

**Appendix 2. Summary of consultation responses to the Draft London Borough of Havering Air Quality Action Plan 2018 - 2023**

# Summary of consultation responses to the Draft London Borough of Havering Air Quality Action Plan 2018 - 2023

April 2018

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# 1. Introduction

Following the approval for consultation of the Draft London Borough of Havering Air Quality Action Plan (AQAP) 2018-2023 in December 2017, a consultation process was undertaken for 10 weeks between the 3<sup>rd</sup> January and 15<sup>th</sup> March 2018.

This document summarises the consultation responses and the Council's responses to the issues raised, including resultant changes to the plan.

## 1.1 Consultation Process

There were three main groups of consultees during the consultation process:

- *Statutory consultees* (The Secretary of State / Defra, the Mayor of London, the Environment Agency, Transport for London, all neighbouring boroughs, other public authorities, bodies representing local business interests and other persons/ organisations, as considered appropriate)
- *Internal services* (Public Health, Transport Planning, Planning, Development, Communications, Regeneration, Trading Standards, Highways, Parking, Housing, Asset Management, School Organisations Team, Legal Services)
- *The public*

The above statutory consultees were consulted directly by email. Havering Friends of the Earth were consulted as the main environmental group in Havering.

The consultation was made widely available through Havering consultation webpage. To make it easier for people to provide comments on the Draft AQAP, a survey with specific questions on the AQAP was designed (Survey Monkey) and the link was provided on the consultation webpage.

In order to alert members of the public to the consultation, posters advertising the consultation were posted in all Havering libraries and a few hard copies of the Draft AQAP were made available. Three public sessions were carried out at the Romford Library, South Hornchurch Library and the Council's Public Advice and Service Centre (PASC), during which members of the public had the opportunity to know more about the Council's actions to improve air quality and the consultation on the Draft AQAP. Facebook and Twitter were also used by the Council's Communications Team to promote the AQAP consultation.

## 1.2 The results of the Consultation - Overview

Consultee	Response
Defra	No
Mayor of London / Greater London Authority	Yes (Section 2.1)
Environment Agency	Yes (Section 2.2)
Transport for London (TfL)	No
London Borough of Barking and Dagenham	No
London Borough of Redbridge	Yes (Section 2.3)
London Borough of Bexley	No
Brentwood Borough Council	No

Havering Friends of the Earth	Yes (Section 2.4)
Internal Services	Yes (Section 3)
Public	84 responses (Section 4)

## 2. Consultation Responses from Statutory Consultees

### 2.1 Greater London Authority (GLA)

Comment Number	Comment	Response
2.1.1	The plan contains a good amount of well-presented background information and a very well-presented action table.	Noted.
2.1.2	In Section 5 it would be beneficial to outline your specific air quality priorities in terms of what you plan to focus on for delivery, rather than (or in addition to) the general aims to reduce emissions. I.e. you should pick your top three priority actions from the action plan and list them here.	The actions we will be focusing on during implementation of the AQAP have been listed as priorities in Section 5. Draft AQAP updated.
2.1.3	A number of the actions need targets/objectives so that you can measure whether they have been a success. Although we accept that it is not possible for all actions, it would be possible for many of them, and there are currently no targets for any of the actions. Targets should be added wherever possible.	Targets for a number of actions (1.1, 2.5, 2.6, 2.9, 2.11, 2.12, 3.1, 4.5, 4.7) have been set. Draft AQAP updated.
2.1.4	Some actions, especially in the Action Policy 4 section, need a little bit more detail on what the project will involve and achieve. Action 4.6, for example - how will this engagement be undertaken and by whom? How many businesses do you plan to engage? And Action 4.4 should include a clearer commitment/target around installation of EV charging infrastructure.	Actions 4.4 and 4.6 (now numbered 4.5 and 4.7) have been amended to provide more detail on what they will involve. Draft AQAP updated.
2.1.5	Action 1.3 is not in line with the Mayor's air quality policies and we would suggest removing this action.	This action has been deleted. Draft AQAP updated.

### 2.2 Environment Agency

Comment Number	Comment	Response
2.2.1	<p>In principle an AQAP should;</p> <ul style="list-style-type: none"> <li>i. Have a clear commitment to meeting the AQ standards.</li> <li>ii. Clearly state the current status of air quality within the borough.</li> <li>iii. Clearly report on the progress against targets set out in any previously published Air Quality Action Plans (if appropriate).</li> </ul>	<ul style="list-style-type: none"> <li>i. Already included in the Draft AQAP. No further action.</li> <li>ii. Already included in the Draft AQAP. No further action.</li> <li>iii. This is the first AQAP for Havering. No further action.</li> </ul>

Comment Number	Comment	Response
	<p>iv. Where the borough does not meet the relevant air quality standards, they should clearly detail what mitigation measures will be used to ensure compliance with air quality standards in the shortest possible time period. It should ensure that compliance is not just 'possible' but 'likely'.</p> <p>v. Make clear what other organisations the borough is working with to implement mitigation measures required in 2 above.</p> <p>vi. Include basic costs required to implement the required mitigation standards and compare against the level of funding available.</p> <p>vii. Take steps to ensure the measures in the Mayor of London's SPGs on sustainable design and construction or similar document to an equal or higher standard are implemented into the air quality action plan.</p> <p>viii. Contribute to achieving EU established health-based standards and objectives for the relevant air pollutants (particularly NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>).</p> <p>ix. Future proof the Air Quality Action Plan by adopting the Mayor of London's Draft LES Chapter 4 Air Quality proposals.</p>	<p>iv. Considering the complexity of the matter and the number of different services and organisations involved, it is not possible to achieve compliance in a short time. The AQAP includes a number of both short and long term actions towards achieving compliance. No further action.</p> <p>v. Already included in the Draft AQAP. No further action.</p> <p>vi. As funding has already been secured for the actions set out in the Draft AQAP, it is not considered necessary to include costs for each action. No further action.</p> <p>vii. The Council uses a number of conditions (NRMM, dust monitoring scheme, dust mitigation measures, requirement of air quality assessment etc.) to ensure that the measures set out in the Mayor's SPG are implemented. No further action.</p> <p>viii. Already included in the Draft AQAP. No further action.</p> <p>ix. Already included in the Draft AQAP. No further action.</p>
2.2.2	Air quality policies must work in partnership with transport policies but also the borough's own fleet procurement policies.	Relevant actions already included in the Draft AQAP. No further action.
2.2.3	Any new development, particularly in air quality 'hotspots', as well as major developments will need to consider how they mitigate the impacts of poor air quality, both during construction and operation phase. Mechanisms for minimising air pollution will need to be closely tied into the transport policies in the Local Plan. Construction and demolition works should be required to meet or exceed the requirements set out in the Mayor of London's SPGs, including NRMM requirements.	Relevant actions already included in the Draft AQAP (Action Policy Three). No further action.
2.2.4	Any new air quality strategy should require the further enclosure of existing waste handling sites, and expect future waste development to be fully enclosed within buildings to minimise health impacts and contribute towards air	The existing waste management sites have already been granted permission, so it is not possible to require further enclosure, in case this condition has not already been imposed. Full enclosure will be required for future waste

Comment Number	Comment	Response
	quality neutrality.	management developments. No further action.

## 2.3 London Borough of Redbridge

The London Borough of Redbridge had no objections or comments to the Draft AQAP.

## 2.4 Interest Groups: Havering Friends of the Earth

Comment Number	Comment	Response
2.4.1	<p>i. The third paragraph of the Executive Summary is minimising the problem and is contradicting to the Mayor of London's February 2017 report.</p> <p>ii. The wording 'long and short term objectives' is imprecise.</p>	<p>i. The available data of PM10 and PM2.5 show that there have been no exceedances of the PM10 and PM2.5 objectives since 2015. This is shown in the Council's annual status reports 2015, 2016 which have been formally approved by the GLA. No further action.</p> <p>ii. The wording has been corrected. Draft AQAP updated.</p>
2.4.2	There is no evidence in the AQAP to indicate how funding was used, and the delay in producing an AQAP again suggests the borough is not taking its responsibilities seriously enough with regard to air pollution.	What has already been done to improve air quality is outlined in a number of sections of the AQAP (section 4.2, as well as sections titled 'What has already been done' under each Action Policy.). Many of these actions have been supported financially by the MAQF and LIP funding. No further action.
2.4.3	Havering has more green spaces than many other London boroughs, so we should expect the borough to have cleaner air.	As air pollution is primarily caused by vehicle emissions, inevitably air quality is poor in roads with traffic congestion despite the existence of green spaces. No further action.
2.4.4	Havering has been an AQMA since 2006. This means that levels of pollution are not satisfactory, and, given that (as the London Mayor points out) the designation of AQMA applies to the whole borough, and much of Havering is green space, then the 'hot spots' (identified in Fig 12, p 15) are likely to be seriously polluted.	The designation of the whole borough as an AQMA has been based on data showing that the national air quality objectives for NO2 and PM10 were not met in a certain areas, however in 2006 there were not many air quality monitoring sites. Since then the air quality monitoring has expanded and as part of this AQAP further expansion will be considered. If there is sufficient evidence to allow the Council re-assess the status of the borough as AQMA, this will be undertaken as per the LLAQM procedures. No further action.
2.4.5	The borough comes 4th from the top of the list when it comes to premature deaths from air pollution (Campaign for Clean Air in London (30 June 2010) via Mayor's website), and the AQAP notes high rates of asthma and COPD (section 4, p19). This should be of great concern, and the fact that our residents are more	The facts mentioned are already of high concern and there is a number of actions focusing on vulnerable residents. No further action.



