

Summary of consultation responses to the **Draft Air Quality Action Plan 2019 - 2024** October 2019



In April, Newham Council declared a climate emergency and committed to becoming carbon neutral by 2030 and carbon net zero by 2050.

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Consultation | Introduction

Following the approval for consultation of the Draft Air Quality Action Plan (AQAP) 2019-2024 in September 2019, a consultation process was undertaken for 6 weeks between the 2nd September and 14th October 2019.

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

1.1 | Consultation Process

There were four main groups of respondents 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.

Interest Groups

Fossil Free Newham, The Cyclist Interest Group & Friends of the Earth and Plashet Secondary School, all provided detailed responses.

Businesses

Detailed responses were received from Brett Concrete Ltd and London City Airport.

The Public

The consultation was made widely available through the Newham website, each community neighbourhood and public engagement events.

Public sessions were held, which were widely represented by Newham's ethnically diverse citizens. Participants had the opportunity to hear and comment on the Council's actions to improve air quality.

| Consultation Publicity

A survey with specific questions on the AQAP was provided on the council's consultation webpage. In order to alert members of the public to the consultation, posters were displayed in all Newham libraries and hard copies of the Draft AQAP and survey were made available for comment. Flyers promoting the consultation were distributed at public events such as 'World Car Free Day', Climate now open forum assembly, Newham Mag and Newham Recorder.

Facebook and Twitter were also used by the Council's Communications Team to promote the consultation.



Rokhsana Fiaz OBE, Mayor of Newham

1.2 | Overview of Consultation Responses

The table below summarises the responses received, through the survey, formal responses and public engagement events.

Table 1 | Consultees

Statutory Consultees	Response
The Secretary of State	No
The Environment Agency	Yes
Transport for London	No
Greater London Authority	Yes
Neighbouring Local Authorities (LB Tower Hamlets, LB Greenwich, LB Havering, LB Redbridge, LB Waltham Forest, LB Hackney)	No
Port of London Authority	No

Public	Response
Online & Paper Survey	Yes (298 persons)
Youth Citizen Assembly	Yes (See S.5.1)
Climate Now Open Forum	Yes (See S.5.2)

Responses from Interest Groups
The Cyclist Interest Group
Friends of the Earth
Royal Wharf Residents Association
Fossil Free Newham
Plasbet Secondary School
Magpie Project
Maryland Community Group
Manor Park Climate Action Group
@stopcityairport / Hacan East Member

Responses from Businesses
London City Airport
Brett Concrete Ltd

2 | Consultation Responses from Statutory Consultees

2.1 Greater London Authority (GLA)

“ **2.1.1 Comment** It's a good plan – excellent and clear introduction and good use of the template, which you have adapted and tailored well to your own needs/circumstances.”

Response: Noted

“ **2.1.2 Comment** There are a few instances in the action table where it's not completely clear what action you'll be delivering, when it will be delivered, and what it will achieve – there's a need for a few more deadlines and targets and in a few places a bit more explanation on what you plan to do.”

Response: Relevant actions have been updated with clearer targets and tighter deadlines and these changes were approved by the GLA prior to the public consultation.

2.2 Environment Agency

“ **2.2.1 Comment** I am personally delighted to see such a great document and the declaration to go borough-wide on the AQMA will assist us greatly at the EA in our control and abatement at regulated industrial activities.”

Response: Noted

“ **2.2.2 Comment** It is important to note that we are not currently aware of any waste facilities or other industrial installations regulated by the Environment Agency in the London Borough of Newham that are causing or contributing to failures of air quality standards.”

Response: Noted

2.2.3 Comment We have a significant history of collaborative working with Environmental Control services and Planning at LBN, where there have been individual sites and clusters of poor performing waste sites in the Borough that have benefitted from integrated regulation and good communications and information sharing. The Environment Agency still wishes to maintain this good relationship for the benefit of environmental protection."

Response: We will continue to maintain the good relationship between regulators.

2.2.4 Comment "We support the declaration to become a borough-wide AQMA for both PM₁₀ and NO₂, and believe that this will also assist the EA in permitting of new sites in being able to apply tighter emission control/ requirements by our own designations."

Response: Noted

2.2.5 Comment We support the content of the draft AQAP (2019- 2024) produced by LBN and have some additional observations that we feel may have a synergetic strength in preventing pollution from emissions:

Require any waste transfer stations to be in a building, enclosed on all vertical sites with small access and egress points covered by doors which default closed when not in use and air extraction and filtration system to collect particulates."

Response: We support this requirement in conjunction with national and local planning policies.

2.2.6 Comment Construction and demolition works should be required to meet or exceed the requirements set out in the Institute of Air Quality Management's Guidance on the Assessment of Dust from Demolition and Construction or the Mayor of London's published supplementary planning guidance on Sustainable Design and Construction, and

on the Control of Dust and Emissions during Construction and Demolition. This includes Non-Road Mobile Machinery used on these sites."

Response: Noted and this is our currently policy

2.2.7 Comment Waste management sites are a potential source of dust and fine particulate emissions to air. Those sites which mitigate the potential effects of air pollution by enclosing processes within buildings tend to be less polluting and the enclosure is now recognised as best practice for such sites. Consequently, we encourage any new air quality management area declaration, air quality action plans and/or proposed clean air zones to 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 improving air quality.

The draft AQAP touches only very slightly on contributions from Industry, however, we believe that on page 23 in section 2.10, LBN is missing an opportunity (when referring to the London Plan) to refer to the enclosure of new waste sites that may significantly contribute. The London Environment Strategy (LES) is also an important document that could be referred to, to strengthen the draft AQAP. (See section 7(d) underlined above)."

Response: The Newham Local Plan 2018 requires that all 'waste facilities and other dust and emissions-generating uses should be fully enclosed or provide an equivalent level of environmental protection with respect to air emissions' (Policy SC5 (Air Quality) part 3c and Policy INF3 (Waste & Recycling) part 3a). The implementation guidance attached to Policy SC5 clarifies at paragraph 5.59 (page 182) that:

...Response Cont. "For the purposes of this policy, 'fully enclosed' means walls and roof. The assessment of 'equivalent environmental protection' should be done in liaison with Environment Agency licensing teams. The requirement applies to both permanent and temporary use permissions but is not applied to demolition and construction activities alone. It is clear from part 1a of this policy that such processes should still consider air quality and incorporate measures to minimise and mitigate impacts, though it would not be feasible to assess delivery of 'equivalent environmental protection' with respect to emissions."

Response: The planning system can only intervene regarding the quality and standards of new development, meaning that unless an application for a new permission is received, little can be done (via planning powers) about the effects from existing sites.

3| Consultation Responses from Interest Groups

3.1| Friends of the Earth

“ **3.1.1 Comment** There is much to welcome in the plans, and it is very impressive how integrated the climate and air objectives and measures are, and we welcome the acknowledgement that tackling air pollution helps inequalities and that there are plans for better monitoring, to inform the public more as well as involve them in the development of plans.

Response: Noted

“ **3.1.2 Comment** Our air pollution campaigner has also had a look at the 2 key relevant documents and has some comments below and would also be happy to liaise, or even meet anyone if that could be helpful. Strong measures are rightly needed as the council acknowledge that the borough has some of the worst air in London – and the World Health Organisation have found health effects below the current NO₂ legal limit, and even below the WHO's own PM_{2.5} limit, which is much stricter than our current legal one <http://bit.ly/36NRzj4>

“ We support the council for reviewing their AQMA (para 3.10 of their report) as currently, it is only for a few main roads <http://bit.ly/33oqErP>

“ (as the council says) most other London LAs have declared them for the whole borough.

Response: Noted

3.1.3 Comment There is much to support in the plans including for differential parking charges for polluting vehicles (AP 23), and we note the reference to AQ Neutral (AP 5) as per the current London Plan requirements but note the new draft London Plan is also now talking about AQ Positive, for large scale at least (which is still the subject of debate), and on CHP (AP4) we welcome moves to reduce emissions as indeed biomass burning is an issue for air pollution (and Friends of the Earth have said biomass burning shouldn't be happening where WHO PM_{2.5} limits are exceeded (which is currently all of London <http://bit.ly/32iGXoJ>) FYI, there are also lots of ideas of what the government is suggesting Local Authorities can do – in section 2 of the CAZ Framework (i.e. non-charging measures) <http://bit.ly/2qo66Bl>

Response: A Cabinet report is to be submitted for consideration of a revised parking strategy incorporating emissions based charging for residential and business permits. Further incentives for zero and ultra-low emission vehicles are under consideration. Implementation subject to approval will be from April 2020.

3.1.4 Comment The council don't seem to be currently doing school streets – but AP 22 of their draft AQ Action Plan plans a trial of “regular temporary car-free days” which sounds good, and is to restrict traffic outside some schools. It's not quite clear if that's quite school streets, but they would be good (see our briefing on the subject <http://bit.ly/2qvAARC>)

Response: The Council is progressing a number of school streets in the borough. Trials beginning in November 2019. More details at; [here](#)

3.1.5 Comment The council could commit to avoid putting schools, care homes and hospitals etc. into air quality hotspots (which

should be where air pollution is over limits), as Parliament's Environmental Audit Committee recommended a while ago <http://bit.ly/2JVLGGG>

Response: Noted and report states; “Recommendation 3. We recommend that air pollution levels should be monitored at key spots within local communities – for example near schools, hospitals and care homes – and the results clearly communicated to local residents and service users. This will not only serve to reinforce the value of measures such as anti-idling campaigns, but will also provide the public with the information they need to press their elected representatives for further changes at a local authority level. (Paragraph 19)

In AP1 we are expanding our monitoring network and are the first LA in England to commit monitoring outside every Primary and Secondary state school in the borough. We will be focusing on anti-idling campaigns at our borough hotspots and where we have sensitive uses as highlighted by FOE.

3.1.6 Comment Even though Newham will be in the expanded ULEZ up to the North and South Circular Roads when that happens in 2021, the Council could call for it to be London-wide for all vehicles (i.e. including cars), which should help the borough.

Response: See AP20. At this stage, in advance of any monitoring outputs, we believe that a boundary road that allows vehicles to circumnavigate the expanded ULEZ zone remains beneficial – although we will review this once the scheme is operational. We will work closely with our Transport Planning Team and the work they

3.1.7 Comment The new London Plan in development is talking about “borough-led traffic reduction strategies” (in Table 10.1) – and Newham should develop bold strategies and targets. Research for [Friends of the Earth](#) has found that at least a 20% cut in car miles is needed for climate reasons and cutting traffic is also key for air pollution as even vehicles with no exhaust emissions produce particle air pollution from brake and tyre wear.

Response: SEE AP 20 and LIP3. We have targets for modal split, active travel, car use (vehicles/km) and car ownership set by the MTS which we are committed to achieving. See [LIP3](#) for more details. Modal shift to active travel is the most important message for future sustainable travel.

3.1.8 Comment We welcome the measures to support sustainable transport and the council's opposition now to the London Mayor's planned 4-lane Silvertown road tunnel – and clear opposition to that as well as any other road river crossing for general traffic would help make things clear. The draft new London Plan has not only Silvertown listed but also an ambiguous “River crossings at Gallion's Reach and/or Belvedere (subject to further assessment)”, which is leaving that open for more road crossings (Gallion's is where the scrapped 6-lane Thames Gateway Bridge was). It will also be important to contain, and reduce as much as possible, emissions from London City Airport.

Response: While we are supportive of new cross-river connectivity in the east sub-region this must be public transport focussed, preferably DLR or Tube/rail. London City Airport has a dedicated air quality strategy and 17 monitoring points around the airport boundary plus 2 Air quality monitoring stations. More [details can be found here](#). The new strategy is due in summer 2020 and LBN approves this strategy under planning condition requirements.

3.2 | Fossil Free Newham

3.2.1 Comment The Council's plans need to go further, faster.

a. The Tyndall Centre for Climate Change Research and University of Manchester have recently produced research on the rate at which local authorities around the UK need to cut emissions to meet the terms of the Paris Agreement and from 2020 Newham must cut emissions at 12.4% per year to remain within the recommended carbon budget, can be accessed and viewed here:

<http://bit.ly/32nuOyV>

b. The Strategic Intent Paper: Part 2 sets out much wider-reaching initiatives including tackling food waste and divestment, which all urgently need addressing.

c. What is the Council's response to our request to implement at least half of the actions outlined in “[Our Plan for Newham](#)” - some are already incorporated into the Council's plans; however others, such as focusing on raising money, protecting the most vulnerable, land use, divestment and waste have not been adequately addressed.

Response: Further details on the Council strategy are set out in [Climate Change full council strategic intent part 2 paper](#) (September 2019)

3.2.2 Comment Transport, If Newham Council is serious about tackling GHG emissions from transport and encouraging electrification, far more EV charging points should be installed. Some companies will install these for free in return for a share of the profits. (See more detailed Clean air proposal for more on this).

Response: 40 double charging points (for 80 vehicles in total) will be rolled out in residential areas this October/November as part of GULCS Phase 1. The Council intends to submit a further bid to GULCS Phase 2 for a further 80 double charging units for residential areas. In addition, the Council is exploring options for the delivery of a rapid charging network across the Borough focussed on main roads and in town centres. Options include TfL or external provider partnering.

3.2.3 Comment Is the Council able to support increased EV hire schemes (pending a future drop in the price of EVs to more affordable levels)?

Response: We are currently engaging with prospective car club operators and part of those discussions relate to the provision of an electric hire fleet over time. We would expect car club vehicles to appear on street early in 2020.

3.2.4 Comment 2028 is not soon enough to electrify the Council's fleet.

Response: Noted- see AP 17, electrification of the fleet involves electrical infrastructure and technology advances for larger HGV. Interim bio-fuels approach is being used.

3.2.5 Comment There is no real detail on car-pooling/sharing initiatives and nothing on public transport improvements in the AQAP.

Response: Car clubs are discussed above, but the use of car sharing and pooling is encouraged in the travel planning for new development, e.g. [Lift share](#)

3.2.6 Comment What work is being done to partner with neighbouring councils, e.g. Greenwich and Tower Hamlets, to call for more public transport links between the north and south of East London (e.g. as an alternative to the Silvertown Tunnel)?

Response: We have a sub-regional transport officers group where such matters are regularly discussed. However, it should be noted that LBTH and RBG are not so opposed to the Silvertown scheme compared to LBN, as they have significant existing air quality and congestion impacts caused by Blackwall which they see Silvertown as solving

3.2.7 Comment What is being done to tackle through traffic? The only road closures mentioned are community day temporary closures or School Healthy Streets initiatives.

a. If Newham has the 4th lowest car ownership rate in the UK and 52% of households do not own a car, isn't something needed to specifically tackle through traffic?

b. What about traffic management schemes like Browning Road, will there be others?

c. Has the Council considered using camera technology that will be used on Browning Road around the borough on non-arterial/non-TfL roads to regulate traffic/collect levies there?

Response: The Council acknowledges that there is a through traffic problem in the Borough which is tackling by a range of measures, as outlined in the LIP3. Specifically, through traffic reduction schemes and low traffic neighbourhood schemes, such as the Browning Road scheme will continue to be implemented, subject to their outcomes. Regarding the more widespread use of cameras, there is no current proposal to introduce road pricing or other cost restraint mechanisms to regulate traffic in the Borough. However, we will continue to use cameras where permitted for moving vehicle and parking offences.

“ **3.2.8 Comment** Why have the A406 and Woolwich Ferry route been accepted in the AQAP?

Response: (see earlier response on A406) Port of London authority and have their own Air quality strategy covering River Thames from Southend to Teddington covering the Woolwich ferry route in Section 3.4 at; [More information here](#). The Woolwich Ferry is run by TfL and in 2019 both ferries were upgraded to low emission diesel-hybrid engines reducing emissions of NOx by 70% and PM by 90% and magnetic technology while moored which negates the need for idling of the engines. The A406 has been included in our current partial AQMA since 2002.

“ **3.2.9 Comment** Housing, has the Council considered technologies such as far infrared heating (FIH) to tackle building emissions and ensure more efficient heating for social housing? (See more detailed Clean air proposal for more on this).

Response: FIH has not yet been determined renewable on the 'Domestic Renewable Heat Incentive Product Eligibility List' (PEL). However, we understand the significant energy efficiency benefits of FIH alongside the 'greening' of the national energy grid as specified under SAP 10. We will continue to follow emerging innovations in this field; such as inbuilt FIH fabrics enabling full heat coverage. We will recommend that major developments consider these solutions within the energy statement feasibility studies.

“ **3.2.10 Comment** What is the Council doing to support the start-up of local community energy projects?

