



**Copers Cope Area  
Residents' Association**



27 July 2020

To: Cllr William Huntington-Thresher, Portfolio Holder for Environment and Community Services  
Cllr Will Harmer, Chair of the Environment and Community Services Policy Development and Scrutiny Committee  
Cllr Michael Tickner, Environment and Community Services Policy Development and Scrutiny Committee & Copers Cope Ward Councillor

cc:

Stephen Wells, Copers Cope Ward Councillor  
Russell Mellor, Copers Cope Ward Councillor  
Christine Harris, Kelsey and Eden Park Councillor  
Diane Smith, Kelsey and Eden Park Councillor  
Peter Dean, Kelsey and Eden Park Councillor  
Ian Dunn, Clock House Ward Councillor  
Vanessa Allen, Clock House Ward Councillor  
Josh King, Clock House Ward Councillor  
Kevin Brookes, Penge and Cator Ward Councillor  
Kathy Bance, Penge and Cator Ward Councillor  
Simon Jeal, Penge and Cator Ward Councillor  
Bromley Council Pollution Team

**Re Bromley's revised draft Air Quality Action Plan 2020-2025**

Dear Cllr Huntington-Thresher, Cllr Harmer, Cllr Tickner, ward Cllrs and Pollution Team

We are writing on behalf of the Copers Cope Area Residents' Association (CCARA) and the West Beckenham Residents' Association (WBRA), which between us have over 1750 paid up members across Beckenham wards.

Our Associations support the revised Air Quality Action Plan. As you are aware air-pollution has become an increasing concern for Beckenham residents, especially in light of the high levels of air pollution in this part of the borough. Our Associations echo the excellent points raised in the detailed response provided by our neighbouring group Ravensbourne Valley Residents.

In particular we would like to emphasis the following points:

**[www.coperscope.org.uk](http://www.coperscope.org.uk) & [www.westbeckenhamra.org](http://www.westbeckenhamra.org)**

To protect and promote the interests of residents in matters of local concern.

CCARA, founded in 1935, covering central and northern Beckenham.

WBRA, founded in 1945, covering parts of Kelsey and Eden Park, Clock House and Penge and Cator.

### **No timeframes, milestones of measurements of success**

Whilst the AQAP is well intentioned it will lack any meaning unless there are accountable measures to ensure its effectiveness. We request that annual milestones are included for each objective.

### **Potential for data to be misleading**

Where assumptions are made on modelled data, rather than actual data, the document should make this absolutely clear. For example on page 8 it is quoted "According to GLA data, no primary or secondary schools in Bromley are exposed NO2 concentrations that exceed to annual limits", this reads as if there is actual data evidencing that no schools in the borough are exposed, however the GLA data referred to is not actual data, but modelled data. We request that modelled data referenced is caveated to state that there is no actual data only modelled data.

### **Increased Air Quality Monitoring**

In order for residents to have confidence in the AQAP it is essential Bromley Council install more non passive air quality monitoring stations and across the borough to ensure there is real-time accurate data. We request the council invest in more monitoring stations. Further we would like to see the use of mobile monitoring stations in assessing the air-quality impacts of large scale development and changes to road layout. Displacement of pollution or worse unintentional creation of pollution hotspots must be considered more broadly in planning and highways, and mobile air-quality monitors will enable this to be done.

### **Biodiversity**

Local residents would like to see more trees planted across Beckenham. Our associations can assist in finding locations. Further, when street trees die or are damaged we would like the Council to commit to replacing them as soon as practical (this does not always happen currently and could perhaps be made a target in the AQAP).

Planted-up tree pits have become popular in some roads in Beckenham, we would like the Council and ID Verde to work with residents, residents groups and friends groups to identify land and tree-pits that can be used to plant pollinator gardens. We request the Council implement an easily accessible outreach scheme for tree planting and other biodiversity initiatives. Our associations would be keen to work with the Council on this.

Elmers End Green has been identified for 'expanding and improving green infrastructure'. We welcome the proposal to improve the environment here, however more detail is needed on the concept of the removal of the gyratory to assess its benefits. The WBRA requests that it is registered as a key stakeholder in the feasibility study to implement the removal of the gyratory. There will also be many other opportunities to improve the 'green infrastructure' across Beckenham (the Green, Croydon Road Rec etc) and the borough - the AQAP could be more ambitious in this regard.

### **Active Travel**

Most of the roads in the borough are controlled by Bromley Council and as such there is far more the Council can do to promote and facilitate active travel. The AQAP proposals for improving active travel are insufficient. The three policies to promote active travel through parking policy, free cycle training, Dr Bike sessions, and encouraging schools to join the TfL STARS accredited travel planning programme are lightweight. They do not reflect the well noted concerns from residents in regard to congestion/pollution and the perception of roads being unsafe for active travel listed below.

- Speeding and rat-running on residential roads creating pollution and dissuading walking and cycling.
- Difficult road junctions that cause congestion for cars, are dicey for cyclists and are some of which are hotspots for near-misses.
- Lack of proper crossings on busy roads that are main walking routes to schools, shops and other amenities.

We request that the AQAP be amended to include additional measures to promote active travel that address some of the above concerns. Further, additional measures are needed to support cyclists and encourage new cyclists in Beckenham and across the borough.

### **Schools**

Travel to school often has the following two complaints raised by residents:

- The school drop off by driving causes congestion and inconsiderate parking on roads near schools.
- The route to school not being safe enough for families to walk or cycle, necessitating the need to drive.

The AQAP does not focus enough on measures to get families travelling to school by active means. This will include zebra crossings on walking routes, improved cycle infrastructure and cycling training for students.

In regard to highways improvements to promote active travel, our Association's previously provided a detailed response to 'Funding submission for highway measures to support social distancing during recovery from lockdown' which outlines the Beckenham highways hotspots that have been raised with us by local residents. We are happy to provide any further information and support.

We look forward to the implementation of the new AQAP and would like to thank all those involved.

Yours Sincerely

Chloe-Jane Ross, Chair, Copers Cope Area Residents' Association

Marie Pender, Chair, West Beckenham Residents' Association

Alan Old, Committee Member for Planning, Copers Cope Area Residents' Association