Comment Number	Comment	Response
	vulnerable must mean that Havering requires even stricter controls on air pollution.	
2.4.6	More details and timescale are needed regarding the three strategic transport aspirations mentioned on page 6 of the AQAP	These proposals are strategic, long term and are currently at a very early stage. Further details will be provided in future versions of the AQAP, if/as they become available. No further action.
2.4.7	<p>7.1 More should have been done to publicise the AQ aspect of the PSPOs to increase public awareness of air pollution.</p> <p>7.2 Four schools is only a fraction of those in the borough, and according to a study by Client Earth, published on 26th Feb 2018, 60% of parents support 'pollution exclusion zones' outside schools.</p> <p>7.3 We are sure that schools would welcome more exclusion zones, and anti-idling enforcement should be implemented.</p>	<p>7.1 Noted. No further action.</p> <p>7.2 Due to the uncertainty on the extension of the scheme it has not been included as a future action of the AQAP. Further PSPOs may be considered taking account of available resources and in line with the Council's School Safety PSPO Application Policy. No further action.</p> <p>7.3 Any comments received from schools will be considered. No further action.</p>
2.4.8	More should be done to make parents and other drivers aware of their contribution to children's ill health. How about tackling idling?	Anti-idling is one of the key messages of Miles the Mole project (action 2.2). This action focuses on schools therefore raises awareness of the parents as well. As part of action 2.2 an anti-idling campaign will be considered in liaison with Communications Team. The outcomes of this campaign will be assessed and further enforcement actions will be considered as a next step in future versions of the AQAP. No further action.
2.4.9	Measurements of pollutants are of course essential to arrive at a precise picture of pollution, but the fact that roads account for over 65% of pollution is already well-known, and what is needed is action to deal with this.	Relevant actions already included (Action Policies 2 and 4) in the Draft AQAP. No further action.
2.4.10	Clean-up of the Havering's own vehicles is welcomed, of course, but the borough's own fleet must only comprise a small fraction of all the vehicles that journey around Havering.	It is recognised that the Council's fleet is a small fraction of all the vehicles, but the Council aims to set an example. There is also action 4.7 regarding engaging with businesses to discuss upgrading their fleet. No further action.
2.4.11	Action Policies One and Two although useful, do nothing to reduce air pollution.	Action Policy One is considered necessary, as all actions towards improving air quality need to be based on representative and reliable data. Action Policy Two is also considered necessary, as awareness raising is the

Comment Number	Comment	Response
		first step to tackle air pollution. No further action.
2.4.12	Action 1.2: In our view any school that has a large amount of vehicles near it is bound to have poor air quality.	The Council needs to make sure that resources are focused where the most significant air pollution problems are identified. To achieve this air quality data is necessary to identify the magnitude of the problem. No further action.
2.4.13	Action 1.3: Focusing actions on key hotspots should clearly be a priority. The question is what actions?	Some of the actions under Action Policies 3 and 4 aim to focus on main roads which are known as air quality hotspots (e.g. actions 4.2, 4.8). Other actions while not focusing on hotspots (e.g. 4.1, 4.3, 4.5 etc.) aim to increase the number of less polluting vehicles, therefore this will help reduce air pollution in hotspots as well. No further action.
2.4.14	While 'raising public awareness and encouraging smarter travel' is laudable, the focus should shift from how to cope with or avoid air pollution to how to prevent it.	Relevant actions already included (Action Policies 3 and 4) in the Draft AQAP. No further action.
2.4.15	The whole AQAP needs to address the basic contradiction between encouraging growth of business and housing whilst not increasing air pollution.	This is addressed under Action Policy Three: Reducing emissions from buildings and developments. No further action.
2.4.16	Question on actions 2.4, 2.11, 2.12: How will this be done? What targets does the borough have and what is the time scale?	Action 2.4 has been deleted, as it was general and already covered by other more specific actions. Draft AQAP updated.  Action 2.12 (now numbered 2.11) has been amended to provide clarity and further details on what is involved. A target for action 2.12 has also been set. Draft AQAP updated.  We believe that action 2.11 (now numbered 2.10) is sufficiently clear and no change has been made. No further action.
2.4.17	Grants for householders to improve energy efficiency are welcome – but more needs to be done to publicise this and encourage householders to improve their insulation etc. Why no mention of solar panels?	Solar panels are also part of the Council's energy efficiency schemes which are primarily delivered by the Council's Energy Strategy Team. No further action.
2.4.18	Action 3.6: very much to be welcomed, but needs to be taken further as more trees, plants and shrubs are needed near sources of air pollution. Why is this only listed as a change to planning controls? There should be action on this.	Relevant action 4.8 already included in the Draft AQAP. No further action.
2.4.19	Action Policy Four: The first action point is merely to provide advice to businesses. Does the council have no	Action Policy Four do not include only provision of advice, but enforcement actions as well. No further action.

Comment Number	Comment	Response
	powers beyond giving advice?	
2.4.20	Actions 4.1-4.3 address the council's own transport. Again, this is only a small part of the problem.	It is recognised that the Council's fleet is a small fraction of all the vehicles, but the Council aims to set an example. There is also action 4.7 regarding engaging with businesses to discuss upgrading their fleet. No further action.
2.4.21	The penultimate action point addresses the need for 'greenery and trees... along main roads and town centres. This should be a high priority in the AQAP.	The order of the actions in the Draft AQAP is not linked to prioritisation of the actions. It should be noted that there is currently not sufficient evidence for the benefits of planting purely for air quality purposes. The available evidence has shown some benefits mostly in relation to particulate matter reduction and not NO2. No further action.
2.4.22	Develop Local Implementation Plan to support improvements in local air quality; together with working with TfL to ensure pollution sources outside of local control i.e. buses and commuter traffic are dealt with. Is 'developing a plan' the most that can be done?	Upgrading the bus fleet is not in the Council's powers, however we are working with TfL on this. No further action.

### 3. Consultation Responses from Internal Services

#### 3.1 Public Health

Comment Number	Comment	Response
3.1.1	<p>We suggest to set a locally measurable and achievable target, such as specific target for reduction of NO<sub>2</sub> or PM10 levels.</p> <p>It is clear from Figure 4 that around half the diffusion tube monitoring sites exceed the mean annual NO<sub>x</sub> limits. Could we therefore suggest that an interim target be set around reducing the number of monitoring stations exceeding the annual NO<sub>x</sub> mean by e.g. 10 stations?</p>	<p>Specifying the desired reduction of NO<sub>2</sub> or of the number of monitoring sites exceeding the annual mean objective is not possible, because the outcome of many of the actions cannot be directly linked to the levels of NO<sub>2</sub>. Measurable targets have been set where it is clear how progress will be monitored. No further action.</p>
3.1.2	<p>i. It would be useful to have a single map that shows the location of the monitors that exceed the EU limit for NO<sub>x</sub> Annual mean and the hot spots we've identified for action to demonstrate that our actions are targeted in the right place.</p> <p>ii. It is not clear from the action plan whether local projects, such as air quality monitoring done by schools or community groups are fed into the overall monitoring data. I would suggest that encouraging greater community involvement in monitoring air quality, through local projects, may help to promote local ownership of the issue and that we all have a responsibility to help improve air quality.</p> <p>iii. As a suggestion, might it be possible to create a local air quality network website where local people could find out how to set up a monitoring station; report their observations or data; and share ideas for initiatives/projects? Not only would this increase the range of monitoring data, but it might also encourage a community of air-quality aware residents.</p>	<p>i. We agree that would be very useful. Due to time limitations it is not possible to develop this map and include it in the AQAP, but it will be included in future versions of the AQAP and/or the Council's website.</p> <p>ii. While local projects are encouraged, e.g. using the AQMesh pods around schools etc., these devices have not been officially approved by Defra and therefore the data collected can only be considered indicative and cannot be fed into the overall monitoring data. No further action.</p> <p>iii. Air quality monitoring is a highly specialist service and needs to be carried out properly (i.e. using appropriate equipment, carried out by people who have knowledge / experience), otherwise there is a high risk of not receiving good quality data which will lead to wrong conclusions. We will however try to improve the degree of public information and engage with the residents as much as possible to raise their awareness. No further action.</p>
3.1.3	<p>Proposed actions to strengthen the AQAP:</p> <p>i. Limit parking within the vicinity of all schools not just those with parking problems.</p>	<p>i. This action has been considered and it has been decided not to include it in this first version of the AQAP, as we have primarily focused on raising awareness on air quality. The outcomes of the proposed actions will be assessed during the progress</p>

