and the construction industry on future policy changes.

We are also acutely aware that smaller developments including refurbishments and extensions can have a significant impact on nearby neighbours. This work often falls outside the scope of controls that larger developments are subject to. We will explore with our Planning colleagues and other partners how these can be better controlled and ensure we have the resources for quicker and more proactive enforcement.



Although the Council has little control over pre-existing properties and their contribution to poor air quality, we will try to influence this important area by drafting and publicising guidance for home owners around the steps that they can take, not only to reduce their impact upon air pollution but also to save money.



## Action measures associated with Reducing Emissions from Building & Developments

Reducing Emissions From Buildings	Action	Who is responsible	By when
Action 10	Ensure that air quality is a vital part of the Council's New Local Plan.	EH Pollution/Future Merton	November 2018
Action 11	Adoption of New AQ Supplementary Planning Guidance to ensure emissions from new development are minimised and effective mitigation is integrated into the scheme of design.	EH Pollution Team/Planning Team	November 2018
Action 12	Ensure air-quality-neutral development is required, and request where applicable an air quality assessment.	EH Pollution	Ongoing where possible
Action 13	Work with key partners in the GLA to explore the feasibility and delivery of air-quality-positive development particularly around our Focus Areas.	EH Pollution/GLA/AQ Cluster Group/Planning	April 2019
Action 14	Ensure that new development contributes to funding air quality measures in the borough through Section 106 and CIL payments.	EH Pollution Team/Planning Team	January 2019
Action 15	Ensure that new development have a scheme of mitigation for tackling air quality including traffic reduction and low emissions strategies.	EH Pollution Team/Planning Team	January 2019
Action 16	Produce and promote guidance to homeowners on what they can do to their homes to help reduce pollution in the borough.	EH Pollution Team/Coms Team	January 2019
Action 17	Consider how we can extend the provision of vehicle charging to smaller residential development to ensure the borough is ready for electric vehicles.	EH Pollution Team/Planning Team	April 2019
Action 18	Continue to run our NRMM Project across the south of London and extend this to other boroughs.	EH Pollution Team	Ongoing until April 2019
Action 19	Seek additional funding from DEFRA/GLA/Construction Industry to promote good practice on construction sites.	EH Pollution Team	April 2018/April 2019
Action 20	Request adoption of new techniques that have proven to be beneficial to air quality, such as Construction Logistics and Delivery and Service Planning.	EH Pollution Team	September 2019
Action 21	Review the Council's allocation of the Section 106 and CILs budget to see if this can provide funding to benefit air quality measures.	EH Pollution/Planning Team/Finance Team	Ongoing
Action 22	Continue to request robust and enforceable measures to minimise the impact of developments during the construction phase.	EH Pollution Team/Planning Team.	Ongoing





### 3.3 Reducing Emissions from Road Transport

#### Why is this important

Road transport accounts for approximately 60% of emissions of NO<sub>2</sub> in our borough. This contribution increases significantly when closer to busy main roads, Transport emissions contribute heavily to air pollution in the borough, as well as being a major contributor to London wide pollution.

Tackling pollution from road transport is predominantly carried out in two ways. The first and most effective way is to reduce our use of vehicles, and move towards more sustainable and active modes of transport, such as cycling, walking and public transport. This also has positive health and lifestyle benefits beyond just the reduction of air pollution.



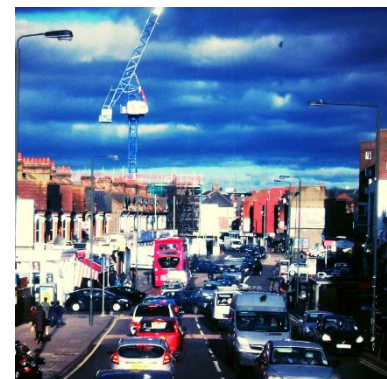
As a borough we can help to create an environment that is welcoming and promotes walking and cycling as a means of travel, as well as for leisure and to promote healthy lifestyles.

In addition, the second way is to tackle road transport itself by trying to move away from the most polluting vehicles and to build infrastructure that provides for the electric vehicle revolution which is starting to emerge.

There are some areas in the borough where we have little influence, such as Transport for London's road network, which consists of many of the busiest and more polluting roads in the borough. We also have no direct control over the movement of black cab taxis or buses through the borough, which again falls under the control of TfL. We strive to work with, and apply pressure on our colleagues, and lobby for the best outcomes for our borough. This is something that we will continue to do, at every opportunity.

We recognise that people own and choose to use private vehicles, whether this is for convenience, necessity or by choice. We need to consider what we as a borough can do to encourage our residents and visitors to move away from polluting vehicles.

The Mayor of London is taking similar action with the new and proposed Ultra Low Emissions Zones which have the ambition to push the change toward cleaner vehicles as quickly as possible.





## What is already being done

We have a good history of promoting the move to cycling and walking in the borough, including the construction of new cycling routes, the provision of cycling facilities and the introduction of on-street cycle parking facilities. We have implemented the Safer Routes to School/Walking Bus scheme via School Travel Plans and the implementation of London Cycle Network.

In 2016 we created cycling and walking maps in the borough and supported London Walkit.com, a walking strategy to promote walking as a sustainable transport mode and to help guide walkers to use less polluted routes.

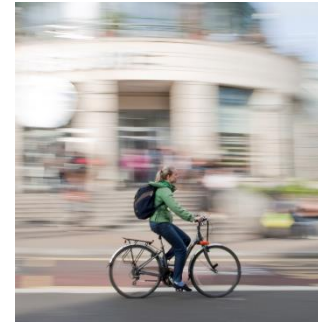
To date we have introduced 56 Controlled Parking Zones and we have an active waiting and loading programme

We also strongly support the use and managed expansion of Car Clubs as a method of reducing the number of vehicles in our borough

We promote School Travel Plans and are members of TfL STARS school travel plan accreditation scheme. As part of a number of initiatives we support schools to operate Safer Routes to School, Walk on Wednesdays, walking bus, cycling, use scooters etc..

Merton's ambition (by 2021/22) is to facilitate 125 electric vehicle charge points across the borough, including fast, rapid and residential charge points.

Following an in-depth study in 2016/17, we took the difficult step of introducing a diesel levy linked to our parking permit system, this was one of the few actions we as a council could take to influence the move away from the most polluting vehicles in our borough. We are already seeing a national reduction of 30% less uptake in diesel vehicles, and it is specifically this type of brave action that is pushing this change.



## What we will do

We accept that there is much more to do to tackle road transport and combat the impact of increasing population and congestion on our roads. In conjunction with the council's third Local Implementation Plan (LIP3) the council will look to develop a wider plan to reduce traffic impacts across the borough.

Creating an environment which promotes cycling and walking is vital, including a change to infrastructure and green planting.

Tackling road transport impacts and adopting of best practice aimed at fleet and service vehicles will also play a role.

We will continue to lobby those transport sources outside our control.

We will review our diesel levy to ensure that this is pushing change and reducing emissions in the borough. We will review areas of law and any new emerging controls available to us that can have a bearing on what sort of vehicles are in the borough or pass through it. This includes exploring the possibility of Clean Air Zones and a Merton Specific Ultra Low Emission Zone, especially in our Air Quality Focus Areas.

We will carry out in-depth air quality audits in these areas, which will review traffic and building sources, traffic management, parking, obstructions and deliveries. We will also assess the contributions made by individual vehicle types and their impact upon air quality, which will then influence what actions can be taken in these areas over the coming years.





Merton would need to empower and encourage those who live, visit and work in Merton make the right choices around private vehicle type and help them to reduce their impact

We will therefore support and promote the GLA's vehicle checker site. This site provides information on emissions from vehicles including types and manufacturers, and is based on real-world emissions testing.

*Action measures associated with Reducing Emissions from Road Transport*

Reducing Transport Pollution	Action	Responsibility for delivery	Timetable
Action 23	Commitment to a cycle Quiet-way between Clapham Common & Wimbledon forming the Merton section of the Wandle trail.	Future Merton	Ongoing
Action 24	Review funding available through Section 106 and CILs around transport and travel infrastructure.	EH Pollution/Future Merton	By November 2018
Action 25	Carryout a borough wide cycling network audit to review and update the network.	Future Merton	Ongoing and dependent upon LIP
Action 26	Programme of installing bicycle infrastructure.	Future Merton	Ongoing and dependent upon LIP
Action 27	Feasibility study to consider the use of Clean Air Zones (CAZ's) or a Merton Specific Ultra Low Emission Zone for Focus Areas and beyond.	EH Pollution Team/Future Merton	April 2019
Action 28	Air Quality Audit traffic and congestion in our three air quality focus areas.	EH Pollution/Merton	April 2019
Action 29	Support and promote the use of a cleaner vehicle checker to inform the public of cleaner vehicle choice.	EH Pollution Team	November 2018
Action 30	Lobby for Cleaner Buses and Taxis.	Future Merton/EH Pollution Team	November 2018
Action 31	Introduce Air Quality initiatives, benefits and monitoring in the new South Wimbledon Junction design and build.	Future Merton/EH Pollution	April 2020



Action 32	Review the impact of our diesel levy* and consider a review of parking and charges to help reduce combustion engine vehicle use and the consequent emissions.  <i>*Note: The Sustainable Communities and Transport Overview and Scrutiny Panel to conduct pre-decision scrutiny on the scope of any reviews on parking levies.</i>	EH Pollution/Parking Services	November 2018
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## 3.4 Raising Awareness

### Why the issue is important

Raising awareness about the issue of air quality is vital. It not only engages and educates but enables people to make informed decisions about how they can positively contribute to tackling the problem.

It's also important to note that air quality is not under the exclusive control of law makers and authorities, but linked to everything we do in our daily lives. From the materials we consume, heating our homes, the way in which we travel and even the deliveries to our homes, all contribute to the problem.

Informing people about local air quality can also help to protect those members of the community who are most sensitive to the health impacts of air pollution. Increasing public understanding of the sources and effects of air pollution can motivate lifestyle changes which can help improve air quality and have other beneficial health effects.

Small changes to behaviour can help members of the public reduce their direct exposure to poor air quality. For example, by travelling on quieter, less polluted routes away from busy roads, personal exposure to air pollution can be dramatically reduced.

### What is already being done

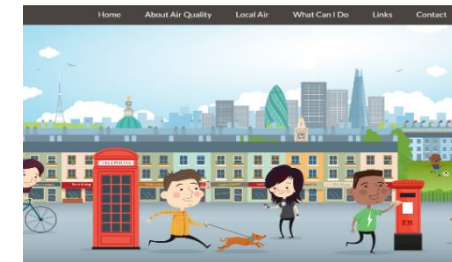


We have been part of the airTEXT service for many years. This service alerts pre-registered individuals with air quality sensitive illnesses (such as asthma and COPD) to take medication and precautions on days of poor air quality. This is a service which we will continue to support and promote, and have funded for the next few years.