Response: Noted and this is covered in the [Climate Change full council strategic intent part 2](#); See also [London wide energy project](#)

“ **3.2.11 Comment** General, much of the AQAP focuses on individual behaviour change. Can the Council provide more detail on how local regulation for businesses and housing development and how neighbourhood-wide initiatives (like the School Healthy Streets) might also be used by the Council, e.g. can the Council enforce higher insulation standards in the local private rented sector?

Response: There are general national and local requirements for energy performance for businesses and new developments. In the private rented sector the Council would always look to seek the highest standards of insulation to be installed in properties that the law allows.

3.2.12 Comment The potential impact of measures proposed by the Council should be estimated and quantified in a way that is understandable to Newham residents. When can this type of information be provided?

Response: Noted- see AP1. Website will be updated and aim to publish results as a dashboard approach to be transparent on our performance on the AQAP measurable actions.

3.2.13 Comment What does "air quality neutral" developments apply to? Is it only for residential developments? How do major construction projects that are being proposed, such as the MSG Sphere, Silvertown Tunnel and London City Airport expansion fit within this?

Response: See AP5. As per [London draft plan AQ Neutral](#) does apply to all major developments.

3.2.14 Comment What can the Council do to regulate London City Airport (LCY)?

- a. Is anything being done to hold LCY accountable to its obligations around the noise contours and offering local residents higher glazed windows?
- b. Can the Council require LCY to reduce its carbon emissions year on year?

Response: Noted London City airport is required to have an air quality strategy under the current planning condition requirements. This is scrutinised by LB Newham and air quality monitoring including 17 lamp post locations around the airport and 2 air quality monitoring stations. Detailed results can be found [here](#).

3.2.15 Comment Please can the analysis of which groups of people will be the most

affected by the proposed measures be shared. What mitigating steps are being taken to address this?

Response: An [Equalities Impact Assessment](#) has been prepared for the LIP3 programme containing all of the transport related air quality interventions, and none of these have been identified as having any equalities implications. There are some aspects of modal change which require careful consideration of certain mobility groups as not all of the public network is currently fully accessible.

3.2.16 Comment In particular, if the Council wants to ensure a "just transition", what re-training opportunities will be available to allow people to shift from carbon-intensive industries/modes of transport to green energy industries/modes of transport?

Response: Noted and see: [Climate change strategic intent part 2](#)

3.2.17 Comment The AQAP is all about air pollution but there is no mention of nature-based solutions and planting trees, which also help to tackle flooding.

- a. Trees should be planted in the worst areas or spread throughout the borough at intervals
- b. Council should commit to clearing spaces so people can plant trees - e.g. entering the Mayor of London ballot for 30,000 trees for Londoners (<http://bit.ly/32kkZ02>)
- c. Council should also commit some budget to help maintain any trees planted
- d. Green screens in front of schools are a false solution to dealing with road traffic emissions
- e. Also, how will greening of spaces outside of schools be measured?
- f. What are Newham's designated green areas? How is this decided?

Response: Green infrastructure is now an integral component of all our highway and public realm schemes. We have recently secured funding from the Forestry Commission for a large number of new trees in the Royal Docks, and from GLA for an additional 100 and 220 street trees for 2019/20 and 2020/21 respectively. Planted areas are now also watered by sustainable urban drainage systems which minimise run-off to the sewerage system.

Response: The [Newham Local Plan 2018](#) encourages 'greening' (or the provision of green infrastructure) in all new development and protects trees via policy that demands their re-provision where disturbed (SP8 2.a.v, SC4 3.a). The multiple benefits of green infrastructure (including in relation to flooding and drainage, and urban overheating) are recognised throughout the Local Plan, most notably in Policy INF6 and throughout the 'Sustainability & Climate Change' section (SC policies).

Response: Newham's designated green spaces are viewable via the [Policies Map](#), available online, though note that the Local Plan affords a degree of protection to all green space and green infrastructure whether designated or not (INF6 1b).

Response: Green spaces designated within the Plan may additionally be categorised as parks (pocket, local, district, regional etc.) or as Metropolitan Open Land (MOL) or Sites of Importance for Nature Conservation (SINC) as per London Plan definitions and available data. This is best illustrated by the INF6/7 map presented on page 222 of the [Local Plan](#).

Response: Note that the Local Plan team will be doing work in the coming year to add to the data behind Newham's green space designations and to ensure any undesignated green spaces are captured in future iterations of the Plan. (To be kept informed about Local Plan updates please sign up to the associated stakeholder database [here](#)).

Response: To assess the provision of green infrastructure in new development, tools like the London Plan's 'Urban Greening Factor' or Defra's 'Biodiversity Calculator' (to measure net-gain) are used.

44 **3.2.18 Comment** How will any citizen assemblies shape policies that have already been drafted and then put for consultation. Is there really a scope to change policies at that stage, shouldn't the public be consulted earlier?

a. C40 Cities have produced a series of tools to help guide cities on how to make policy-making more inclusive <http://bit.ly/2Nnk2of>

Response: Noted Findings from the upcoming climate emergency assembly will inform policymakers and assess the public's willingness to engage with more expansive/ stretched/ radical energy and transport shifts to a zero carbon footing.

3.2.19 Comment How is enforcement going to be addressed? It doesn't appear to have been costed for either.

- a. Has the Council considered incentivising community monitoring? For example, NY are incentivising it by sharing fines <http://bit.ly/2Chlxqf>

Response: We will be recruiting volunteers for our anti-idling events, our initial emphasis will be on educating drivers. We are supported by London wide project officers funded through Mayor for London to carry out idling action days.

3.2.20 Comment How will the Commissioner for Air Quality and Climate Change's pot of funding be used?

- a. Will it be separate from measures mentioned in the AQAP and Strategic Intent Paper: part 2?

3.2.21 Comment What does the costing framework Low/Medium/High mean?

Response: Any distribution of funds will be overseen by agreed council priorities. The AQAP has been updated with an explanation on costings. Estimated cost to the Council (**Low:** up to £4,000; **Moderate:** £4,000 - £10,000; **Medium** £10,000k - £50,000k; **High** £50,000k plus).

3.2.22 Comment What are all the acronyms used throughout that are not in the Glossary? Some seem to relate to funding schemes - can more detail be provided on these?

Response: Noted and the acronym list on the AQAP and this summary consultation document has been updated.

3.3 | Newham Cyclists



Newham Cyclists, Stratford High Street

3.3.1 Comment Newham Cyclists strongly support the aim of improving air quality in Newham and the direction of travel in this Action Plan. However, given the admitted poor current position, significantly firmer action is required than that set out in it."

Response: Noted but this is a five year strategy which will be a live document and reviewed twice yearly.

3.3.2 Comment We focus here on how this could be achieved in respect of active travel - a major component of any strategy to improve air quality.

The Air Quality Action plan acknowledges that Newham falls behind the rest of the country with regard to deaths and hospital asthma admissions attributable to poor air quality. To this can be added its poor record compared to other London Boroughs on road casualties. All this is significantly attributable to the failure of the Council to take active travel seriously over the previous decade. Indeed there are major instances in the past of the Council obstructing TfL active travel initiatives. Whilst there are signs of improvement in its approach, the fact that there is a good deal of catching up to do makes it imperative that the Council takes seriously, at the political level, improvement in sustainable transport by consistently following its own policies and swiftly adopting the best practice seen in other London boroughs. It cannot afford to equivocate; for example as it did in the recent episode concerning Browning Road Bridge.

Newham Cyclists believe that improving air quality through the promotion of active travel also contributes to making Newham a borough where people will want to live.

Response: Agreed – and this is reflected in our LIP3 policies and interventions. Lessons have been learned, both political and at an officer level, on the first of our through traffic reductions schemes but we are committed to continuing the delivery of such schemes.

3.3.3 Comment To this end the Air Quality Action Plan needs to be strengthened by setting serious targets and outlining concrete actions that will be implemented - rather than continue to rely on mere aspiration. In terms of this documents this means:

- Greater and active publicity for the results of air quality monitoring.

Response: We intend to be entirely transparent with our monitoring results for the schemes concerned to demonstrate the effectiveness of our actions to the wider community.

- Countering the bias in favour of motor traffic when less than half the households in Newham have access to a car. An instance of this is the free first parking permit which is an outlier in terms of London Boroughs.

Response: Noted, and this anomaly is likely to be addressed, subject to Cabinet approval, in due course.

- A significant improvement in enforcement of all traffic rules, concerning emissions levels, parking restrictions, (especially pavement, parking and the misuse of loading bays) and motor vehicle idling.

Response: A potential increase in parking income would allow for an expansion of existing enforcement resources and improved targeting of offences.

- Ensuring that all transport schemes are assessed for their contribution to improved walking and cycling, reaching a target for modal shares for journeys and achieving a Cycle Level of Service Score of at least 70% in accordance with the aims of the Cycle Strategy.

As a high proportion of strategic cycling routes as identified by TfL in its Strategic Cycling Analysis are within Newham these routes should be given priority with a target of building at least 50% of the connections on these routes by 2024. Low-quality schemes should not be pursued (for example the recently approved Barking Road/Greegate St scheme, which is at the intersection of two such routes).

Response: These outcomes are specified in the [Cycle Strategy](#) which is now adopted and in the process of being implemented.

- Newham must ensure maximum leverage for sustainable transport improvements from developments and have a target for doing so.
- There must be proper targets for creating Low Traffic Neighbourhoods i.e. areas without through traffic. Car Free Days and temporary road closures are useful contributions towards this aim but cannot be a substitute for Low Traffic Neighbourhoods.

Response: Noted, and agreed. While such temporary closures can help communicate the advantages of low traffic environments, they are no substitute for permanent traffic reduction schemes.

- There should be a commitment to a borough-wide 20mph speed limit except on the A13, A12 and A 406.

Response: Noted, and we will continue to implement 20mph zones across the Borough. However, due to resource and cost reasons, we cannot progress with a blanket 20mph zone for whole Borough in a single step.

- Newham should apply to the [DEFRA Air Quality Grant fund](#) to support specific air quality projects including for improved cycle infrastructure.
- Newham should also support national and London wide initiatives such as Smart Road User Charging."

Response: While Newham retains some concerns over the piecemeal introduction of road user charging on a borough by borough basis, we are certainly supportive of a London-wide traffic restraint scheme of this sort, which would also generate much needed funds for public transport and active travel investment for the capital. We actively seek funding for Air quality initiatives via Mayor for London air quality fund and we are currently funded for two pan-London projects detailed in AP3 and AP21.

“ 3.3.4 Comment Translating these principles into the text of the Strategy: Page 6, it should be acknowledged that re-prioritisation of road space has been patchy to date and needs to be reinforced by systematic assessment of all schemes to ensure due priority for walking and cycling.

The policy of introduction of residents parking zones throughout the borough should acknowledge that Newham is the outlier of London Boroughs in providing a free parking permit.”

Response: This approach is now embedded in our scheme development processes and the provision for cyclists and pedestrians in new schemes is paramount. Parking permits issue is acknowledged and will be addressed in the forthcoming parking strategy review.

“ 3.3.5 Comment Page 8, key priority 1 should be “Enforcing all rules relating to motor traffic and non-road mobile machinery including emission standards, parking restrictions, pavement parking and engine idling.” Enforcement of emission rules directly improves air quality. Enforcement of other traffic rules contributes indirectly to air quality by discouraging the improper use of motor vehicles and the clogging of streets by delivery vehicles and facilitates active travel.

Response: Noted – see earlier comment on increased enforcement (3.33).

3.3.6 Comment This more generalised priority should be expressed also at Page 17 Point 2.1. This section should set out a pathway to achieving significant improvement in enforcement.

Priority 8 should be “Creating Low Traffic Neighbourhoods throughout the borough”. As indicated above car-free days and temporary road closures are only precursors to the proper general provision which will supersede such temporary events.”

Response: Noted, low emission neighbourhoods category has been amended to also include low traffic neighbourhoods (AP19)

3.3.7 Comment Page 19, point 2.4 on supporting alerts and promoting air pollution forecasts should include broader publicity for active publication of the results of air quality monitoring.

Point 2.5 on reducing pollution around schools should recognise the strong connection between air pollution reduction and the reduction of local motor traffic journeys to and from local schools and also connect such measures to the creation of Low Traffic Neighbourhoods which would also reduce air pollution in the schools located within them - see also comment on point 2.8.”

Response: Noted and see AP 1 on transparency of monitoring results. We seek to integrate across a geographical area and will coordinate interventions accordingly.

3.3.4 Comment Page 21, point 2.7: The aim of improvement of walking and cycling infrastructure must be given the teeth (not found in the LIP or Cycle Strategy) of

- a target for improved modal share;
- a commitment to the assessment of all traffic schemes as outlined above;

- a commitment to borough-wide 20mph speed limit.

Point 2.8: The aim of regular Car-Free days/temporary road closures in high footfall areas should be replaced by a target of creating Low Traffic Neighbourhoods without through traffic for (say) one-third of the borough by 2024 and continuing thereafter until the whole borough is covered. Through routes surrounding Low Traffic Neighbourhoods should still have welcoming provision for walking and cycling. Car Free Days etc. are properly seen as a precursor to Low Traffic Neighbourhoods.”

Response: Firstly, we would disagree that the improvement of walking and cycling facilities is not given appropriate priority – they are key imperatives for us. Also, our modal share targets are explicit in our LIP3, although we will also include the target in the updated AQAP revision.

3.2.5 Comment There should be an aim of securing significant development funding for active travel supported by a target figure which should not be less, for example, than that secured by Waltham Forest.

Implementation of the Newham Air Quality Plan should include a commitment to apply for funding from the DEFRA Air Quality Grant Fund to accelerate the implementation of specific schemes. We support car-free developments.”

Response: Noted – although we consider our funding achievements to be amongst the best in London – e.g. Stratford/Greenway. We will continue to apply for GLA funding for AQ projects.

3.3.6 Comment Table 4, Item 1 should include as an output positive publicity targets (e.g. on the website and in the Newham Magazine).

Response: While we are not convinced of the merits of targets we will seek to disseminate our results as widely as possible.

“ 3.3.7 Comment Item 3 should reflect the wider enforcement objective in relation to emissions (e.g. when the ULEZ extends to Newham and include Key Performance Indicators (KPIs) for enforcement of parking and restrictions.

Response: The parking strategy review will contain a set of new performance indicators for enforcement.

“ 3.3.8 Comment Item 16 should include KPIs related to green deliveries (e.g. by cargo bikes) and enforcement of restrictions relating to loading bays and parking offences by delivery vehicles which cause congestion.

Response: Collection of this data is not practical at present but will be kept under review.

“ 3.3.9 Comment Item 12 should be expanded to include Low Traffic Neighbourhoods with a target for a significant percentage of the borough to be included in Low Traffic Neighbourhoods by 2024.

Response: We think you mean AP19 and we will keep this under review .

“ 3.3.10 Comment AP 23 should commit to environmental-related parking permit charges, not mere consideration. Also a commitment to a Workplace Parking Levy – not mere “investigation”.

Response: Noted and see response to 3.13 on parking charges. There will be an initial investigation on Work Place charging levy and report back to committee to determine the next steps.

“ 3.3.11 Comment Item 25 should include a target for improving walking and cycling modal share significantly, a target for Low Traffic Neighbourhoods, a commitment to 20mph, a commitment to assessing all new schemes for their contribution to active travel and a commitment to not proceed with poor quality schemes that do not promote the aims of the cycle strategy.

Response: See comment on 3.33 and LIP3 targets set out in tables at the end of the document to go into section 3 of consultation document

3.4 | Plashet Secondary School, East Ham

3.4.1 Comment The Newham Recorder reported on 23rd July 2019 that air pollution monitors have been fitted outside all schools. We believe that this is a fantastic opportunity for students to be able to use the results in order to have hands-on experience of real data handling. This coupled with our weather station will be a powerful tool for our Geography team. We, therefore, wanted to enquire about the location of the closest air pollution monitor to Plashet School, and if there was a plan to share the data generated with schools?

Response: We are in the early stages of collecting air quality data from all 96 primary and secondary schools. We will be working with individual schools through the STARS Scheme (See AP 13) and implementing appropriate mitigation measures where identified through our schools. We see this as an excellent educational opportunity to raise awareness of air quality amongst pupils.

3.4.2 Comment We have a large amount of support from the student body with regards to maximising the amount of waste that is recycled. At present, as a school, we have no separate food waste collection and we would like to know if there are there any plans to create a borough-wide strategy for this? Also, given the low rates of recycling in Newham, what plans are there to increase public Willingness to recycle and what role does your office feel that schools can play?

3.4.3 Comment Is there support for a Newham wide move against single-use plastic water bottles in Newham schools? Perhaps by funding a subsidy for reusable water bottles.