Comment Number	Comment	Response
	<p>ii. Provide a network of safe cycle lanes across the borough to encourage sustainable transport</p> <p>iii. Encourage and support more schools to adopt PSPOs.</p> <p>iv. Raise cost of parking in the borough to encourage walking for short journeys</p>	<p>reviews of the AQAP and further enforcement actions, such as parking restrictions will be considered in future versions of the AQAP.</p> <p>ii. As part of funding that has been allocated by Transport for London, the Council is currently looking at options for improving pedestrian and cycling access along the A1306 to support the Rainham and Beam Park Housing Zone. The Council will continue to explore opportunities to improve cycling infrastructure where this supports new development.</p> <p>iii. Due to the uncertainty on the extension of the scheme it has not been included as a future action of the AQAP. Further PSPOs may be considered taking account of available resources and in line with the Council's School Safety PSPO Application Policy. No further action.</p> <p>iv. A relevant action has already been included in the Draft AQAP (action 4.6). No further action.</p>
3.1.4	<p>i. We support the creation of supplementary planning guidance on air quality, and would add to this that all developers should consider air quality impacts in a Health Impact Assessment of their development.</p> <p>ii. Action 3.2: it might be useful for Local Planning Officers to consider the location of new schools, avoiding building them in areas of poor air quality to protect children from harm.</p> <p>iii. Action 3.5: could we suggest adding into the benefits column, the mental health and wellbeing benefits that can be achieved through greening as well as the air quality benefits.</p>	<p>i. This will be considered to be included in the Supplementary Planning Guidance, but we will need to make sure that this is line with the Mayor of London's guidance. No further action.</p> <p>ii. Environmental Protection (EP) provides comments on planning applications, including new schools, in relation to air quality matters. If the available evidence shows that children will be introduced to an area of poor air quality, EP will recommend refusal of the planning application unless adequate mitigation measures can be taken. No further action.</p> <p>iii. Draft AQAP updated.</p>
3.1.5	<p>i. The largest challenge in action policy area Four appears to be the level of commuting along major transport routes (A12, A13, A127) that are outside of Havering's local authority control. It will therefore require a significant amount of partnership working with both the Mayor</p>	<p>i. We agree that partnership working and support from senior management and Councillors are key to the successful implementation of the AQAP. No further action.</p>

Comment Number	Comment	Response
	<p>and councillors from neighbouring boroughs to work collaboratively to reduce the amount of traffic commuting through the borough. This will require both adequate provision of alternative, and preferably sustainable, transport modes as well as behavioural change in the commuters themselves. Might we suggest strengthening the plan to make it more explicit as to what the level of senior leadership will be, including councillors and upper tier staff.</p> <p>ii. In order to reduce the amount of car traffic coming in to the town centre, has Havering considered a park and ride scheme?</p> <p>iii. Action 4.2: the provision of dedicated bus and coach drop off zones outside schools could be further strengthened by requiring the bus and coach companies providing these services to sign up to an anti-idling policy, perhaps as part of their contract?</p>	<p>ii. The Council commissioned consultants to undertake a feasibility study into delivering a Park and Ride scheme in the borough. It was considered that a Park and Ride scheme in Romford would require considerable subsidy to fund its operation which was likely to be excessive in comparison to the benefits to be gained from pursuing the scheme. No further action.</p> <p>iii. This recommendation will be considered as part of this action in liaison with Asset Management Team. No further action.</p>
3.1.6	<p>Consideration should be given to the modes of transport available to older people. Whilst walking and cycling are the preferable forms of transport, how can we support older people to consider mobility scooters to maintain independence rather than their cars? What would facilitate sufficient provision of scooter charging points in our town centres to encourage their use? Perhaps we could strengthen any schemes in place to support people to purchase such scooters.</p>	<p>Strengthening the existing funding schemes for mobility equipment will be considered in liaison with Adult Social Care and can be included in future AQAPs. No further action.</p>

### 3.2 Transport Planning

Comment Number	Comment	Response
3.2.1	Proposed change on page 20, section 4.2, first bullet point: delete Rainham from Rainham & Engayne Primary School.	Draft AQAP updated.
3.2.2	Complete review date on page 22.	Draft AQAP updated
3.2.3	Corrections on numbers of STARS	Draft AQAP updated.

Comment Number	Comment	Response
	accredited schools on page 26 (16 schools Bronze level, 5 schools Silver level, 4 schools Gold level).	
3.2.4	Page 26: add Smarter Travel and Comms Team	Draft AQAP updated.
3.2.5	Action 2.1: Addition of cycling	Draft AQAP updated.
3.2.6	Delete action 2.3 as funding application was unsuccessful	Action amended to include a cross borough bus rapid study aiming to improve access to the London Riverside BID. Draft AQAP updated.
3.2.7	Delete action 2.4, as it is too general and covered elsewhere.	Draft AQAP updated.
3.2.8	Action 3.7: Change funding as it is unlikely to justify LIP funding.	LIP Funding replaced with Public Protection staffing. Draft AQAP updated
3.2.9	Delete action 3.11, as it is already covered by action 3.10	Draft AQAP updated.

### 3.3 Development

Comment Number	Comment	Response
3.3.1	Undertake some feasibility work on re-routing buses in Romford so that they don't come past Romford station and Western Road.	This action has been added to the AQAP (action 4.10). Draft AQAP updated.
3.3.2	Undertake some feasibility work to investigate the air quality benefits of including planting and green walls within the masterplan.	There is currently not sufficient evidence for the benefits of planting purely for air quality purposes. The available evidence has shown some benefits mostly in relation to particulate matter reduction and not NO2, therefore it has been decided not to include this action in this first version of the AQAP. This recommendation will be re-considered during progress reviews and may be included in future versions of the AQAP. No further action.

### 3.4 Regeneration

Comment Number	Comment	Response
3.4.1	Proposed correction on page 5 to read: 43 square miles.	Draft AQAP updated.
3.4.2	Proposed addition on page 11 to include A1306 where higher concentrations of PM2.5 are expected.	Draft AQAP updated
3.4.3	Page 17: What is the proposed effect of TfL's bus service review?	The effect is not known. No further action.

Comment Number	Comment	Response
3.4.4	Page 19: i. Note that industrial sites in Harold Hill & Harold Wood have not been mentioned. ii. 6.3% of all deaths in outer London boroughs are attributable to air pollution?	i. Noted. No further action. ii. Yes. No further action
3.4.5	Page 20: The Council's assessment that PM10 objectives will not be met in the future is conflicting with Section 3.1	Accepted. Correction on Page 20. Draft AQAP updated.
3.4.6	Page 20: Has the effect of PSPOs been displaced to surrounding areas?	No. No further action.
3.4.7	Page 21: How much the staff trips / mileage have been reduced?	There are no figures available. No further action.
3.4.8	Page 22: Are aiming at specific reductions of emissions from developments and transport	No specific target on reduction of emissions has been set in the Draft AQAP. No further action.
3.4.9	Section 5.1: We could include S106 agreements as funding source	Accepted. Addition made. Draft AQAP updated.
3.4.10	Page 26: Forecasts show that over 65 population percentage in Havering is expected to grow.	Addition made. Draft AQAP updated.
3.4.11	Action 2.3: Amend action to include strategic review of buses in the area.	Action amended to include a cross borough bus rapid study aiming to improve access to the London Riverside BID. Draft AQAP updated.
3.4.12	What does STARS stand for?	Explanation of STARS added. Draft AQAP updated.
3.4.13	Action 2.11: Proposed addition to action to read "...Havering staff...")	Addition made. Draft AQAP updated.
3.4.14	Page 32: Proposed amendment to take account of medium environmental impacts as well (apart from short and long term impacts)	Proposed amendment not considered necessary. No further action.
3.4.15	Page 32: Does programme Homes in Havering still exists or not?	This is included in the Section what has been done, not as future action. No further action.
3.4.16	Action 3.3 Is the wording correct? Do we want to promote CHPs?	There are specific emission limits for CHPs. The wording is correct. No further action.
3.4.17	Proposed addition to action 3.6 to read "...for innovative and recognised green space..."	Addition made. Draft AQAP updated.
3.4.18	Action 4.1: Suggestion to specify what is meant by 'large' council contracts.	This can be examined / defined during implementation of the AQAP. No further action is required.
3.4.19	Actions 4.2, 4.3: Typo corrections	Corrections made. Draft AQAP updated.
3.4.20	Include electric car charging points in planning applications	There is already a relevant planning condition. No further action.



Comment Number	Comment	Response
3.4.21	Action 4.5: The review of parking charges needs careful consideration	Noted. This will be considered during implementation of the AQAP. No further action.