For the past few years we have been raising awareness of the contribution to poor air quality that wood burner appliances can have during the winter months. This involves writing to all suppliers and retailers in the borough which supply wood burners and/or fuel to remind them of their responsibilities, and asking that their customers are properly informed about air quality when they purchase fuel.



We are also the founding member of a London-wide air quality network that co-ordinates communications and messages through a website called Love Clean Air (<http://lovecleanair.org/>). This site not only provides information on what boroughs are doing to promote cleaner air, but is also an educational resource for schools and children. We also regularly promote cycling schemes, events and walking campaigns.



## What we will do

We will continue to build on this good work, however we are aware that much more needs to be done.

### *Action measures associated with Raising Awareness:*

Raising Awareness	Action	Responsibility for delivery	Timetable
Action 33	We will continue to support, fund and promote airText and other health based initiatives in the borough.	EH Pollution Team	Ongoing and over the next 5 years
Action 34	We will continue to support and update information on our Love Clean Air Website.	EH Pollution Team	Ongoing and over the next 5 years
Action 35	We will review and update our own corporate website to include themed initiatives.	EH Pollution Team/ Coms Team/IT Service	December 2018
Action 36	We will play an active and co-ordinating role in national and regional campaigns such as National Clean Air Day.	EH Pollution Team/Coms Team	Ongoing and reviewed annually
Action 37	Continue to aspire to London's Cleaner Air Borough status award.	EH Pollution Team/GLA Air Quality Team	Annual award June 2018
Action 38	Ensure that the good work and best practice we are delivering is publicised and disseminated to colleagues in the air quality industry.	EH Pollution Team/Coms Team	Ongoing
Action 39	Work closely with our Public Health colleagues around joint health benefits.	EH Pollution/Public Health	Ongoing



## 3.5 Working Together

### Why this is important

Whilst local authorities can monitor air pollution, raise awareness and take some direct action, some important regional, national and European controls remain outside our influence. This includes legislative changes, measures associated with national taxation and those relating to vehicle manufacturing/testing.

Also as a London council some important areas within the borough are not within our direct control, and need to be addressed at a regional level. Examples include public transport, taxis and non-borough-managed roads.

We also need to be aware that we are surrounded by other local authorities and some measures that we introduce can impact upon our neighbours, just as their actions can impact upon us.

That said, it is important that we make our voice heard at every level of government and that we take steps to ensure the best outcomes for our borough.

On a local level we work closely with surrounding boroughs both through our South London Air Quality Cluster Groups and more widely with our governing bodies such as the GLA and DEFRA, all to ensure that we are using best practice and are keeping up-to-date with changes to the air quality agenda. This also gives us an opportunity to express concerns or raise questions around new policy and any impact on our borough.



We need to ensure that we work closely and in co-operation with our internal partners that directly affect and contribute to cleaner air, including teams such as Highways, Transport, Procurement Commissioning, Parks and Greenspaces.

Through the consultation of this new Action Plan we have become aware of the number of very active and influential local groups that are also tackling air quality through lobbying, citizen science and promoting cycling and cleaner transport. These are groups that we want to work very closely with over the coming years. We will set up a group with the single ambition of tackling air quality. This will also provide a clear, influential voice for lobbying for changes outside our direct control.





## A Critical Partner - Public Health Professionals

Local Authorities now have embedded Public Health services. This is a valuable resource that can help link strategies and policies together to ensure overall health benefits for the borough. The links between active travel and healthy lifestyles complement the air quality agenda in so many ways.

Our Director of Public Health will ensure that local air pollution is assessed and appropriately prioritised, as well as playing a critical leadership role in making air pollution a strategic priority for the borough. The Director will ensure we have shared goals, with purposeful co-ordinated action across local government services and local health services, while working closely with the community.

### What is already being done

Our officers and councillors are active participants of a number of local and regional groups where air quality forms part of the agenda.

Our officers are active members of co-ordinated air quality groups such as the Air Quality Cluster Groups. They meet regularly with the GLA to discuss new initiatives, sharing resources and the dissemination of best practice.

There are a number of technical and advisory groups that deal with some of the more scientific components of air quality, of which we are active members.

To deliver the measures in this action plan it is vital that we work together. Local government funding has been reduced over the past few years so joining resources and ensuring partnership working is necessary for the success of this plan.

The Council has a number of funding streams for air quality measures, including revenue, capital, the Local Implementation Plan, the Community Infrastructure Levy, Section 106 arrangements, GLA and Mayor Funding, as well as national initiative funding. This funding is limited and we have a better chance of success if we combine and co-ordinate bids, or if teams are working together towards the same objectives.

Our Councillors also regularly attend air quality meetings with public groups to answer questions. We are active members of 'London Councils' where important issues such as the ULEZ are discussed regionally and responded to with a co-ordinated and united voice.



## What we will do

We will establish a group for air quality in the borough consisting of elected members, council officers from key departments and important community groups.

It is proposed that this group will meet every six months and will have the remit of taking action on air quality. It will be necessary to draft terms of reference for members and assign responsibilities. We hope that this influential and co-ordinated group will have a direct and positive contribution, both locally through identifying and assessing the effectiveness of local measures, and regionally through lobbying.

We will also establish an internal group of officers to ensure that air quality is a wider consideration in the decision making process in all areas of the Council's work.

We will provide training and support to colleagues in other departments with regard to what they can do in their everyday work to foster good air quality.

We will continue to disseminate our good practice from our industry-leading work on construction, wood burning initiatives and school's projects.

### *Action measures associated with Working Together.*

Working together	Action	Responsibility for delivery	Timetable
Action 40	Establish a borough-wide air quality group.	EH Pollution Team	By September 2018
Action 41	Establish an internal steering group within the local authority.	EH Pollution Team	By September 2018
Action 42	Provide internal training sessions on air quality to internal partners and Cllrs	EH Pollution Team	By November and then every six months
Action 43	Co-ordinate air quality funding and lobby national government to provide further financial and strategic support for local authorities to improve air quality.	Council wide	Ongoing
Action 44	Lobby TFL for action on cleaner buses and taxis in our Air Quality Focus Areas.	EH Pollution Team/Public Health Team	Ongoing
Action 45	The Director of Public Health (DPH) to be kept fully updated on air quality status and initiatives.	EH Pollution Team/Public Health Team	Ongoing
Action 46	Public Health teams to support engagement and projects aimed at local stakeholders (businesses, schools, community groups and healthcare providers).	EH Pollution Team/Public Health Team	Ongoing
Action 47			Annually



Action 48	<p>All air quality policies to be signed off by the DPH and to form close links to Public Health objectives.</p> <p>Make air quality part of The Health &amp; Wellbeing Strategy / Joint Strategic Needs Assessment (JSNA) – the DPH to be retained as a member of the AQ steering group.</p>	<p>EH Pollution Team/Public Health Team</p> <p>EH Pollution Team/Public Health</p>	Ongoing
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## 3.6 Leading by Example

### Why this is important

As the local authority with responsibilities for air quality we have a duty to be leading by example. Air quality should be a material consideration in all our actions from our buildings, goods and servicing, to travel and the vehicles we use.

We need to ensure that the vehicles we own and use in the borough for Council activities are as clean as possible and signed up to the latest fleet recognition schemes, with drivers trained about their contribution to air quality.

Our buildings need to be as energy efficient as possible, using the cleanest possible heating systems, with the delivery and servicing to these buildings being as efficient as possible and aimed at reducing air pollution in the borough.

Even for those services we now commission or share, we need to ensure that there is a commitment to improving air quality in the borough.

### What is already being done

Our commitment to reduce transport emissions is reinforced through guidance to staff carrying out Council duties. We actively encourage the use of Oyster cards for business travel on public transport, and the use of personal cycles. Secure cycle facilities are provided at our Civic Centre, together with showers and changing rooms to encourage commuter cycling. We are a corporate car club member and have electric bikes and cars available to staff for their site visits.

As a sign of our commitment to air quality we will use funding from the Diesel Levy to recruit an Air Quality Officer to help deliver this air quality action plan.



## What we will do

We will take steps to ensure that air quality is considered in all areas of our work. Where we have no direct control, we will use all of our abilities to influence change.

### *Action measures associated with Leading by Example.*

Leading By Example	Action	Responsibility for delivery	Timetable
<b>Action 49</b>	Review our procurement contracts for outsourced transport services and incorporate policies to establish the best and most cost effective fleet possible.	EH Pollution Team/Finance Team	April 2019/Annually
<b>Action 50</b>	Review our maintenance and servicing arrangements for our buildings to ensure that these are as energy efficient and cost effective as possible.	EH Pollution Team/Facilities Management	April 2019/Annually
<b>Action 51</b>	Ensure all new build and extensions within the council portfolio are to the highest, most efficient standards possible within the allocated budget.	EH Pollution Team/Facilities Team	Ongoing
<b>Action 52</b>	Encourage more walking, cycling and use of public transport for council business and review active travel plan for all staff.	Future Merton	Ongoing and December 2018
<b>Action 53</b>	Review staff parking to reduce the use of personal vehicles.	Parking Services Team	April 2019
<b>Action 54</b>	Recruit an Air Quality Officer, funded by our Diesel Surcharge.	EH Pollution Team	May 2019



## 3.7 Innovation and Technology

### Why this is important

The world of air quality is constantly changing with new initiatives, new focuses and improved scientific understanding.

Keeping up-to-date with changes in technology and current thinking around the health impacts of pollution is vital. It gives us opportunities to review monitoring and develop better techniques that improve the delivery, impact and performance of services.



The move towards 'smarter' modern cities also provides a great opportunity to use the power of personal mobile technology to inform and influence behaviour around pollution hot spots and during episodes of poor air quality, as well as providing up to date information.



Monitoring technology has remained unchanged for many years, with the use of diffusion tubes and automated stations. We are currently seeing a revolution in smaller, cheaper monitoring equipment, some of which we have tested in our borough.

Although many of these prove to be inaccurate or not certified for legal purposes, we need to join agencies such as DEFRA and the GLA in looking objectively at devices which can enhance and improve the flow of information.

Changes to the way in which boroughs tackle pollution and interpret legislation is also important. The sharing of this good practice can improve our own approach to reducing pollution and raising awareness.





