

Consultation questions

1. Monitoring - Proposed amendment

Boroughs should as a minimum, maintain current levels of air quality monitoring.

This represents a firming up and clarifying of the previous requirement for boroughs to “continue to monitor and assess air quality in their areas.”

Do you agree with this as a minimum requirement? If not please state why.

The London Borough of Havering (the Council) does agree with this statement, however Boroughs need to maintain flexibility regarding the location, frequency, method and types of pollutants measured to ensure its monitoring programme continues to provide relevant data demonstrating the state of its local air quality.

The Council recognises the importance of air quality monitoring as a statutory duty, to identify air pollution hotspots, assist in targeting actions where most needed, measure the effects of actions taken ('before' and 'after'), to inform the public to empower them to reduce their exposure and to support development and regeneration projects.

2. PM_{2.5} - Proposed amendment

Boroughs should maintain Air Quality Management Areas (AQMAs) for PM₁₀ even where the limit value / objective is met, so as to provide an interim mechanism for a focus on PM_{2.5} reduction measures.

Boroughs should support the Mayor's commitment to meet the World Health Organization (WHO) guidelines for PM_{2.5}, which is more ambitious than the goal in the new national Clean Air Strategy. The government's goal is to reduce the number of people exposed to PM_{2.5} above the WHO target by 50 per cent by 2025, which would leave many Londoners still exposed to the health effects of high levels of pollution.

Boroughs can do this by formally adopting the guidelines at a local level and / or outlining their intention to focus on reducing and monitoring this pollutant in the Air Quality Action Plan.

Furthermore, if funding or opportunities arise for new monitoring, priority should be given to PM_{2.5}

Do you agree with this approach? If not please state why. Do you have any further comments on how PM_{2.5} can be most effectively addressed at the borough level?

The Council agrees that maintaining the AQMA for PM₁₀ can be an effective instrument to enable boroughs to focus on PM_{2.5} reduction, however where there is robust evidence that boroughs meet the PM₁₀ objectives and will continue to

meet them in the future, boroughs should be allowed to consider revoking the AQMA for PM10. This does not mean that boroughs will stop monitoring PM10, but they could replace part of PM10 with PM2.5 monitoring, in order to get a better idea of PM2.5 levels in the borough.

The Council does currently monitor for PM2.5 in Rainham. Measurements for the past four years show that levels are well below the current legal objective, which is 25 µg/m³. The WHO guideline for PM2.5 annual mean (10 µg/m³), which is much tighter than the current objective. While the Council agrees that boroughs should work towards tighter air quality targets, such as the WHO guidelines, a formal adoption of the WHO guidelines at a local level would be considered as a formal commitment to achieve these targets, which could entail disproportionate costs for the boroughs. The Council has already included measures in its AQAP to reduce PM2.5, in line with the GLA proposals.

If funding opportunities were available for further monitoring for PM2.5, the Council agree that priority should be given to PM2.5 and would suggest this be done in Romford, where there is already an automatic monitoring station and Romford Town Centre is on of the borough's pollution hotspots.

The Council has no further specific suggestions currently on how PM2.5 could be addressed at a local level over and above the GLA recommendations. The Council is able to deliver the GLA suggested measures and most are already being actioned and delivered.

3. Air Quality Action Matrix - Proposed amendment

The updated Matrix consolidates the actions into 25 key actions for boroughs to take locally. These are ranked in priority order.

The updated Matrix was sent to boroughs for preliminary feedback in late 2018. This pre-consultation feedback from boroughs has been incorporated into the Matrix where possible. A summary of these comments and changes is provided in the supporting documents. Many thanks to those who took the time to respond.

Please provide any additional comments over and above those submitted in the pre-consultation.

The Council has already included most of the 25 key actions in its AQAP and work to deliver these actions is progressing. The Council has additional comments on the actions below:

Low Emission Neighbourhoods: *As stated in the proposed Matrix, design and implementation of LENs require significant levels of funding. The Council may consider this in the future, should funding opportunities arise.*

Installation of Ultra-low Emission Vehicle (ULEV) infrastructure (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations): *As part of its AQAP, the Council is currently carrying out a feasibility study to investigate demand for Electric Vehicles (Evs) and EV charging*

infrastructure in the borough. The outcomes of this study will be taken into account, in order to design a ULEV infrastructure network that meets the needs and wishes of Havering's residents. EV charging points as part of new developments will continue through appropriate planning controls.

Provision of infrastructure to support walking and cycling: The Council provides cycling and walking infrastructure as part of its regeneration schemes. Havering's Local Implementation Plan (LIP) includes a proposal to undertake a feasibility study looking at potential cycle links to/from Harold Wood, Upminster and Rainham town centres. The LIP also includes a commitment to deliver bikeability training within the borough and a review of access into Havering's parks and open spaces.

4. Air Quality Action Plans (AQAPs) - Proposed amendment

Boroughs should deliver all actions in the Air Quality Matrix, unless there are extenuating circumstances agreed with the Greater London Authority. An exception to this is the Low Emission Neighbourhood, if no funding has been obtained from the Greater London Authority /Transport for London /other sources. Boroughs should also commit to and ensure a strong focus on the nine key priority areas.

Boroughs should ensure that all AQAPs have clear, measurable and focused actions with projected benefits wherever possible.

Boroughs do not have to rewrite AQAPs that are less than five years old, even if they're adding new actions or updating targets within existing actions. As part of the Annual Status Report process, the action table from the AQAP should be extracted and amended as necessary to reflect the additional actions, key priority areas and new targets/timescales. Actions planned for the forthcoming year should be clearly identified.

This represents a firming up and clarifying of the previous requirement.

Please provide any comments on this stronger focus on the Matrix and keeping Action Tables as live documents.

The Council has already included most of the 25 key actions in its AQAP and work to deliver these actions is progressing. However, with ever reducing resources, it may not be possible to always deliver all actions in the Matrix.

Report on actions which have not been included in the original AQAP will be undertaken annually as part of the Annual Status Report process. With regard to the AQAP being a 'live' document, the Council will consider whether this would be a public document or for internal use only.

The Council agrees that the stronger focus of the matrix actions is positive as it provides greater clarity on the direction of actions / targets to then achieve better air quality both locally and regionally.

5. Cleaner Air Borough criteria - Proposed amendment

The criteria have been updated to:

- align with the Matrix categories
- clearly outline what information is required from boroughs and how this will be scored

Do you have any comments on the criteria? Do you agree with the proposal to award it as bronze, silver, gold as a way of indicating different levels of performance and encouraging progressive improvement?

The Council agrees that the new Clean Air Borough (CAB) criteria are comprehensible and make it easier for boroughs to see how they can achieve CAB status. The Council also agrees that the bronze, silver and gold levels would encourage progressive improvement, however the proposal does not clarify the scores required to achieve the various levels of CAB status. Furthermore, there should be measurable targets with regard to how the score for each measure will be assigned.

6. Other comments

The Policy Guidance and Technical Guidance contain a number of other smaller updates, such as updating the wording in the Introduction and the Powers of Direction sections of the Policy Guidance, and removing information on screening sources in the Technical Guidance.

If you have any further comments any of the other proposed revisions within these documents, please provide them here.

The Council has no other comments to make regarding the small updates and revisions at this stage..