ROYAL TUNBRIDGE WELLS TOWN FORUM

Response from the RTW Town Forum to the Tunbridge Wells Borough Council Air Quality Action Plan 2018 – 2023

11 October 2018

The Town Forum welcomes the opportunity to respond to TWBC's Air Quality Action Plan. We note the concerns in the document about air quality and agree with many of the measures. The Town Forum has for at least 10 years been pressing for reductions in traffic volumes and speeds, encouraging a modal shift to cycling and walking within and around Royal Tunbridge Wells, and urged implementation and funding of agreed TWBC/KCC strategies on Transport, Cycling and Active Travel. We have ourselves produced a number of papers to support these objective which we trust you have referenced (see Appendix below).

However, seen through the prism of 'air quality' as well as congestion and cycling and pedestrian safety, the recent report on climate change from the IPCC serves to underline the urgency of changing the town's current trajectory of traffic growth, with consequential benefits to air pollution.

We have four main concerns with the document:

- It lacks ambition in achieving a modal shift to non-polluting transport, particularly active travel.
- The track record of on delivering changes in RTW to enable active travel suggests that even the modest targets will not be met.
- The report focusses on NOx and, to an extent on PM_{10}, which is becoming a more important source of pollution, but lacks references to $PM_{2.5}$, for which there is no safe level.
- A town-wide approach to tackling pollution and promoting active travel is necessary rather than the piecemeal approach and underfunded approach currently on offer.

While our main concerns are about transport, which forms the bulk of pollution in the town, concerns are also being increasingly expressed (a) about the effects of wood-burning stoves and (b) whether the new charges for garden waste will lead to an increase in bonfires. Both issues should be included.

Insufficient ambition.

An objective is stated of reducing traffic emissions by 33%. Within Tunbridge Wells, the main source of air pollution is vehicle traffic. The way to reduce pollution from CO_2, NO_2, PM_{10} and $PM_{2.5}$ is to reduce the number of motor vehicles on the road by enabling realistic active travel alternatives for people. Given that 65% of all UK car journeys are under 5 miles, many of which could be undertaken by bike or on foot, implementing a comprehensive programme to enable active travel would achieve this on its own.

Currently people do not use a bicycle for short journeys because they are too frightened of the heavy, fast moving traffic (see Dft British Social Attitudes Survey 2017 Public attitudes towards transport published July 2018, page 5). The solution is to build safe, segregated cycle lanes, in many cases by allocating public space currently used by cars to bicycles, which are 7 times as space-efficient and cause no pollution.

While the existing transport and cycling strategy documents have useful components, delivering an increase in active travel will require more than 'encouraging' modal shift, which has been shown to not work. Levels of cycling are barely changed from a decade ago and walking levels have declined. It will be

necessary to develop a network of cycling and walking routes, segregated from each other and from motor vehicles. The network will have the following characteristics:

1) All dwellings to be within 400m of a cycle route

2) All roads to be designated as EITHER

    a. Places for people to live, work, shop or play. This will require:

        i. the pedestrianisation of town centres; and

        ii. filtered permeability for most residential streets to ensure the protection for vulnerable road users from vehicles using those roads as cut-throughs and to ensure that short trips are quicker and easier by active travel; OR

    b. For transporting people from place to place, where fully segregated cycling infrastructure will be required.

3) For short journeys, particularly up to 3 miles, it will be made easier to walk or cycle than to drive. All local communities such as Hawkenbury, Pembury, Rusthall, Sherwood and Showfields should be connected to the town's key facilities – shops, schools, trains and workplaces – using sustainable and/or active travel.