3.4.4 Comment Given that the borough has set a target of being carbon neutral by 2030, what further changes will school be supported to make in order to play a role?

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

3.4.5 Comment We would be interested to know what pressure your office can give in terms of the buses used on routes past Plashet being changed to green energy such as electric or bio-fuel powered buses.

Response: We already have an ultra low emission bus corridor on Romford Rd and will continue to lobby TfL for cleaner buses elsewhere on routes in the Borough.

4 | Consultation Responses from Businesses

4.1 | Brett Concrete Ltd

4.1.1 Comment

Brett Concrete Ltd and S Walsh and Sons Ltd are currently in the process of preparing a joint planning application for the erection and operation of a concrete batching plant and associated infrastructure on land at Bow East Goods Yard. Bow East Goods Yard falls within the London Legacy Development Corporation area (LLDC), however, also falls within the London Borough of Newham.

The draft AQAP (2019-2024) does not make reference to the air quality benefits associated with transporting freight via rail as opposed to the road. However, LBN 2002 adopted AQAP includes an action that *'Newham Council will continue to support initiatives to transfer freight from road to rail and 'Transferring freight by rail is more sustainable than transferring it by road and the council will support appropriate initiatives to transfer freight from the road'.*

The proposed concrete batching plant is located at a strategic railhead which will allow the importation of the vast majority of materials by rail. The reduced emissions associated with the importation of materials by rail have been a key consideration in selecting this location for the batching plant.

We consider that the draft AQAP (2019-2024) should continue to: *"support initiatives to transfer freight from road to rail" as per the draft London Plan, Policy 6.14 which promotes the movement of freight by rail and waterway...'* will be encouraged as this will ease congestion on the highway network and help combat climate change' and paragraph 10.1.3; *'the Mayor will work with partners to minimise freight trips on the road network'.*

The inclusion of this action will also act to support the 'Healthy Streets' approach which is contained within the draft London Plan. The supporting text to Policy T2 'Healthy Streets' (paragraph 10.2.3) recognises that the approach requires better management of freight so the impact of moving goods, carrying out servicing and supporting construction on London's streets is lessened. The text goes on to state (paragraph 10.2.5) that the

Mayor will work with the freight industry, its customers and London Boroughs to develop more creative solutions to managing freight.

Additionally, Policy T7 of the draft London Plan has specific regard to Deliveries Servicing and Construction and states that 'development proposals must consider the use of rail/water for the transportation of material'.

In light of the above, We consider that the inclusion of an action to support initiatives to transfer freight from rail to the road will have a positive impact on reducing emissions related to the movement of goods and will ensure that the Air Quality Action Plan once adopted will be in line with the London Plan.

Response: Generally supportive. However, this action is not specified within the 2019 [Mayor of London's AQAP matrix](#). No further action needed.

4.2 | London City Airport

4.2.1 Comment

Summary of London City Airport (LCY) representation relevant to the AQAP;

The Airport is committed to minimising any negative air quality impacts for people living and working in the area. The Airport operates a comprehensive air quality monitoring network which was established in 2006. There have been no recorded exceedances of the air quality objectives at any site since monitoring commenced.

The Airport has developed an [Air Quality Management Strategy \(2017 – 2019\)](#) that has been agreed with the London Borough of Newham (LBN), and which will be reviewed in 2020. Within the [Draft Master Plan 2020-2035](#) that has been published by the Airport, a further set of commitments to minimise pollutant emissions has been listed [on Page 62]

Response: Noted.

4.2.2 Comment

Section 1 of the Draft AQAP states that "operations at London City Airport are a significant source of air pollution", and reference

is made to the London Atmospheric Emissions Inventory (LAEI). Whilst the data cited from the LAEI are not disputed, the statement is potentially misleading in that it infers that emissions from the Airport significantly affect pollution concentrations in Newham. In this context, it is important to note that:

- Emissions in the LAEI related to the Airport are based on the Landing and Take-Off (LTO) Cycle that includes emissions from aircraft up to a ceiling of 3000 ft (950m). In reality, emissions from aircraft at altitudes above several hundred metres will have an imperceptible impact on ground-level pollutant concentrations; and
- This is reflected by the Air Quality Management Area (AQMA) declared by LBN which encompasses the major road network in the borough. Figures 2 and 3 of the Draft AQAP note that NO₂ concentrations are exceeding the air quality objective "in the locality of all major roads in the Borough" and "the most significant source of PM₁₀ in the Borough is road transport and other sources associated with central London".

Response: See fig. 6 of the AQAP which shows that aviation NO_x emissions in LB Newham is 4th highest out of 8 categories according to the LAEI 2016 data.

4.2.3 Comment

LBN notes that the "LAEI (2013) forecasts that NO_x and PM₁₀ emissions from aviation will increase up to 2025" and that these forecasts do not take into account proposals within the draft Master Plan. The Airport has carried out a detailed air quality assessment to support the masterplan which quantifies the change in emissions and concentrations associated with the proposals. This assessment concludes that in 2035, the maximum concentrations are predicted to decrease compared with the current situation, in the vicinity of the Airport. In addition, all predicted concentrations are well below the air quality objectives.

Response: The above underlined comment does not align with the summary of the published annual pollutant emissions between 2017 and 2035 ([LCY Air Quality Assessment](#), table 1 p.D3), which specifies an overall 53% increase in Nitrogen Dioxide (NOx) emissions, an 8.4% increase in Particulates < 10 µm (PM10) and 4.9% increase in Particulates < 2.5 µm (PM2.5)".

4.2.4 Comment

...However, [under 1.2] LBN notes that "airborne emissions are not required to be monitored under the permission, which is of concern to the Council". The Airport does not explicitly monitor "emissions" and it is assumed that LBN is referring to "concentrations". It is not clear why airborne concentrations are of concern (as there is no public exposure there) or how such concentrations could be practically measured.

Response: Noted and have reworded in AQAP to: "emissions from aeroplanes once airborne, are not required to be monitored under the CADP planning permission. This source of air pollution remains a concern to the council."

4.2.5 Comment

London City Airport supports the measure to enforce the NRMM LEZ and confirms that all NRMM associated with the ongoing CADP construction works are registered and comply with the LEZ. Since the commencement of the CADP works, two automatic monitors recording levels of PM10 have been installed at locations agreed with LBN, and reports are sent to the Council on a regular basis.

Response: Noted.

4.2.6 Comment

Reducing Emissions from CHP, As part of the CADP project, CHP with 95% catalytic reduction will be installed along with photovoltaic panels on the terminal roof. The CHP NOx emissions are well below the standard set in the GLA's SPG.

Response: Noted.

4.2.7 Comment

Air Quality Neutral. The CADP project has been shown to conform to the requirements of Air Quality Neutral, and any proposals brought forward under the Masterplan will also conform to this, and any updated benchmarks. The latest version of the draft London Plan (July 2019) requires that "Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating a) how proposals have considered ways to maximise benefits to local air quality, and b) what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this." London City Airport supports this approach in principle, subject to forthcoming guidance from GLA on how this policy should be applied.

Response: We welcome the above approach in future Master Plan/developments at LCY and in the future towards Air Quality Positive.

4.2.8 Comment

Installing Ultra Low Emission Vehicle (ULEV) Infrastructure Within the Masterplan proposals London City Airport has committed to ensuring that 300 parking spaces (1 in 5) are equipped with electric charging points by 2035, with provision for electric charging or zero-emission vehicles on all other spaces.

The Airport has also committed to ensuring that all airside vehicles with a permanent pass will be electric (or zero emissions) or use renewable fuels, by 2030.

Response: Noted.

5 | Consultation Responses from Citizen Assembly Engagement

5.1 | Youth Citizen Assembly

127 young people attended the boroughs four youth zones, Police Cadets/Woodcraft Folk/primary/secondary Schools/ third sector youth clubs and shared their views on the AQAP.

| Promotion of Air Quality Initiatives

Key Quotes “talk about it in schools”, “advertisements on social media”, “let students go on strikes”, “put posters and leaflets in youth clubs”, “activities in school encouraging better habits”, “Newham should take charge and speak to our young people”, “Advertisements in local areas (cinemas)”, “external organisations coming into schools” “empowering and supporting young people to make a change”, “raising awareness to adults so they try to make a change”, “do a song/rap”, “force government to change”.

Response: See AP 10 & 13. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.



Consultees, Youth Citizen Assembly

| Built Environment

Key Quotes “More Solar Panels, “eco-friendly houses”, “investments for schools”, “renewable energy and electric”, “loft insulation”, “use less fossil fuels, use more bikes and wind turbines”, “cooling systems instead of air conditioners”, “make changes that other boroughs have already implemented to become greener?”.

Response: See AP 6, 9 & 18. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Green Infrastructure

Key Quotes “green areas”, “have walked only areas”, “plant more trees”, “plant a tree for every tree we takedown”.

Response: See AP 5 & 8. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.



Consultees, Youth Citizen Assembly

| Transport Planning

“make cycle lanes safer”, “make bikes free to ride”, “electric cars”, “raise money for more electric cars”, “fewer vehicles passing near schools”, “discourage drivers from using main roads”, “bike lanes on major roads”, “more cycle docks around”, “more electric buses”, “target cars”, “walk more”, “schools provide ride to school scheme”.

Response: See AP 20-25. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.



Speaker, Youth Citizen Assembly

5.2 | Climate Now Open Forum

More than 60 people joined the borough's first 'Climate Now Open Forum' at the Town Hall in East Ham, where residents shared their views on the AQAP. This involved residents, local interest groups, faith leaders and young persons.

There are very useful collective comments. Where these are appended by 'Climate Now Strategy' or the relevant part of the AQAP, these will be reviewed alongside the recent Council Report on [Addressing Climate Change](#). This will also continue to be discussed on the agenda of the 'Air Quality & Climate Emergency Taskforce'.

Key Quotes | Green Infrastructure

- “ Give money incentives to local people to influence positive behaviour change such as a £200 grant to de-pave your front gardens and have greenery instead to help drain water to stop floods, cooling, nicer environment and act as a carbon sink;
- “ Enough tree surgeons to care for Newham's existing trees and promote new tree planting initiatives - one for each resident in Newham;
- “ More green screens vertical gardens and tree planting;
- “ Greening Infrastructure Delivery Plan needed - This is ongoing and it is clear that it has been taken up in different ways in the community, by voluntary groups doing local garden initiatives. However, there needs to be more thought by the council regarding this issue. As part of the Forest Gate Newham and TFL developments, we were supposed to have 15 new trees. However, because of underground infrastructure that was not known about before this will no longer be possible. So what happens now? Unless this is dealt with creatively and in a timely way, we will not have the greening delivery that was planned which will have a consequence on air quality.
- “ Promote planting on balconies and in front and back garden;
- “ Tree and hedge planting in community gardens to increase drainage and biodiversity and nicer environment;
- “ Plant a tree for every resident and then for every birth and death in the borough;
- “ Greening programmes of all main roads from Romford Rd, Roman Rd, A13, A406 etc;
- “ Ensure greening of all planning development permissions;

Response: See AP 6, 9 & 18. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

Key Quotes | Cycling and Walking

- “ Need to force behavioural change by having cheaper and good quality sustainable public transport, so that walk, cycle, bus etc. becomes the norm and not car use;
- “ Make cycling safer and improve quality of cycle lanes (Newham must keep them swept as debris can lead to punctures);
- “ More cycling lanes and lessons;
- “ Repeat cycle lane improvements done in Stratford, pedestrianising, less space for cars and more for cycling;
- “ Provide cargo bikes for cheap hire to transport a big shop from supermarkets;
- “ More cycle lanes such as in Stratford around the borough particularly in East Ham such as Romford Road, Barking Road and Green Street;



Consultees, Climate Now Open Forum

- “ Have more e-bike hires for older and less fit residents;
- “ Bike hub schemes including cargo bikes for when children are young and for weekly shop use only;
- “ Newham to loan out child-friendly different-sized bikes as children grow out of them and can be returned, so more sustainable as can be expensive. Will help with the obesity problem;
- “ Make Greenway safe and particularly at night time for cycling use. Security patrols to

reduce incidents of ASB and bike thefts and improve lighting;

- “ Educate cyclists on good bikers' code, such as responsible use of cycle lanes, no riding through red lights, bell use on canals and cycle paths and to give way to pedestrians, particularly at bus stops;
- “ Increase money incentives to residents to walk and cycle;
- “ Promote how great the Greenway is - publish info on low pollution level areas on the website as well as areas of high pollution;
- “ If the council really want to increase cycling rates, then making it easier and safer for cyclists is paramount. I have looked at the cycling strategy and I do not understand why when there is highway development going on in Forest Gate that cycle paths have not been included in the plans. This was an ideal opportunity. All the pavements have been widened considerably but no infrastructure has been put in place for cyclists, except token cycle boxes at traffic lights. In the plan for this point, it indicates the cost as high however if it is incorporated into the building of the highway now it could be achieved at a lower cost as some of this might have been taken up by TFL. It is a totally missed opportunity;
- “ Walking bus for every school in the borough.

Response: See AP 25. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

Key Quotes | Transport Planning

- “ Recognise that need more river crossings and for Silvertown Tunnel rather than opposing it, as it is going to be built, a campaign to be 100% Zero-emission, use only such as electric vehicles and divert other polluting vehicles to other crossings;
- “ Have quieter streets designation and promote this to the public for walks;
- “ Have a car-free zone in Stratford town centre and more electric charging points in petrol stations;
- “ Promote electric car club sharing schemes so can ditch the car;
- “ Zoned traffic areas to stop cars rat-running and allow only residents in;
- “ Lowest car ownership but have the highest pollution deaths so need to get rid of commuting through our borough and non-resident traffic;
- “ Shops to install EV chargers in their car parks for public and staff;
- “ More electric taxis in Newham;
- “ More electric car apprenticeships places;
- “ More local job promotion in green industry technologies;
- “ Introduce car-free zones on high streets and at schools;



Cllr Mas Patel, Climate Now Open Forum

- “ Campaign to reduce idling of stationary vehicles and switch the vehicle off in traffic queues such as Romford Rd;
- “ More public transport options, particularly in the east part of the borough;
- “ Promote carpooling arrangements;
- “ More public transport options to reduce the need to use the car;
- “ More electric charging points;
- “ Hold more zero traffic days. The statistics of these days show that they are very effective. Closing a residential street for two hours makes a mockery of what could be achieved and is more a social event than really trying to introduce improved air quality;
- “ I think it should be the whole community project. Why not close Woodgrange Road on a Saturday for 8 hours and get free parking organised in Forest Gate community school so that people can come and shop on a pedestrianised street and experience what that would be like. The market could move to the street, there could be activities for families and shoppers could come from outside of the area because free parking would be provided for the day. This would have a real impact on air quality similar to that on the day of the marathon;
- “ Hold more play streets and map traffic when they take place to work out which streets you can close permanently without major traffic impacts;
- “ More safe spaces away from traffic fumes to play in;
- “ Traffic wardens to hand out tickets for dog fouling, fly-tipping, car idling and on the spot fines for car idlers;
- “ This should be a whole Newham policy. Many people sit with their engines on throughout the borough, not just outside schools. There should be an education in the Newham Magazine about this and there should be fines for people who refuse to turn their engines off. This is a serious pollution problem. We have many people in the road I live in who, in the summer, keep their engine on to keep cool with air conditioning and in winter warm with heating, while they wait to pick

people up or unfortunately waiting for "drug drops" ;

- “ Make buses in Newham more eco-friendly work across London;
- “ Incentivise public transport;
- “ Lobby Mayor of London for eco-friendly buses and better public transport options.

Response: See AP 20 – 25. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

Key Quotes | Built Environment

- “ Insulate all homes, community centres and faith buildings; (Climate Now Strategy)
- “ More efficient heating systems and change to air source away from fossil fuels; (Climate Now Strategy)
- “ Use of smart meters, but they say what you use but not how to reduce energy consumption- more info; (Climate Now Strategy)
- “ Draught proof windows- small cost and simple to do; (Climate Now Strategy)
- “ Don't leave white goods such as microwave and laptops on standby; turn off lights when leave room - local campaigns on this; (Climate Now Strategy)
- “ All to change to LED lights - big energy save promotion; (Climate Now Strategy)
- “ Install solar panels and offer grants on all council/private housing southern roofs - campaign for feed-in tariffs incentives into the national grid; (Climate Now Strategy)
- “ Switch to renewable energy tariffs; (Climate Now Strategy)
- “ Engage private landlords through licence conditions (e.g. change waste disposal for more recycling, solar panels on the roof, air-source heat pumps and not gas boilers, green gardens and not paved over to increase the level of SuDS and 100% renewable energy tariff for tenants to use); (Climate Now Strategy)

- “ Incentives to residents to install solar panels on south-facing roofs; (Climate Now Strategy)
- “ Environmental impacts important in all planning decisions; (Climate Now Strategy)

Response: See AP 8 and recent Council Report on Addressing Climate Change. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

Key Quotes | Localised Impacts

- “ Close cement factory next to the school in Olympic Park;

Response: This site is within the LLDC planning authority area and is subject to an LLDC planning application.



