

Report on the Public Consultation of the Draft Air Quality Action Plan 2022-27

Section 1: Introduction

1.1 Requirement for an Air Quality Action Plan:

The Environment Act 1995 places a duty on local authorities to review the air quality in their areas, to assess whether the standards and objectives set out in Air Quality (England) Regulations 2000 (as amended) are likely to be met.

Where any areas are identified that are unlikely to meet standards and objectives, the Act requires local authorities to designate an air quality management area (AQMA). The whole of the Borough of Tower Hamlets was designated an AQMA in December 2000 for two pollutants of concern, NO₂ and PM₁₀.

Where an AQMA is declared, the local authority is required to prepare an air quality action plan (AQAP) setting out measures they propose to take ‘in pursuit of the achievement of air quality standards and objectives.

The overseeing of the Local Air Quality Management regime for London Boroughs has been devolved to the Mayor of London who has provided London specific guidance: London Local Air Quality Management (LLAQM) Policy Guidance and Technical Guidance 2019, which the Council is obliged to follow.

Tower Hamlets’ Current AQAP

The current AQAP was approved by Cabinet in October 2017 and runs for 5 years until October 2022. It is a statutory document and was developed in consultation with key stakeholders to address poor air quality in the Borough. The Environment Act 1995 requires that an action plan is periodically reviewed. Statutory guidance issued by the GLA (London Local Air Quality Management Technical Guidance (LLAQM TG, 19) requires that the AQAP is updated every 5 years as a minimum “to reflect current policy and to improve their effectiveness”.

This AQAP will replace the current plan and sets out 30 actions that the Council proposes to deliver over the next 5 years to contribute towards improving air quality in the Borough and meeting the national air quality objectives.

1.2 Requirement for consultation

Statutory Consultation

Schedule 11 of the Environment 1995 Act requires consultation with a range of stakeholders including

- Transport for London (will provide a joint response with The Mayor of London who is the key statutory consultee and will need to approve final AQAPs prior to publication. In addition, Schedule 11 requires Boroughs to consult
- the Secretary of State
- the Environment Agency

Appendix 2

- all neighbouring Boroughs and/or neighbouring district and County Councils
- other public authorities as the Borough considers appropriate
- bodies representing local business interests and other persons/ organisations as considered appropriate

There is no specific requirement to consult the public, however given the importance of the issue and the wider objective of raising awareness of air quality issues it was decided that a full public consultation would be a valuable exercise.

1.3 Aims

The aims of the consultation exercise were:

- To fulfil our statutory duty to consult on air quality action plans
- To obtain feedback and input from statutory consultees to help shape the plan
- To identify and add more practical and effective proposals where relevant
- To identify and remove unworkable, inefficient, or unachievable actions where necessary
- To promote awareness of air quality issues
- To engage residents, businesses, schools, community, and environmental groups for feedback on the plan

Section 2: Consultation Methodology

2.1 Online Survey

The public consultation was carried out via an online survey hosted on the Council's consultations web page, Let's Talk.

The action plan together with the action matrix was available to download from the consultation webpage as well as a summary of our priorities including setting out the themes that the actions will be grouped under to tackle air pollution and improve air quality within the Borough.

The survey questions included questions on our key messages to firstly judge the respondents current understanding of air quality and also how important an issue they thought it is to tackle. Following this we then asked which areas and actions should be prioritised, with a space for respondents to suggest new actions or state any they thought not appropriate. Finally, equalities questions were also included.

The online public consultation was run for a period of 12 weeks from 1st December 2021-24 February 2022. Separately an internal staff consultation was also carried out between 3 and 11 March 2022 on TH now weekly update. A further online public consultation was targeted particularly at the BAME and Community groups as they were underrepresented in the responses received in the first consultation. The consultation was carried out between 10 May 2022 and 30 June 2022 on the Let's Talk platform and promoted via the following:

- VCS newsletter
- Ethnic Minority Network
- Interfaith Forum
- LGBT+forum
- Older People's reference group
- Women's network

Appendix 2

- Youth Council
- East London Business Alliance

2.2 Internal Council Departments

Officers from the Environmental Health and Trading Standards Service attended management team meetings for each relevant Council Service area to give a briefing on the draft action plan consultation and to bring to attention the specific action/s relevant to their Service. Each Service area was invited to make comments on the action/s, whether the Service agrees with the action, is the timescale achievable, and if there is an alternative action they would like to suggest.

Post consultation meetings were also held with the relevant Services to discuss the consultation feedback and to finalise the actions and targets relevant to their Service areas.

2.3 Statutory Consultees

The following statutory consultees were consulted as per the LLAQM Policy Guidance (LLAQM PG 19). A link to the consultation page was emailed and invited to take part in the consultation survey.

- Secretary of State
- Environment Agency
- GLA/TfL
- Neighbouring Boroughs – Newham, Hackney, City of London, and Royal Borough of Greenwich

Air Quality Action Plan consultation summary

- 85 per cent of respondents said that it is very important to tackle air pollution in the Borough
- 82.4 per cent want us to work towards meeting the World Health Organisations (WHO) air quality guidance (AQG) levels for particulate matters for PM10 and PM2.5, as set in 2021
- Almost all respondents (95 per cent +) knew that pollution could be reduced by:
 - swapping from using cars to active travel; and
 - not idling cars
- 44 per cent of respondents agree that the AQAP has identified the areas of work needed to improve air quality in the Borough
- Residents top priorities for the AQAP are:
 - Improving walking and cycling infrastructure
 - Promoting regular car free days / temporary road closures in high footfall areas and
 - Reducing pollution in and around schools
- Over three quarters of respondents (77 per cent) thought that the Council needs to communicate about air quality better