4) 20mph will be the default speed limit in all residential streets and in town and village centres, with exceptions where necessary. There is plenty of evidence worldwide to support this view, the most recent being contained in a report from an independent think tank about decarbonising Transport in Wales (see also point X below) http://www.iwa.wales/wp-content/uploads/2018/06/IWA_Decarbonising_Transport-1.pdf

Inability to deliver

Even if the proposed review of the transport strategy were to include adequate proposals, we are unconvinced that they will actually be delivered to the appropriate standard. Experience so far has been that where cycling infrastructure is actually built, it is so far below the necessary quality, that it will not increase cycling and can be worse for pedestrians. This is for a number of reasons:

1) Political commitment to deliver active travel is missing at the highest levels within KCC or TWBC. Senior politicians are still convinced that the phrase "Keep Kent Moving" means concentrating on moving people by car and goods by lorry. Wherever there is a conflict between the needs of residents or vulnerable roads users and those of motorists, the motorist always wins. Examples include:

    a. At Carrs Corner in Tunbridge Wells, there are around 1 million pedestrian movements per year and yet the Highways Authority fails to do anything to protect vulnerable road users such as safe crossing places.

    b. Phase 2 of the Public Realm scheme in the centre of Tunbridge Wells was conceived as a way of improving the pedestrian experience. However, it is proposed to allow taxis to use the area, which is counter-productive for air quality and pedestrian safety. Furthermore, retaining bus stops in the area, while welcome in delivering people by a sustainable travel mode, is likely to reduce air quality with the current generation of buses.

2) Kent Highways uses outdated standards and lacks experience of designing cycling infrastructure. E.g. the default position is to build cycle routes on footpaths shared with pedestrians. Such designs satisfy no-one and build in conflict.

3) Senior local politicians without the experience of designing cycling infrastructure, that don't understand its benefits and are not committed to delivering active travel are able to interfere in the design process and ensure that the quality of schemes is reduced to the point where new infrastructure will fail to deliver the desire benefits. There are many examples, but the most recent is the A26 cycle infrastructure:

   a. a key section of the route has been removed;

   b. on another section, the proposal for reducing the speed limit to 20mph has been refused, with no alternative cycling infrastructure proposed;

   c. two bus stop bypasses have been removed;

   d. on-carriageway parking has been left in, ensuring that cyclists have to re-join the main carriageway for short sections; and

   e. the cycle lanes have been built without any form of segregation.

4) Parking: The fact base underlying the strategy is inadequate, with no published detailed data about use of MSCPs and supply / demand for parking. There is an inadequate disincentive for cars to come to the town centre. Building a new car park in the centre of town and extending an existing one are counterproductive measures. Better would be to invest in measures to enable people to leave their car at home or, potentially, move car parking to the edge of town and implement a park and ride scheme (bus, bike or other vehicle). Car parking pricing could be used as a form of congestion charge and pollution control.

5) Ignoring the evidence: There have been several studies on traffic levels, routes and congestion, none of which are implemented. It is frustrating to see this work ignored and more studies undertaken that just confirm the problems and at considerable cost which could otherwise be spent on implementing solutions.

   Typical is the A26/A264 *(link*) study which found that key traffic junctions are at or near capacity resulting in crippling congestion at peak times. Through the spectrum of air quality we now see that queuing at each of these junctions for several changes of traffic lights with many minutes with engines idling, contributes to damaging levels of pollution at street level to pedestrians and cyclists.

   This same study also identifies that although HGVs account for only 3% of traffic entering the town, some 28% do so unnecessarily as through traffic. Given their disproportionate impact on pollution, we proposed re-routing these HGVs in order to significantly improve air quality in the town centre.

   Traffic management must ensure that traffic entering and leaving RTW does so with the least impact on both exhaust and particulate pollution. The current congestion delivers a stop-start slow journey with the emphasis on braking, tyre wear and engine idling along all approach roads, and increasingly rat-runs on residential streets. The importance of smooth, low speed (20mph town-wide) flows with modernised traffic light controls, restricted on-street parking and loading/unloading should become a priority on air quality grounds alone.

Lack of focus on particulate pollution

Measures to encourage the take up of electric vehicles are welcome, since they produce less pollution at source than diesel or petrol ones. But even these produce harmful particulate emissions from brake, tyre and road wear, which is likely to become the major source of air pollution in the future. This is particularly so in RTW where congestion is as critical levels and monitoring of these pollutants is not undertaken. Measurement of the levels of particulate pollution should be implemented urgently. Various references to

the harmful effects of particulates are listed below:

https://www.centreforlondon.org/reader/street_smarts_report_of_commission_on_future_of_londons_roads_and_streets/chapter-1-challenges-and-opportunities/

From the NHS report – "every breath we take".