## What is already being done

We have invested in a significant number of hand-held and deployable monitoring devices. These not only help us in assessing complaints and the impact of poor air, but are vital for project work and mapping air quality at a local level.

Our officers regularly attend seminars and training sessions, where information and the latest good practice in the field of air quality can be exchanged.

We also lead in key areas of tackling air quality and provide help, advice and support through important London-wide projects such as our NRMM, schools and wood burner projects.

We actively support and promote a number of smartphone apps and websites to provide updated air quality information, including:

- *air*TEXT: a free service for the public providing 3-day forecasts of air quality, pollen, UV and temperature across Greater London. This is intended for residents with breathing difficulties or heart problems who are most susceptible to poor air quality. Residents can sign up for free: <http://www.airtext.info/>



 **Air quality, UV, pollen and temperature forecasts for Greater London and the South East** 

- We work closely with Kings College London; data from our automated air quality stations is downloaded every hour and available via the London Air website or via the London Air app <https://www.londonair.org.uk/LondonAir/Default.aspx>
- We promote <http://walkit.com> for low pollution walking routes in our activities, communications and on our website.



## What we will do

We will ensure that we keep up to date and participate in appropriate trials and the assessment of new technologies, including the exploration of opportunities around personal mobile technology.

We will continue to play a role in developing and delivering new initiatives and sharing good practice both with, and learning from, colleagues in the air quality industry.

We will work closely with our colleagues in Public Health to review and update the latest information and research in the field of air quality and health, which will help determine the joint action and campaigns we can undertake.

We will continue our support of airText and Londonair and ensure links are available to useful websites and apps via the Council website.

We will continue to investigate the role and benefits of pollution alerts in public locations.

### *Action measures associated with Working Together.*

Innovation and Technology	Action	Responsibility for delivery	Timetable
<b>Action 55</b>	We will work closely with our Public Health colleagues to keep up-to-date with the latest research relating to air quality and health.	EH Pollution Team/Public Health Team	Quarterly Meetings
<b>Action 56</b>	We will work closely with Kings College, GLA and APRIL (Air Quality Expert Group) to review the latest monitoring techniques.	EH Pollution Team	Every six months
<b>Action 57</b>	Apply for grant schemes and incorporate new technologies and best practice.	EH Pollution Team	December 2018 and Annually
<b>Action 58</b>	Disseminate and publicise our ground-breaking work around schools, NRMM and wood burning appliances.	EH Pollution Team	Ongoing



## 3.8 Tackling Pollution in Our Borough

### Why this is important

As a Local Authority we have a number of direct policy and legislative controls for tackling air quality. These cover a number of service areas including Environmental Health/Regulatory Services, Public Health, Planning, Parking and Highways.

Some of this legislation and its controls are 'adoptable' or 'discretionary' whereas others are statutory requirements of the Council. However, all are dependent on resourcing, staffing and expertise.

At a time of considerable reduction in local government funding we need to ensure that we are resourcing, investing in and safeguarding those areas of our work that will best deliver outcomes which tackle air quality in the borough.

### What is already being done

We have an excellent history of awareness campaigns, activities, controls and partnership working to promote air quality.

We are leading in the field of construction for the south of London where we are working in partnership with the GLA and the construction industry. We operate both in an advisory and an enforcement capacity. This work will help shape emission controls on major sites for many years to come. It also provides training and guidance to a large number of authorities and to the construction industry. We are now seeking to link this work to national initiatives through DEFRA funding.

We have an active and responsive Pollution Team that respond to reported concerns and complaints, taking action to deal with local air pollution, such as dust, smoke, fumes and other emissions.





Some industrial processes also contribute to air pollution. We have a statutory duty to regulate emissions into the air from some industrial processes in accordance with the Environmental Permitting Regulations. This legislation requires site operators to adopt the best emission control practices in order to protect local air quality.

### What we will do

We are acutely aware that some of the actions that have traditionally been treated as awareness raising need to be embedded in the Council's enforcement processes. We also need to consider how the many different enforcement services can work actively together to identify and address local pollution.

#### *Actions associated with tackling pollution in our Borough*

Tackling Pollution in our Borough	Action	Responsibility for delivery	Timetable
<b>Action 59</b>	Anti-idling to be adopted as an enforcement action in the borough with associated signage in problem areas.	EH Pollution Team/Highways Team	Signage by June 2018 throughout the borough, enforcement plan by September 2018.
<b>Action 60</b>	Start partnership working with the GLA and surrounding boroughs on anti-idling campaigns.	EH Pollution/Volunteer Groups	April 2018
<b>Action 61</b>	Work with neighbouring boroughs to consider tighter restrictions on bonfires.	EH Pollution Team/Cluster Group	By April 2019 By April 2020
<b>Action 62</b>	Conduct campaigns relating to wood burning appliances and seek additional funding from DEFRA to carry out an impact assessment and explore further controls.	EH Pollution Team/DEFRA	By April 2019
<b>Action 63</b>	Deliver cleaner construction throughout South London through our NRMM project and extend this nationally.	EH Pollution Team/GLA/DEFRA	Ongoing
<b>Action 64</b>	Assess and inspect newly installed CHPs to ensure compliance with planning conditions.	EH Pollution Team/Planning Team	By September 2018



## 3.9 Our Schools

### Why this is important

Our children are considered a vulnerable group whose developing lungs make them particularly susceptible to air pollution. A study commissioned by the Mayor of London showed that 802 schools, nurseries, and colleges were within 150 metres of an area breaching the annual objective limits for air pollution in London.

As a local authority we need to ensure that we are continually assessing the impact on this vulnerable group and taking steps to minimise their exposure to air pollution, including where possible:

- Moving school entrances/ play areas away from busy roads;
- Enforcing no engine idling schemes around schools;
- Imposing changes to local roads to restrict polluting vehicles around schools;
- Pedestrianising roads near school entrances;
- Introducing green infrastructure around schools to absorb / disrupt pollutant dispersion;
- Formalising walking buses for large numbers of children, by funding a paid walking bus 'conductor' similar to the school crossing supervisor;
- Schools travel plans;
- Filtration and ventilation where applicable.

It is important to note that not all of these actions are required of every school but the measures will be tailored to individual schools.



## What is already being done

We also have one of our two schools in priority areas being audited by the Mayor as part of a London-wide campaign with the results due to be published soon. Our air quality specialists worked very closely with the auditors and supplemented their work by providing air quality monitoring.

## What we will do

Schools will form a standalone part of this air quality action plan and we must ensure that the actions being taken are continually reviewed and monitored to adapt to any potential changes in air pollution around our schools. We will carry out some of the first in-depth assessments of air quality around three schools in the most polluted areas of the borough. This will provide us with a picture of how pollution impacts schools in sensitive areas and influence measures that can be taken by these schools to help minimise exposure.

We will support and provide advice to schools on any matters or concerns related to air quality and reducing exposure for pupils.

For schools that have been audited, where necessary, we will help to seek funding for measures such as screening and green planting through various grant opportunities.

We will also aim to have schools in areas of high pollution incorporated into our monitoring and reporting regime.

We will work closely with our Public Health partners to deliver the joint health benefits of active travel and healthy lifestyles.

We will consider activities such as Very Important Pedestrian (VIP) days to promote walking and cycling around some of our schools and as part of wider campaigns. Where more proactive measures are needed to protect children we will take steps to control traffic and parking around our schools.



## Actions associated with Schools

Our Schools	Action	Responsibility for delivery	Timetable
<b>Action 65</b>	Maintain our ongoing commitment to school travel plans and the STARS review.	Transport Team	Ongoing
<b>Action 66</b>	Carry out audits of schools in the most polluted areas of the borough and help provide a scheme of mitigation where necessary and possible.	EH Pollution Team/GLA	September 2018
<b>Action 67</b>	Review and assess annually the necessity for audits at schools and nurseries in areas subject to high levels of pollution.	EH Pollution Team/Future Merton/GLA	June 2018
<b>Action 68</b>	Incorporate schools in areas of poor air quality into our monitoring network and regime.	EH Pollution Team	Ongoing
<b>Action 69</b>	Joint working arrangements with Public Health partners around schools to deliver joint health benefits.	EH Pollution Team/Public Health Team	Ongoing
<b>Action 70</b>	Work with and provide specialist advice and support to schools around air quality issues.	EH Pollution Team	Ongoing

## 7. Responsibilities and Commitments

This AQAP was prepared by the Environmental Health Department of Merton Council and with the support and agreement of the following service areas:

- *Environmental Health – LB Merton*
- *Public Health Merton*
- *Spatial Planning Policy*
- *Facilities Management*
- *Future Merton Commissioning*
- *School Travel Planning*
- *Sustainability and Climate change*
- *Development Control*
- *Strategic Policy & Research*
- *Transport Planning*
- *Parking Services*
- *Road Safety & Smarter Travel*





This AQAP has been approved by:

**Councillor Ross Garrod, Cabinet Member for Environment**

**AQ Measures approved by the Air Quality Scrutiny Panel**

This AQAP will be subject to an annual review, appraisal of progress and *reporting to the relevant Council Committee*. Progress each year will be reported in the Annual Status Reports produced by Merton Council, as part of our statutory London Local Air Quality Management duties.

If you have any comments on this AQAP please send them to:

**Jason Andrews MCIEH MOIL MInstLM**

*EH Pollution Manager*

*Regulatory Services Partnership*

*London Boroughs of Merton and Richmond upon Thames*

*Civic Centre, London Road, Morden SM4 5DX*

[jason.andrews@merton.gov.uk](mailto:jason.andrews@merton.gov.uk)



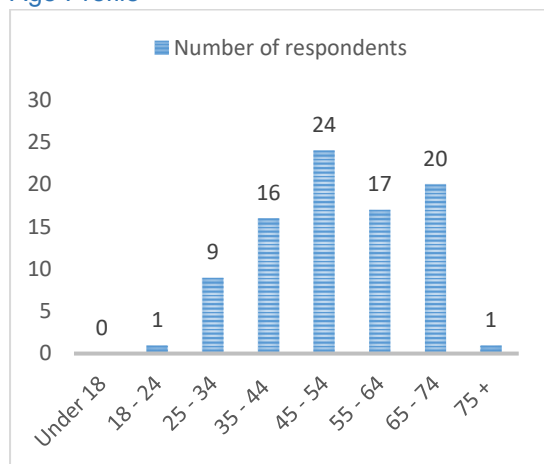
## Appendix A: Consultation Analysis

This document summarises the responses to the Council’s Air Quality Action Plan consultation. The action plan proposed a number of actions covering distinct areas of policy.

