

Appendix 1

Air Quality Action Plan - consultation report

1 Overview

The Hillingdon Air Quality Action Plan has been the subject of a full public consultation process. This has included all the statutory consultees as defined in the GLA guidance (GLA/TfL, Environment Agency, Highways England, neighbouring boroughs, bodies representing local business interests). In addition, the Council has undertaken a local consultation to ensure residents have been able to give their views on the Plan and on any potential air quality issues in their own local areas. With the inclusion of the statutory consultees who have responded, the total number of responses has totalled 106.

This report summarises the concerns raised by consultees and considers their suggestions for practical actions to improve air quality. How the suggestions will be taken forward for further investigation and potential implementation has been identified. The text of all the responses to the consultation is provided for further information, this will be circulated to all the relevant Council departments for further investigation where relevant.

2 Consultation responses

2.1 Statutory consultees

Table 1 below shows the results of the responses from statutory and other major consultees and how they have been taken into account.

Table 1 Statutory consultee responses

Organisation	Comments (summarised)	How they have been addressed
GLA	It is a very well put together plan which demonstrates a good understanding of the specific air quality challenges and solutions in your borough.	The GLA has given approval for the Air Quality Action Plan.
Highways England	Further information was requested in regard to the description of Air Quality Focus Area 93 and the burden it places upon Highways England; Confirmation was given that the Smart Motorway	Highways England has been informed that the GLA are responsible for the description of Air Quality Focus Area 93, not the Council, therefore this needs to be addressed directly with the GLA. The information in regard to air quality monitoring and the Smart Motorway DCO

	<p>DCO does not require Highways England to carry out air quality monitoring in the portion of Hillingdon impacted by the M4;</p> <p>In regard to partnership working with the Council, a meeting has been requested with the Council to discuss potential air quality improvement measures Highways England has been exploring and to consider actions that could be taken to help improve air quality alongside the M4.</p>	<p>is noted. However this remains a matter of concern for the Council as residential areas are impacted by levels of pollution above the EU limits. The Council will continue to monitor air pollution in the vicinity of the M4 and report this annually to the GLA as an area of concern requiring partnership action to gain improvements as soon as possible;</p> <p>The Air Quality Action Plan table, (Action 28) has been updated to include a timescale of 2019/2020 for a meeting with Highways England to discuss potential solutions for the M4 corridor within Hillingdon with an aim to protect public exposure from this source.</p>
Environment Agency	<p>Whilst unable to provide detailed comments on every individual action plan the EA provided a set of principles for consideration in regard to air quality action plans.</p> <p>It is noted that there are no waste facilities or other industrial installations regulated by the EA within Hillingdon that are causing or contributing to failures of air quality standards installations.</p>	<p>The EA set of principles are all addressed in the GLA guidance for action plans therefore have been taken into account in the development of the Hillingdon Air Quality Action Plan</p> <p>This is noted and agreed. A dialogue will be maintained with the EA to review this situation on an annual basis.</p>
Heathrow Airport Limited	<p>Heathrow fully supports the need for coordinated action on air pollution and supports the intent of the AQAP to improve local air quality.</p> <p>Heathrow will continue to</p>	<p>This is noted.</p> <p>This supports Action 27 in the Air Quality</p>

	<p>provide regular updates and information on the sustainability leadership plan, Heathrow 2.0, and allow the Council to review and challenge progress and the level of ambition</p> <p>Heathrow will continue to host the Heathrow Air Quality Working Group which works to share best practice, provides updates on emission reduction efforts and local air quality trends. The dedicated website provides information on air quality monitoring from around 25 sites around Heathrow and the surrounding areas.</p>	<p>Action Plan table.</p> <p>The Group meets quarterly, updates on progress will be reported on an annual basis via the GLA required reporting mechanism</p>
<p>Hillingdon Health and Wellbeing Board</p>	<p>Supports the strong focus on improving air quality and the need to improve emissions proof nitrogen dioxide and particulate matter given the detrimental implications for health including respiratory disease and asthma.</p> <p>Supports the Council priorities of reducing public exposure, focussing initially on areas where air quality is poorer and the actions to work with schools and acknowledges the requirement to work with those external organisations necessary to securing air quality improvements for the borough.</p> <p>The Board would welcome stronger links with public health and</p>	<p>This is noted</p> <p>This is noted</p> <p>This supports Air Quality Action 10 in the Air Quality Action Plan table, the Board's influence to bring partners on board is</p>

	<p>stronger engagement with health partners on issues such as hospital travel plans.</p> <p>The Board would welcome updates on the progress of the promotion of the Airtext service, plus progress on engagement with the school travel plans and the interaction with the community asthma service.</p>	<p>welcome</p> <p>This supports Air Quality Action 10 in the Air Quality Action Plan table, the annual progress report on actions, as required by the GLA, will be presented to the board on an annual basis.</p>
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2.2 Local consultation

The consultation was carried out via an online dedicated webpage over a 6 week period. The webpage included information on why improving air quality is important for health and included an overview of the Air Quality Action Plan including the objectives and the key priorities to be undertaken over the Plan period of 2019-2024. A link was provided to the full Air Quality Action Plan if more detailed information was required.