Evidence suggests that particles from [the wear of brakes, tyres and the road itself] these sources are rich in transition metals, inhalation of which is associated with toxicological effects. In contrast to exhaust emissions, no regulations exist to control these sources of particles and, with the trend towards heavier vehicles, they look set to increase. Pollution from tyre, brake and road wear also means that even electric and alternatively fuelled vehicles can never be emission free at the point of use.

https://www.rcplondon.ac.uk/projects/outputs/every-breath-we-take-lifelong-impact-air-pollution

The Committee on the Medical Effects of Air Pollutants (COMEAP) estimates 29,000 'equivalent' deaths annually from exposure to PM2.5 in the UK,4 with only a small fraction of that figure relating to exposures to concentrations in excess of legal limits. This figure increases to around 40,000 if the recently described effects of NO2 are taken into account.

A literature review of non-exhaust traffic related emissions. Brake and tyre wear for the EC in 2014 stated:

"non-exhaust traffic related particles, which are either generated from non-exhaust traffic related sources such as brake, tyre, clutch and road surface wear or already exist in the environment as deposited material and become resuspended due to traffic induced turbulence.

It is estimated that exhaust and non-exhaust sources contribute almost equally to total traffic-related PM10 emissions. However, as exhaust emissions control become stricter, relative contributions of non-exhaust sources to traffic related emissions will increasingly become more significant.

There are a number of nonexhaust processes, involving mechanical abrasion and corrosion, which also result in PM generation and have not been adequately studied.

http://publications.jrc.ec.europa.eu/repository/bitstream/JRC89231/jrc89231-online%20final%20version%202.pdf

Para 63 of the parliamentary enquiry on Air Quality 2015-16 fourth session. States:

"Government policy focuses on developing technology to reduce emissions from exhaust systems but vehicles' tyre and brake wear also cause pollution; 75% of transport-generated particulates are from this source.101 Academics urge that greater attention be given to these emissions since they contain smaller particles known to be especially harmful because of their ability to penetrate the lungs and bloodstream.102"

https://publications.parliament.uk/pa/cm201516/cmselect/cmenvfru/479/479.pdf

As already stated, the more effective answer is to convert to methods of transport that are completely free of pollution - namely active travel.

We also suggest that

- More AQMA measuring points should be installed across the town, not just along the A26 spine. We understand that lightweight mobile equipment is easy to install and operate to identify the most polluted locations for all pollutants. We recommend additional measuring at
    - Carrs Corner/Crescent Road where pavements are very narrow and a canyon effect is

created by nearby buildings

- Vale Road from High Street to London Road where where pavements are very narrow and a canyon effect is created by nearby buildings

- Halls Hole Road between Cornford Lane and Pembury Road where traffic queues within the hilly, narrow rock lined road creating very foul air.

- Page 13, section 3 Theme 1 Transport: This Action Plan must also complement the TWBC's Cycling Strategy and KCC/TWBC Active Travel strategies

- The remedial qualities of vegetation have not been mentioned. The green tree lined approaches to the town must be maintained for air quality as well as aesthetic reasons. As the town grows to accommodate more housing, the importance of existing and new parks and open spaces grow too as 'lungs' that help to counterbalance man-made pollution. Loss of green space and front gardens should be resisted.

Appendix – catalogue of documents produced by Town Forum

- Green network plan for Tunbridge Wells (May-15), showed how developing a network of green routes could enable walking (in particular) to replace short car journeys

- Response to KCC consultation on Active Travel (Jun-16) highlighted the existing congestion within Royal Tunbridge Wells and how active travel is the best solution.

- Vision for Royal Tunbridge Wells (Feb-17) emphasises the need for development proposed in the Local Plan to be fully sustainable

- Town Centre Transport Plan (Jun-17) and a submission to Tunbridge Wells Borough Council on its Transport Strategy (Feb-18) for the Local Plan both focussed on the need for Active Travel for the town and how its lack endangers delivery of the new Local Plan because of increased congestion.

- Responses to KCC consultations on Rights of Way Improvement Plan from Sep-17 and Aug-18 emphasised how PROWs need to be seen as a strategic part of the transport network, supporting KCC's strategy of active travel, helping to improve air quality.

End

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