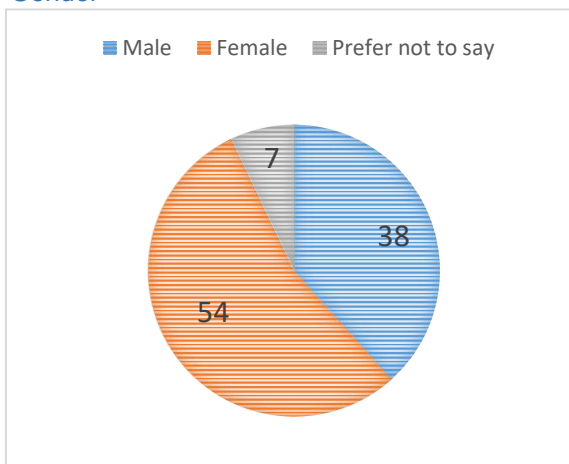
This consultation ran for a period of 6 weeks and resulted in 155 responses.

### 1. Response demographic

Age Profile

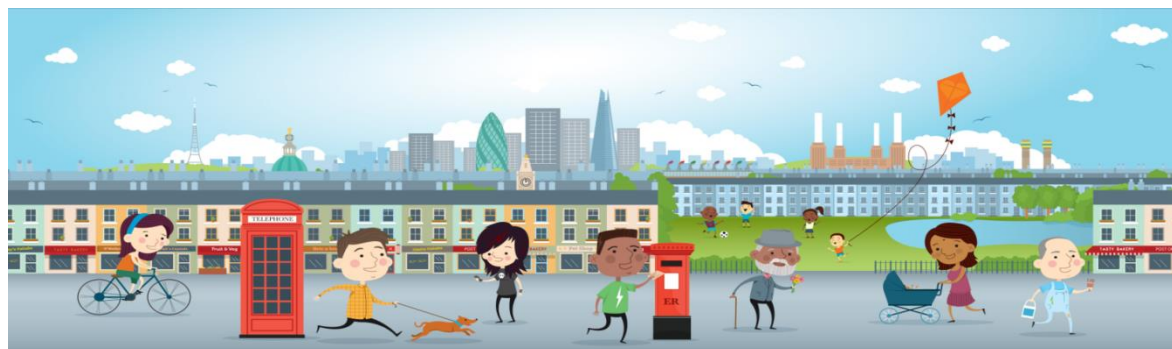
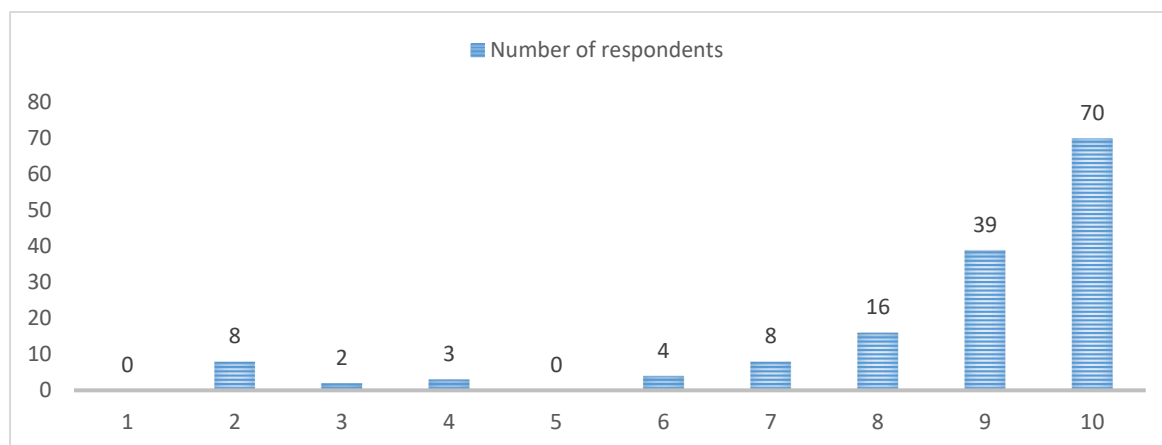


Gender



### 2. Concern for Air Quality

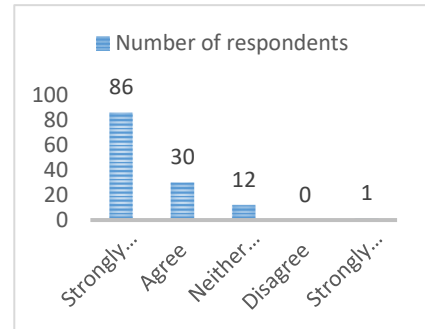
Question; “To what extent are you concerned about air quality in Merton?”



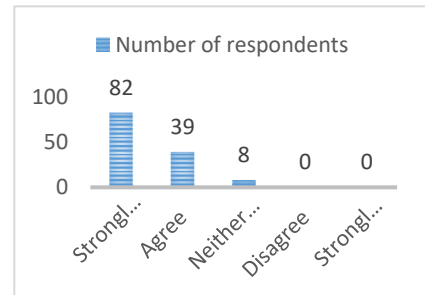
### 3. The Action Plan proposed measures to tackle poor Air Quality

Question; "To what extent do you agree or disagree with the proposed actions the Council could take?"

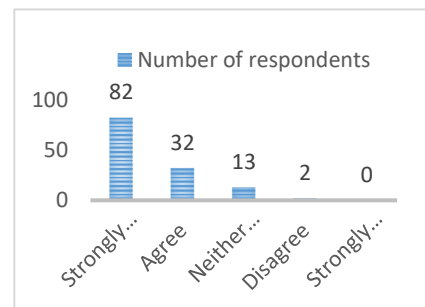
*Reducing the impact of new developments on air quality*



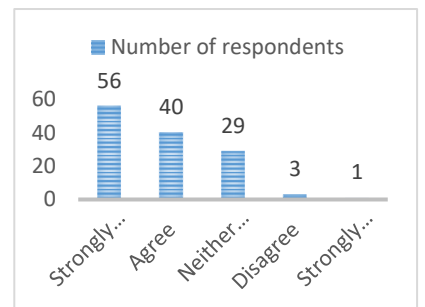
*Ensuring enforcement of cleaner construction policies*



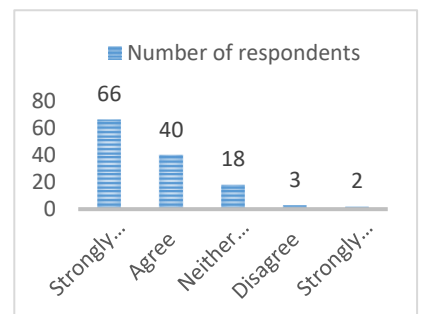
*Mapping focus areas and air quality hotspots on planning GIS maps*



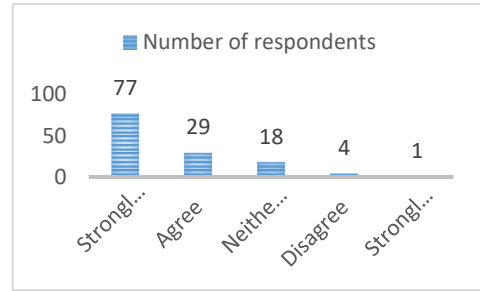
*Enforcing CHP and biomass air quality policies*



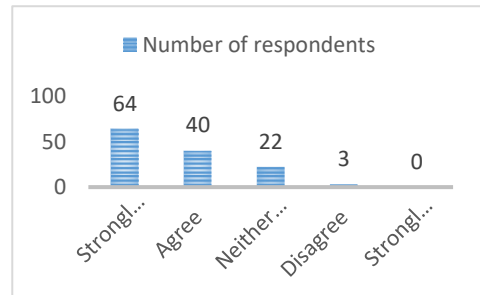
*Enforcing air quality neutral policies*



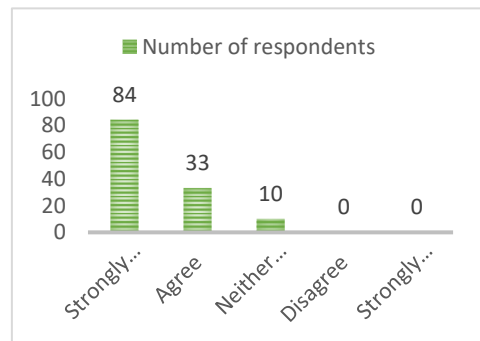
*Ensuring that smoke control zones are fully promoted and enforced*



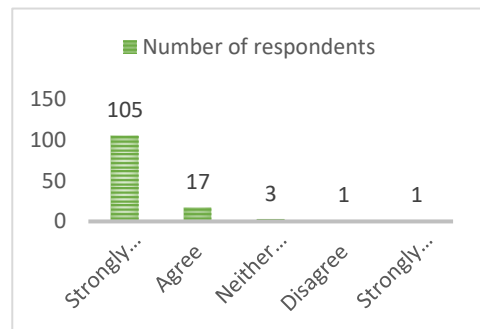
*Promoting and delivering energy-efficient retrofitting projects in workplaces and homes*



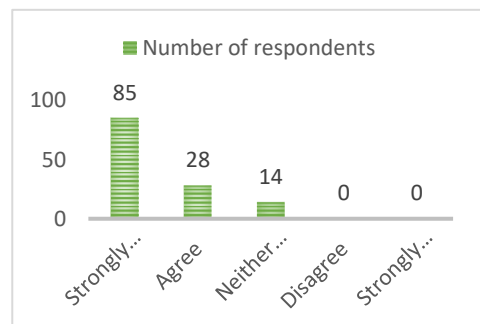
*Working more closely with public health colleagues to tackle air quality*



*Working more closely with transport colleagues to tackle air quality*

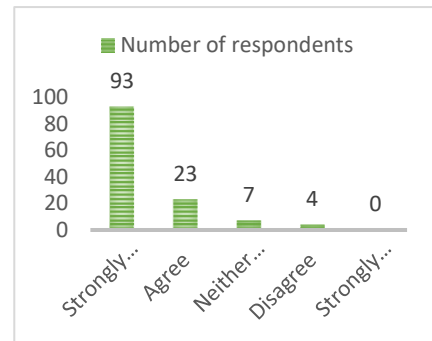


*Promoting health and air quality initiatives*

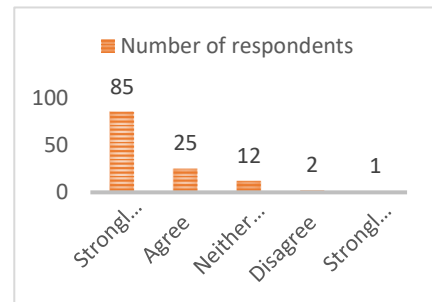




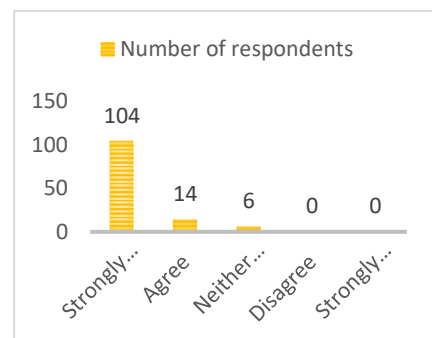
*Reviewing air quality at schools by updating school travel plans and reviewing STARS accreditation in line with new initiatives*