Appendix 2

Section 3: Results

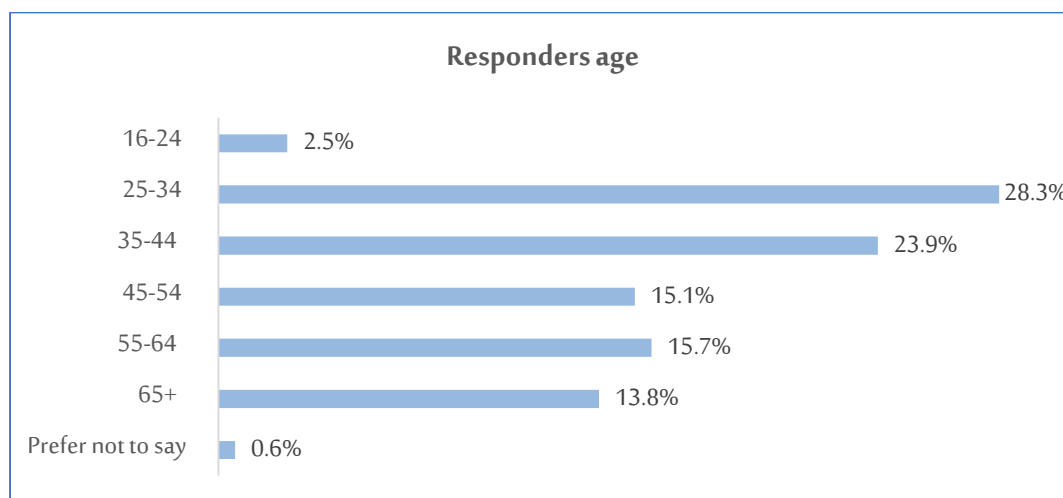
3.1 Online Questionnaire

Public consultation was carried out using the Council's 'Let's Talk' portal between 1st December 2021 to 22nd February 2022. A further consultation was targeted particularly at the BAME and Community groups between 10 May 2022 and 30 June 2022. Additionally, an internal staff consultation was carried out between 3 and 11 March 2022 on TH now weekly update.

Respondents:

In total, 159 responses were received to the consultation which ran from 01 December 2021 – 30 June 2022. Of these, 95% were residents, 23.3% work in the Borough, 6% were representing an organisation and 5% were business owners.

28.3 per cent of survey respondents were in the 25-34 age group, and 23.9 per cent were in the 36-44 age group. Only 2.5 per cent of respondents were aged 16-24 years old. The highest percentage of respondents were in the age bracket 25-34 and 35-44 followed by 55-64 and 45-54. This suggests a good spread of age groups interested in air quality issues in the Borough.



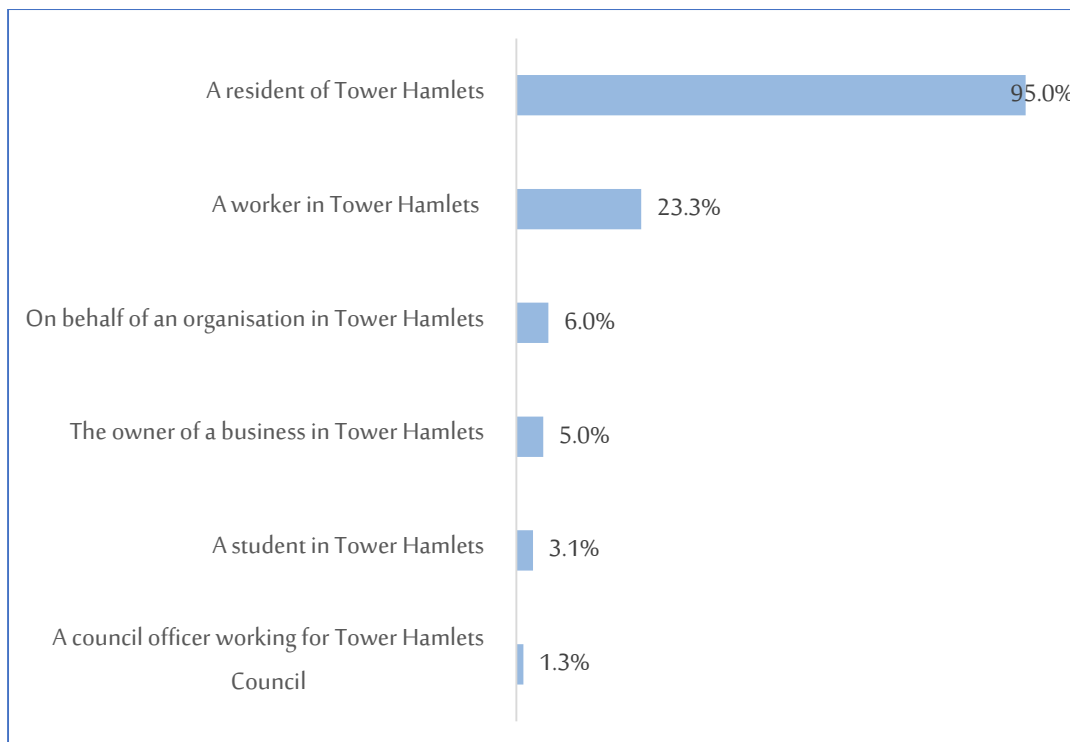
Survey responder analysis

Who responded:

95 per cent of survey respondents said they were residents, and 23.3 per cent of respondents worked in the Borough.

Only 6 per cent of responded on behalf of an organisation, and 5 per cent said they were business owners in the Borough.

Appendix 2



Responders by location:

Survey respondents were asked what where they lived. 88.1 per cent of survey respondents said they lived in the Borough. 11.9 per cent of respondents either did not answer this question or said they lived outside of the Borough.

Of the respondents living in the Borough, 39.3 per cent lived in Bow East, Bow West and Weavers wards.