### 3.5 Schools Organisation Team

Comment Number	Comment	Response
3.5.1	Page 20, section 4.2, 1 <sup>st</sup> bullet point: Has funding been committed to allow the PSPO scheme to continue indefinitely at the four schools where it has already been implemented? Is it possible for new PSPO schemes to be set up at additional schools around the borough? What is the mechanism for implementing this? Has funding been identified/committed to enable PSPO scheme to be implemented at other schools? The PSPO scheme has been very popular with the four schools that have them, with other schools keen to implement a PSPO if possible. While it is a popular initiative I think there needs to be some clarity as to whether it is something that can be rolled out across all schools in the borough and how this can be achieved. If this can't be implemented at additional schools then this should be stated.	Funding is available until 2019, with possibility to extend, however this will depend on whether there will be a Business Case to show value for money. Other schools can also apply, but they need to meet the criteria set out in the Council's School Safety PSPO Application Policy. Due to the uncertainty on the extension of the scheme it has not been included as a future action of the AQAP.  A sentence has been added in Section 4.2 to provide clarification on these questions. Draft AQAP has been updated.
3.5.2	Page 20, section 4.2, 4 <sup>th</sup> bullet point: Is there scope for this to be extended to other schools in the borough?	There is currently uncertainty on the extension of the scope, this is why no relevant future action has been included. No further action.
3.5.3	Page 26: What strategy is in place to encourage more schools to use their School Travel Plans very actively? Could there be a reward scheme within individual schools to encourage further use of STPs or is this covered by the TfL STARS scheme?	The TfL STARS scheme is very actively used within the borough. Presently the borough has almost 90 schools with approved School Travel Plans (STP's), and over 55 schools issue their STP's very actively. Havering currently has 55 accredited schools, 16 schools at bronze level, 5 schools at Silver level and 34 schools at Gold level. One of the requirements for schools being eligible for a Small Grant is that they have to be an accredited school. No further action.
3.5.4	Action 2.10: Could the cycle training budget to promote "bike ability" in primary schools be rolled out to secondary schools too?	Yes. The word primary has been deleted, so this budget can be used in secondary schools as well. Draft AQAP updated.
3.5.5	Action 4.2: Is this something that is planned or something that has already been implemented? There are many school sites within Havering where it would not be possible to implement such	Noted. The feasibility of this action will be considered further during the implementation of the AQAP. No further action.

Comment Number	Comment	Response
	a drop off zone. It also needs to be acknowledged that the introduction of any such zone would likely be used by parents to pick up/drop off children, possibly leading more children travelling to school by car and fewer children using sustainable methods such as walking or cycling.	

### 3.6 Trading Standards

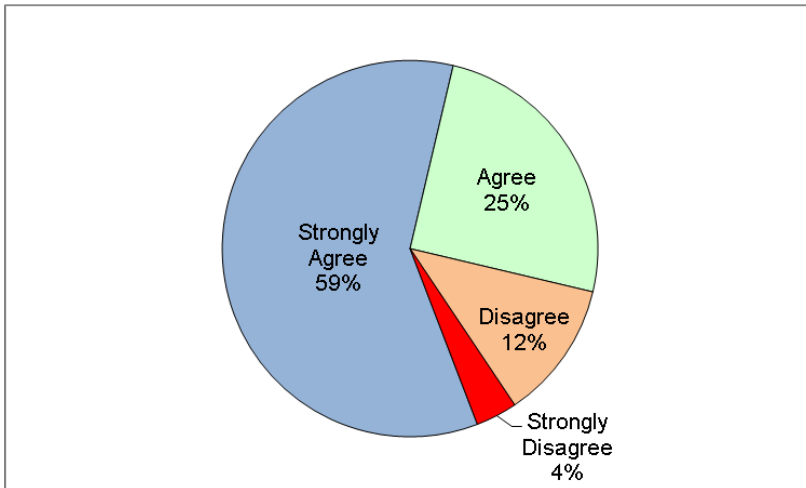
Comment Number	Comment	Response
3.6.1	Trading Standards routinely check all the weighbridges used commercially by (usually large) vehicles across east London and Southwark on a biannual basis. We generally find these have a failure rate of about 50%, and this will usually mean that the weighbridge is under-weighing, showing the vehicle is light rather than heavy. There is some evidence suggesting that the emissions of overloaded vehicles could be higher. Therefore checking the weighbridges could have an air quality benefit	This action has been added to the AQAP (action 4.11). Draft AQAP updated.

## 4. Responses from the Public

### 4.1 Responses by Question

**Q1: To what extent do you agree or disagree with the following statement:  
“Air pollution is an important issue”.**

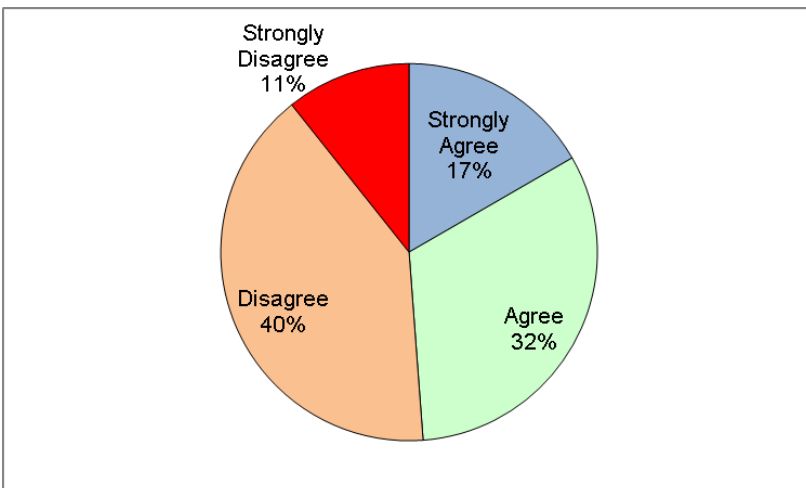
100% (84) respondents answered this question.



**Figure 1:** Breakdown of answers to the statement “Air pollution is an important issue”

**Q2: To what extent do you agree or disagree with the following statement:  
“The air quality in Havering is poor”.**

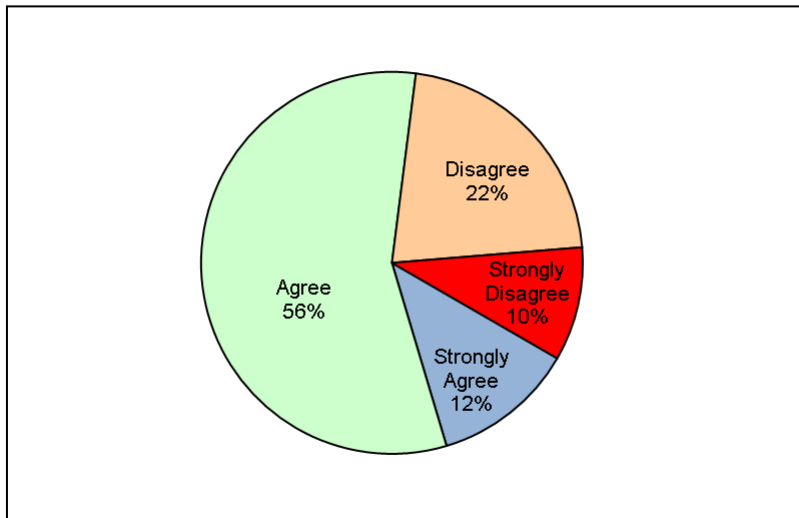
100% (84) respondents answered this question.



**Figure 2:** Breakdown of answers to the statement “The air quality in Havering is poor”

**Q3: To what extent do you agree or disagree with the following statement:  
“I can take action to help improve air quality in Havering”.**

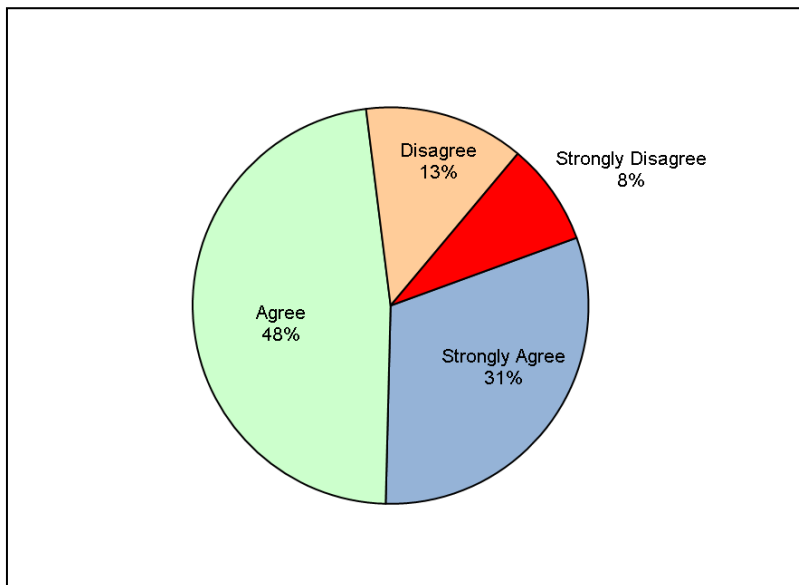
98.8% (83) respondents answered this question.