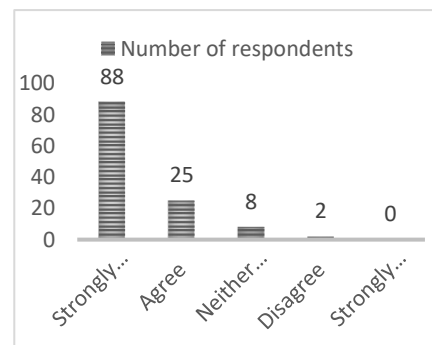
*Updating Merton's procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation / EcoStars accreditation scheme*



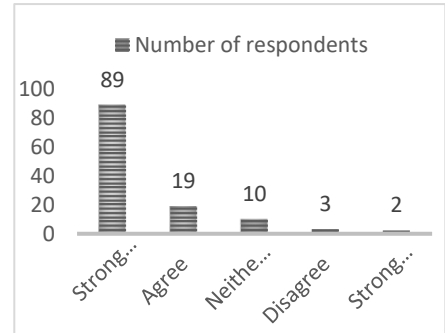
*Ensuring Merton's own fleet of vehicles comply with the best possible emissions standards*



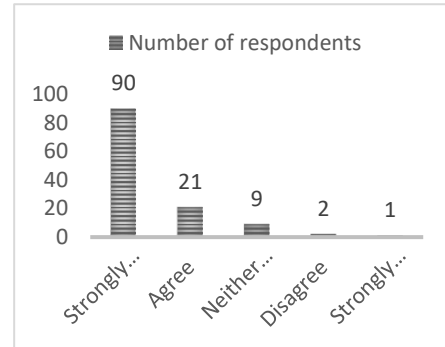
*Conducting a detailed assessment of traffic management solutions for air quality focus areas and pollution hotspots*



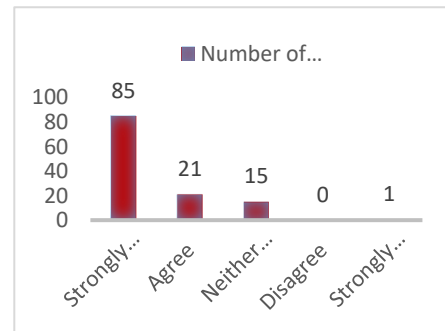
Considering possible implementation of CAZs in parts of the borough



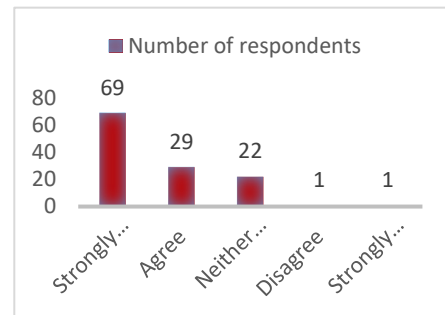
Undertaking audits of air quality in and around Merton schools subject to poor air quality



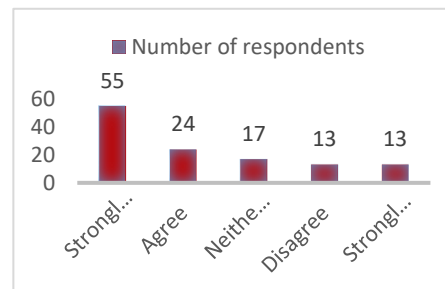
Formalising anti-idling enforcement



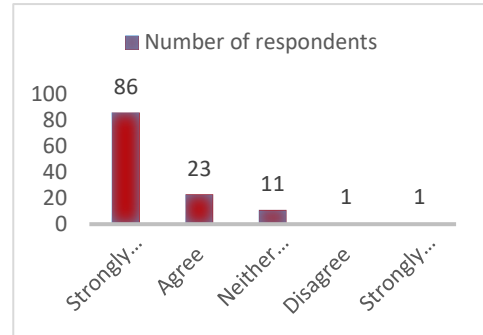
Expand electric vehicle charging infrastructure



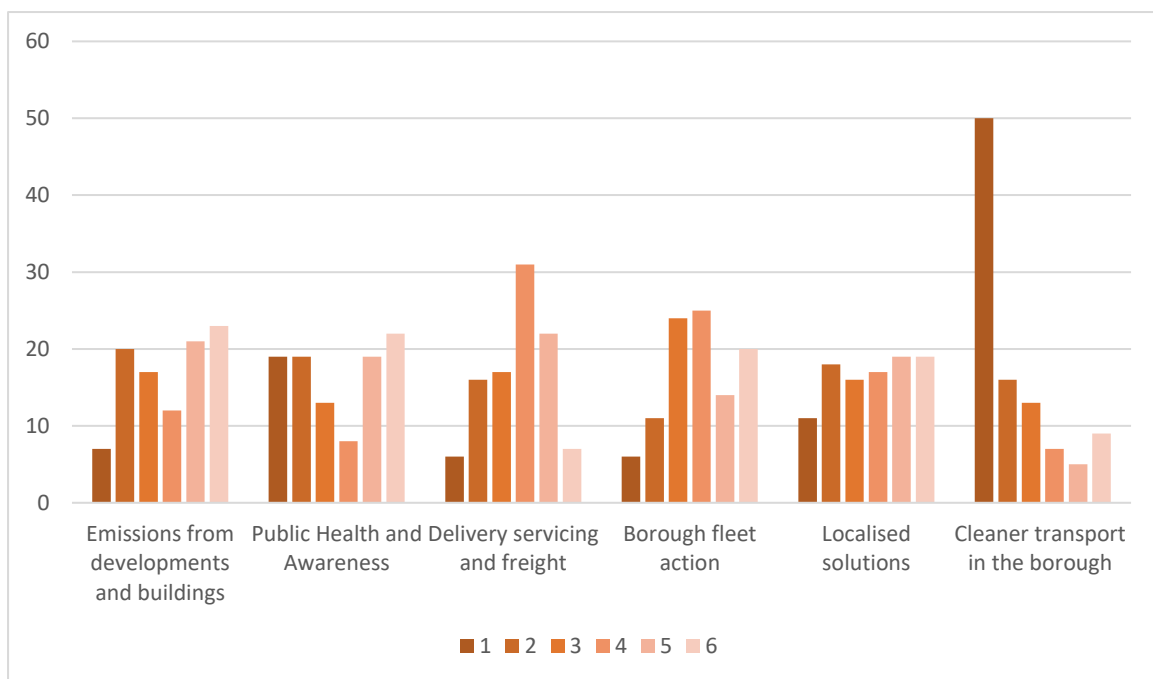
Extending use of an emissions-based parking levy for residential and business permits in Merton



## Providing infrastructure to support walking and cycling across the borough



## 4. Ranking of categories in order of importance (1 being most important and 6 being least),



## 5. Here's what you said

- ULEZ
  - Expand to outer boroughs, including Merton (x3)
  - Have car-free days in the borough or certain areas
- Schools' air quality
  - Tackle engine idling and driving to school (x10)
  - More education on the subject (x2)
- Speeding
  - More enforcement of speed limits
  - Remove speed bumps
  - 20mph zones (x5)
- Parking
  - De-centralise parking in Wimbledon. Pedestrianise Broadway or only buses (x4)
  - Increase parking charges (x2)







infrastructure, greener and safer walking and cycling routes, strong and enforceable anti-idling measures with public awareness campaign. The local AQ strategy needs to be implemented as a priority in the shortest possible time frame, which includes working with TfL to switch to clean buses ASAP. Air pollution is a silent killer and needs to be treated by Merton Council as the health emergency that it is. Thank you.

1. As three leading community organisations in Mitcham we welcome Merton's Air Quality Action Plan and the opportunity to propose further measures to improve air quality in the area. Air pollution is an issue which respects no boundaries and requires an area wide approach. We have come together to provide this broad perspective for Mitcham.

2. Both Mitcham Cricket Green Community and Heritage and Mitcham Society have undertaken air quality monitoring in the area in collaboration with Friends of the Earth and Sustainable Merton. The results confirm that Mitcham's air quality is regularly in breach of World Health Organisation limits. The results for Cricket Green are summarised in our air quality blog and the Mitcham Society surveyed the previously pedestrianised stretch of London Road through Fair Green in June/July 2016 to get readings of 32.51 µg/m<sup>3</sup>, 31.03 µg/m<sup>3</sup> and 31.23 µg/m<sup>3</sup> at these points. These and other results have been collated on the Merton hotspots map. Mitcham Common, the grounds of The Canons and Park Place and many of Mitcham's Town Greens act as air quality reservoirs providing both areas of relatively low air pollution and trees and other natural methods for reducing particulates.

3. We welcome the intention to address air quality in Merton and the proposals to extend the Ultra Low Emission Zone to Merton. Nevertheless, we believe the draft Air Quality Action Plan lacks the ambition and measures necessary to address the scale of the problem facing the area.

4. We believe further measures are needed and these should include:

- Targets for improving air quality year on year to 2022
- A network of air quality monitoring stations – particulates and NO<sub>x</sub> – throughout the Mitcham area, including on Mitcham Common as well as along the roads that pass through it, with data made publicly available in a timely manner
- Zero emission or hydrogen buses on all routes through Mitcham Town Centre and its designation as a Low Emission Bus Zone
- A ban on heavy lorries running on Church Road between Lower Green West and Benedict Wharf as part of the measures to address "hot spots"
- Changed traffic flow at Lower Green West to remove the existing "roundabout" configuration and reconnect it to Lower Green East
- Improved pedestrian permeability in Mitcham Town Centre and Cricket Green – including enhanced pedestrian crossings and reduced crossing times
- A requirement in all travel plans for schools and new development to demonstrate how they will contribute to improvements in air quality, and a commitment from Merton Council to monitor and enforce these travel plans
- Investment in a behavioural change programme to raise awareness of individual actions to improve air quality
- Enforcement against idling cars and lorries which extends beyond any plans to act on idling outside schools
- Community consultation over the location of a network of well-designed electric vehicle charging points in Mitcham as an alternative to the current process whereby Merton Council submits planning applications to itself ahead of any community engagement
- Active programme of succession planting of trees and hedges throughout Mitcham to conserve and enhance tree cover, especially along major routes
- Stronger connections between Mitcham and the Wandle Trail and open spaces, including Willow Lane Industrial Estate
- Active promotion of Mitcham Common as a source of health and wellbeing with relatively better air quality including:
  - Promotion of healthy walks
  - Opening up the Ecology Centre as an affordable location for hosting community-led activity promoting health and well being
  - Management and planting along the fringes to filter particulates.