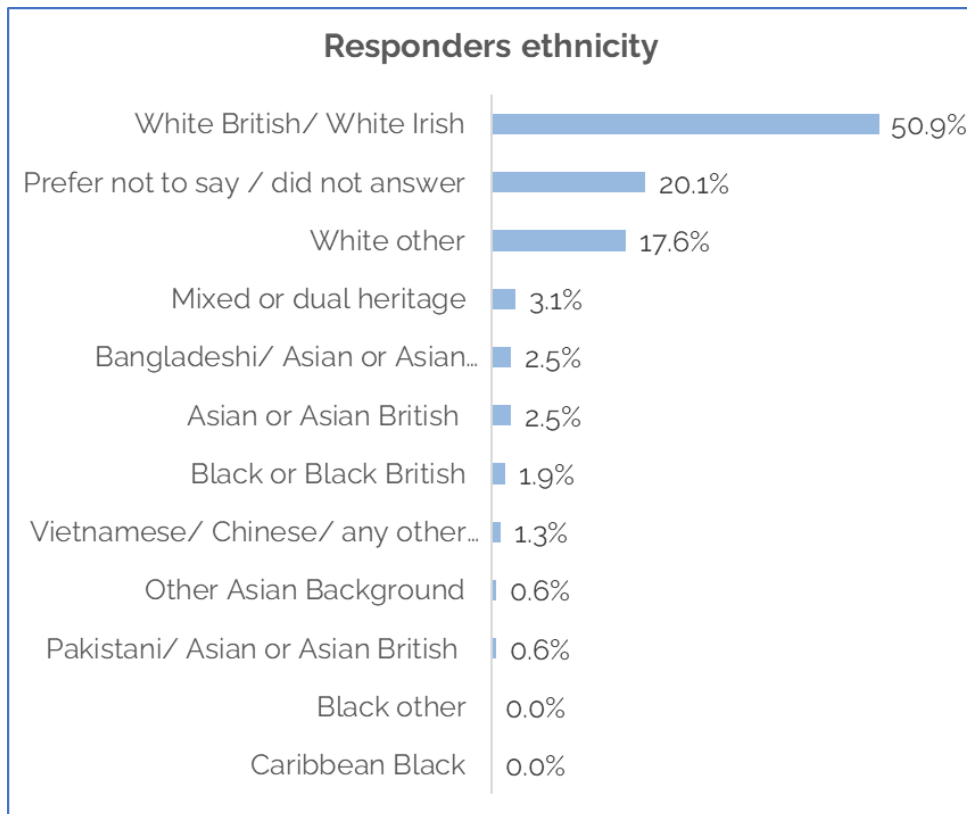
Equalities analysis

Responders by ethnicity

Almost 60 per cent of survey respondents identified as White British, and just 2.5 per cent identified as Bangladeshi.

The consultation initially ran from December to March. To try and address under representation from ethnic minority groups we wrote to all ethnic minority network groups on the TH Equalities hub, promoted the survey through the Council's VCS newsletter and contacted residents who expressed an interest in joining the council's resident panel. We extended the consultation to end of June 2022 to facilitate this.

Appendix 2



Baseline/awareness Knowledge:

To gauge an understanding of existing baseline knowledge, survey respondents were asked about their knowledge of four air quality facts. The first section of the questionnaire asked participants whether they were aware of the Council's key messages around air quality. There were 4 questions in this category:

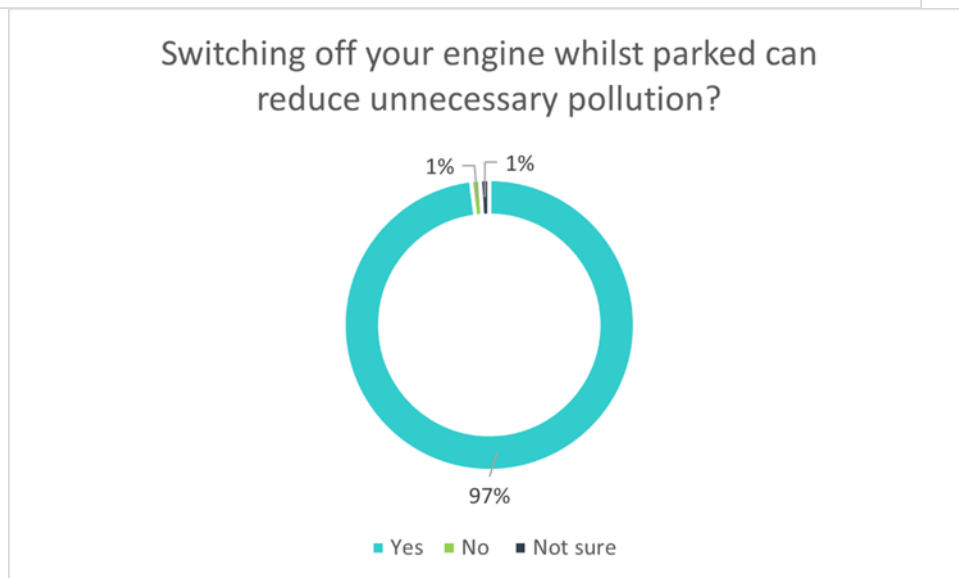
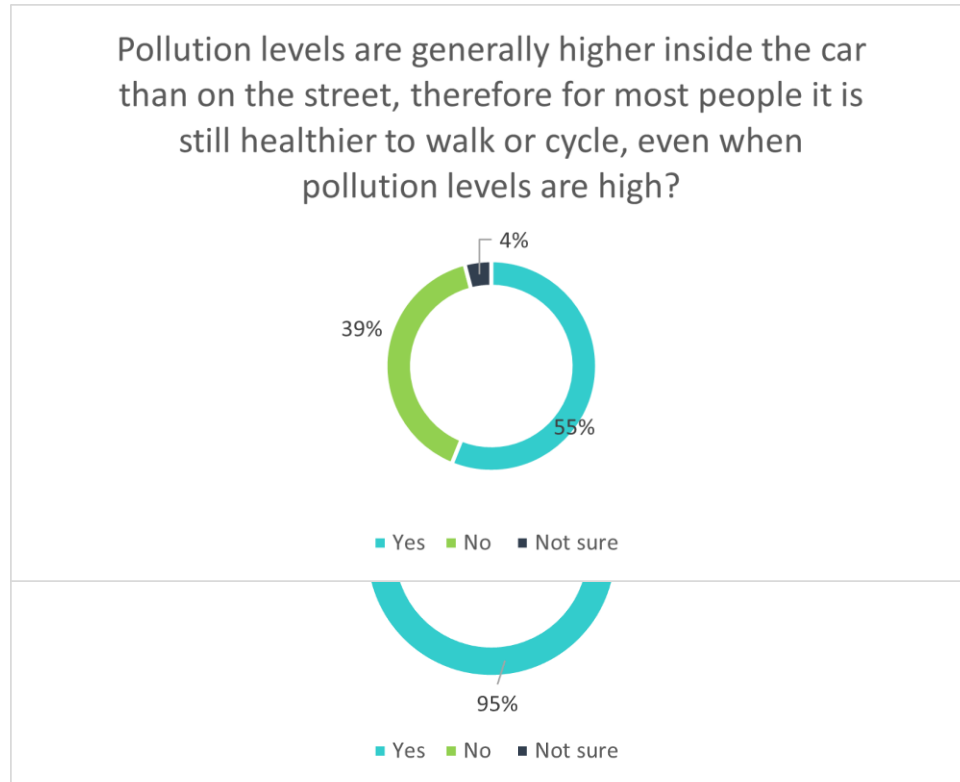
Question 1 : Did you know...