The consultation asked consultees to:

- Rank the priorities in terms of where the Council should take action first;
- Describe their perception of air quality in their area;
- If poor, state what do they believe are the main causes;
- List any practical suggestions for air quality improvements in their area;
- If responding as a business, identify the ways the Council could provide support in reducing pollution from the operation of their business.

The consultation was advertised via direct mailing to all ward councillors, all residents groups, the Council consultation database for interested groups, businesses and organisations and to voluntary organisations. In addition social media was used to promote the consultation on a regular basis throughout the consulting period via facebook (7,389 followers) and twitter (451k followers)

2.2.1 Local consultation responses

The majority of responses were from individual residents (93.7%) with residents groups and local businesses forming the remainder. There were responses from across the borough with 22 wards providing a response either as individual resident or represented as part of a residents group response. The individual responses can be read in the attached document Air Quality Action Plan Consultation document, 8th May 2019.

A summary of the key responses received under each consultation question is given below.

Council priorities

In regards to the Council priorities, consultees ranked these in the following order in terms of implementation:

- Reduce exposure to pollution at, and on the journey to, school **(53.7%)**;
- Ensure the planning system supports the achievement of air quality improvements in new developments **(47%)**;
- Council to lead by example to reduce emissions from its own council fleet and buildings **(40%)**;
- Implement the Healthy Streets approach **(37.9%)**;
- Promote the use of greener walking and cycling routes **(36.8%)**;
- Prioritise the implementation of improvement strategies in the Hillingdon Focus Areas **(35.8%)**;
- Raise awareness via targeted campaigns **(27.4%)**;
- Work with external stakeholders **(20%)**.

Air quality concerns

A total of 66 responses were given, the majority of responses highlighted concerns over elevated pollution levels and the impact on incidences of asthma, respiratory conditions and COPD. Concerns over the impacts on children in particular were raised by a number of consultees. This supports the Councils' objective to continue to improve air quality across the borough and reduce public exposure to air pollution, especially for vulnerable groups within our communities such as the young, the elderly and those already suffering with respiratory illnesses.

Perception of air quality in your area

A total of 96 responses were received. Over 60% of people regarded the air quality in their area as poor, 25% as fair and around 10% as good.

The majority of consultees having a perception of poor air quality were responding from wards where there is already an identified air quality problem and where Air Quality Focus Areas have been put in place to focus action. It is anticipated the implementation of the council priority to develop an air quality improvement strategy for each air quality focus area over the timescale of the Plan will help address this issue.

A request for additional consideration to be given to the boundary of a specific Air Quality Focus Area in Northwood to ensure all traffic impacted roads are accounted for has been noted. The Air Quality Action Plan is a live document and a review of all the monitoring data and pollution mapping information will be undertaken in light of updated information and/or consultation responses. This will be undertaken as an action in 2019/2020.

Main causes of poor air quality

A total of 64 responses were received. A summary of the key themes are listed below:

- Road traffic was identified as the highest recorded cause of pollution, with gridlocked roads and congestion the main complaint. Specific areas of concern were also highlighted where residential areas are impacted by the operation of the major road networks across the borough, in particular the A40 and the M4 and where residential areas are used as rat runs to avoid congested main roads;
- The impact of the operation of Heathrow Airport and the congestion caused by the construction of HS2 were identified as serious concerns for the borough and for specific local areas. RAF Northolt and its additional use as a commercial airport, as opposed to military, was considered a potential source for additional pollution;
- The impact of the school run was noted by many consultees as a cause for local concern along with high numbers of idling vehicles at drop off and pick up times;
- Planning developments such as intensive housing schemes, large retail and industrial parks were considered to be a main source of additional traffic throughout the borough with particular concern raised over HGVs using residential roads;
- Bonfires and idling vehicles were noted as aspects of anti social behaviour that caused specific local pollution hotspots;
- The control of the impacts from specific industrial installations and from HGV - based businesses in residential areas was a matter of concern.