5. We look forward to contributing to monitoring, delivery and review of the Action

## Appendix B: Successful projects delivered through Action Plan 2004 -2017

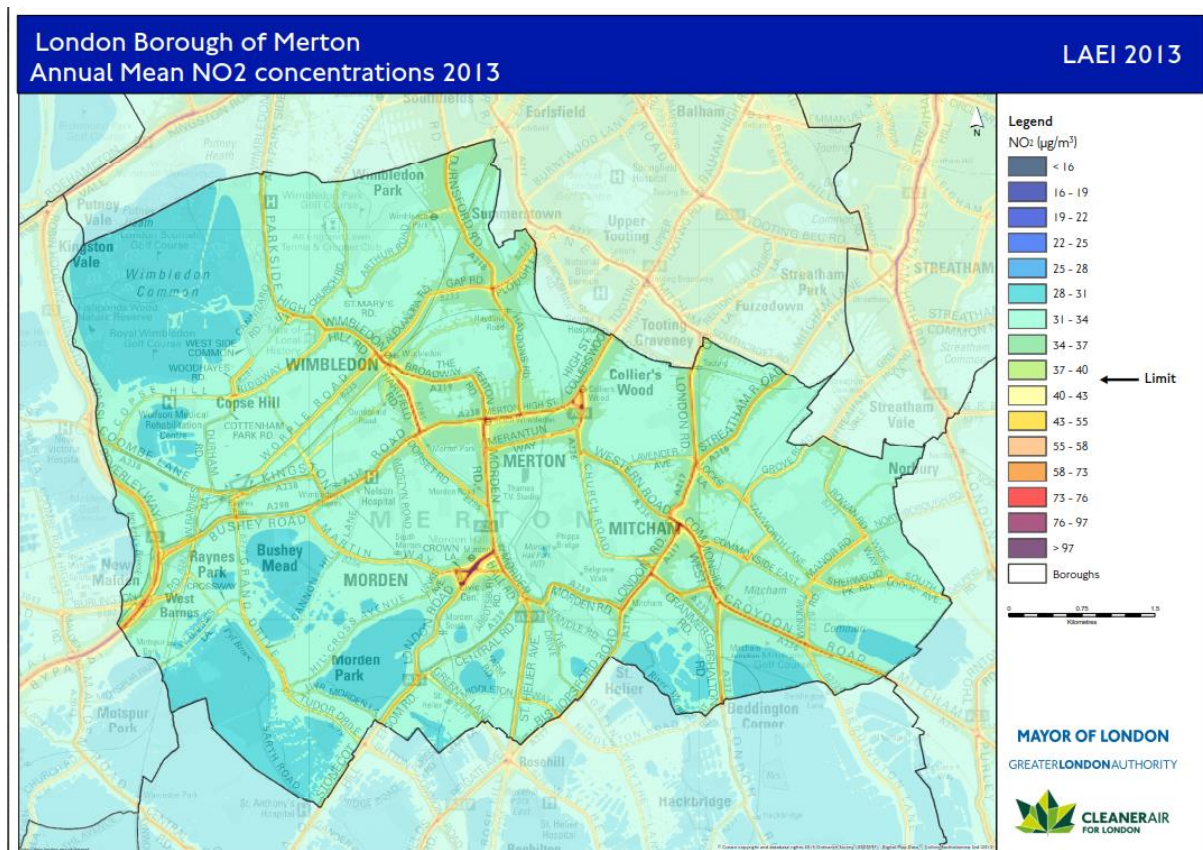
- Introduction of car clubs across borough currently operated by Zipcar and City Car Club (Action No 8)
- Introduction of Controlled Parking Zones including 4 new zones and 73 waiting and loading reviews in 2015/16 (Action No 10)
- Signed up to Walkit.com walking strategy in 2010 (Action No 15)
- Implemented Safer Routes to School/Walking Bus scheme via School Travel Plans (Action No 16)
- Implementation of London Cycle Network (Action No 17)
- Provision of 90 on-street cycle parking facilities via Local Implementation Plan
- Participated in CleanerAir4Schools – joint project between Croydon, Merton, Richmond and Wandsworth including ‘walk once a week campaign’, School Travel Plan champions training events held in three schools in each borough(Mayor’s Air Quality Fund project 2015 - 2017)
- Provision of electric vehicle charging infrastructure including 21 new charge points installed in 9 locations across the borough during 2016.
- AQ project at Willow Lane Industrial Estate, Mitcham. Funded through Mayors Air Quality Fund (2013 -16). Project increased green infrastructure through planting schemes; enhanced road/gully cleansing to reduce re-suspension of dust; delivered sustainable travel training & support and raised awareness of air quality to approximately 150 local businesses.

## Appendix C: Summary of current air quality in Merton

The UK Air Quality Strategy (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.

Merton borough is meeting the national AQS objectives for all pollutants other than for Nitrogen Dioxide (NO<sub>2</sub>). Based on limited monitoring data Merton is also meeting the current objectives for Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>), however pollutant dispersion modelling indicates that levels of PM<sub>10</sub> are likely to be exceeding the annual mean objective at specific locations. As both PM<sub>10</sub> and PM<sub>2.5</sub> are damaging to health at any level, this remains a pollutant of concern.

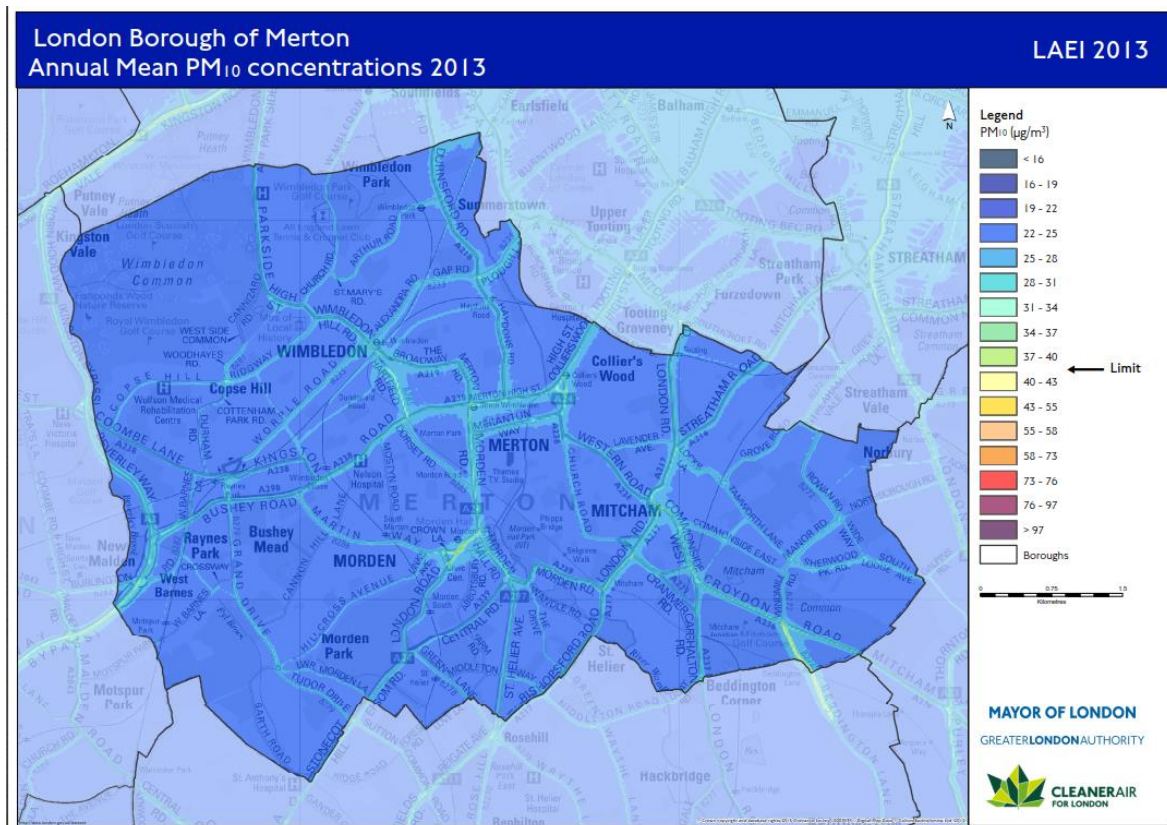
Figure 1: Modelled map of annual mean NO<sub>2</sub> concentrations (from the LAEI 2013)