1.The easiest way to reduce pollution where you live is by swapping your car travel to walking, cycling or public transport?

Appendix 2

Almost all respondents knew that road traffic emissions is the main contributor to poor air quality.

2. Switching off your engine whilst parked can reduce unnecessary pollution?



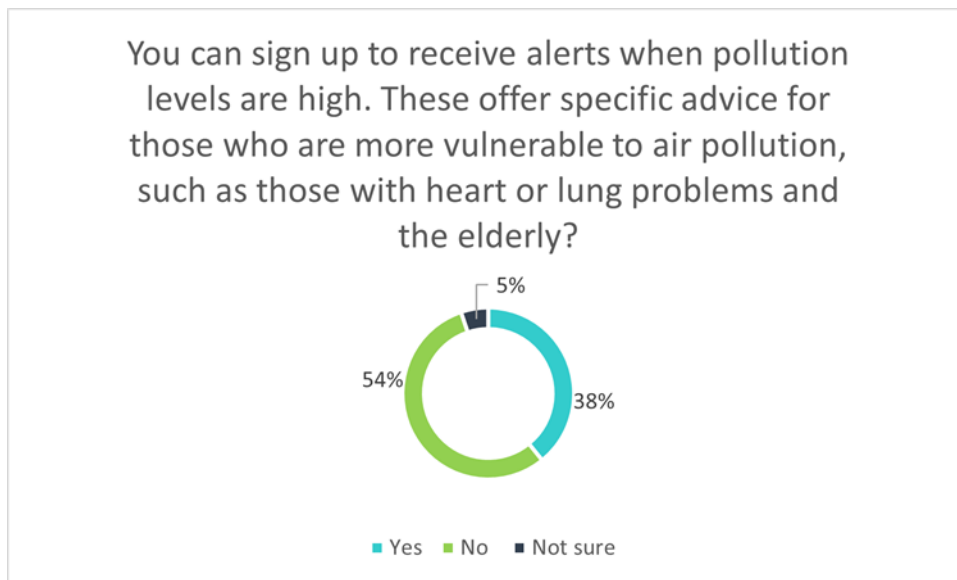
Again, a significant number of respondents were aware that vehicle idling causes unnecessary pollution.

3. Pollution levels are generally higher inside the car than on the street, therefore for most people it is still healthier to walk or cycle, even when pollution levels are high?

Appendix 2

Majority of respondents were aware, but a significant number (39%) did not know. This area is where more awareness raising could be useful as part of an overarching awareness raising campaign.

4. You can sign up to receive alerts when pollution levels are high. These offer specific advice for those who are more vulnerable to air pollution, such as those with heart or lung problems and the elderly?

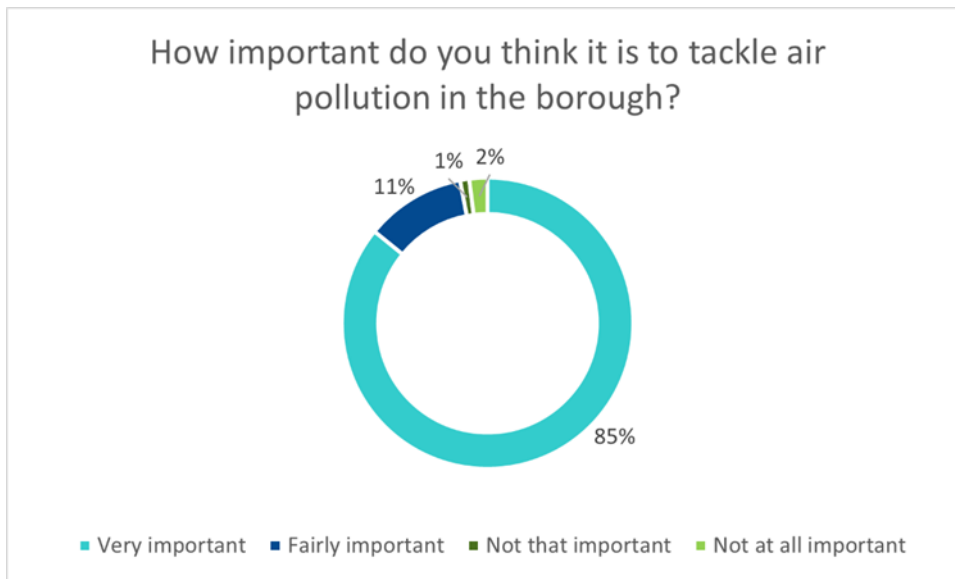


More than half of respondents were unaware of the *airTEXT* Service. This is a free of charge subscription-based Service providing air quality alerts to the public and has the potential to reduce the adverse effects of poor air quality by taking preventative measures. The Council supports such alerts. This is an action in the current AQAP and an action in the new AQAP. However, if most of the respondents are not aware of this Service, it indicates this Service needs to be promoted more widely to improve awareness.

In summary the results to the baseline knowledge questions show that most of the respondents are aware of the local causes of air pollution and what they can do to reduce their impact on air quality. However less people are aware that pollution exposure differs between traveling in a car or by walking/cycling. 54% of respondents either did not know or were unsure of the availability of the *airText* Service. These results suggest more needs to be done to inform air quality communications campaigns in the new action plan.