Consultee, Climate Now Open Forum

Key Quotes | Promotion of Air Quality Initiatives

- “ Educate on anti-idling and switch the engine off outside schools, put up notices outside the school and fine drive who continue to idle; (see AP20)
- “ Educate the public and collect data and make it available on how Newham is performing. (see AP1)
- “ More walk, cycle public transport improvements and promotion. (see AP25)
- “ Pension divestment promotions so 100% on renewable energy investments- lobby your pension provider; (Climate Now Strategy)
- “ Residents to use their vote to hold politicians to account if not delivering on the climate emergency issues.
- “ Promote locally grown food markets to reduce food miles; (Climate Now Strategy)
- “ Promote and provide incentives to residents to move to green energy tariffs such as octopus/beam energy; (Climate Now Strategy)
- “ All to tackle our bad habits on our carbon footprint- promote carbon trust website advice; (Climate Now Strategy)
- “ LBN to use Neighbourhood Offices, leisure centres, faith Groups, shopping centre posters, website, magazines to promote and disseminate messages on educating the public (Climate Now Strategy)
- “ Newham council to do more to educate residents to take collective responsibility and take small steps on a large scale; (Climate Now Strategy)
- “ As Newham has a high level of BME people, whose first language is not English, provide these forums to these groups to educate and make aware especially on renewable energy take-up and reducing fuel poverty; (Climate Now Strategy)
- “ Climate Change awareness in schools, our children are the future and most impacted; (Climate Now Strategy)
- “ Change public perception on climate change being everyone's responsibility and take collective responsibility - how can individuals make a difference- publicity campaign; (Climate Now Strategy)

- “ Educate the public on myths of green energy being more expensive and for the poorest in fuel poverty who would benefit the most if switched; (Climate Now Strategy)
- “ Educate school children in the curriculum on air quality and climate change – we all need to be climate activists; (Climate Now Strategy)
- “ Hand out leaflets outside schools to parents on idling pollution and also to car idlers; (see AP20)
- “ Raise awareness of fewer food miles and carbon footprint of local produce; (Climate Now Strategy)
- “ Encourage one big weekly car shop rather than daily car shops to reduce congestion and pollution; (Climate Now Strategy)
- “ Publicise health effects of driving versus walking down side streets. (see AP13)



Speaker, Climate Now Open Forum

Response: Where comments relate to the councils Climate Now Strategy these are set out in the recent Council Report on [Addressing Climate Change](#). We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

6 | The Online and Paper Public Survey, Summary of Responses

There were 298 public responses to the online and paper AQAP consultation survey. This section is divided into three parts. The first summarises who completed the survey. The second reports on the most popular suggestions to Improve Air Quality in Newham. The third reports on the general popularity of each of the key proposed actions in the AQAP.

6.1 | Who responded to the online survey?

Figure 1 below shows the capacity in which people responded to the survey. Respondents could choose more than one option. 92% of respondents said that they were responding as a Newham resident.

Figure 1 | How are you responding to this survey?

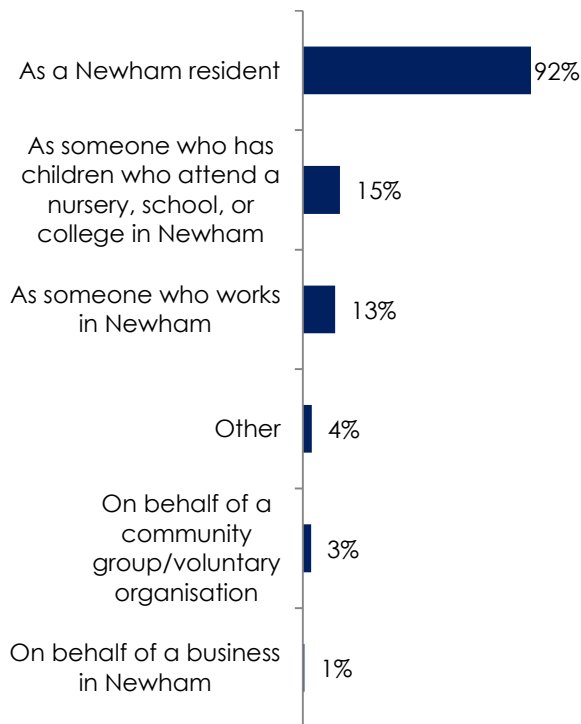


Figure 2 shows how all consultation survey responses who specified they were responding as a Newham resident reported their ethnicity (275 out of 298 responses) compared with current projections from the Greater London Authority (GLA) for Newham residents aged 18 and over. Ethnic group categories used in the consultation have been collapsed so they map onto the GLA categories to aid comparison. The chart shows that the ethnicities of those who

responded as a Newham resident to the consultation are generally not representative of the borough, with White British residents being particularly over-represented (48% of respondents identified as White British compared to a projected 15% at the borough level). The council ensured ethnic minorities were also represented via other engagement activities such as the youth citizen assembly and climate now open forum.

Figure 2 | How would you describe your ethnicity?

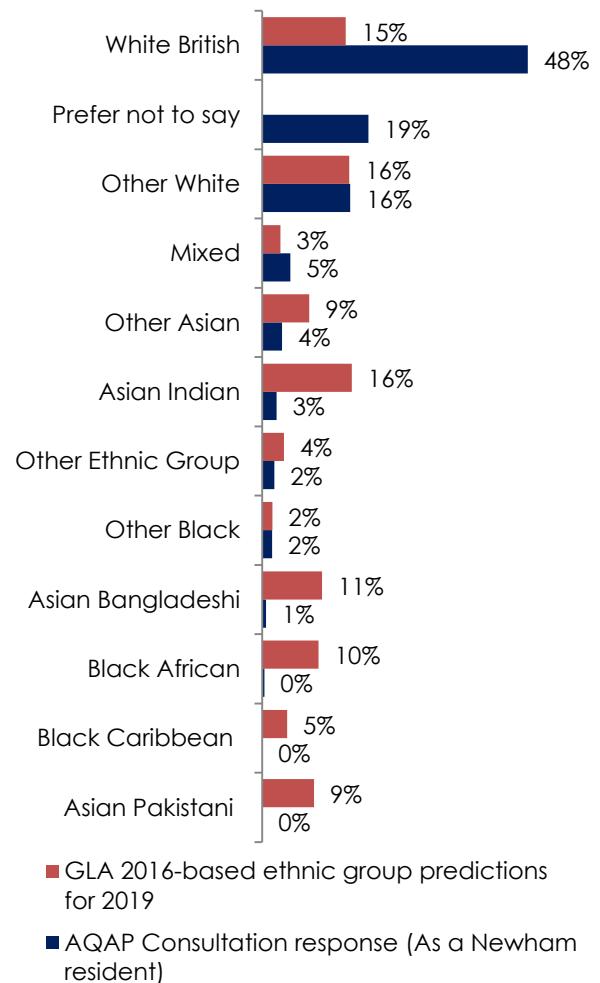
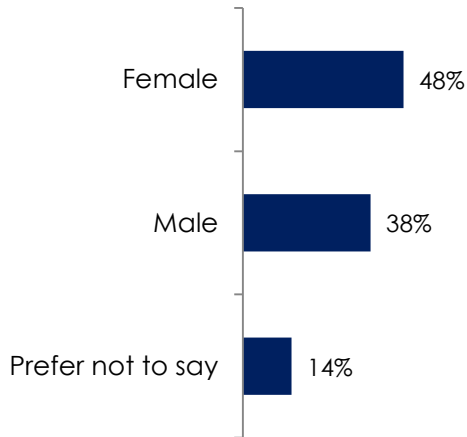


Figure 3 shows 48% of respondents said that they were female, compared to 38% male; however, 14% did not provide their gender.

Figure 3 | Respondent gender (All respondents)



Consultation survey respondents tended to be in the younger and mid-age groups; 59% of respondents were aged 25 to 44 (Chart 4).

Figure 4 | Respondent age group (all respondents)

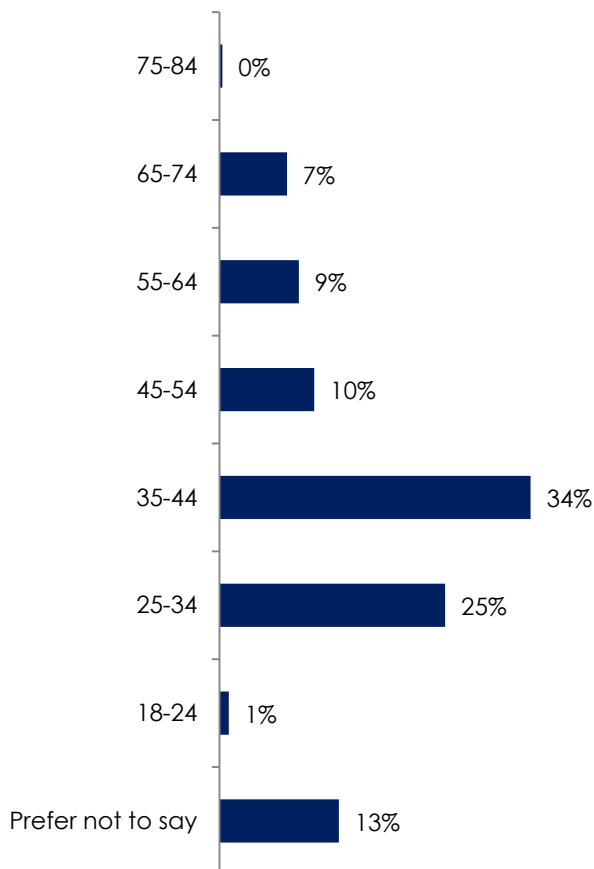
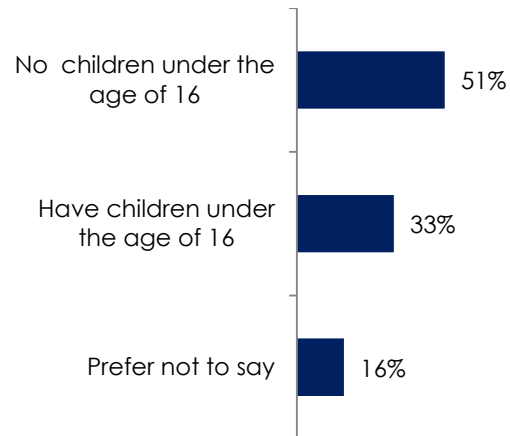


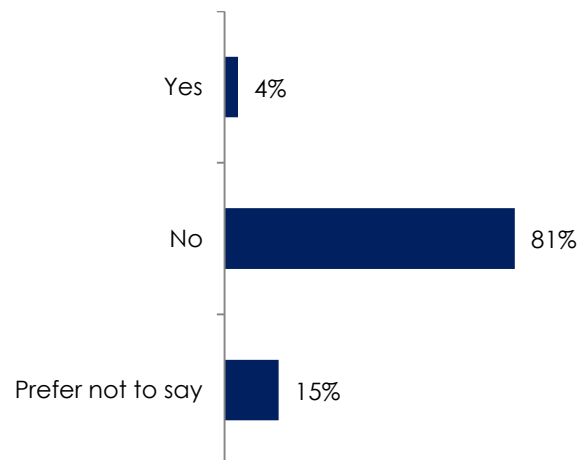
Figure 5 below shows that 33% of respondents said that they have children under the age of 16, compared to 51% without children under the age of 16.

Figure 5 | Do you have any children under the age of 16? (All respondents)



11 respondents (4%) said that they considered themselves to be a disabled person (Figure 6).

Figure 6 | Do you consider yourself to be a disabled person?

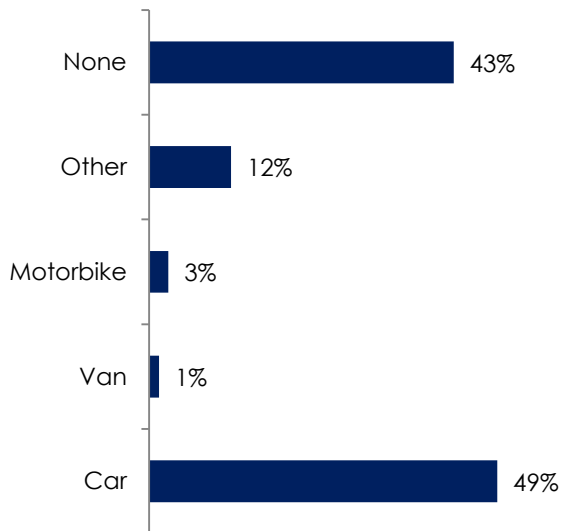


| Vehicle ownership and Travel in the borough

Respondents to the AQAP consultation survey were asked about the type of vehicle they own, awareness of the introduction of the ULEZ, and how they travel around the borough.

Figure 7 below shows that a range of vehicles is owned by respondents, however, the largest group of respondents own a car (49%).

Figure 7 | Please say what vehicles your household, business, or organisation currently owns? (all respondents)



Of those that reported owning a vehicle listed above, 19% said the vehicle they use most was a low-emission vehicle.

Awareness of the ULEZ was relatively high, with 83% of respondents saying they were aware (Figure 8).

Figure 8 | Were you aware of the upcoming introduction of the ULEZ?

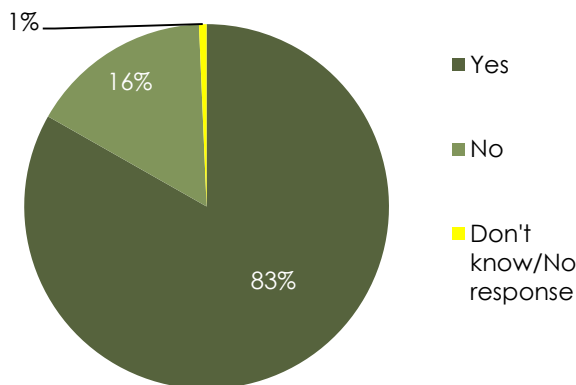
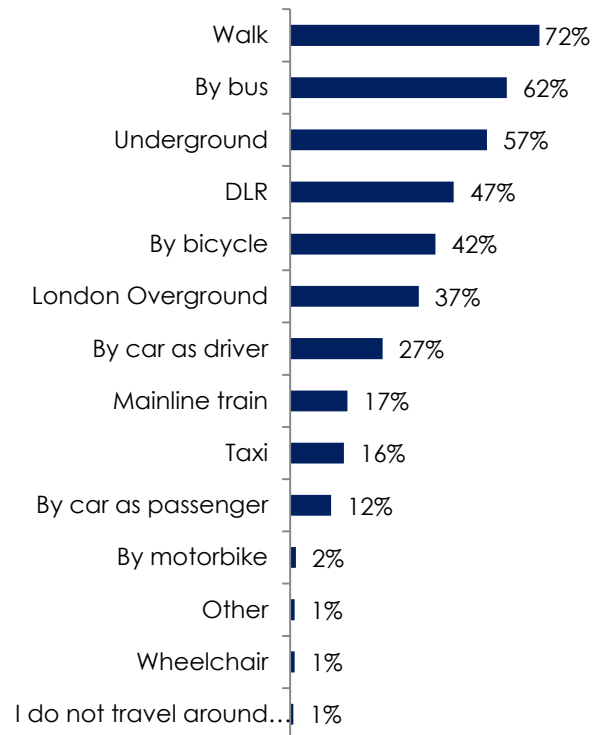


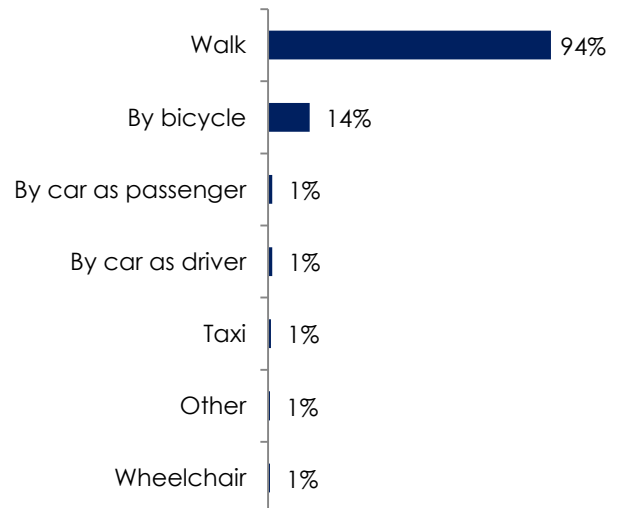
Figure 9 below shows that walking was the most common way for respondents to get around the borough, with 72% of respondents saying they typically walked. This was followed by a bus (62%) and the Underground (57%)

Figure 9 | How do you typically travel in and around the borough? (All respondents)



Respondents were also asked how they travelled to local public transport hubs. In these situations, walking was by far the most common mode to use; 94% of respondents said they typically walked. (Figure 10).