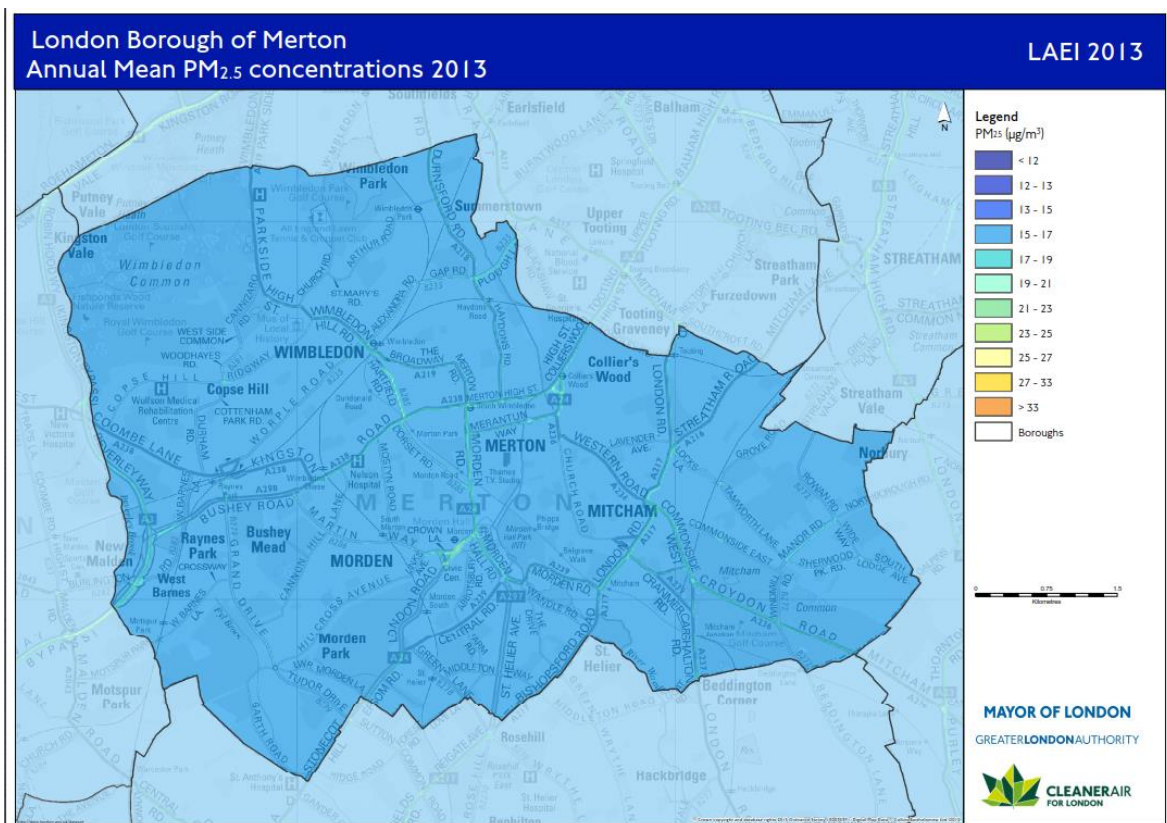
The modelled NO<sub>2</sub> concentrations clearly identify the contribution of road traffic emissions with exceedance of the NO<sub>2</sub> annual mean objective closely correlated with the main transit routes and busy junctions within the borough.



Figure 2: Modelled map of annual mean PM<sub>10</sub> (from the LAEI 2013)



Exceedance of the PM<sub>10</sub> annual mean objective also extends along the main transport links. The main areas of concern are in the centre of Morden and a section of the B272 Beddington Lane in the south east corner of the borough.





### Figure 3: Modelled map of annual mean PM<sub>2.5</sub> (from the LAEI 2013)

PM<sub>2.5</sub> concentrations are not currently monitored in Merton but the dispersion model identifies elevated concentrations along the main transit routes and in the town centres within the borough, as would be expected. There is no regulatory standard applicable to English local authorities in respect of PM<sub>2.5</sub> however, the EU Ambient Air Quality Directive (2008/50/EC) does set out air quality standards including an exposure reduction obligation, a target value and a limit value (25µg/m<sup>3</sup> by 2020). The GLA has introduced a 'PM<sub>2.5</sub> borough role' for air quality teams to consider how existing and new priority actions can help reduce PM<sub>2.5</sub> levels in their area, and to work collaboratively to align any new measures with the objectives of the borough Public Health team.

### Public Health Outcomes Framework

The current Public Health Outcomes Framework (PHOF), produced by Public Health England, provides an indication of differences in life expectancy and healthy life expectancy between communities. The fraction of mortality attributable to particulate air pollution (Indicator 3.01) for Merton borough is as follows:

Region/community	Particulate air pollution (Indicator 3.01)(Feb 2017)
London Borough of Merton	5.3
London Region	5.6
England	4.7

Source: Public Health Outcomes Framework – Public Health England (website accessed March 2017)

The PHOF data indicates that the fraction of mortality attributable to particulate air pollution is slightly below the average value for the London region but is higher than the average for England.

For other pollutants Nitrogen Dioxide (NO<sub>2</sub>) concentrations remain in excess of the UK Air Quality Objectives at a number of locations across the borough. Monitoring during 2015 indicated that the annual mean NO<sub>2</sub> objective of 40µg/m<sup>3</sup> was exceeded at several locations including Colliers Wood, Morden, Tooting and South Wimbledon. At monitoring sites in Tooting and High Street, Merton the NO<sub>2</sub> concentration was measured in excess of 60µg/m<sup>3</sup> which is indicative of an exceedance of the 1-hour Air Quality Objective. This short term objective represents a risk to individuals spending as little as an hour in the area of exceedance and is therefore significant not just for people living in that area but also for those working or visiting the area.

### AQMAs and Focus Areas

In Merton an Air Quality Management Area (AQMA) has been declared for the whole borough.

The AQMA has been declared for the following pollutant's:

- Nitrogen Dioxide - we are failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations. We may also be breaching the UK 1-

hour Air Quality Objective based on measured concentration for NO<sub>2</sub> being in excess of 60µg/m<sup>3</sup> at some locations within the borough.

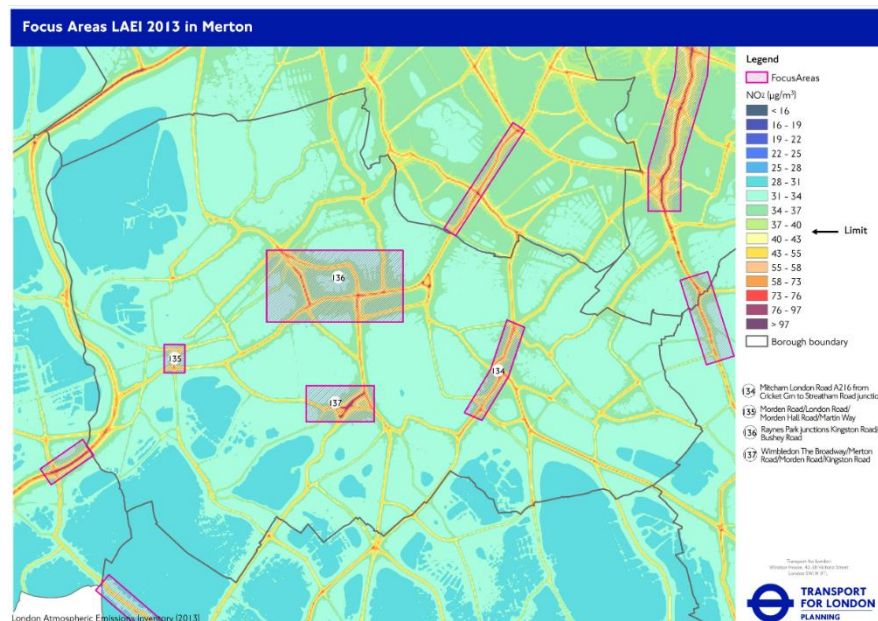
- Particulate Matter (PM<sub>10</sub>) – whilst monitoring data from the automatic monitoring station at South Wimbledon indicates we are complying with the UK Objectives and EU Limits, the wider modelling data indicates that we are likely to be breaching the 24-hour and annual mean PM<sub>10</sub> Objectives at a number of locations across the borough. We are also exceeding World Health Organisation air quality guideline for this pollutant, and we have a formal responsibility to work towards reductions of PM<sub>2.5</sub>.

An Air Quality Focus Area is a location that has been identified as having high levels of pollution and human exposure. There are four focus areas in the borough. These are in the main centres of Mitcham, Morden, Raynes Park and Wimbledon.

**Figure 4: London Borough of Merton GLA Focus Areas (2013)**

Focus Area Ref.	Location
Focus Area 134	<b>Mitcham</b> - London Road A216 from Cricket Green to Streatham Road junction
Focus Area 135	<b>Morden</b> - Morden Road/London Road/Morden Hall Road/Martin Way
Focus Area 136	<b>Raynes Park</b> - junction Kingston Road/Bushey Road
Focus Area 137	<b>Wimbledon</b> - The Broadway/Merton Road/Morden Road/Kingston Road

**Figure 5: Map of London Borough of Merton Focus Areas (2013)**



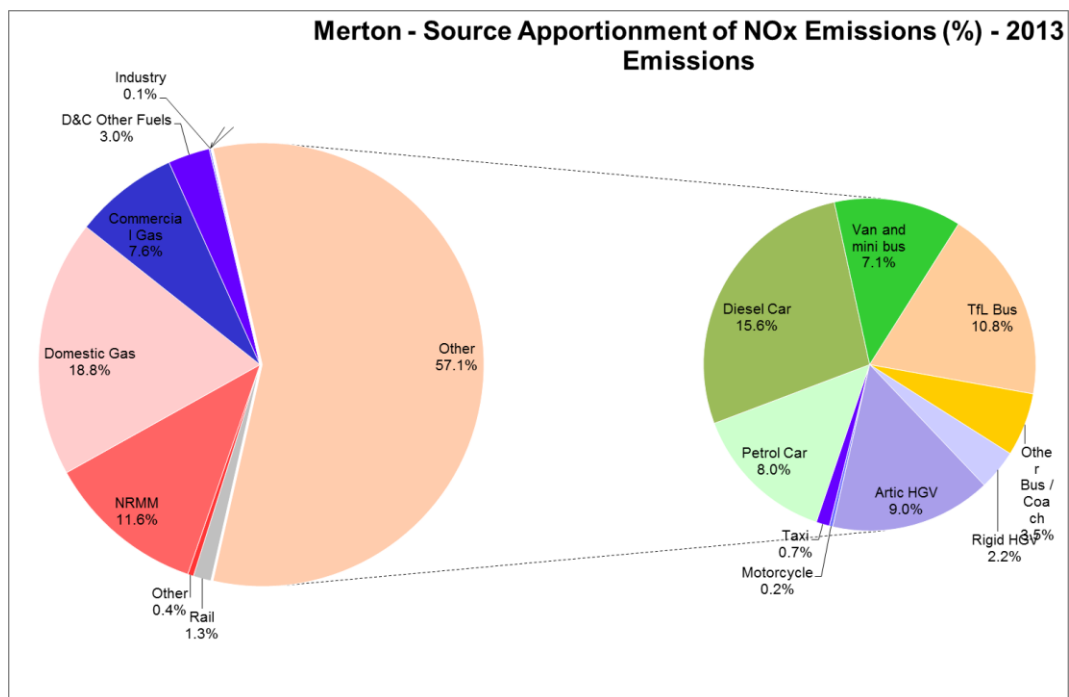
## Appendix D: Sources of Pollution in Merton

Pollution in Merton comes from a variety of sources. It includes pollution originating outside the borough, and, in the case of particulate matter, a significant proportion of this comes from outside London and beyond the UK.