Question 2: How important do you think it is to tackle air pollution in the Borough?

Appendix 2



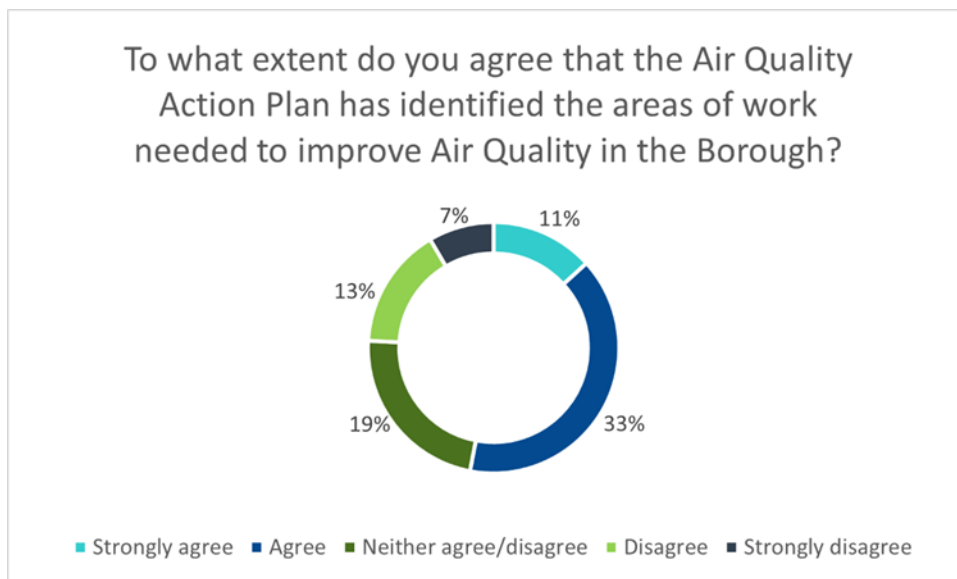
Almost 85 per cent of respondents felt that tackling air pollution in the Borough was very important and a further 11.3 per cent felt that the issue was fairly important.

3.2 per cent of respondents did not think that it was important to tackle air pollution in the Borough. Those responders thought that none of the priorities in the air quality action plan were priorities.

This result strengthens the importance and urgency for producing an ambitious plan to reduce pollution levels across the Borough.

Question 3: To what extent do you agree that the Air Quality Action Plan has identified the areas of work needed to improve Air Quality in the Borough?

Appendix 2



Majority of respondents agreed that the AQAP has identified the correct areas to tackle air pollution in the Borough but still a significant number disagreed or strongly disagreed.

Question 4: Which areas do you think should be prioritised in the 2022 Air Quality plan?

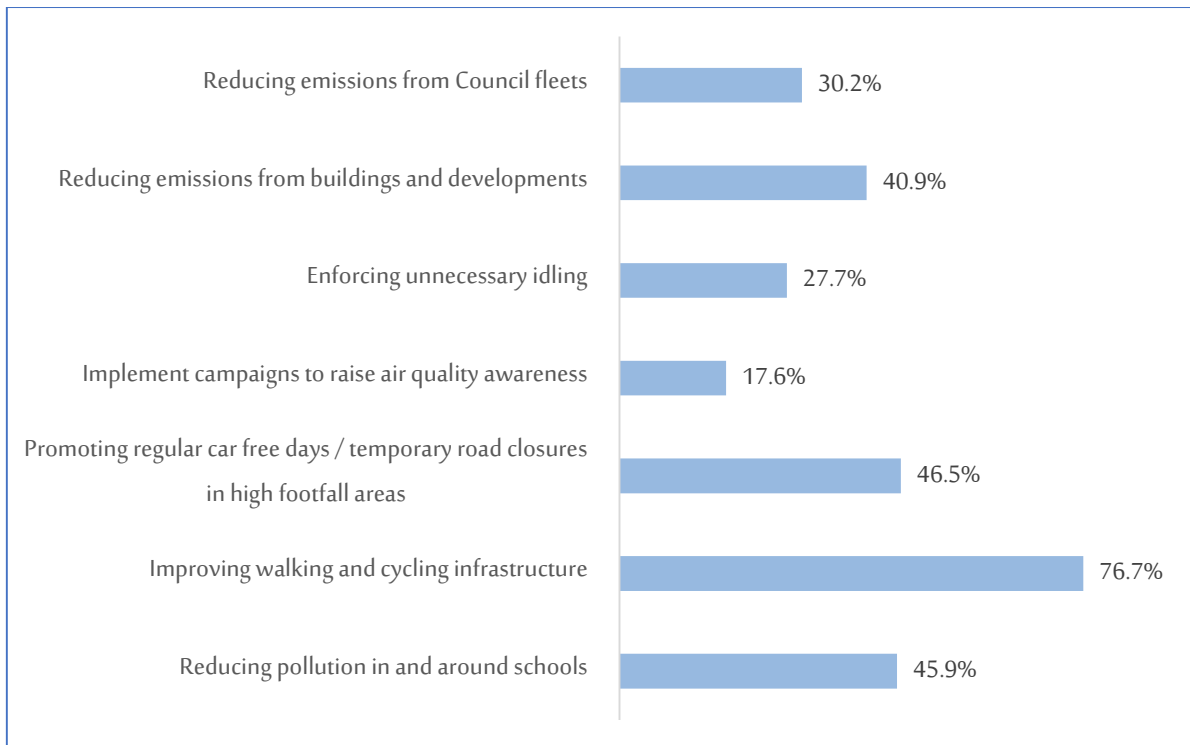
In the draft AQAP we identified some priorities. The purpose of this question was to rate areas that should be prioritised for action according to the stakeholders.

Survey respondents were asked which areas they think should be prioritised in the 2022-27 Air Quality plan. They were asked to rank the areas from 1-7 with 1 being most important and 7 being least important.