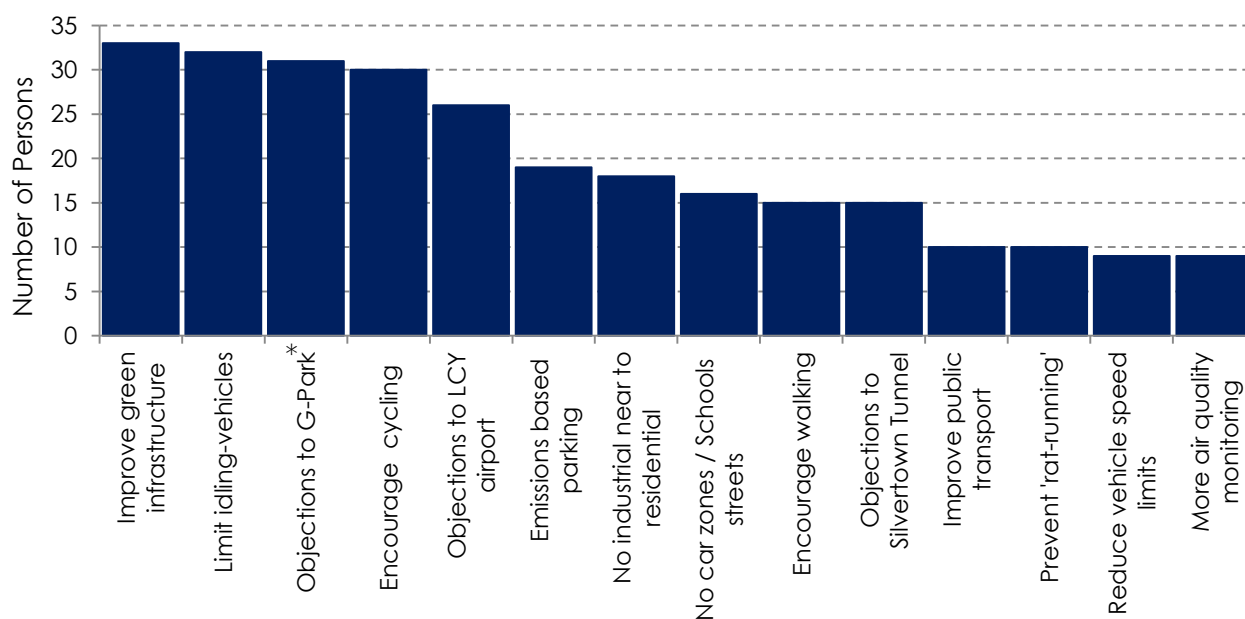
Figure 10 | If you use public transport, how do you typically travel to that local transport hub, such as a bus stop or train station? (All respondents)



6.2 | Popular Online-Survey Suggestions on Improving Air Quality (Key Words and Quotes)

This section reports on the most popular online survey suggestions to Improve Air Quality in Newham. Figure 11 below illustrates the top 14 suggestions. Each of these suggestions is explored in more depth with keywords and quotes. This report will be shared with all relevant service areas to review the constructive comments received on a local level.

Figure 11 | Top 14 common suggestions



| Improve Green Infrastructure 33 suggestions

Key Quotes "Healthy Streets", "plant more trees", "green parklets... instead of vehicle parking", "residents adopt a tree sapling", "promote greening driveways", "vertical planting walls... including mosses", "habitats like native trees and wildflowers", "do not sell off Forest Gate community garden", "implement Liveable Neighbourhoods", "greening streets", "new build vertical gardens", "trees along A13", "local seed bank for residents", "consider if privately-owned hard standing (front gardens) can be reduced & or re-greened", "Create more green space", "minimum of 9 m2 of green space per person", "all beds are continually sprayed by a weed killer...question the contractors".

...This includes promoting permeable surfaces and the re-greening of gardens, maximising the multiple functions of green infrastructure, where new development is proposed. Future updates will aim to ensure any new green spaces are given explicit plan protection. The Council has plans to develop a public-facing 'Green Infrastructure Database' so that residents can contribute.

Response: See AP 6, 9 & 17. The Local Plan supports many of these suggestions (TfL's healthy streets approach, minimising parking as far as practicable...)



Clr James Asser and 'Trees for Cities', Beckton Park

| **Limit Idling-Vehicles 32 suggestions**

“Key Quotes “Anti-idling campaigns”, “focus on hotspots”, “public education”, “improve enforcement”, “No idling outside schools/ on high roads”, “ Signs outside schools”, “anti-social behaviour”, “fumes from idle vehicles are the main cause of pollution in my area”, “particularly at night as people sit and socialise within”, “Woolwich Ferry”, “London City Airport”, “deliveries”.

Response: See AP 10. The first volunteer air quality health champions are being trained in October 2019.



The anti-idling campaign, North Beckton School

| **Object to Gazeley G-Park/Silvertown Lorry Park* 31 suggestions**

“Key Quotes “Stop the lorry park in Silvertown”, “do not approve”, “disgraceful Lorry Park”, “reject constructions that encourage further NO2 emission, such as the lorry park”, “will create a lot of air pollution as well as damage roads further”.

Response: This subject to a planning application and there have already been a high number of objections received. This will be subject to a committee decision in early 2020.

| **Encourage Cycling 30 suggestions**

“Key Quotes “Improve cycling facilities”, “secure bike storage hubs”, “Improve infrastructure”, “Improve safety”, “more bike lanes”, “segregated lanes”, “raised cycle lanes with curb”, “mini Holland”, “better bike stands/racks/cycle hoops... in every road”, “costs more to rent a cycle space than park a car”, “Remove car parking on one side of the road”, “family-friendly routes... away from A13”, “improve Greenway”, “Please allow residents to apply for parking permits on the street for CARGO BIKES”, “CURRENTLY not possible to park a cargo bike, yet it’s completely FREE to park your car?!!”, “ban pavement parking in cycle lanes”, “lobby TFL to extend bike hire scheme”, “e-bikes as an alternative to cars”, “safer road crossings”, “Greenway... Flagship project”, “Cycle to work/school schemes”.

Response: See AP 25 which refers to our current [cycling strategy](#) which aims to double the number of journeys taken by bike by 2025. We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.



Rented Cycle Hoop, Forest Gate

*See [planning application 19/01776/FUL](#) for further information.

| **Object to LCY Airport 26 suggestions**

“Cap the number of air polluting flights at London City Airport. No further expansion!” Do not allow the expansion of city airport”, “reduce or close the airport”, “expansion incompatible with Newham's climate emergency”, “extend the respite window to the whole weekend”, “further increases will again worsen air pollution which is already very bad in the borough”, “Stop City airport from increasing the flight frequency”, “Simply paying money to make the airline's flight carbon neutral will not directly benefit me. But restricting flights will benefit me”, air miles need to be abolished”, “a lot of cabs and taxis are using the surrounding streets”.

Response: See AP1 on monitoring at City Airport. The Local Planning Authority has responded to consultation on the London City Airport draft masterplan, expressing concerns about noise, air quality and climate change.

| **Emissions Based Parking 19 suggestions**

“Improve Parking Restrictions”, “emissions-based parking”, “charge for first parking permit and increase for second”, “costs more to rent cycle space than park a car”, “limit council / school staff from purchasing permits”, “Charge much higher costs for large gas-guzzlers”, “get the SUVs off the roads”, “scrapage scheme for diesel vehicles”, “more support for electric cars”.

Response: See AP23. We will promote the [ULEZ Car and motorcycle scrappage scheme](#). We will pass these suggestions onto the relevant service areas and Air Quality and

| **No Industrial Near to Residential 18 suggestions**

“better town planning”, “Bradfield Road”, “Knights Road”, “Silvertown”, “hundreds of lorries”, “North Woolwich Road”, “2 HGVs/heavy construction vehicles on the road every 30 seconds”, “Lyle park is unhealthy due to... construction recycling plant”, “dust and dirt”.

Response: See AP20 . We will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| **No Car Zones /Pedestrianised Areas Near to Schools 16 suggestions;**

“close roads am and pm”, “Pedestrianise the roads directly around schools”, “chaos around the local schools at school pick up times”, “stop cars on the school run”.

Response: AP9, AP14 [The Healthy School Streets programme](#) is commencing in November at pilot schools.

| **Object to Silvertown Tunnel 15 suggestions**

“Stop Silvertown Tunnel”, “oppose”, “major source of traffic”, “worsen air quality”, “impact will be catastrophic for air quality”, “contrary to Action Plan”.

Response: The Silvertown Tunnel is the subject of a Development Consent Order issued by Government (Secretary of State for Transport) under the National Infrastructure Planning regime. The proposal was not supported by Newham but these powers surpass the Council's. See AP 20 (g) and the [Mayors letter to TfL](#) (August 2019).

| Encourage Walking 15 suggestions

- “less polluted walking routes”, “safer walking routes”, “reviewing dark areas for additional street lighting and additional CCTV would help”, “more car-free zones proposed, which are closed off to all but residents.”, “cross-borough walking routes”, “better street lighting”, “crime prevention, more action on pavement cycling”, “encourage school children to walk to school”, “total ban on pavement parking”, “Pedestrian crossings often have potholes”, “Borough-wide car-free days”, “more walking buses”, “Timings (on Greenway) prioritise car flow and discourage walking and cycling”.

Response: See AP 13 & 25 LIP 3, and [The School Travel Plan](#). The Council will be developing a Walking Strategy by 2021.



Walking Bus, Selwyn Primary School

| Improve Public Transport 10 suggestions

- “More bus routes”, “cleaner buses”, “more dedicated bus lanes”, “buses and trains are often crowded, diverted, or late”, “tackle TfL bus emissions”, “campaign for tube coverage”, “alternative to the Silvertown tunnel... e.g. joint campaigning on tube coverage, “bus only high streets such as High St North in East Ham”.

Response: We already have an ultra low emission bus corridor on Romford Rd and will continue to lobby TfL for cleaner buses elsewhere on routes in the Borough.

| Prevent ‘Rat-Running’ 10 suggestions

- “Stop through commuter traffic, “A13”, “road closures”, “road layout changes”, “Tollgate Road”, “Eisenhower Drive”, “Columbine Avenue”, “Clova Road”, “Earlham Grove”, “Aldworth Road”, “Tennyson Road”, “Lonsdale Avenue”.

Response: These suggestions will be passed onto the Highways Team. See AP20 & 25.

| Reduce Vehicle Speed Limits 9 suggestions

- “improved speeding enforcement”, “ALL roads in the borough should be 20mph!”, “The main high streets in East Ham need a slower drive speed limit”, “put speed camera’s in”, “Control the speed of racing cars, motorbikes with illegal exhausts”, “Introduce speed cameras along North Woolwich Road”, “traffic calming measures”, “add more speed bumps”.

Response: See AP25 (f) and [details on speed limits](#). These suggestions will be passed onto the Highways Team. We encourage you to discuss safety concerns with your local Councillor.

| More Air Quality Monitoring 9 suggestions

- “increased monitoring”, “Airborne aviation emissions need to be included in your figures”, “Greater scrutiny and monitoring”, “educating people”, “monitoring of air quality in Newham schools”, “educate children on the data collection”, “involve...in the development of plans”, “Data needed”, “more AQ monitors for residents and schools”.

Response: See AP1 on expansion of monitoring and publishing of results. Further air quality data in Newham is available [here](#).

6.3 | Other suggestions

- “ Better parking enforcement / ANPR camera enforcement **(8 suggestions)**;
- “ Incentivise the public and not penalise (to influence behavioural change) **(5 suggestions)**;
- “ Browning Road Bridge Closure **(4 support & 2 against)**;
- “ More EV charging/EV Car Hire/dedicated parking on roads & developments **(7 suggestions)**;
- “ Better community engagement and publicity of actions residents can take - faith leaders - citizens assembly, local forums as a complex subject. **(4 suggestions)**;
- “ Romford Road Improvements **(4 suggestions)**;
- “ Environmental and Health concerns for diesel taxis, lorries & busses **(3 suggestions)**;
- “ Promotion & provision for cargo bikes & tricycles for freight / shopping / luggage. **(3 suggestions)**;
- “ Dust concerns from construction site & HGV traffic **(2 suggestions)**;
- “ Ban Ice cream vans **(2 suggestions)**;
- “ Restrict lorry deliveries - by time (i.e. 10 pm - midnight) or by weight on residential streets **(2 suggestions)**;
- “ Better traffic management systems on main roads to counteract residential road closures **(2 suggestions)**;
- “ EV / ULEZ too costly / not the only solution **(2 suggestions)**;

- “ Green Council Fleet/procurement to remove non ULEZ compliant companies **(2 suggestions)**;
- “ Freecycle to work scheme for low-income residents **(2 suggestions)**;
- “ Educating about garden waste fires and BBQ's **(2 suggestions)**;
- “ Planning - Clear Planning application requirements for discouraging developments that impact AQ **(2 suggestions)**;
- “ Against restricting freedom of movement for cars in the borough **(1 suggestion)**;
- “ Impact on disabled drivers i.e. cost of Electric Motability Schemes **(1 suggestion)**;
- “ Introduce workplace parking levy **(1 suggestion)**;
- “ Promote the preservation and growth of green spaces in residential gardens **(1 suggestion)**;
- “ Car Free developments through planning **(1 suggestion)**;
- “ Enforce smoke-free zones **(1 suggestion)**;
- “ Minimise street lighting (research suggests outdoor lighting can interfere with chemical reactions to clean polluted air at night) **(1 suggestion)**;

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

6.4 | Selection of Detailed Suggestions

| Suggested Green Infrastructure

- “ More green spaces and things like [Hammersmith parklets](#)”;
- “ More emphasis on green corridors and spaces (e.g. Forest Gate Community Garden) and greening projects, in particular street and garden trees, tree

walks for the kids to follow to school. Lifting paving stones for drought-resistant planting”;

- “ Tree planting, please. And with that education about how to keep the saplings alive whilst they are vulnerable. So many dies, buried under refuge sacks or from lack of water”;
- “ Stop your green team contractors using glyphosate weed killer. We need healthy non-toxic wildlife areas that are good for pollinators and wildlife”;
- “ Trees and wildlife areas are important. Get communities involved in tree planting and caring for saplings. Explain the benefits [...] Inform people of suitable garden trees to plant” Invest in pilot schemes to demonstrate the benefits of greening over hard landscaping (particular attention to driveways)”;
- “ Plant more trees continuously along major roads and especially dual carriageways. Invest in making the Greenway cycle/pedestrian route more pleasant to use - suggest to reduce smell install high-level vent outlets to sewer & robust durable fragrant planting - e.g. rosemary and lavender”;
- “ I don't have a front garden but would love to be able to plant a climber on the side of my house which would take up a very small space in the pavement. I've seen climbers like wisteria and roses in other parts of London in pavements”;
- “ I saw nothing in the proposals which discussed the use of vertical planting which could effectively create a significant surface area of pollution absorbing plants (or I believe there are highly effective mosses) which could also be used to create pleasant green spaces as well as helping tackle air quality issues”;
- “ Pavements with less parking and car fumes could make cafes / small park-lets or seating areas more attractive and viable”;
- “ I believe good air quality and easy and safe access to public green spaces should be considered a human right and should be prioritised as such”;
- “ WHO suggested that every city should have a minimum of 9 m2 of green space per person? An optimal amount would sit between 10 and 15 m2 per person”;

- “ Council support for tree planting by individuals, communities, companies and organisations. See the current Woodland Trust initiative”;

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Suggested Idling Actions

- “ The large 366 vans that deliver catering leave engines running and squeeze down small residential roads. They should do all deliveries at once or use smaller vans”;
- “ Consider the current terrible service that the TFL Ferry is providing: the slow service and more than usual “one ferry operating only” cause terrible delays and traffic, with cars and heavy vehicles waiting with running engines, this affects the quality of air of our neighbourhood too”;
- “ I think there should be a greater focus on eliminating vehicle idling, which is a major issue in the borough. It is very evident on the residential streets where I live [...]. Can Newham introduce a fining system for idling vehicles, as they have in [New York](#), with an easy reporting system for residents to use?”;
- “ Transport for disabled children minibuses do not need to stop in the middle of the road with their engines running”;
- “ Please introduce fines for idling engines. I live on a road adjacent to Romford Road, and there are nearly always people sitting in idling cars outside the house”;
- “ Please get traffic wardens to check out idling on yellow line areas outside people houses regularly”;
- “ Enforce no idling. Currently scandalous that people sit in cars outside schools and nurseries charging their phones”; Repeated confrontations when asking drivers to turn off engines outside my house and school, despite it being illegal”;
- “ Aldworth Road/Tennyson Road E15, still remains a rat-run... because this wasn't 'designed out' when plans for the gyratory works were drawn up. Significant numbers of drivers who are

faced with the extra journey time of having to drive all the way around the town centre to reach Romford road are therefore continuing to use Aldworth road as a rat-run to short cut the above";

Response: We are in the process of recruiting Volunteer Air Quality Health Champions to tackle idling in problem areas. In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.