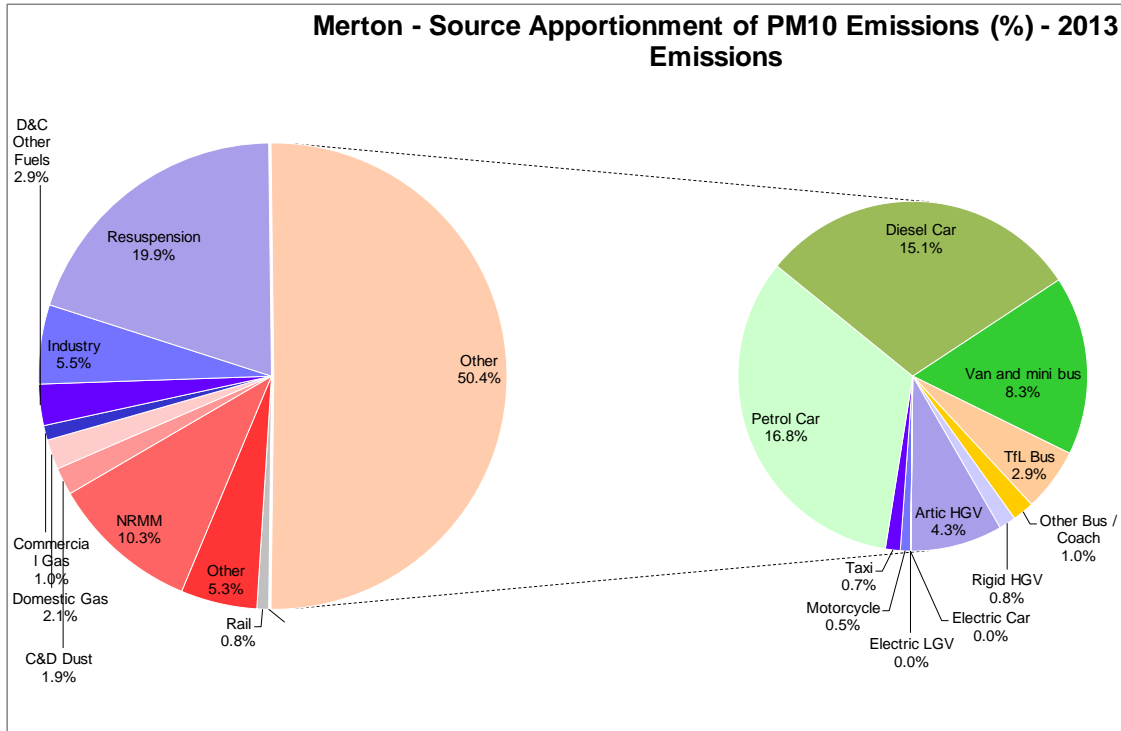
Of the pollution that originates *inside* the borough the main sources of NO<sub>2</sub> are transport (57.1%), domestic gas boilers (18.8%) and static non-road mobile machinery (11.6%). The main sources of particulate matter are road transport (50.4%), re-suspended dust from roads and surfaces (19.9%) and static non-road mobile machinery (10.3%). (See figures 6, 7 and 8 below).

In respect of the transport sources the LAEI source apportionment data for the borough indicates that diesel vehicles contribute approximately 90% of the NO<sub>x</sub> emissions and 80% of the PM<sub>10</sub> emissions (based on 2013 modelled data). This supports the evidence from the dispersion modelling (Figures 1, 2 & 3) which indicates that the highest concentrations of both NO<sub>2</sub> and PM<sub>10</sub> are most closely associated with the main traffic routes and road junctions within the borough.

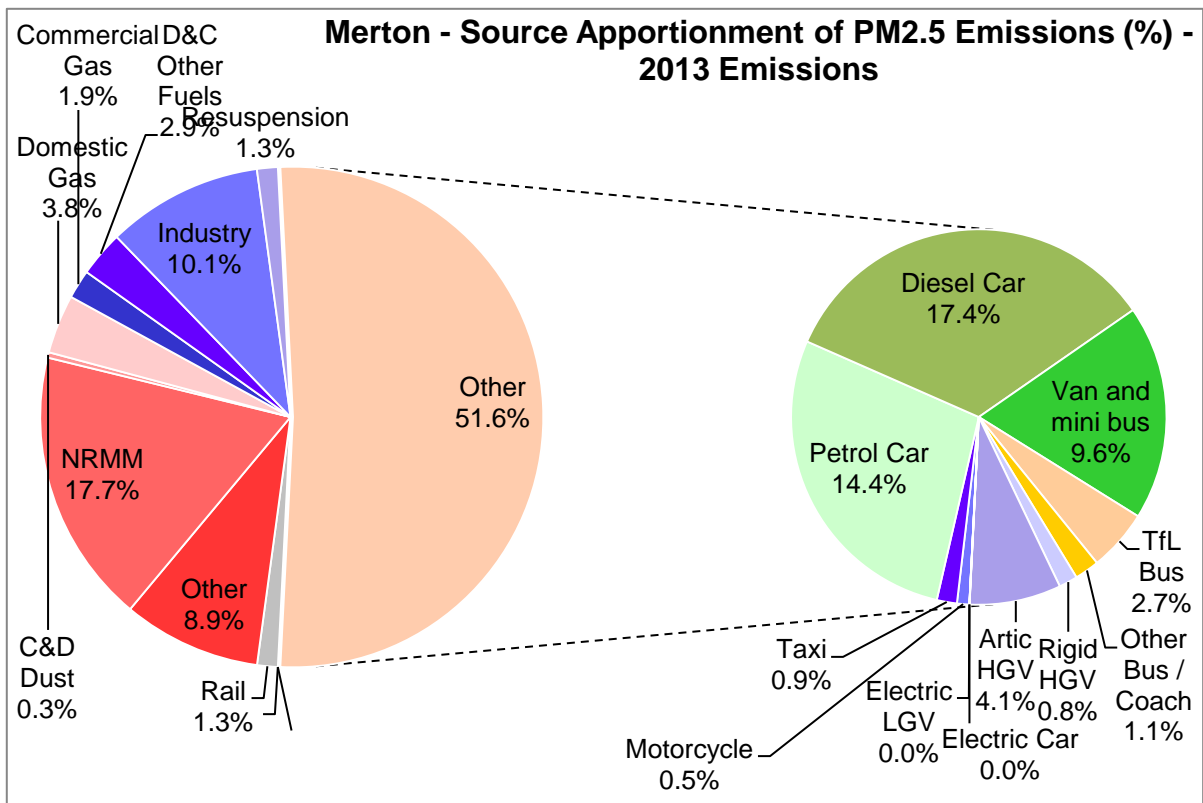
**Figure 6: NO<sub>x</sub> Emissions by source and vehicle type (from the LAEI 2013)**



**Figure 7: PM10 Emissions by source and vehicle type (from the LAEI DATE?)**



**Figure 8: PM2.5 Emissions by source and vehicle type (from the LAEI 2013)**



Most NO<sub>x</sub> from transport sources comes from diesel cars (15.6%) followed by HGVs (rigid and articulated) with combined emissions of 11.2%, TfL buses (10.8%), petrol



cars (8%) and vans/minibuses (7.1%). In terms of targeting particular vehicle types for selection of action plan measures, the borough source apportionment data does not identify any clear dominance in terms of vehicle use type but indicates that diesel vehicles across all use types are contributing 92% of the total road-NO<sub>x</sub> emitted. This suggests that AQAP actions need to address emissions from all vehicle types but focus on those which are diesel powered. This includes general measures which aim to reduce traffic volume and improve traffic flow but also more specific measures to increase the proportion of low emission vehicles in the general fleet such as increasing the number of electric cars and vans, improving emission standards for local bus and taxi fleets and reviewing freight and delivery practices to minimise emissions in areas with poorest air quality.

The predominant source of non-transport-related NO<sub>x</sub> emissions is commercial and domestic gas which contributes 26.4% of total NO<sub>x</sub> emissions, and non-road mobile machinery which contributes 11.6%. Merton is limited when it comes to reducing domestic gas NO<sub>x</sub> emissions as the Council no longer has any housing stock, however the Merton Air Quality Supplementary Planning Guidance document and GLA Air Quality Neutral policy for London boroughs provide some controls on heating appliances for new and redeveloped properties and businesses.

For non-road mobile machinery (NRMM), Merton has jointly commissioned an NRMM emissions study to identify compliant machinery and develop a checklist for contractors, which will be used to improve emissions from machinery and equipment operated on development sites.

Similarly for particulate matter, the dominant source of emissions is transport and within that sector diesel powered vehicles collectively contribute more than 80% of PM<sub>10</sub> emissions. Measures to address transport sources generally, and to reduce reliance on diesel fuels, will have a positive impact on PM<sub>10</sub> and PM<sub>2.5</sub> emissions. One additional source of particulate matter is the re-suspension of dust from roads and commercial and development sites. For development sites re-suspension of particulate matter is controlled to some extent by use of the Sustainable Design and Construction and Control of Dust and Emissions Supplementary Planning Guidance, and for highways sources, existing street cleansing regimes will have some benefit.

## Appendix E: Development and Implementation of Merton's AQAP

### Consultation and Stakeholder Engagement

In updating the action plan we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.1. In addition, we have undertaken the following stakeholder engagement:

The response to our consultation stakeholder engagement is given in Appendix A.

**Table 3.1 Consultation Undertaken**

Yes/No	Consultee
Yes	The Environment Agency
Yes	Transport for London and the Mayor of London (who will provide a joint response)
Yes	All neighbouring local authorities
Yes	Other public authorities as appropriate
Yes	Bodies representing local business interests and other organisations as appropriate

### Steering Group

An AQAP steering group was convened and a meeting to review the first draft of the updated AQAP held on 5th June 2017. Representatives from the following departments attended:

- Public Health - Merton
- Environmental Health – LB Merton
- Environmental Health – LB Richmond upon Thames – adjoining authority/shared EH service
- Spatial Planning Policy
- Future Merton commissioning
- School Travel Planning
- Sustainability and Climate Change
- Development Control
- Strategic Policy & Research
- Transport Planning
- Parking Services
- Road Safety & Smarter Travel

A review of the draft AQAP was undertaken with suggested amendments incorporated into a revised document. The steering group were broadly supportive of the identified measures. Securing adequate resources was identified as a key requirement for ensuring successful implementation and completion of measures. Opportunities for increased collaborative working between the AQ team, Planning, Transport and the Sustainability team were identified and the format for effective liaison discussed. The need to share information effectively was identified in order to

ensure that AQ impacts are assessed and mitigated/reduced where possible. Information on existing and planned projects was shared and the AQAP revised to reflect those areas of work.

## Appendix F: Acronyms

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non-Road Mobile Machinery
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London