76.7 per cent of respondents ranked improving walking and cycling infrastructure as a top priority (ranking it either 1st, 2nd or 3rd out of 7). Three other areas were ranked as a top priority by more than 40 per cent of survey responders:

- Promoting regular car free days / temporary road closures in high footfall areas (46.5 per cent):
- Reducing pollution in and around schools (45.9 per cent)
- Reducing emissions from buildings and developments (40.9 per cent)

Appendix 2



Question 5: Are there any specific actions from the table you feel should be prioritised?

Question 5 gave respondents the chance to select specific actions that they felt were urgent and of the most importance to prioritise. The top two most popular actions were:

- Encouraging active travel / improving active travel infrastructure (cycling walking) (19 per cent of survey responders)
- More Low Traffic Neighbourhoods (LTNs) (11.3 per cent of survey responders)

Other priorities include:

- Measures to disincentivise car use / ownership
- Tackle / penalise vehicle idling
- More school streets
- Tackling emissions from construction sites (buildings and vehicles)
- Better communications and awareness raising
- More car free days
- Penalties for dangerous drivers / road traffic infringements
- Discouraging more polluting vehicles
- Improving public transport; and

Appendix 2

- Tackling emissions from river / canal traffic

Some of the common responses included:

“The monitoring of air, in particular when there is construction being undertaken of a medium to large scale - at present there is no monitoring of particulate matter. There is also no notification to local residents of when sites have breached limits”.

“How can you "enforce unnecessary idling" when the Council and TfL are the main contributors to "idling"? Reducing traffic flow to an idle is caused by the loss of traffic lanes, reduced bus frequency forces people to use alternate transport means. Those less able are discriminated against by being "forced" to walk when they are not able to. Your priorities are totally anti car to the detriment of small businesses, tradesmen, and those less able. This campaign appears to be a cover for more anti car activities. Prioritize getting ALL traffic moving and not forced to idle by the Council imposed restrictions, unused bike lanes and lack of sequencing of traffic lights”.

“Design out parking spaces, unless they are for people with mobility issues”.

“Get Liveable Streets done as promised”.

“You need not just secure cycle parking, but install on-street cycle parking for visitors - should be easier to access anywhere in Tower Hamlets and park bike than it is by car”.

“Improving cycle infrastructure. In the 'Draft Air Quality Action Plan 2022-2027', it notes the only target for this in the number of secure cycle hangers. Whilst cycle hangers are important, how does that make it safer and more inviting for individuals to choose to cycle on the current dangerous roads within the Borough?”

“Close streets to cars! There is no justification to let traffic go through neighbourhoods that that were not designed for this level of car traffic. Streets are too narrow and this generates traffic jam which then generates pollution right next to people's homes”.

“Idling vehicles in and around the side streets of Whitechapel market from market traders vehicles is something totally within the control of LBTH to stop”

“As you say that road transport is the biggest cause of road pollution in London, you should prioritise car free days/road closures and improving pedestrian and cycling infrastructure”.

“Closing streets, and not just temporarily - we know the pollution comes from cars, and everyone can see there are way too many cars in TH. The Borough should be for people, not for cars! I know closing streets down is not popular in the short term, but it's so obvious that that is what we need. The LTN built recently have been huge successes”.

“Definitely more infrastructure for walking and cycling whilst de incentivising driving”

“Enforcing unnecessary idling”

“Reducing pollution in and around schools”

“Low Traffic Neighborhood in Bow

School street on Harford Street

Appendix 2

“Idling is at crazy levels. There needs to be enforcement especially outside schools”.

“Disincentivate the use of cars”

“School children should not be subjected to poor quality air. Improving air quality in and around schools should be the number one objective”

Also the appalling behaviour of car drivers is detracting from any messages about cycling and walking being better. Every car speeding, dangerous overtaking, jumping red lights, failing to indicate - with no repercussions - makes it dangerous and unattractive to cycle as an adult, I would never let my children do it alone. You will make no progress if you don't tackle this.

Question 6: Are there any additional actions that you would like to see included in our air quality action plan?

Survey respondents suggested adding in additional measures to tackle air quality, including:

- Incentivise switch to electric vehicles
- Develop partnerships with not for profit / local organisations to raise awareness
- Increase number of air monitoring stations in high volume areas (e.g. main roads, around major public hubs)
- Introduce a cycle borrow / hire scheme
- More electric charging points in parking and along canal-side
- Introduce a workspace parking levy
- Lobby GLA / TfL to install lift at tube stations to encourage more public transport use
- Cancel / reduce travel infrastructure developments that will result in more air pollution in the Borough (e.g. Silvertown Tunnel and London City Airport)
- Increase ULEZ charge
- Installing live displays at all bus stops
- Introduce pollution barriers along A12
- More tree planting and other biodiversity measures
- Improve safety and cleanliness on Borough streets to encourage people to walk more

Question 7: Are there any actions in the plan that you feel we should not include in the plan?

Survey respondents were asked to identify what they **did not want to see included** in the air quality action plan. Respondents identified the following areas:

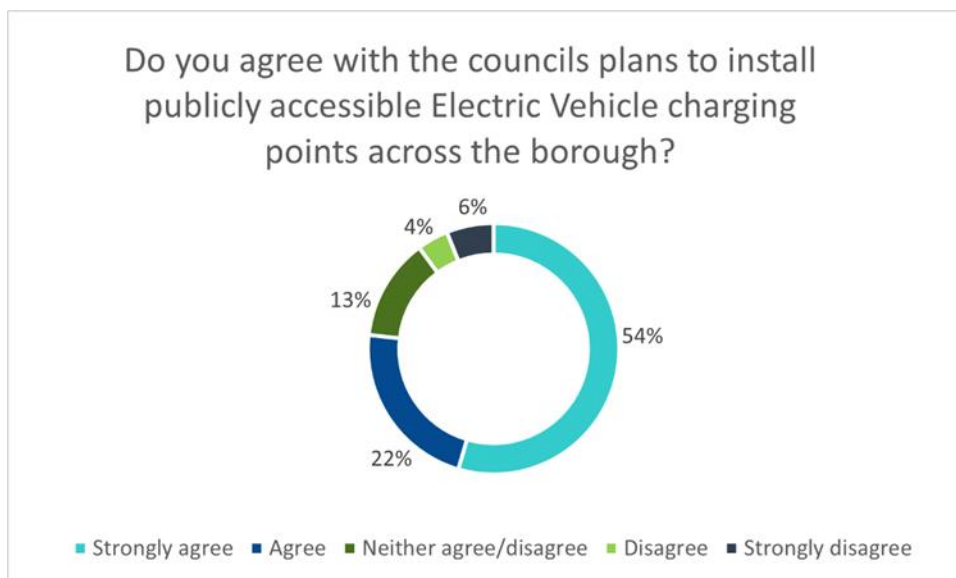
- Road closures / LTNs – because they encourage more traffic and more idling, making air quality worse on other roads