Newham Volunteer Air Quality Health Champions

| Suggested Walking & Cycling Schemes

- “ A focus on the Greenway would be very welcome - this is a great walking and cycling route but it is dangerous, with a lot of muggings for bikes and phones reported (see the Greenway Users Facebook group)”;
- “ Please introduce/extend the Santander TfL bikes throughout the borough, even if this extension is slow. If people could hire bikes to go to the shops/leisure centres and train stations, this would help enormously”;
- “ Pedestrianise the roads directly around schools permanently - adding green areas and cycle racks”;
- “ Remove parking completely on one side of the road and introduce more cycle lanes with raised curbs (marking the road does not make it safe for cyclists!)”;
- “ Free bikes for low-income residents; give real financial incentives to residents for giving up existing cars”;

- “ Ideally getting as many people on to bicycles and e-bikes (or e-scooters) as possible could play a big part in reducing resident caused pollution”;
- “ It is surprising that improving cycling and walking infrastructure figures at number 7 on the list of 10 key priorities in the Plan”;
- “ Ensure pedestrian crossings are safe especially on main roads. A crossing on Barking Road (a central island type crossing with no lights) was damaged and not repaired for over a year. It was inherently unsafe, especially at night. Again, this sends the message that pedestrians are lower class citizens in Newham who must always act with deference to the car driver”;
- “ Timings (on Greenway) prioritise car flow and discourage walking and cycling because they are unsafe and the timings make pedestrians wait for a long time to cross”.

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Suggested Transport Planning Actions

- “ Reduce emissions from large diesel vehicles in residential streets by introducing a 5 tonne (except for access) weight limit”;
- “ Priority lanes on the street and priority parking spots to incentivise electric vehicles... Existing housing developments with a car park must have 50% electric car charging points... Ask local car parks to offer cheaper or free parking for electric vehicles. Newham schools and buildings should have priority electric vehicle parking bays for staff... All housing associations in Newham must provide an electric charging point for every resident that wants one”;
- “ The removal of exit lanes at junctions should be reversed, as it has done next to nothing for pedestrians and cyclists while making traffic at junctions significantly worse”;
- “ [New research](#) shows that night-time light pollution makes air pollution worse... Findings presented at the American

Geophysical Union meeting in San Francisco on Monday indicate that uplight from outdoor lighting that contributes to sky glow over cities also interferes with chemical reactions that naturally clean the air during night-time hours. Reducing night-time light pollution is a quick and easy win for cleaner air for Newham";

- “ I can't afford to switch or personally own an electric vehicle but would get rid of it tomorrow if there was a car club/ride share option installed nearby. I think Newham should push for a relationship with a company who would provide electric car rental schemes and bike/scooter rental schemes (with racks!) across the borough";
- “ Not everyone can afford a low emission vehicle but businesses should be the first to implement";
- “ it doesn't have any suggestions for addressing through traffic in the borough despite introducing it on the first page of the Plan as part of the mayor's forward";
- “ Things that would immediately reduce pollution is opening roads that have been closed to prevent through traffic as all this does is get the vehicles that are already in borough to burn more fuel going around using longer routes which then leads to them joining queues on main through fairs which then results in them sitting in traffic idling causing more pollution. All the traffic lights in the borough need to be better sequenced to keep traffic moving and some case removed and zebra crossings put on as some are too close to each other and actually creates traffic which then results in more pollution";
- “ Could the council organise/promote 'informal car clubs', it would be more feasible if shared cars could park in either party's RPZ";
- “ Encourage commercial car clubs like Zipcar... I considered this instead of having a shared car, but there isn't one nearby and the parking problem made it impossible".

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration. We will promote the [ULEZ Car and motorcycle scrappage scheme](#).

| Suggested Planning Policy

- “ fining developers whose residential developments increase car use";
- “ Not much is being done about... major infrastructure projects like the London city airport, Silvertown Tunnel, concrete works and MSG sphere. These bigger things could have a real impact, and I wasn't sure if they are included in your definition of 'air quality neutral' developments or whether this part of the plan just applied to residential developments?";
- “ Create more green space - the Gallions 3B project is a slap in the face of local residents - by developing this part of our neighbourhood you are robbing us of what little green space we used to have on Armada Green";
- “ enforcement of planning permission breaches especially on the proposed green spaces should be very strict";
- “ Ask the builders to provide verticals gardens, cross ventilation, partial usage of the balcony to dry clothes";
- “ I wish to question why Newham council have authorised building both housing and other public buildings on one of the busiest roads in the borough (Great Eastern Road E15) in recent years".

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Council Promotion of Air Quality Initiatives

- “ I would like the Council to find other ways to promote air pollution initiatives than giving out tote bags, which have a [significant environmental footprint](#)”;
- “ Council working closely with faith leaders to raise awareness of the dangers of pollution and to take steps to mitigate it”;
- “ Newham Magazine - could you dedicate a column in each issue to the environment and what local residents can do to improve the environment”;
- “ Publicity & education should be at the heart of the action plan. References are buried in the KPIs - there should be a separate section detailing the public awareness & education actions that will be taken. For example, on publishing the results of AQ monitoring in and around schools. Data such as this needs to be highlighted, not lost on the Council website”;

Response: We are in the early stages of collecting air quality data from all 96 primary and secondary schools. We will be working with individual schools through the STARS Scheme (See AP 13) and implementing appropriate mitigation measures where identified through our schools audit programme.

- “ LBN needs to take a leadership role in demonstrating what can be done in response. The figures on asthma in childhood are truly shocking - proving that this is an emergency requiring urgent action”;

Response: See AP10, Public Health are working on the [‘Health and Wellbeing Strategy’](#) for 2020. The ‘Joint Strategic Needs Assessment’ will consider Air Quality and respiratory health in the borough.

- “ I'd like to see a huge billboard on the blank wall of the house opposite (sidewall) stating parking & running engines is polluting and anti-social”;
- “ As a non-driving resident, I am literally paying for others' convenience with my health”;

- “ Clean air is essential and it is short-sighted and selfish of those who argue (and there are plenty of them in the borough) that making changes that would benefit the masses could impact their lifestyle choices. Please be brave”;
- “ Newham has a fantastic asset in the Greenway — a ready-made cycle and walking route, which plenty of residents use. It's the main reason that I moved to the area, and one which really makes Newham stand out as a pleasant place to commute to and from (depending on your route, obviously!)”;
- “ Borough-wide school events to raise awareness about the importance of clean air and what we can do to achieve it”;
- “ Newham-sponsored events should aim to be air quality neutral”;
- “ Airline products are likely to cause significant air degradation, therefore all airline ticket sales should have a mandatory warning about this, i.e. like the warnings we see on cigarettes. Fuel pumps at service stations should also be forced to carry these warnings”.

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Regional and National Lobbying

- “ I would also like to see more in the plan about how Newham will lobby the Mayor of London and Central Government to improve air quality legislation on a city-wide and national basis”;
- “ Liaise with Transport for London to improve services - increase bus services with frequent short hop services linking to local amenities and train stations. Improve safety and accessibility for pedestrians and cyclists around big shopping centres (like Gallions Reach etc.) and improve links from shopping centres to train services”;
- “ In the longer term a new strategy of employment and business development so that people can live near where they work and goods and services are provided locally”;

- “ Actively lobby the GLA... Can the ULEZ be brought earlier in Newham?”;
- “ We welcome all measures in Newham's proposed plan but would like to see more collaboration between action plans in neighbouring boroughs”.

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Suggested Council Fleet/Housing Actions

- “ Council should act quickly to reduce the number of diesel vehicles in its fleet - invest some money - this is actually killing people”;
- “ Why aren't all the buildings owned by the council all fitted with solar panels?”.

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Suggested Monitoring Actions

- “ Add more air monitors (not just around schools) around high streets, shops as that is where most people are walking around and breathing in”;
- “ I don't trust the council on this issue. If you were serious then why did you opt-out of the London Air Quality Network?”.

Response: Newham is part of the [Air Quality England network](#). See AP 1 for more info on our air quality motioning strategy.

| Localised Issues

- “ A13- the turn off at the A13 to East Ham or Beckton is constantly heavy traffic queue”;
- “ Please reduce the numerous rat-runs in the borough. People use Clova Road and

Earlham Grove as rat runs to get to and from Woodgrange Road/Maryland. Please consider blocking off both ends of Earlham Grove to reduce this area is a shortcut”.

Response: There is a process of identifying and prioritising schemes based on liaison with Ward Member, surveys and other information which will determine the scheme priority. There is insufficient funding to take forward all suggested schemes.

- “ The Council needs to take strong action, and be prepared for opposition (as over Browning Road, where LBN rightly continued with its planned restrictions despite vociferous opposition from a small group)”;
- “ I am currently part of the Browning Bridge Road Closure experiment. Traffic decreased initially but then increased as there is no enforcement in place. The effectiveness of the experiment is being jeopardised as the experiment has not been implemented to its true extent”;
- “ The actions are missing (or not highlighted) the pollution and air quality emitted by the factories and industrial work/outlets in Newham... we regularly experience unusual smells in the Pontoon Dock and West Silvertown station areas, which are surely unhealthy. This needs to be addressed as a priority”;
- “ I live just streets away from Romford Road and the pollution is almost visible. Watching small kids walk or being pushed in buggies almost at tailpipe level is very upsetting”;
- “ We constantly endure idling gridlocked traffic either through roadworks and if there is a problem on the A13 as it [Tollgate road] is daily being used as a rat run. We cannot use our garden for the fumes”;
- “ I'm living in Royal Wharf, and I think it's the worst air I've ever breathed. Due to constructions around, the lorries, the companies near the Thames, the air is filled with particles and dust. It's the first time that I have to vacuum every day. They should integrate air purifiers in the flats in Newham now”;
- “ Along the Romford Road, consider if privately-owned hard standing (front

gardens) can be reduced & or re-greened, Almost all the houses have hard standing, cars regularly spill out onto pavements, drive across pavements or park on pavements damaging them and making it unpleasant to walk";

- “ Bradfield Road and Knights roads have hundreds of lorries speeding daily and new proposals for a recycling plant";
- “ Reduce vehicle congestion along Barking Road and A13. I feel fumes from idling vehicles are the main cause of pollution in my area";
- “ On North Woolwich Road, during school run times, there are at least 2HGVs/ heavy construction vehicles on the road every 30 seconds. We parents take our young children and babies walking this road twice a day and we are at the forefront of the pollution and noise right in our faces!";
- “ West Silvertown, Each day, trucks and heavy goods vehicles are shooting up and down the roads spreading dust and dirt - particularly from the RMS Supplies site on Bradfield road";
- “ Lyle park is unhealthy to relax or spend time in due to the building construction recycling plant right next door".

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

| Comments from those who identified as living with a disability.

- “ There need to be better bus routes throughout the borough to enable access to hard to reach areas. For example, if I wanted to get to my local hospital from where I live by bus I would have to walk 15 minutes to get a bus. There is also not an easy way to get to other areas in the next borough e.g. Leytonstone, Leyton etc";
- “ I do have an elderly mother that I take shopping and it's hard not to use the car for that";
- “ Campaign that all mobility scheme cars are electric (and ensure that the charging points are accessible)";
- “ I myself have respiratory problems and am largely housebound. I can't escape the air. Aside from addressing climate change, this is the single biggest problem I need my council to solve";
- “ As a disabled person it is really hard for me to cut car usage And I don't know what you are going to do that can help me to do this I don't want to end up with another reason for people to think that I am lazy/selfish (which the government hostile environment on disability benefits has been very effective in doing) How will these measures affect me? Electric cars are just too expensive to buy";
- “ I have a diesel car, that won't meet new standards. I am over 70 and have a degree of disability. I have no option but to use my car for shopping, although I try not to make journeys less than 2 miles. I use the bus whenever possible. In fact my car is 10 years old, passes all MOT tests for emissions, but during the time I have had the car I have only driven 12,500 miles from new (less than 1200 miles a year) I also believe that a HUGE amount of the portion comes from London Transport vehicles, and diesel taxis, many of which are very dirty. In my area [...] large numbers of residents are installing wood burners in the belief that these are some sort of clean alternative - they are not"!

Response: The ULEZ Car and motorcycle scrappage scheme is open to those who live within the 32 London boroughs or the City of London and receive certain means-tested and non means-tested disability benefits. They will be able to apply for a grant to scrap vehicles that don't meet the [Ultra Low Emission Zone \(ULEZ\) emissions standards](#).

Response: In conjunction with AP 1-25 we will pass these suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

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Consultee, Climate Now Open Forum

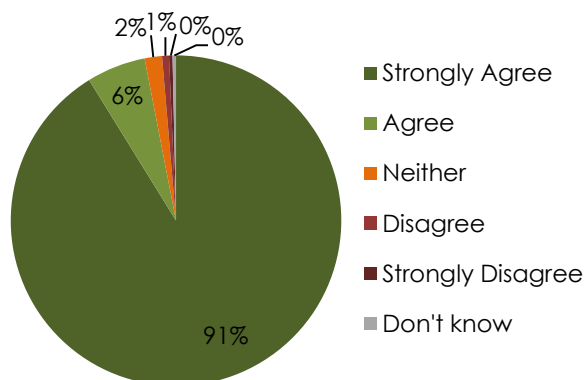
| General Comments

- “ Midwife measured (high) VCO (carbon monoxide breath test)... I don't smoke... she explained that it is likely because I live in a high pollution area... feel really upset about this result and the air quality already affecting my unborn baby”;
- “ I suffer asthma and the condition is getting worse due to the deteriorating air quality in Newham”;
- “ I feel the questionnaire, to be useful, should have asked us to rate the measures in order of importance and relevance”;
- “ I use a car. It is sometimes necessary to use it to go to work locations. Reducing parking spaces would impact on my ability to travel to different work locations”;
- “ Overall I think the action plan is a really well written and comprehensive document that has informed me of the extent air pollution is being managed in Newham. The work that has to date been undertaken in relation to air pollution management outside of schools in a particular area that is impressive and it seems as though thorough consultation has been completed in support of the plan”;

6.5 | Perceptions and Behaviors

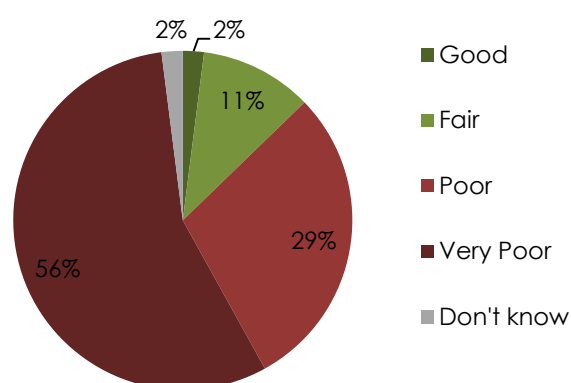
The vast majority of consultation survey respondents (97%) agreed or strongly agreed that air quality in Newham is an important issue.

Figure 12 | To what extent do you agree or disagree that air quality in Newham is an important issue?



Additionally, 85% of respondents thought that the air quality in Newham was either poor or very poor.

Figure 13 | Overall, how good or poor do you rate the air quality in Newham?



The following figures show how much respondents agreed or disagreed they or others would change certain 'green' behaviours in certain contexts. The results presented here exclude 'Not Applicable' responses. Figures 14 and 15 show that respondents agreed they would cycle more if there were more accessible routes (75%) and routes were safer (82%). The majority of respondents (74%) also agreed that they would walk to more places if routes felt safer (figure 15). Figures 16 and 17 shows that the majority of respondents felt they would move to a greener car if there were more charging points (59%) or Parking permit charges incentivised it (57%). Charts 18 and 19 show that only a minority of respondents thought that more bus routes (46%) and few parking places would reduce car use (32%). Chart 20 shows just over half of the respondents thought that increased parking charges would reduce car usage (52%); however, 61% agreed that they choose more sustainable transport options even if it is inconvenient for them.