**Figure 3:** Breakdown of answers to the statement “I can take action to help improve air quality in Havering”

**Q4: To what extent do you agree or disagree with the following statement:  
“It is the responsibility of Havering Council to improve air quality in Havering”.**

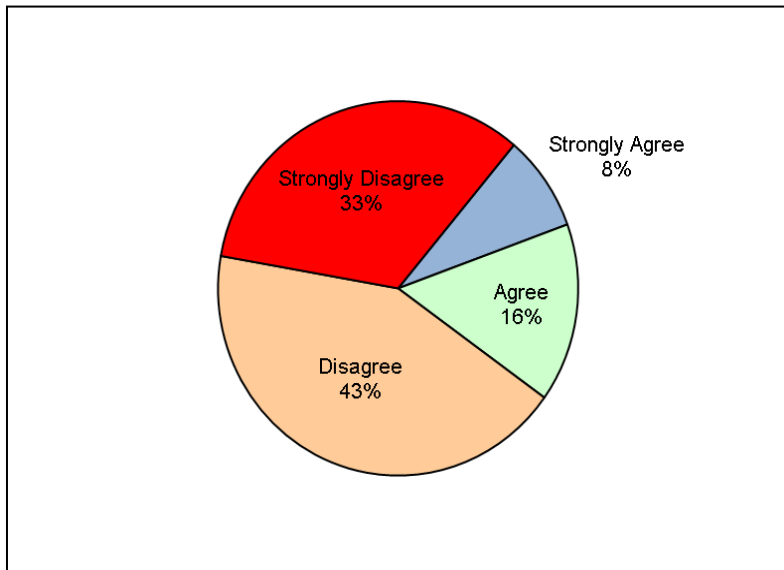
100% (84) respondents answered this question.



**Figure 4:** Breakdown of answers to the statement “It is the responsibility of Havering Council to improve air quality in Havering”

**Q5: To what extent do you agree or disagree with the following statement:  
“Air quality is not within our local control”.**

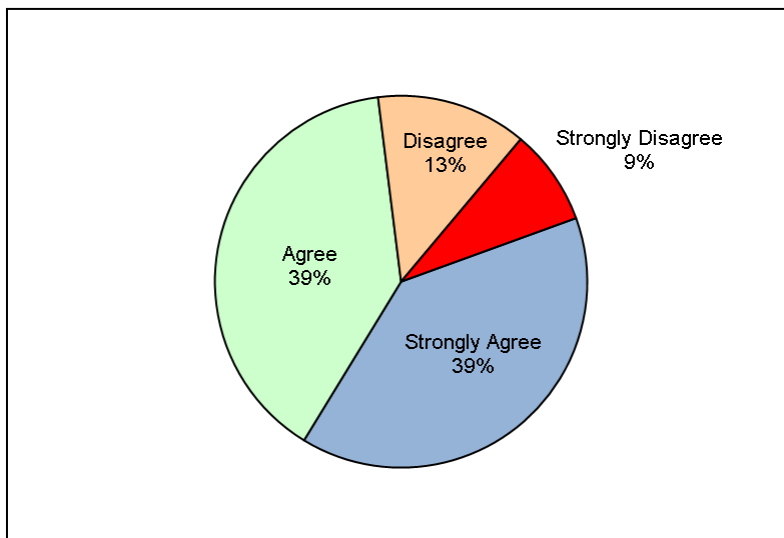
100% (84) respondents answered this question.



**Figure 5:** Breakdown of answers to the statement “Air quality is not within our local control”

**Q6: To what extent do you agree or disagree with the following statement:  
“Poor air quality affects my health and wellbeing”.**

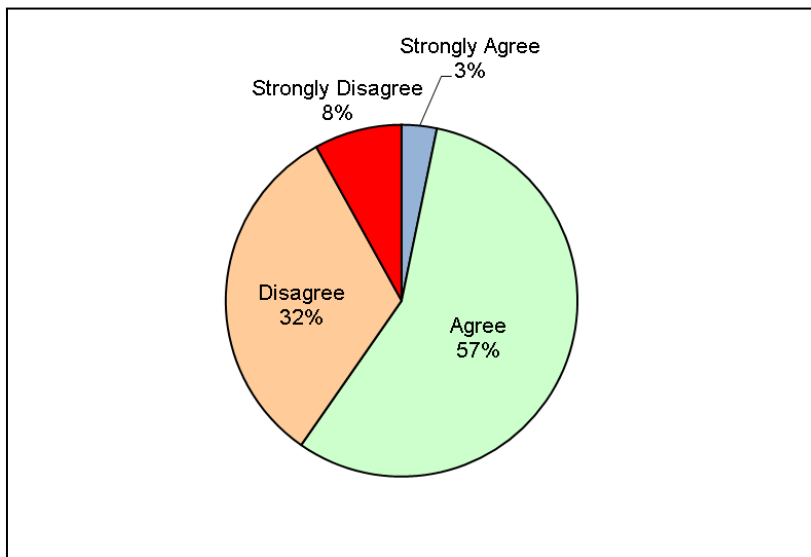
100% (84) respondents answered this question.



**Figure 6:** Breakdown of answers to the statement “Poor air quality affects my health and wellbeing”

**Q7: To what extent do you agree or disagree with the following statement:  
“The draft Air Quality Action Plan is easy to understand”**

74% (62) respondents answered this question.



**Figure 7:** Breakdown of answers to the statement “The draft Air Quality Action Plan is easy to understand”

**Q8: Is the proposed approach and its pace realistic and achievable for Havering?**

98.8% (83) respondents answered this question

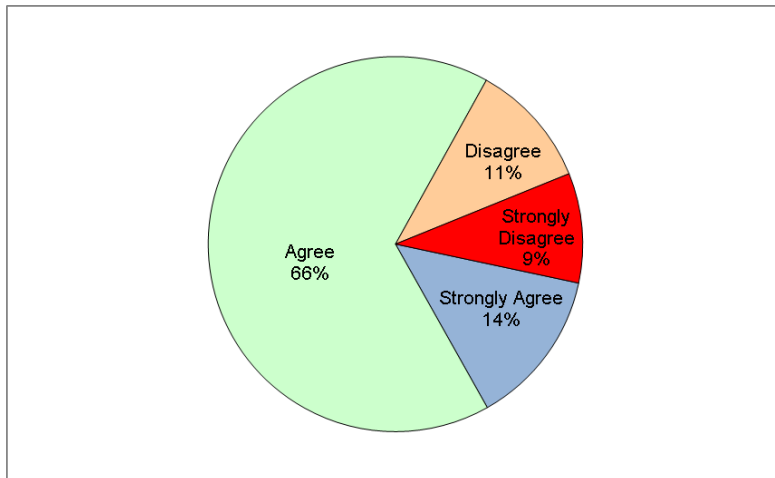
The breakdown of answers is provided below:

- Yes (23.8%)
- Yes, but more should be done (15.7%)
- Possibly / I hope so (4.8%)
- No / Probably not (18.1%)
- The AQAP lacks targets / priorities (3.7%)
- There are no strong direct actions / it is all about encouragement (3.7%)
- Not sure (9.7%)
- Didn't answer whether approach and pace are realistic but provided comments (20.5%)

Suggested actions under this question were: reduction / ban of bonfires, pavement maintenance, tree planting, removal of speed humps, reduction of cars / HGVs / buses in Romford, development of local high streets so that people can walk/cycle more.

**Q9: Do you agree or disagree with the proposed actions for air quality monitoring and modelling? (Action Policy One)**

88% (74) respondents answered this question.



**Figure 8:** Breakdown of answers to the question “Do you agree or disagree with the proposed actions under Action Policy One?”

**Q10: What other suggestions do you have to improve Havering's air quality monitoring? Please include here any specific locations for the best placement of future monitoring stations.**

69% (58) respondents answered this question

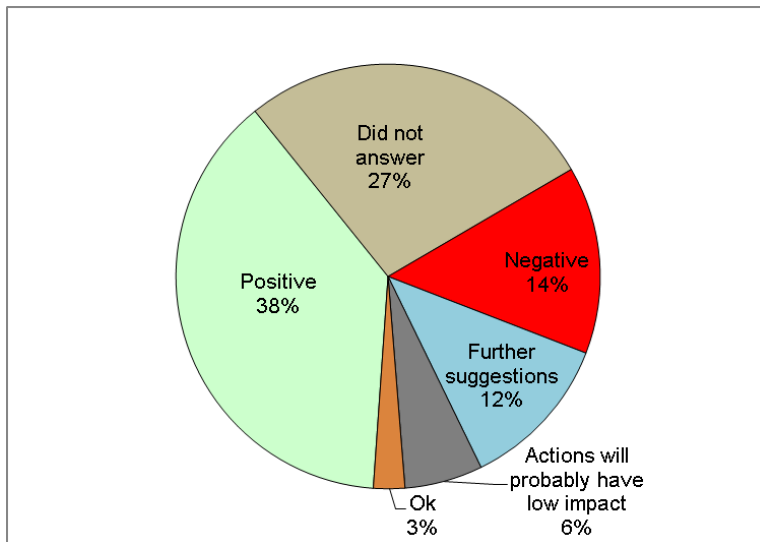
The breakdown of answers is provided below:

- Did not answer / No further suggestions (42%)
- Suggestions / Comments not relevant to Action Policy One (21.5%)
- Specific monitoring locations were suggested (15.5%)
- Monitor air quality around schools (6%)
- Monitoring is expensive and/or does not reduce pollution / has no impact (6%)
- Data should be published (e.g. visual alerts, Council's webpage) (2.5%)

Other answers included: air quality monitoring is not representative, ensure all areas within the borough are covered, the residents should be more involved in air quality monitoring, record more accurately the number of people with asthma, carry out monitoring close to industrial estates, carry out monitoring at sites of future developments.