Appendix 2

- Active travel measures – at the expense of discriminating against those who are less physically able
- Electric vehicles and their infrastructure – these vehicles still generate emissions. It would be better to encourage people to give up cars altogether
- Penalties for people who live in boats – because they have fewer options for fuel
- Awareness campaigns without alternative options suggested
- Fewer car free days, particularly in high footfall areas – because it causes displaced congestion

Question 8: Tower Hamlets currently has very limited provision for electric vehicle charging. Do you agree with the Council's plans to install publicly accessible Electric Vehicle charging points across the Borough?

One of the key priorities of the draft air quality action plan is to improve the electric vehicle charging infrastructure in the Borough to encourage ultra -low emission vehicles by installing publicly available charge points. Question 8 sought the views of the respondents on this action.

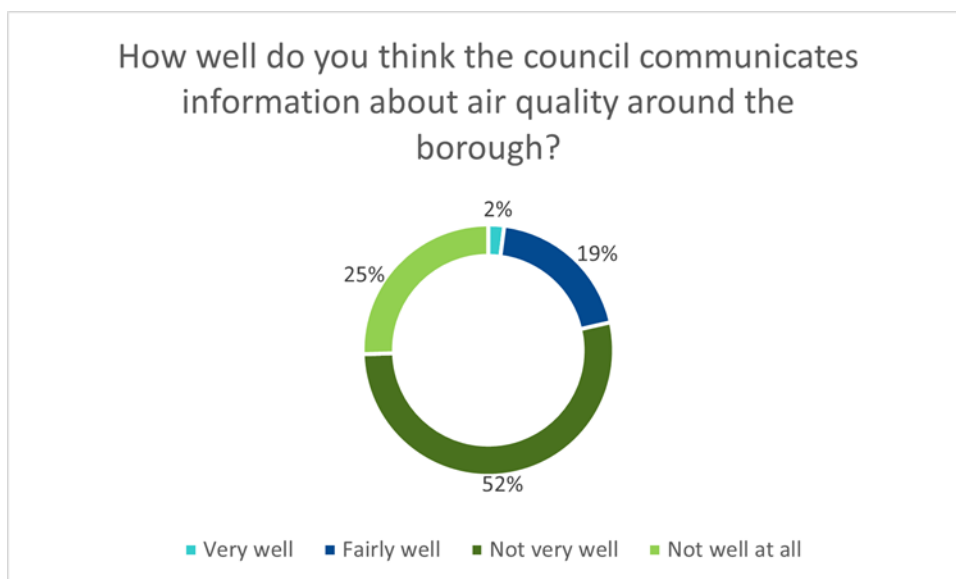


Over three quarters of survey respondents agreed with this statement. Just over 10 per cent of survey responders did not agree. 13.2 per cent of respondents did not have an opinion. This supports the Council's ambition to increase the proportion on ultra-low emission vehicles in the Borough.

Question 9: How well do you think the Council communicates information about air quality around the Borough?

One of the key aims of the draft action plan is to develop a communications strategy for disseminating air quality information to the community. Question 9 aimed to establish a baseline on how well we are doing at this so far.

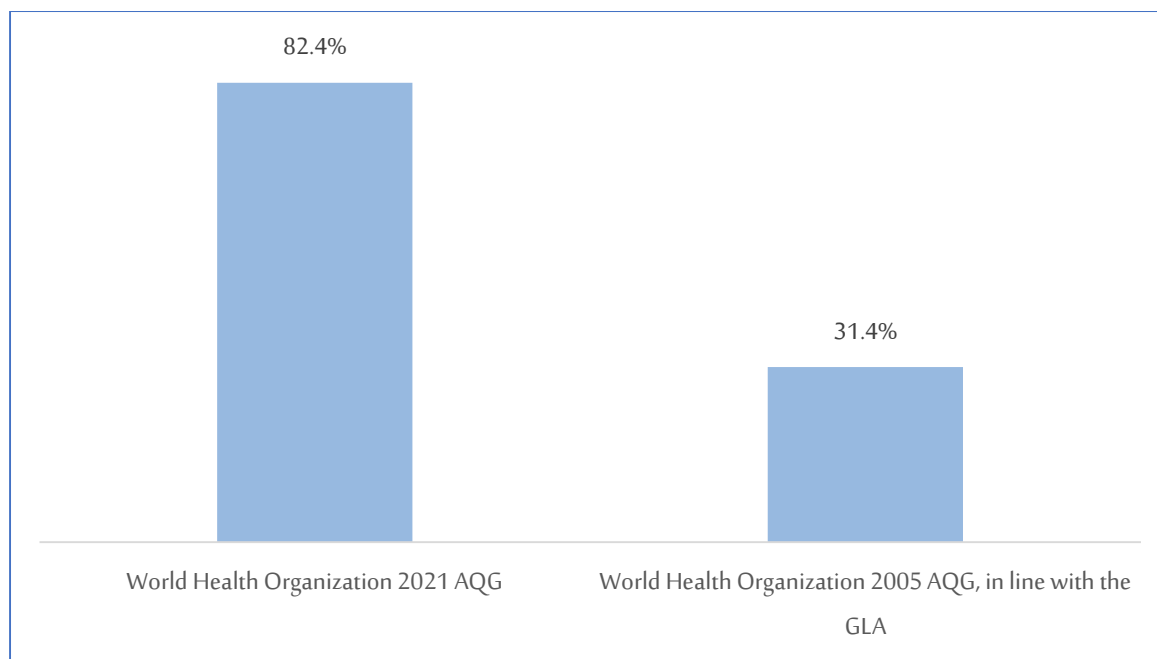
Appendix 2



Over three quarters of respondents (76.8 per cent) responded negatively. 21.4 per cent said very well or fairly well. The results show that the majority of respondents do not think that the Council communicates air quality information well and that there is a lot of room for improvement. This emphasises the need for a new air quality communications strategy and is an action that has been included in the air quality action plan.