Figure 14 | I would cycle to more places if there were a higher number of accessible routes (Number of respondents: 269).

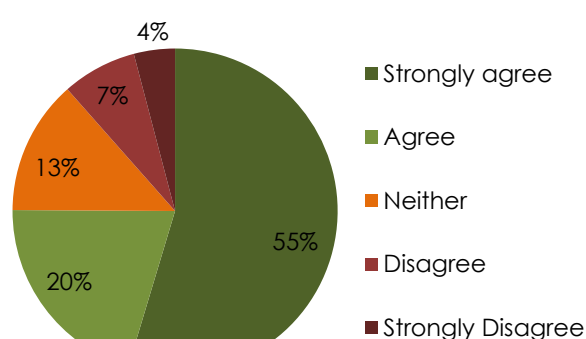


Figure 15 | I would cycle to more places if routes were safer (Number of respondents: 272)

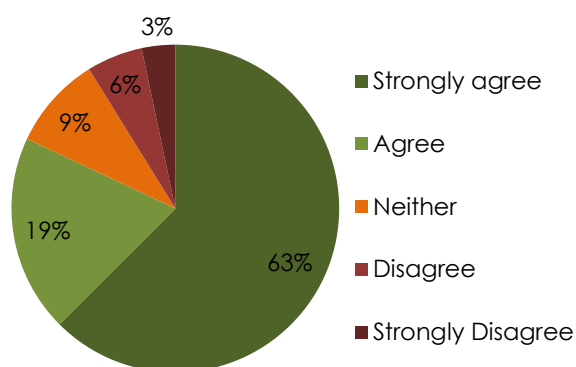


Figure 18 | If I had to pay for all parking permits except for Ultra Low Emission Vehicles, I would consider changing to an Ultra-Low Emission Vehicle (Base 203)

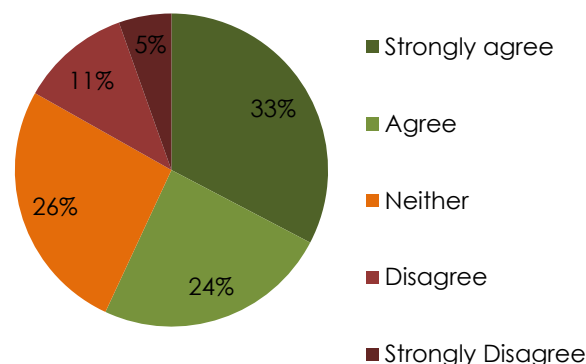


Figure 16 | I would walk to more places if the routes felt safer (Number of respondents: 290)

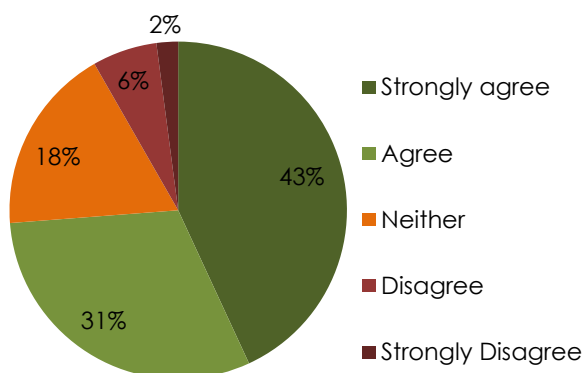


Figure 19 | I would use my car less if there were more bus routes serving the area I live in (Number of respondents: 197)

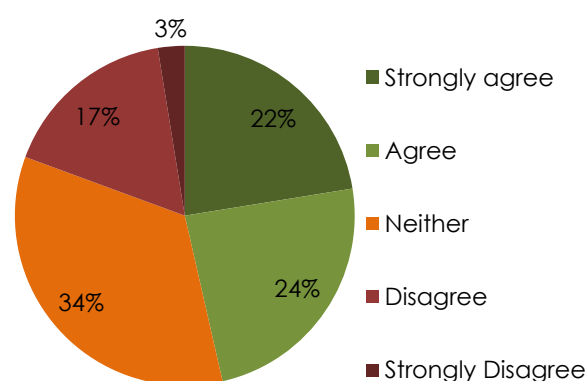


Figure 17 | I would consider changing to an electric vehicle if there were more charging points (Number of respondents: 214)

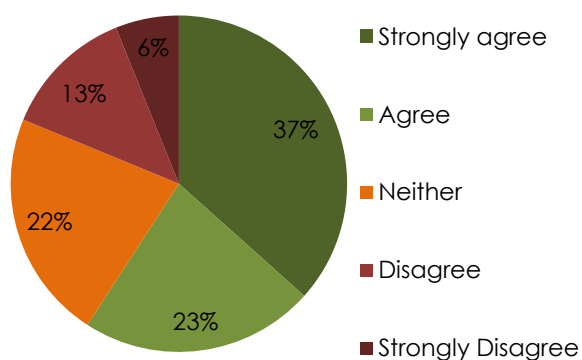


Figure 20 | I would use my car less if there were fewer parking spaces at my destination (Number of respondents: 194)

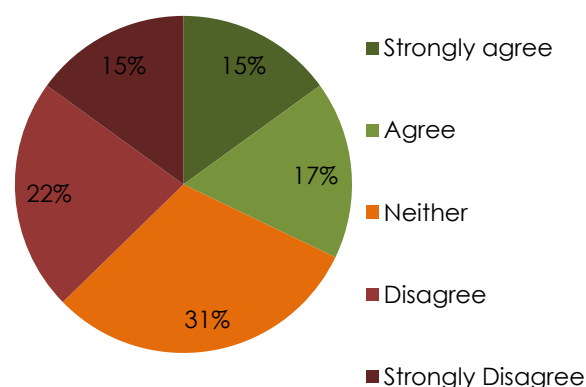


Figure 21 | Increased parking charges will help reduce car usage (Number of respondents: 276)

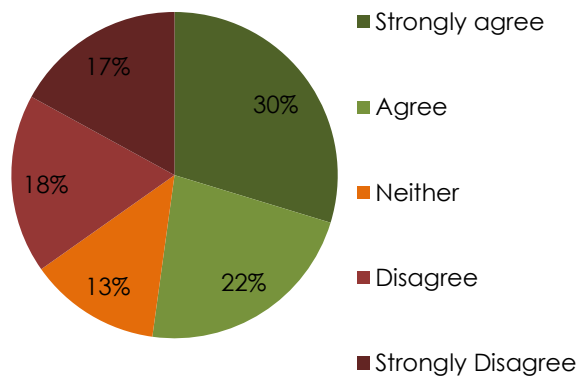
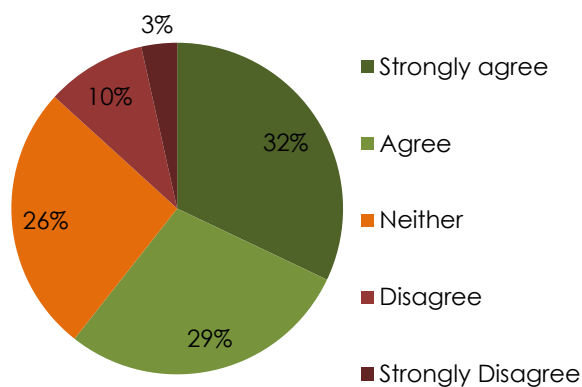


Figure 22 | I tend to choose more sustainable transport options even if it is inconvenient for me (Number of respondents: 287)



6.6 | Popularity of AQAP Actions

The following figures show how consultation survey respondents overall supported or opposed each of the proposed actions presented in the AQAP.

Figure 23 | Maintain and expand an appropriate air quality monitoring network so that air quality within the Borough can be properly understood.

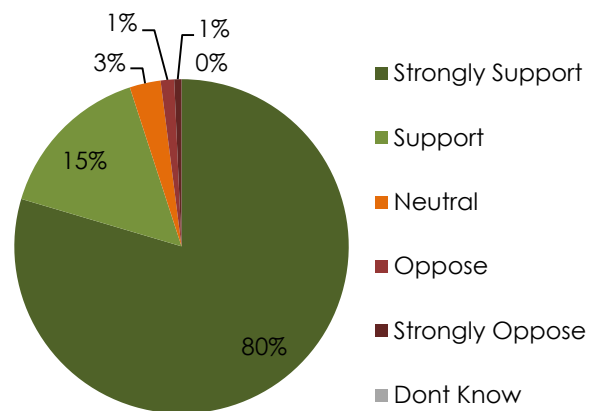


Figure 24 | Minimise emissions from construction

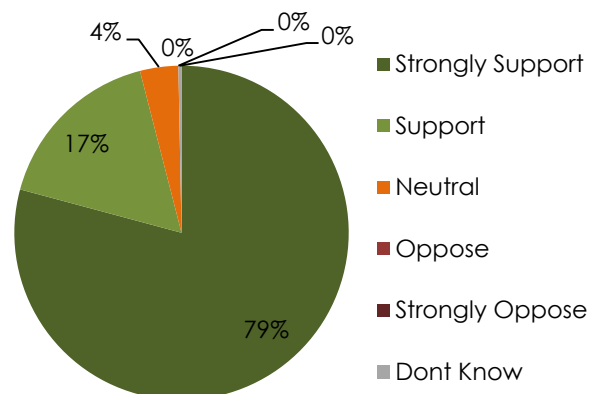


Figure 25 | Ensure non-road mobile machinery (NRMM) meet existing air quality policies

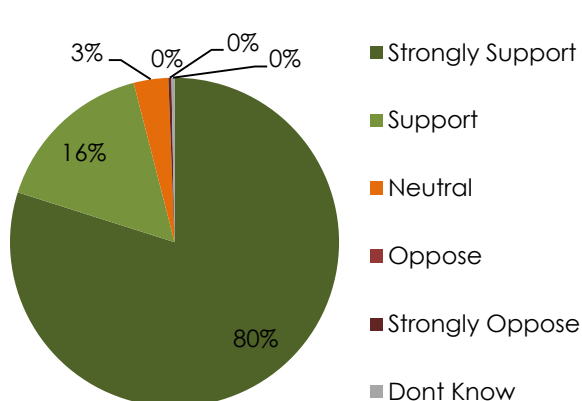


Figure 28 | Make sure major developments implement the air quality provisions of the new London Plan

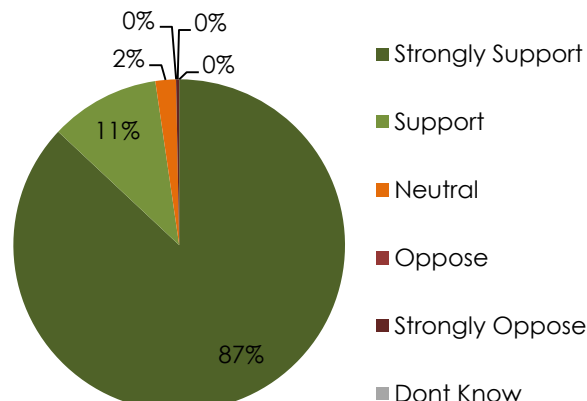


Figure 26 | Minimise emissions from new buildings

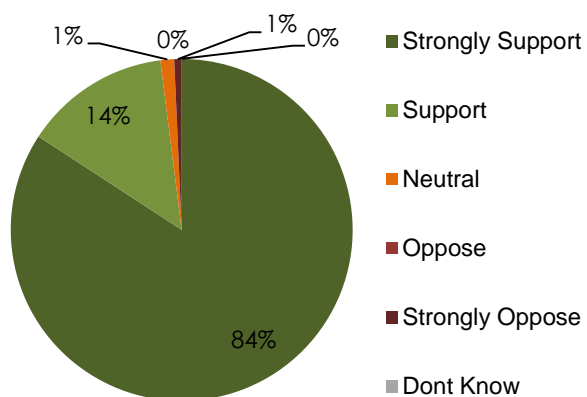


Figure 29 | Maximise the air quality benefits of green spaces and other environmental features in new developments

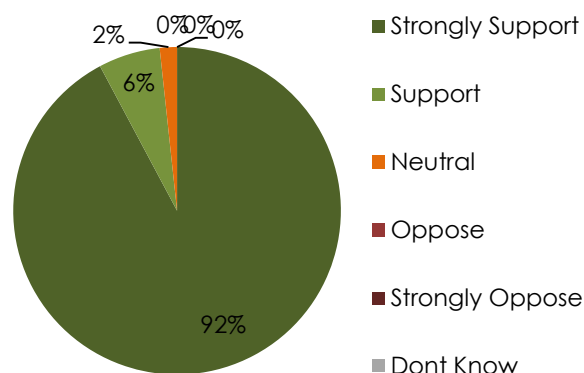


Figure 27 | Ensure all new developments are at least 'air quality neutral'

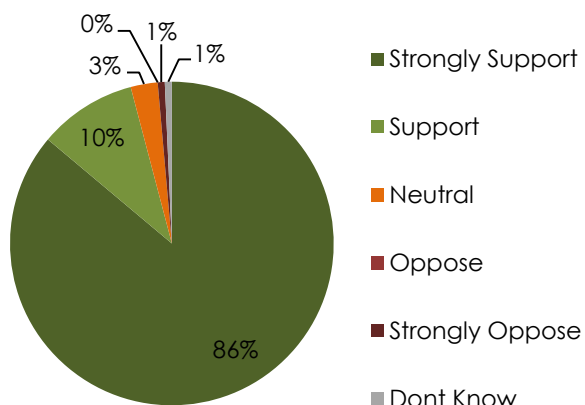


Figure 30 | Ensure that Smoke Control Zones are fully promoted and enforced

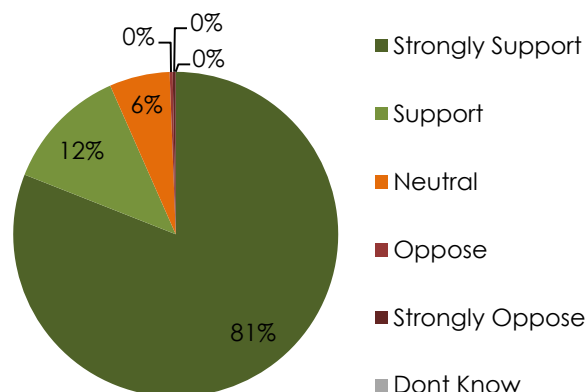


Figure 31 | Promote and deliver energy efficiency projects in homes and workplaces, including the Council's buildings

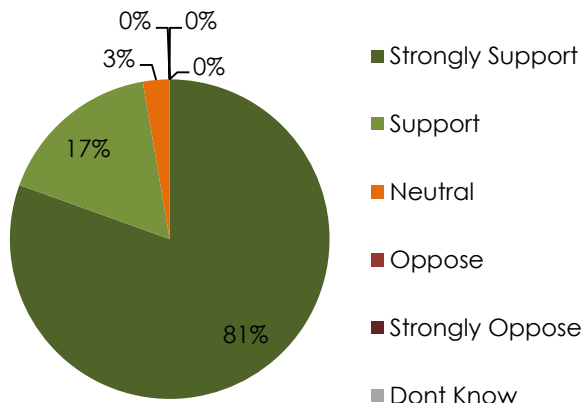


Figure 34 | Actively engage with businesses on improving air quality

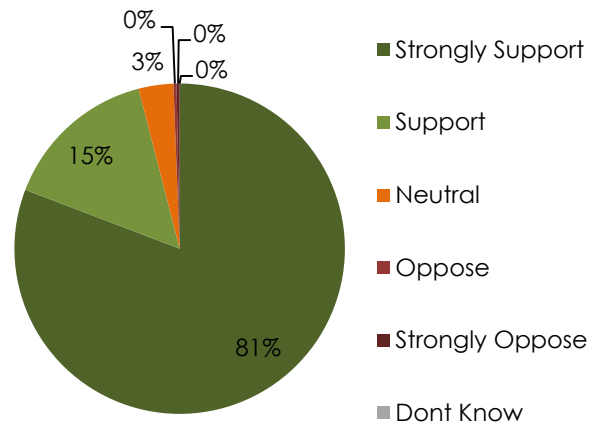


Figure 32 | Adopt Healthy Streets approaches to empower the Council, developers, local businesses and residents to consider how streets can be made nicer places to be