**Q11: What is your opinion of the proposed actions for public health and awareness raising to encourage smarter travel? (Action Policy Two)**

77.3% (65) respondents answered this question.



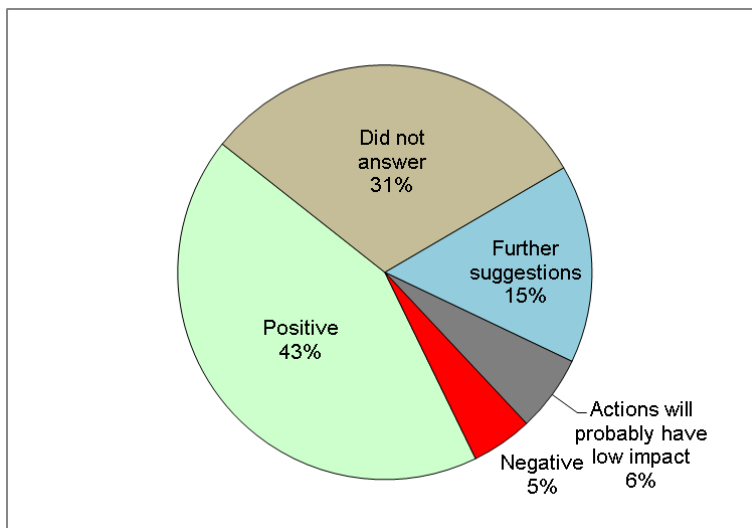
**Figure 9:** Breakdown of answers to the question “What is your opinion of Action Policy Two?”

Common themes from the proposed additional actions are as follows:

- Discourage engine idling
- Improve cycle infrastructure (e.g. more cycle lanes, bicycle storage space etc.)
- Plant more trees / green walls

**Q12: What is your opinion of the proposed actions for reducing emissions from buildings and developments? (Action Policy Three)**

69% (58) respondents answered this question.



**Figure 10:** Breakdown of answers to the question “What is your opinion of Action Policy Three?”

Common themes from the proposed additional actions are as follows:

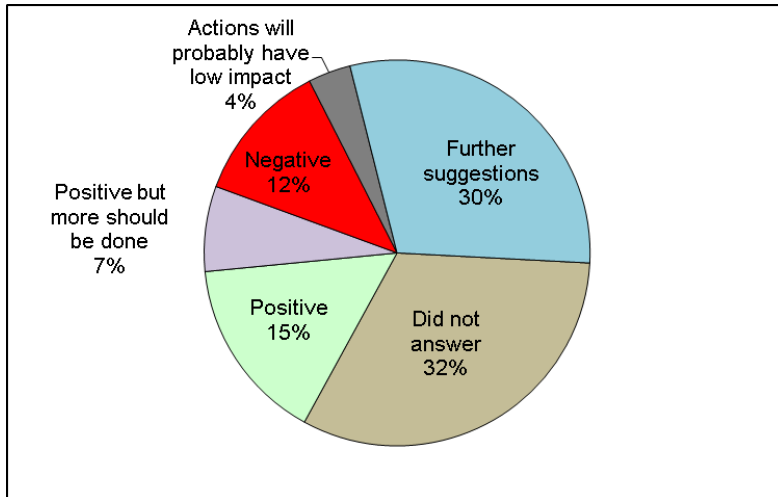
- Offer grants / subsidies to house owners to invest in energy efficiency and reduce environmental impact of their houses (e.g. replace old boilers, install insulation etc.)
- More renewable energy in new developments



- Introduce more solar panels

**Q13: What is your opinion of the proposed actions for reducing emissions from transport? (Action Policy Four)**

68% (57) respondents answered this question.



**Figure 11:** Breakdown of answers to the question “What is your opinion of Action Policy Four?”

Common themes from the proposed additional actions are as follows:

- Increase electric car charging points
- Improve cycle lanes
- Provide more incentives to businesses to improve their fleets / reduce reliance on vehicles
- Enforcement actions against polluting vehicles
- Upgrade bus fleet

**Q14: Do you have other suggestions on what actions the Council should consider taking to improve air quality in Havering?**

56% (47) respondents answered this question.

Common themes from the proposed additional actions are as follows:

- Actions to reduce pollution around schools (e.g. restrict / ban parking, discourage idling vehicles, change school run, children should only be admitted when they live at walking distance, more encouragement to parents not to use car) (23.5%)
- More green spaces / trees / planting (11%)
- Improve cycle lanes / infrastructure (8.5%)
- Improve public transport (e.g. frequency, lines etc.) (8.5%)
- Remove speed humps (6.3%)

- Enforce parking restrictions (6.3%)
- Improve traffic design and roads (e.g. remodel junctions) within the borough to smooth out traffic flows (4.2%)
- More actions to encourage electric vehicles (4.2%)
- Upgrade bus fleet (4.2%)
- Improve communication / information on air quality (e.g. displays, posters etc.) (4.2%)

Other proposed actions include: reduce new developments, more solar panels, enforcement actions against polluting cars, prohibit / reduce garden bonfires, make traffic lights smarter, cycle workshops, more incentives to businesses.

**Q15: Do you have ideas as to how residents could support this Air Quality Action Plan and help improve air quality in Havering?**

40.5% (34) respondents answered this question.

Common themes from the proposed actions which could be taken by the residents to help improve air quality are as follows:

- Reduce car use / use alternative transport modes (e.g. walking, cycling, public transport) (44%)
- Engage more with the Council (18%)
- Make homes more energy efficient (9%)
- Have gardens / plant more (6%)
- Replace polluting cars / use of electric vehicles (6%)
- Reduce garden bonfires (6%)

Other proposed actions include: avoid peak times when using car, stop idling, keep cars serviced.

## **4.2 The Council's response**

The consultation comments outlined in Section 4.1 and the Council's response are provided in Appendix 1. The Draft AQAP has been amended where considered necessary.

## 5. Proposed Changes to the Draft Air Quality Action Plan

Having taken into account the consultation responses, we have identified suggestions that have been incorporated into the AQAP and have produced an updated version of the Draft AQAP with tracked changes and comments so that it is clear where and why changes have been made.

The majority of the proposed changes to the Draft AQAP are minor amendments to

- Incorporate suggestions from the consultation and provide clarifications.
- Bring the AQAP up to date given that it was drafted in October 2017.
- Correct minor typos.

The following changes to the Draft AQAP are considered more significant.

- Top 3 priorities have been set

This change has been made in response to the GLA's recommendation (comment 2.1.2). Taking into account that most of the actions under Action Policy 1 are ongoing actions and statutory requirements under Part IV of the Environment Act 1995 and the Local Air Quality Management system for London (LLAQM), the three priority actions have been selected from Action Policies 2, 3 and 4.

More specifically, Actions 2.3, 3.10 and 4.2 have been set as the Council's three priority actions. The first two aim to improve accessibility to Romford, Rainham and Beam Park areas by creating and promoting a choice of sustainable transport modes for the residents. This is expected to reduce car reliance and associated emissions and will therefore deliver air quality benefits. The introduction of dedicated drop-off zones for buses and coaches outside schools is expected to reduce congestion outside schools and in surrounding local roads and therefore lead to air quality improvement on the school run.

- Targets have been set for specific actions

This change has been made in response to the GLA's recommendation (comment 2.1.3). It should also be noted that setting targets and priorities in the AQAP has been raised through public consultation as well. Setting measurable targets for all the actions was not possible, however targets have now been added, where possible, and the progress of these actions will be assessed against the targets set.

- Action 1.3 has been deleted

This change has been made in response to the GLA's recommendation (comment 2.1.5), as it was considered not to be in line with the Mayor's air quality policies.

- Action 2.4 has been deleted

This action (Promote use of public transport) was too general and already covered by other more specific actions under Action Policy 2, as such, it has been decided to delete this action.

- Action 3.11 has been deleted

This action (A1306 redesign) was already covered by Action 3.10, as such, it has been decided to delete this action.

- Action 2.3 has been deleted and replaced with a new action

This action was included in the original Draft AQAP, as the Council supported the London Riverside BID with its submission of an application for funding to provide a shuttle bus service in Rainham. However, this application was unsuccessful. Other options for improving access to the London Riverside BID will be examined as part of a TfL led initiative to commission a cross borough bus rapid transit study, therefore action 2.3 has now been replaced with a new action.

- Action 4.10 has been added

This action has been added primarily in response to the Council's Development recommendation (comment 3.3.1). Improving access into Romford town centre and addressing air pollution in the area which is one of the local "hotspots" in Havering has been raised through the public consultation as well. It has therefore been decided to undertake a feasibility study to examine the air quality implications of re-routing of bus services away from Romford town centre and look options for improving sustainable travel access.