Question 10: PM2.5 (particulate matter) refers to particles in the air that have a diameter less than 2.5 micrometres (that's about 3% of the diameter of a human hair). Based on current evidence PM2.5 is thought to be the air pollutant which has the greatest impact on human health. The World Health Organization (WHO) provides recommended Air Quality Guideline (AQGs) levels for particulate matters (PM10 and PM2.5). With regard to PM2.5, the 2005 WHO recommended AQG was an annual mean concentration of 10µg/m³ (micrograms per cubic metre). The WHO has recently updated their AQG value for PM2.5 to 5µg/m³ as an annual mean. This is much stricter than the current UK requirement. The Greater London Authority (GLA) is working towards meeting the 2005 levels by 2030. Which of the following WHO AQG for PM2.5 do you consider Tower Hamlets should work towards meeting by 2030 in our AQAP?

Appendix 2



82.4 per cent of respondents said work towards meeting the WHO air quality guidance (AQG) levels for particulate matters for PM_{2.5}, as set in 2021. However significantly fewer respondents, (31.4 per cent) said work towards the less strict 2005 levels for PM_{2.5}, as adopted by the Greater London Authority (GLA). A new action has been added committing the Council to work with the Mayor of London to achieving the WHO interim guideline value by 2030 and an aspiration to achieve the WHO 2021 guideline value by 2040. Particulate matter is a transboundary issue and will require action from national government to achieve this.

3.3 Statutory Consultees

Statutory consultee	Consulted	Responded
Secretary of State/DEFRA	Yes	Yes
Mayor of London/GLA	Yes	Yes
LB Newham	Yes	Yes- no comment
LB Hackney	Yes	Yes- no comment
Royal Borough of Greenwich	Yes	No
City of London	Yes	No

The Greater London Authority (GLA) were the only statutory consultee to provide comments on the draft air quality action plan. The Secretary of State (DEFRA) responded only to say that the LAQM responsibilities have been devolved to the Mayor of London so they would not be commenting themselves.

The response from the GLA stated that “ this was a good plan, well done”. Small changes to some actions were suggested including adding new targets. Changes have been made to reflect GLA feedback.

Section 4: Conclusions

Appendix 2

The public consultation exercise showed that 95% of the respondents were resident in the Borough. This is very encouraging as poor air pollution affects the residents the most. Engaging them and taking account of their feedback and views is essential to the successful delivery of the AQAP.

The results also show the survey participants are generally aware of air quality issues and would like more action to be taken limiting the emission of pollutants. Lack of communication about air pollution in the Borough was highlighted strongly in the consultation responses. Over three quarters of respondents (77 per cent) thought that the Council needs to communicate about air quality better. Therefore, communication would be a key measure to be addressed in the AQAP. A communication strategy has been included as an action in the AQAP.

The results also show more needs to be done to engage the BAME community as they're one of the groups who are disproportionately affected by poor air quality. The Council is already addressing this through a DEFRA funded joint project with Hackney, Newham, and City of London. The project aims to disseminate information on air quality and exposure reduction to those communities impacted the most by air pollution and have high rates of deprivation, as well as to those clinically vulnerable to air pollution such as children and those with respiratory disease. It aims to do this by:

1. Identify the top areas within each of the four administrative areas which have the highest levels of NO₂ annual mean exposure and Multiple Deprivation (1st, 2nd and 3rd percentile) to establish project 'target areas'.
2. Work in partnership with local communities to **develop an interactive web-tool** to provide relevant air quality information in an easy to use and engaging way.
3. Work in partnership with local communities, especially within identified target areas to recruit, **train and establish an air quality champions network** across the four boroughs to deliver community engagement events raising awareness on air pollution. Events will be co-designed and incorporate the promotion of the webtool.
4. **Train relevant healthcare professionals** within each of the partner boroughs target areas to increase their knowledge and confidence in advising patients on reducing exposure from air pollution. This will be done through procuring a healthcare partner to develop and deliver training for health professionals as well as **creating informative patient resources** in collaboration with local health professionals.

In addition, the Council's communication strategy to disseminate air quality information in the Borough should also include a strategy to help reach this group.

Most of the respondents are in favour of the proposal to install publicly accessible electric vehicle charging points across the borough. This could help drive a switch from fossil fuel to electric vehicles which in turn will reduce air pollution – this action is therefore an important measure in the AQAP and should be promoted.

The improvement of walking and cycling paths, and a reduction of idling are major concerns given by the respondents. Actions targeting idling and improving cycling and walking paths has been addressed in the AQAP.

Only 2.5% of respondents were aged between 16-24. It is clear more needs to be done to engage this group as they're one of the groups vulnerable to air pollution. There is opportunity to do this through the communication strategy mentioned above and include social media platforms.

Appendix 2

The results also show there is an overwhelming support for the Council taking action to tackle air pollution. 96 percent of respondents said tackling air pollution is very important or fairly important. However, only a small majority agreed that the correct areas for action have been identified. Most of the actions selected in the action plan are from the GLA recommended action matrix that the GLA expect London Councils to take to reduce air pollution.

All areas of the plan were judged as important but respondents' top priorities for the AQAP are

- Improving walking and cycling infrastructure
- Promoting regular car free days / temporary road closures in high footfall areas and
- Reducing pollution in and around schools

The feedback from internal Council departments has been used to better link the AQAP to other relevant Council strategies and the process of consulting different departments on the plan has led to increased emphasis on air quality across the Council and stronger inclusion of air quality issues in other Council policy areas.