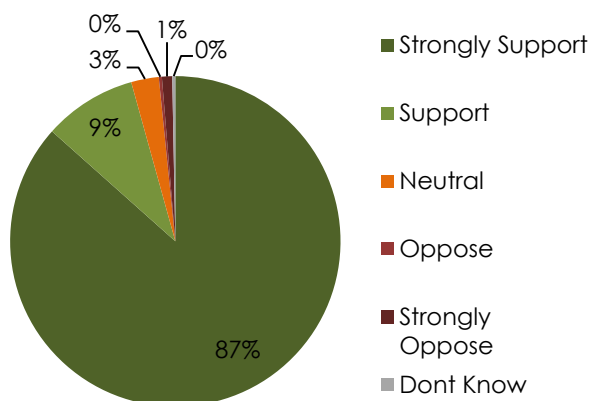


Figure 35 | Promote and share high pollution alert services

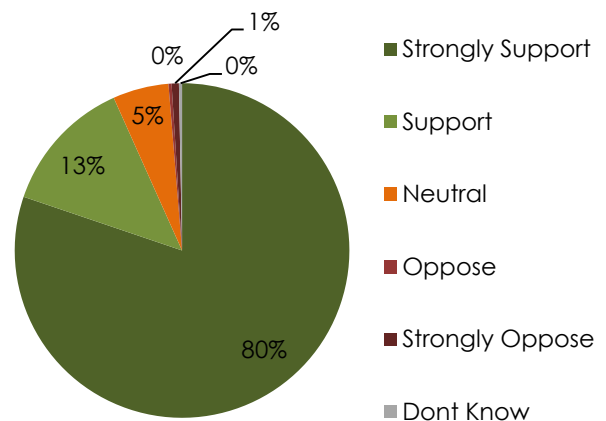


Figure 33 | Treat air quality as a public health issue

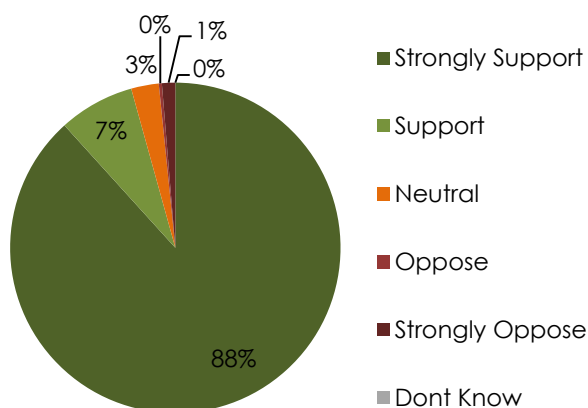


Figure 36 | Support the 71 schools in Newham that have Transport for London STARS travel-planning programme accreditation, and encourage the remaining 25 schools to join

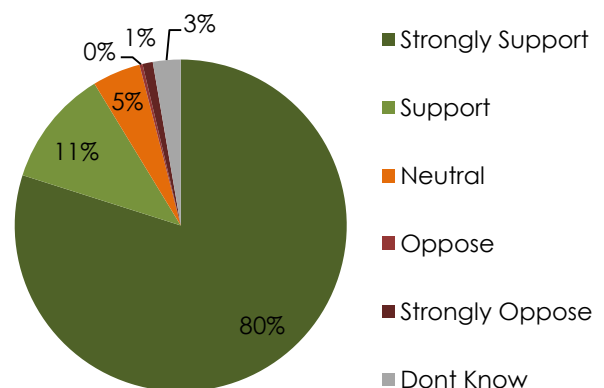


Figure 37 | Monitor and audit the air quality in and around all schools in Newham and identify solutions where necessary

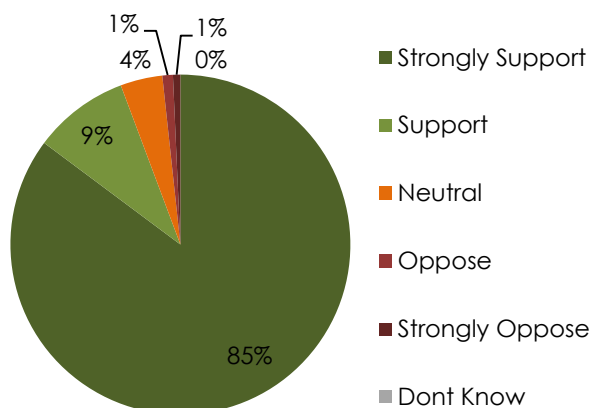


Figure 40 | Reduce emissions from Council fleets by introducing electric vehicles (small vans), charging points and biofuel/gas to liquid as an alternative to diesel for Heavy Goods Vehicles

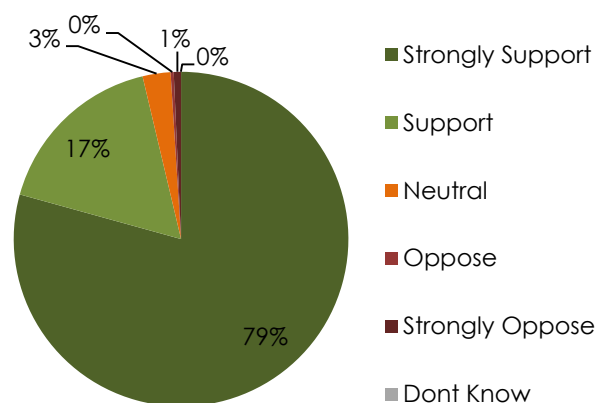


Figure 38 | Update how Newham Council buys goods and services to reduce the pollution they produce

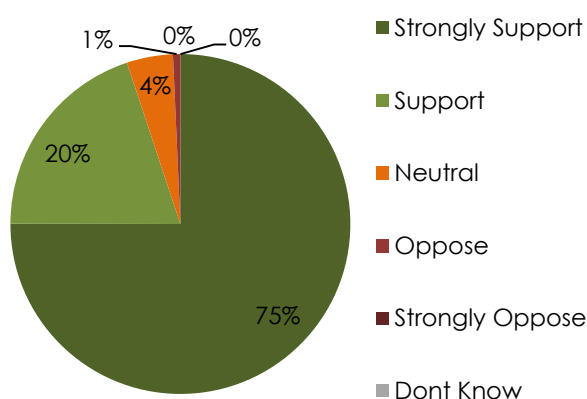


Figure 41 | Deliver green infrastructure (green spaces and other environmental features) through our other responsibilities relating to Council-owned land and transport infrastructure

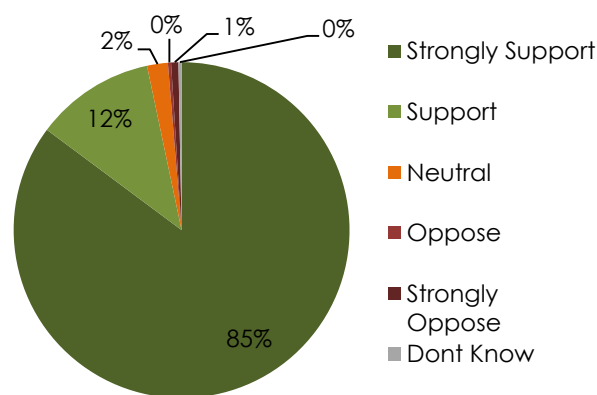


Figure 39 | Reduce emissions from deliveries to local businesses and residents

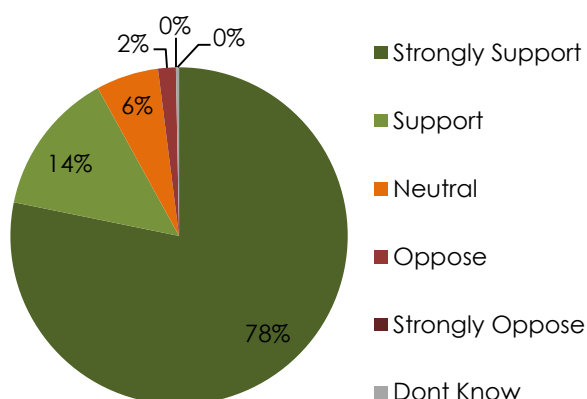


Figure 42 | Commit to submitting future bids for Low-Emission Neighbourhoods through the Mayor of London's Air Quality Fund

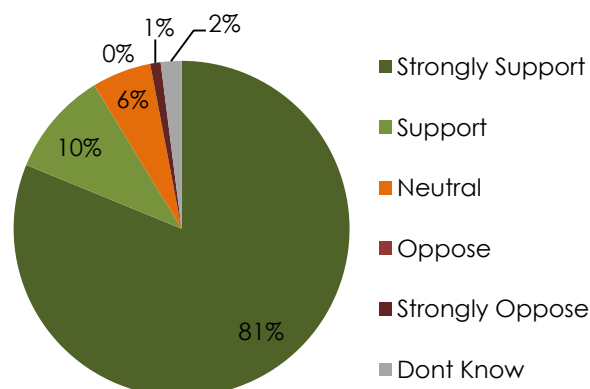


Figure 43 | Ensure that the Council's Transport and Air Quality policies and projects are integrated

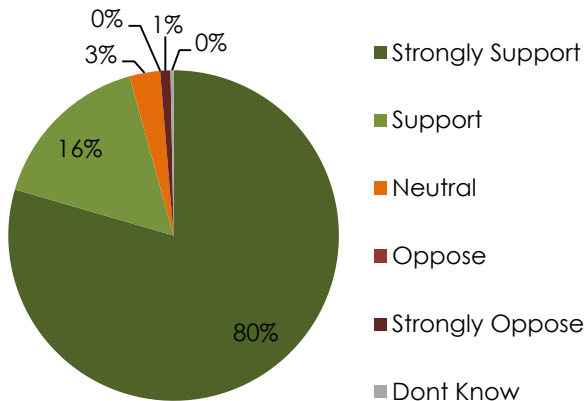


Figure 46 | Install rapid double electric chargers around the Borough and ensure that the charging infrastructure provided by development is consistent with the London wide network

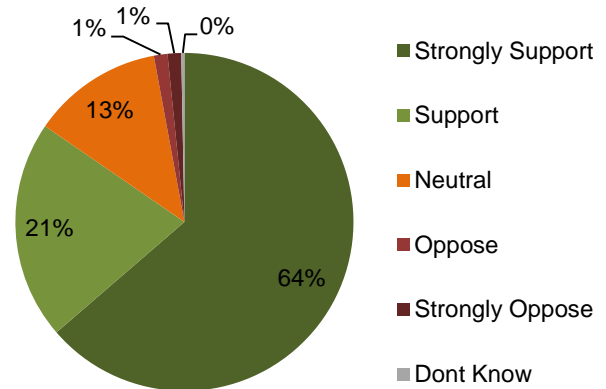


Figure 44 | Discourage vehicle idling in the borough

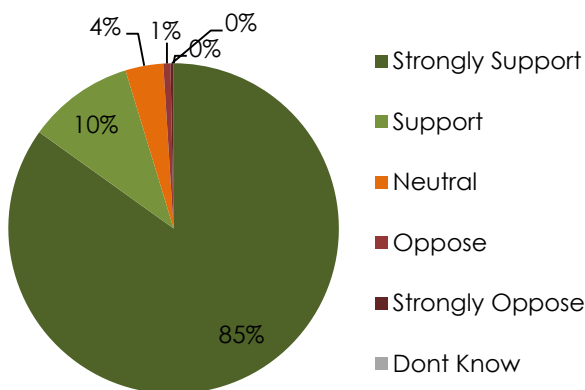


Figure 47 | Increase the number of journeys by bike or walking

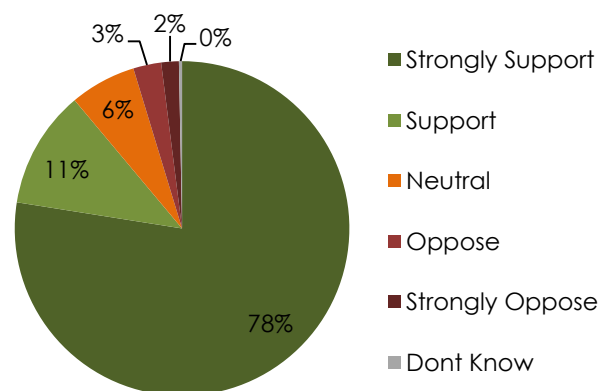
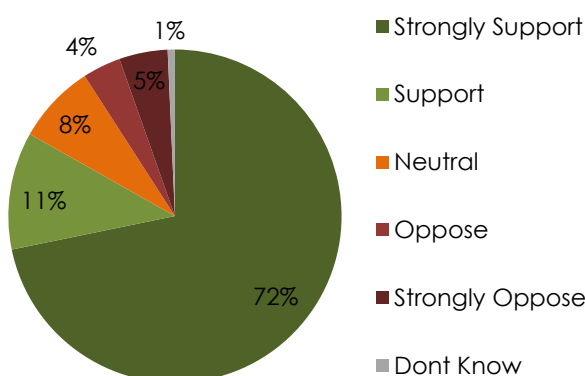


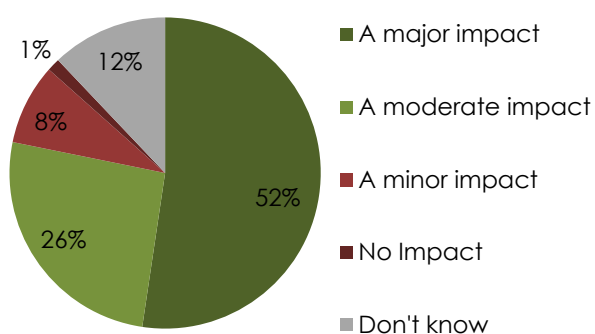
Figure 45 | Deliver regular temporary Car Free Days and pedestrianisation schemes in every community neighbourhood to raise awareness and encourage walking or cycling instead



6.7 | Overall Impact

Respondents were asked how much of an impact they thought that the AQAP would have on them overall. Figure 48 below shows that 78% thought that it would have either a major or moderate impact on them

Figure 48 | How much of an impact would the proposed Air Quality Action Plan have on you?



6.8 | Equalities Impact

15% of consultation responses (45 cases) were from people who identified as being from a Black or Minority Ethnic (BAME) group. Respondents' level of support and opposition to each of the proposed actions did not differ significantly from responses overall apart from the last action (Increase the number of journeys by bike or walking) where 9% of BAME respondents (4 cases) opposed or strongly opposed compared to 4% of respondents overall. 4% of consultation respondents identified as being disabled (11 cases). Consultation respondents who identified as disabled supported all actions proposed in the AQAP.

33% of consultation responses (99 cases) identified as having one or more children under the age of 16. Levels of support for each of the actions from this group are in line with responses overall.

Numbers of consultation respondents in the youngest age group (18-24) and oldest (75+) are small. Using aggregated age groups,

younger respondents (18-34) and older respondents (55+) generally respond in line with overall levels of support and opposition to the actions, with two exceptions. Those aged 55 and over were more likely to neither support nor oppose "Treat air quality as a public health issue" (8% compared to 3% overall). Those aged 55 and over were less likely to support "Commit to submitting future bids for Low-Emission Neighbourhoods through the Mayor of London's Air Quality Fund" (81% compared to 92% overall) and instead were more likely to neither support nor oppose (13% compared to 6% overall).

Respondents who identify as BAME, as being disabled, as having one or more children, and by aggregated age group do not differ significantly from the overall consultation response in the level of impact that the AQAP will have on them by.

6.9 | Summary of changes made to post-consultation AQAP

The AQAP will evolve over the next 5 years and the majority of the suggestions raised will fit within the 7 action plan categories recommended by the Mayor of London and implemented in the 'Action Plan Table'.

We will pass specific suggestions onto the relevant service areas and Air Quality and Climate Emergency Taskforce for review and consideration.

Where responses have noted a need to change the AQAP text, this has been specified in the relevant comment boxes.

In summary, the key changes made include;

- | An update to the Mayors Foreword;
- | An explanation of the 'Low-Medium High' costings;
- | Updated abbreviations;
- | The Action ID's in draft AQMA (p. 26-47) will be renamed to 'AP1, AP2... etc.
- | AP13 has been updated to reflect that the Council is match funding the GLA schools and Nursery Audit Programme.

Abbreviations

AP	Refers to ID number on the draft 'Action Plan' (p. 26-47 of AQAP)
AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQS	Air Quality Strategy
AQO	Air Quality Objective
AQ	Air Quality
ASR	Annual Status Report
CAZ	Central Activity Zone
CHP	Combined Heat and Power (Energy System)
DEFRA	Department for Environment and Rural Affairs
EV	Electric Vehicle
FIH	Far-Field Heating
GLA	Greater London Authority
GTL	Gas to Liquid Fuel
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LBN	London Borough of Newham
LIP	Local Implementation Plan
LLAQM	London Local Air Quality Management
LCY	London City Airport
NRMM	Non-Road Mobile Machinery
ODA	Olympic Development Authority
PEL	Product Eligibility List
PM₁₀	Particulate matter less than 10 microns in diameter
PM_{2.5}	Particulate matter less than 2.5 micron in diameter
PAR	Planning Application Requirement
TfL	Transport for London
ULEV	Ultra-Low Emission Vehicle
WHO	World Health Organisation