- Action 4.11 has been added

This action has been added in response to the Council's Trading Standards recommendation (comment 3.6.1). Routine checks of the weighbridges used commercially by (usually large) vehicles across east London and Southwark are already carried out by the Council's Trading Standards. The available evidence suggests that overloaded vehicles may have higher emissions (and therefore increase air pollution), as such it has been decided to add this action to the AQAP.

## Appendix 1. Consultation Comments submitted via Survey Monkey and the Council's response

Question	Number of responses	Consultation Comments	The Council's Response
Q1: To what extent do you agree or disagree with the following statement: "Air quality is an important issue"	50	Strongly agree	Noted. No further action.
	21	Agree	
	10	Disagree	
	3	Strongly Disagree	
Q2: To what extent do you agree or disagree with the following statement: "The air quality in Havering is poor".	14	Strongly agree	Noted. No further action.
	27	Agree	
	34	Disagree	
	9	Strongly Disagree	
Q3: To what extent do you agree or disagree with the following statement: "I can take action to help improve air quality in Havering"	10	Strongly agree	Noted. No further action.
	47	Agree	
	18	Disagree	
	8	Strongly disagree	
Q4: To what extent do you agree or disagree with the following statement: "It is the responsibility of Havering Council to improve air quality in Havering"	26	Strongly agree	We hope the Air Quality Action Plan will contribute to improved air quality in Havering. No further action.
	40	Agree	
	11	Disagree	
	7	Strongly disagree	
Q5: To what extent do you agree or disagree with the following statement: "Air quality is not within our local control".	7	Strongly agree	Noted. No further action.
	13	Agree	
	36	Disagree	
	28	Strongly disagree	
Q6: To what extent do you agree or disagree with the following statement: "Poor air quality affects my health"	33	Strongly agree	Noted. No further action.
	33	Agree	
	11	Disagree	
	7	Strongly disagree	

Question	Number of responses	Consultation Comments	The Council's Response
and wellbeing".			
Q7: To what extent do you agree or disagree with the following statement: "The draft Air Quality Action Plan is easy to understand"	2	Strongly agree	Every effort has been made to keep technical details to a minimum, however we had to follow the structure and contents recommended by the GLA. No further action.
	35	Agree	
	20	Disagree	
	5	Strongly disagree	
Q8: Is the proposed approach and its pace realistic and achievable for Havering?	20	Yes	Noted. No further action.
	17	Didn't answer whether approach and pace are realistic but provided comments	Responses to suggested actions under this question are provided below.
	15	No / Probably not	We believe the approach and timescales of the AQAP are realistic and achievable, however these will be reviewed annually and the AQAP will be updated if/as necessary. No further action.
	12	Yes, but more should be done	We believe that this AQAP includes a sufficient number of actions. Further actions will be considered during progress review of the AQAP. No further action.
	8	Not sure	Noted. No further action.
	4	Possibly / I hope so	Noted. No further action.
	3	The AQAP lacks targets / priorities	Targets to specific actions and priorities have now been included. Draft AQAP updated.
	3	There are no strong direct actions / it is all about encouragement	As this is the first AQAP for Havering, we have focused on actions to raise awareness and encourage behavioural change. However, direct actions have also been included in the AQAP. No further action.
	3	Remove speed humps	This suggestion has been considered and rejected, as there is not sufficient evidence to show that the removal of speed humps would improve air quality and that this outweighs any possible public health disbenefits due to increased road injuries and fatalities. No further action.
	2	Plant more trees	Already included in the Draft AQAP. No further action.
	2	Ban / Reduce bonfires	The Council has a reactive procedure on dealing with bonfires. Banning bonfires is not considered a feasible measure. No further action.

Question	Number of responses	Consultation Comments	The Council's Response
	2	Reduce cars / HGVs / buses in Romford	Not directly within the Council's power to achieve, however a feasibility study on re-routing bus services outside Romford town centre has been added as an action (action 4.10). Draft AQAP updated.
	1	Improve pavement maintenance	This is delivered by the Council's Highways Team. No further action.
	1	Develop local high streets so that people can walk / cycle more.	This is delivered through the Council's planning policies. No further action.
Q9: Do you agree or disagree with the proposed actions for air quality monitoring and modelling? (Action Policy One)?	10	Strongly agree	Noted. No further action.
	48	Agree	
	8	Disagree	Action Policy One is considered necessary, as all actions towards improving air quality need to be based on representative and reliable data. Also the council has a legal duty to monitor and assess air quality within the borough. No further action.
	7	Strongly disagree	
Q10: What other suggestions do you have to improve Havering's air quality monitoring? Please include here any specific locations for the best placement of future monitoring stations.	35	Did not answer / Had no further suggestions / comments	No further action.
	18	Suggested actions and comments were not relevant to Action Policy One	
	13	Suggested specific locations for future monitoring	The proposed locations will be considered during expansion of the Council's air quality monitoring network, as part of actions 1.4 and 1.5. No further action.
	5	Monitor air quality around schools	Air quality is already monitored around a number of schools. Additional schools will be considered during expansion of the Council's air quality monitoring network, as part of action 1.5. No further action.
	5	Air quality monitoring is expensive / does not reduce pollution / has no impact	All actions towards improving air quality need to be based on representative and reliable data. Also the council has a legal duty to monitor and assess air quality within the borough. No further action.
	2	Air quality monitoring data should be published (e.g. Council's website, visual alerts)	Access to Havering air quality monitoring data is already provided via the Council's webpage. We are intending to update the Council's air quality webpage to further improve the degree of public information. No further action.
	1	Ensure all areas are covered	While it is not feasible to install monitoring equipment in every area within the borough, we make every effort to have a monitoring network which is representative across

Question	Number of responses	Consultation Comments	The Council's Response
			the borough. Further expansion of this network will be considered as part of actions 1.4 and 1.5. No further action.
	1	Record more accurately people with asthma	This comment will be passed to the Council's Public Health Team and will be considered as part of the AQAP progress review. No further action.
	1	Monitor air quality close to industrial estates	Many industrial sites are already required to undertake air monitoring as part of their environmental permit conditions. Industrial estates will be considered during expansion of the Council's air quality monitoring network, as part of action 1.5. No further action.
	1	Monitor air quality at sites of future developments	Already delivered through planning policies and relevant planning conditions. No further action.
	1	Residents should be more involved in air quality monitoring	As part of action 1.2 residents are encouraged to be involved in air quality monitoring. However, it should be noted that air quality monitoring is a highly specialist service and needs to be carried out properly (using appropriate equipment, carried out by people who have knowledge / experience), otherwise there is a high risk of not receiving good quality data which will lead to wrong conclusions.
	1	Air quality monitoring is not representative	While it is not feasible to install monitoring equipment in every area within the borough, we make every effort to have a monitoring network which is representative across the borough. Further expansion of this network will be considered as part of actions 1.4 and 1.5. No further action.
Q11: What is your opinion of the proposed actions for public health and awareness raising to encourage smarter travel? (Action Policy Two)?	23	Did not answer / Did not provide opinion on Action Policy Two	Noted. Responses to specific suggestions / comments are provided below. No further action.
	32	Positive opinion	
	12	Negative opinion	
	10	Further suggestions	
	5	Actions will probably have low impact	
	2	Ok	
	3	Discourage engine idling	Anti-idling is one of the key messages of Miles the Mole project (action 2.2). This action focuses on schools therefore raises awareness of the parents as well. As part of action 2.2 an anti-idling campaign will be considered in liaison with Communications Team. The outcomes of this



Question	Number of responses	Consultation Comments	The Council's Response
			campaign will be assessed and further enforcement actions will be considered as a next step in future versions of the AQAP. No further action.
	2	Improve cycle infrastructure	As part of funding that has been allocated by Transport for London, the Council is currently looking at options for improving pedestrian and cycling access along the A1306 to support the Rainham and Beam Park Housing Zone. The Council will continue to explore opportunities to improve cycling infrastructure where this supports new development. No further action.
	2	Plant more trees / green walls	Already included in the Draft AQAP. No further action.
	1	Improve pavement maintenance	This is delivered by the Council's Highways Team. No further action.
	1	Educate parents	Awareness raising actions under this Action Policy do not only target children but adults as well. No further action.
	1	Remove speed humps	This suggestion has been considered and rejected, as there is not sufficient evidence to show that the removal of speed humps would improve air quality and that this outweighs any possible public health disbenefits due to increased road injuries and fatalities. No further action.
	1	Change the flight path of planes from London City airport	This recommendation is outside of the Council's powers. No further action.
Q12: What is your opinion of the proposed actions for reducing emissions from buildings and developments (Action Policy Three)?	26	Did not answer / Did not provide opinion on Action Policy Three	Noted. Responses to specific suggestions / comments are provided below. No further action.
	36	Positive opinion	
	13	Further suggestions	
	5	Actions will probably have low impact	
	4	Negative opinion	
	4	Offer grants / subsidies to house owners to invest in energy efficiency	There are already energy efficiency schemes / grants primarily delivered by the Council's Energy Strategy Team. No further action.
	2	More renewable energy	This is delivered by the Planning and Building Control Teams and is not, strictly, an air quality issue. No further action.
	2	More solar panels	Solar panels are also part of the Council's energy efficiency schemes which are primarily delivered by the Council's Energy Strategy Team. No further action.
	1	Environmental sustainability of new developments	Already included in the Draft AQAP. No further action.
	1	New developments should meet energy efficiency targets	This is primarily delivered by the Building Control Team