Practical suggestions for improvements

A total of 74 responses were received. A summary of the general key themes which featured in the majority of responses from all locations in the borough is listed below in Table 2:

Table 2: Key themes from practical suggestions for improvement

General theme	Is this issue addressed in the AQAP	Responsibility areas
<u>Address congested traffic</u> <ul style="list-style-type: none"> • effective management of road traffic required in congested areas including the addressing of rat running through residential areas including the use of enforced 20mph speed restrictions; • restrict the movement of HGVs in residential streets; 	Action 19 implementation to improve air quality in the Air Quality Focus Areas; Action 20 - delivery of Healthy Streets and Healthy neighbourhoods via LIP3 programme	Transportation teams; Liaison required with TfL where operation of the strategic road network eg A40, impacts on local roads; Liaison with HS2 where construction causes road closures and additional traffic
<u>Promote cleaner vehicles</u> <ul style="list-style-type: none"> • cleaner vehicle technologies to be prioritised for example, low emissions buses to be prioritised for use in the borough, taxis to be electric; • more infrastructure for 	Action 24 installation of electric vehicle infrastructure Action 26 work in partnership with TfL to prioritise actions to improve local air quality in Hillingdon	Transportation teams; Liaison required with TfL in relation to buses and taxis

<p>electric vehicles;</p> <ul style="list-style-type: none"> • more incentives required for residents to convert to electric vehicles 		
<p><u>Secure planning improvements</u></p> <ul style="list-style-type: none"> • developments (high density residential and retail/industrial parks), to ensure their impact in terms of additional traffic is properly managed and mitigated before approval; • adequate green infrastructure and green space to be included in all developments; 	<p>Action 5 enforce air quality neutral policy on planning applications;</p> <p>Action 6 ensure the provision of adequate, appropriate and well located green space and infrastructure in new developments;</p> <p>Action 9 master planning and redevelopment areas to be aligned with air quality positive and healthy streets approaches;</p> <p>Action 18 use of green infrastructure throughout the borough</p>	<p>Development management team</p> <p>Green spaces team</p>
<p><u>Air quality and schools</u></p> <ul style="list-style-type: none"> • tackle the impact of the school run; • stringent walk to school targets in school travel plans; • air quality awareness raising in schools; • no idling campaigns specific to the school and surrounding residential areas; • more walking and cycling to school schemes; • installation of traffic lights at school crossings to improve traffic flow 	<p>Action 13 increase the number of schools to join the TfL Stars accredited travel planning programme;</p> <p>Action 14 air quality and schools prioritised programme of action for air quality improvements;</p> <p>Action 21 continued enforcement of no idling, funding sought for targeted campaign at schools and other locations.,</p>	<p>Transportation teams;</p> <p>ASBET</p>
<p><u>Raising awareness</u></p> <ul style="list-style-type: none"> • promotion of Airtext; • no idling campaigns with notices targeted by schools, hospitals, doctors surgeries and clinics, to be accompanied by appropriate enforcement action; 	<p>Action 1 fulfilling statutory duties in regard to nuisance and ant social behaviour;</p> <p>Action 7 raise awareness of and enforce requirements for living in a Smoke Control Zones</p>	<p>ASBET</p> <p>Comms team</p> <p>Transportation teams</p> <p>Public health teams</p>

<ul style="list-style-type: none"> • banning of all bonfires; • ensuring adherence with the requirements of the need to use only approved wood burners and fuels in a smoke control area such as Hillingdon; • email/website page to alert residents to forthcoming road works and their duration • use of electronic boards in public areas to inform residents of air pollution issues, air quality levels, airtext promotion etc 	<p>Action 10 work with public health to promote actions to raise awareness of air quality and protect exposure to pollution</p> <p>Action 12 support and promote AirText</p> <p>Action 21 continued enforcement of no idling, funding sought for targeted campaign at schools and other locations</p>	
<p><u>Green infrastructure</u></p> <ul style="list-style-type: none"> • More hedges and green barriers along roads, parks, schools; • raise awareness to all residents of the use of hedges in front gardens as a potential pollution barrier from roads; • more tree planting to be included in all town centres and throughout the borough; • incorporation of green infrastructure in all highways improvements 	<p>Action 10 work with public health to promote actions to improve air quality and protect exposure to pollution</p> <p>Action 18 use of green infrastructure throughout the borough</p>	<p>Green spaces team</p> <p>Comms</p> <p>Public health teams</p>
<p><u>Promote cycling and walking</u></p> <ul style="list-style-type: none"> • Better infrastructure to encourage safe cycling and walking; • More sustainable mode shift achieved by making safer segregated cycling routes along existing roads, this should be a priority; 	<p>Action 25 provision of infrastructure for cycling and walking</p>	<p>Transportation teams</p>
<p><u>Working with other stakeholders;</u></p> <ul style="list-style-type: none"> • All HS2 vehicles to be low emission/electric; • No Heathrow expansion; • RAF Northolt - restrict commercial flights; 	<p>Actions 26, 27, 28, 29, 30</p> <p>All require working with stakeholders whose activities influence the pollution levels within the borough.</p>	<p>Transportation team and partnership working with all the relevant partners</p>

