

By Email: airquality@westminster.gov.uk

25 February 2020

Dear Sir or Madam,

Response to Westminster City Council's Air Quality Action Plan Consultation – February 2020

Thank you for the opportunity to respond to Westminster City Council's consultation on the Air Quality Action Plan. Our response is primarily focused on those areas of Westminster City Council that New West End Company (NWEC) works across.

NWEC is a business partnership of 600 UK & international retailers, restaurateurs, hoteliers and property owners in the world's top shopping and leisure destination, anchored by Bond Street, Oxford Street and Regent Street. We work across 74 streets, representing 216,000 employees.

We work in partnership delivering transformational projects, sustainable placemaking and management, destination marketing, advocacy, inward investment and commercial insights.

Improving air quality in the West End is a core aim of New West End Company as part of an overall strategy to create the world's first choice destination to visit, work, invest and locate business; as well as to live.

In parallel to improving the West End's air quality, we are seeking to reducing carbon emissions and work with the council to address the Climate Emergency. In many cases, measures to improve local air quality can also contribute to reducing carbon emissions.

New West End Company is encouraged by Westminster City Council's new five-year Air Quality Action Plan and looks forward to working in close partnership with the city council and other organisations to deliver a West End free from emissions that negatively affect people's health.

New West End Company also supports Westminster City Council's place-shaping plans for the Oxford Street District, including much needed investment in the public realm and creating traffic-free gateways at the key stations, including Oxford Circus.

Oxford Street has the worst air quality in Westminster, both in terms of PMs and NO₂ (pp16 and 17) and is also one of the seven 'Air Quality Focus Areas' in Westminster (p18). Air Quality on Regent Street is also poor. The continuous high level of exposure to poor air quality of workers and residents in particular, but also visitors to Oxford Street, Regent Street and Bond Street, warrants intensive and immediate action beyond the measures and at quicker timescales than in the draft Action Plan.

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The investment in new public realm for the Oxford Street District and the opening of the Elizabeth line in two years' time provides the ideal platform in which to further encourage a switch to sustainable and zero emission at tailpipe modes of transport for commuting, visiting and also business servicing and supplies.

With regards to the overall draft Air Quality Action Plan, we have the following comments, suggestions and/or observations:

1. We strongly welcome the proposals to investigate the feasibility of Zero Emission Zones for the Oxford Street District and Dean Street (p44, Action 62 and 63) and strongly suggest that these are accelerated to ensure they are in place for the whole international centre of Oxford Street, Regent Street and Bond Street in time for the opening of the Elizabeth line within two years.
2. TfL's recently issued [guidance](#) for borough councils on [Zero Emission Zones](#), which can assist Westminster City Council is planning and delivering a workable Zero Emission Zone for the West End or the International Centre.
3. Over the last decade a number of approaches to reducing commercial vehicles have been piloted, which has been informative and in many cases effective, but has also caused the growth in localised schemes, each promoted by a BID, an estate or Westminster City Council. It is confusing for businesses to know which scheme to join and which approach to reducing commercial vehicles they should support. There are also gaps in provision where no scheme is available. It therefore would be beneficial for a strategic body, such as Westminster City Council, to take the best from each localised scheme and develop a single, strategic approach to reducing the number of polluting commercial vehicles in the West End. This may, for example, take the form of micro-distribution centres on the edge of the International Centre, with portage to the final destination, or further differential parking charges and restrictions for polluting vehicles, with discounts for zero-emission at tailpipe vehicles.
4. Reducing emissions from road transport is just one part of resolving the problem. Westminster City Council's draft Air Quality Action Plan (p21) indicates a trend of falling levels of NOX from road transport, while emissions from buildings have become the single largest source of NOX emissions. Consequently, we welcome and encourage more support, targeted measures and incentives to improve the energy efficiency of older buildings.
5. Action 36 (p41), the retrofitting of buildings, could contribute to reducing emissions from the Oxford Street District's historic and listed buildings. We encourage use of the council's Carbon Fund for the delivery of a programme to improve the energy efficiency of listed and historic buildings, which otherwise could be costly to retrofit with energy-efficiency measures.



6. We welcome the focus on additional monitoring and encourage that this is for NO₂, PM₁₀ and PM_{2.5}, and that this is implemented in year one of the new Action Plan, and the data is fully available to the public. We believe that effective air quality monitoring throughout (and beyond) any proposed zero emissions zone is vital both for benchmarking at the start, evaluating progress towards zero emissions and ensuring that this standard, when met, is maintained.

Thank you for considering our suggestions and observations during this process. NWEA are keen to work with WCC to deliver the proposals and look forward to the final policy document.

We are of course happy to discuss any of these points further should that be beneficial.

Yours faithfully,



Jace Tyrrell
CHIEF EXECUTIVE