Question	Number of responses	Consultation Comments	The Council's Response
			and is not, strictly, an air quality issue. No further action.
	1	The Council needs an effective Local Plan and development control system backed up by Planners, Building Control, Environmental Services and Highways.	These issues are beyond the scope of the AQAP, however a number of actions are already included aiming to better coordinate the work across Planning, Building Control, Environmental Protection and Highways.
	1	Reduce lighting	This is not an air quality issue. No further action.
	1	The AQAP should not focus only on the Council developments but private developments as well	Action Policy Three includes a number of actions focusing on private developments. No further action.
	1	Enforce existing regulations	Already included in the Draft AQAP (e.g. actions 3.3, 3.4, 3.8). No further action.
	1	Stop building new developments	Less development is counter to existing Council policy and has not been incorporated into the AQAP. No further action.
Q13: What is your opinion of the proposed actions for reducing emissions from transport? (Action Policy Four)	27	Did not answer / Did not provide opinion on Action Policy Four	Noted. Responses to specific suggestions / comments are provided below. No further action.
	25	Further suggestions	
	13	Positive opinion	
	10	Negative opinion	
	6	Positive, but more should be done / the AQAP doesn't go far enough	
	3	Actions will probably have low impact	
	4	More actions on electric vehicles (e.g. increase electric car charging points)	Already included in the Draft AQAP. No further action.
	4	Improve cycle infrastructure	As part of funding that has been allocated by Transport for London, the Council is currently looking at options for improving pedestrian and cycling access along the A1306 to support the Rainham and Beam Park Housing Zone. The Council will continue to explore opportunities to improve cycling infrastructure where this supports new development. No further action.
	3	Provide more incentives to businesses	Already included in the Draft AQAP. Further incentives will be considered as part of actions 2.6, 2.12, 4.7. No further action.
	3	Enforcement actions against polluting vehicles	Roadside emissions testing may be used by local Authorities, however such actions are generally expensive and time consuming and do not result in a marked improvement in air quality. As a result road side emissions testing has not been included as an action. No further action.

Question	Number of responses	Consultation Comments	The Council's Response
	2	Upgrade bus fleet	Not in the Council's powers to achieve, however we are working with TfL to try and upgrade the bus fleet in Havering. No further action.
	1	Use freight trains instead of lorries	Not in the Council's powers to achieve. No further action.
	1	Push diesel car manufacturers to improve cars	Not in the Council's powers to achieve. No further action.
	1	Remove speed humps	This suggestion has been considered and rejected, as there is not sufficient evidence to show that the removal of speed humps would improve air quality and that this outweighs any possible public health disbenefits due to increased road injuries and fatalities. No further action.
	1	Offer scrappage schemes	This would primarily delivered nationally if the government makes such decision. No further action.
	1	Partnership work with other boroughs	We agree that partnership work with other local authorities is important. During implementation of the AQAP, we will consider how certain actions can be implemented in partnership with other local authorities. We will also look into potential joint funding opportunities.
	1	Remove pedestrian crossings	This suggestion has been rejected, as there is not sufficient evidence to show that the removal of pedestrian crossings would improve air quality and that this outweighs any possible public health disbenefits due to increased road injuries and fatalities. No further action.
	1	Move lorries out of South Hornchurch	This comment will be considered in liaison with Transport Planning and Highways. No further action.
	1	Encourage ways to offset pollution	This is already delivered through existing planning policies. No further action.
	1	Introduce a workplace parking levy	We do not consider this action to be suitable for this AQAP, but it will be considered in future version of the AQAP.
	1	Improve public transport in Rainham	Action 2.3 has been amended to include commissioning of a cross borough bus rapid transit study which look at options for improving access to the London Riverside BID in Rainham. Draft AQAP updated.
	1	Discourage engine idling	Anti-idling is one of the key messages of Miles the Mole project (action 2.2). This action focuses on schools therefore raises awareness of the parents as well. As part of action 2.2 an anti-idling campaign will be considered in liaison with Communications Team. The outcomes of this

Question	Number of responses	Consultation Comments	The Council's Response
			campaign will be assessed and further enforcement actions will be considered as a next step in future versions of the AQAP. No further action.
	1	Ban diesel vehicles	Not in the Council's powers to achieve. No further action.
	1	Reduce population density	Not in the Council's powers to achieve and outside the scope of the AQAP. No further action.
Q14: Do you have other suggestions on what actions the Council should consider taking to improve air quality in Havering?	11	Actions to reduce air pollution arising from the school run (e.g. more encouragement to parents not to use their cars, PSPOs, parking restrictions, discourage engine idling, change school run, children should only be admitted when they live at walking distance etc.)	Anti-idling is one of the key messages of Miles the Mole project (action 2.2). This action focuses on schools therefore raises awareness of the parents as well. As part of action 2.2 an anti-idling campaign will be considered in liaison with Communications Team. The outcomes of this campaign will be assessed and further enforcement actions (e.g. pedestrian zones, parking restrictions etc.) will be considered as a next step in future versions of the AQAP. No further action.
	5	Plant more trees / greening / green walls	Already included in the Draft AQAP. No further action.
	4	Improve cycle infrastructure	As part of funding that has been allocated by Transport for London, the Council is currently looking at options for improving pedestrian and cycling access along the A1306 to support the Rainham and Beam Park Housing Zone. The Council will continue to explore opportunities to improve cycling infrastructure where this supports new development. No further action.
	4	Improve public transport (e.g. frequency, lines etc.)	This is primarily TfL's responsibility, but
	3	Remove speed humps	This suggestion has been considered and rejected, as there is not sufficient evidence to show that the removal of speed humps would improve air quality and that this outweighs any possible public health disbenefits due to increased road injuries and fatalities. No further action.
	3	Enforce parking restrictions	This will be considered as part of action 4.6. No further action.
	2	Improve traffic design (e.g. remodel junctions) to smooth out traffic flows	This comment will be considered in liaison with Highways Team. No further action.
	2	Upgrade bus fleet	Not in the Council's powers to achieve, however we are working with TfL to try and upgrade the bus fleet in Havering. No further action.
	2	Improve communication / information on air quality	Access to Havering air quality monitoring data is already provided via the Council's webpage. We are intending to

Question	Number of responses	Consultation Comments	The Council's Response
			update the Council's air quality webpage to further improve the degree of public information. No further action.
	2	Improve electric vehicles infrastructure	Already included in the Draft AQAP. No further action.
	1	Make traffic lights 'smarter'	This comment will be considered in liaison with Highways Team. No further action.
	1	Carry out cycle workshops	Already included in the Draft AQAP (action 2.9). No further action.
	1	New developments should have car charging points and cycle parking	Already delivered through planning policies and relevant conditions. No further action.
	1	Get more funding from government	We will look into funding opportunities if/as they arise. No further action.
	1	Lobby government so that green technology can be used	We are lobbying the government and other appropriate bodies to reduce pollution over which the Council has little or no control. No further action.
	1	Stop London Borough Barking and Dagenham to divert lorries from Bull Lane into Havering	This comment will be considered in liaison with Transport Planning and Highways. No further action.
	1	More coordinated work across Services and with the Councillors	We agree that coordinated work is important this is why each action has a Lead Service
	1	Stop building on open spaces	This is beyond the scope of the AQAP. No further action.
	1	Reduce development	Less development is counter to existing Council policy and has not been incorporated into the AQAP. No further action.
	1	Change flight path of planes from London City Airport	This recommendation is outside of the Council's powers. No further action.
	1	Prohibit garden bonfires	The Council has a reactive procedure on dealing with bonfires. Banning bonfires is not considered a feasible measure. No further action.
	1	Planning permission should allow less than 1 car parking space per home	This is beyond the scope of the AQAP, as car parking standards are set out in the London Plan and the Council's planning policies. No further action.
	1	Reduce population	Not in the Council's powers to achieve and outside the scope of the AQAP. No further action.
	1	Provide more incentives to businesses to reduce reliance on vehicles / upgrade their fleets	Already included in the Draft AQAP. Further incentives will be considered as part of actions 2.6, 2.12, 4.7. No further action.
	1	Extend emissions zone to Romford	Low and ultra-low emission zones are defined by the GLA. No further action.
	1	Ban vehicles in town centre	The feasibility of this proposal will be considered. No

Question	Number of responses	Consultation Comments	The Council's Response
			further action.
Q15: Do you have ideas as to how residents could support this Air Quality Action Plan and help improve air quality in Havering?	15	Reduce car use / use alternative transport modes (e.g. walking, cycling, public transport)	Noted. We will try to further improve the degree of public information and engage with the residents as much as possible during implementation of the AQAP. No further action.
	6	Engage more with the Council	
	3	Make homes more energy efficient	
	2	Have gardens / plant more	
	2	Replace polluting cars / use EVs	
	2	Reduce garden bonfires	
	1	Avoid peak times when using car	
	1	Stop idling	
	1	Keep cars serviced	
	1	Voting the right people	

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