<ul style="list-style-type: none"> • Move polluting industry such as Tarmac away from residential areas; • London-wide Low Emission Zone to be extended to the M25 boundary and encompass all Hillingdon roads; • Reduce the road level under the two bridges in South Ruislip to provide more direct access to the A40 for HGVs • Impose speed reduction on the A40 		
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Location specific comments

In addition, location specific suggestions have been provided. A selection of examples is provided below, please note these are only a selection, the full information can be found in the report Air Quality Action Plan consultation, 8/5/2019 which provides the text of all comments received. This report will be shared with the relevant departments so that the location specific concerns can be considered in Council projects through the timescale of the Plan.

- *Increase the clearance under South Ruislip railway bridge. This would enable HGVs from the various industrial areas in South Ruislip to gain access to the A40 without having to take a long congested route via Ruislip.*
- *Prevent traffic jams on Swakeleys Road and Breakspear Road*
- *Make all domestic bonfires illegal - why are people burning and causing a public health nuisance when they can recycle.*
- *Make it an offence to idle your engine outside schools, doctors surgeries, in hospital grounds, and in parking bays outside shops.*
- *Stop drivers using Harefield as a rat run by introducing traffic calming schemes to discourage drivers from using the village as a rat run. Especially since the HS2 road closures are on-going. The traffic is also much heavier when the M25 has issues. The village is often gridlocked*
- *diesel buses going in and out and all around Hayes town could all easily have been switched to emission free alternatives by now. Work to ban non-electric vehicles starting with non electric taxis. All electric night buses on routes to the airport would really benefit residents in Hayes town and with improved air quality and reduced noise.*

- *Improve traffic management on main roads so vehicles flow better particularly in the morning rush hour and separately install rush hour only 20mph speed restrictions on 'rat runs' such as Thornhill Road and Warren Road enforced with cameras.*
- *Long Lane cannot cope with the amount of traffic coming through - encourage people to leave cars at home and use bikes or public transport. Maybe introduce low emission zones along this area. Encourage use of electric vehicles maybe some sort of incentive for people to ditch petrol/diesel. Better cycle lanes around the area so you feel safe on the roads if using a bike. I personally would not feel safe riding a bike in the rush hour along any area of Long Lane*
- *Only allow less polluted transportation through Ickenham. Implement lower emission charge in Ickenham.*
- *Create a pedestrianised area or part pedestrianised area (buses only) in the centre of Northwood.
More bussing of schoolchildren in the area. Our perception would be that there's more and more large cars doing the "school run". We, the public, are not aware of any progress re bussing by local schools - maybe this data should be made public (on the schools websites ?).
Easier parking prices in local car parks and streets with maybe covered parking facilities.
More incentives for residents to convert to electric cars and to also phase out diesel cars faster.*
- *Increased planting along boundaries of open spaces where people exercise, Cavendish Pavilion, Eastcote House Gardens and Tennis club and church halls where mother and baby or toddler groups meet.*
- *Support requested for the Ruislip RA Centenary celebration for planting of 100 trees, key areas identified for the replacement of trees and the provision of green infrastructure mitigation, eg hedging, required for congested area around Bury Street approaching Ruislip High Street, Wood Lane adjacent to railway line;*
- *Not giving planning permission to more multi occupation buildings, too much high density housing being given go ahead without thinking through implications on traffic. Rush hour traffic at a standstill for two hours morning and evening, target school traffic with a turn off your engine awareness campaign outside schools.*
- *Do not build the third runway. I can't see how this would help the air quality in this area*
- *Erect concrete/green walls on the border of M4, and planting of trees on small green corridor*
- *HS2 lorry movements should be monitored and curtailed. The traffic they are causing leading to more pollution particularly with the frequent closures of Breakspear Road South /Harvil Road is unacceptable as is their failure to plant and sustain replacement trees for the ancient woodland they are removing*

3 Conclusion

The consultation process has provided the Council with support for the implementation of the Air Quality Action Plan from 2019-2024 with key external stakeholders integrated into the process to prioritise helping improve air quality in Hillingdon. The key concerns in regard to air quality raised by consultees are considered within the Plan, the practical suggestions reinforce and support the actions will required to improve air quality in the Borough.