

Air Quality Action Plan Table

Friends of the Earth Hackney and Tower Hamletsⁱ and Our Air Our Healthⁱⁱ have made detailed comments on the Air Quality Action Plan action table published for consultation by the London Borough of Tower Hamlets (LBTH), as follow in [blue](#). Where we have left 'xx' in place of a figure, we believe a quantitative target is needed, but do not ourselves have the expertise to suggest an appropriate figure.

We are significantly concerns by the dangerous levels of air pollution in Tower Hamlets, and its grave impacts on our health – particularly of vulnerable groups such as children. LBTH must use this action plan to put the borough on the path towards safe, legal, clean air as soon as possible.

Action category	ID	Action description	Department/ Team	Expected emissions/ concentration s benefit	Timescale for implementation	Target/ monitoring	Further information	Priority level
LLAQM	1.	Continue to run the 3 continuous monitoring stations, monitoring pollutants of concern to ensure air quality objectives are being met and to assess the effectiveness of local and regional policies.	Pollution team	Data collection only	Ongoing	Pollution monitoring is reported on in the ASR	Monitoring data is the evidence base for our AQMA declaration and for measuring the effectiveness of projects	High (compulsory)
LLAQM	2.	Continue to implement the NOx Diffusion Tube Monitoring network across the borough	Pollution team	Data collection only	Ongoing	Pollution monitoring is reported on in the ASR	Supports Cleaner Air Status	High (compulsory)
LLAQM	3.	Continue to ensure that all pollution monitoring data is available to the public, that communities are actively engaged with monitoring to support awareness raising and the website is kept up to date	Pollution team	Information sharing and awareness raising.	Ongoing	Target – 100% monitoring data available online	New data management contract, data soon to be available on www.airqualityEngland.co.uk	Medium
LLAQM	4.	Fulfill the GLA's criteria to retain our Cleaner Air Borough Status each year.	Pollution team	NO2, PM & CO2	Ongoing and Reported annually in the ASR	Target – Cleaner Air Borough Status to be achieved each reporting year.		High
Emissions from devt and buildings	5.	Ensuring emissions from construction are minimized via planning application reviews, traffic management at construction sites, dust control measures, following the best practice guidance in the GLA and London Councils' 'The control of dust and	Pollution team	PM & NO2	Ongoing Reported on in annual ASR	KPI % of major planning applications, target – 100%	Officer to ensure the GLA's 'Control of Dust & Emissions' SPG is applied to all major planning apps	High

		emissions from construction and demolition'						
Emissions from devt and buildings	6.	Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies, which should conform to standards for Dust and Emissions of Stage IIIB of the EU Directive 97/68/EC as a minimum.	Planning/ Pollution Team	PM & NO2	Ongoing. Monitoring of the NNRM database.	KPI – No of Construction sites signed up on the database and inputted equipment. 100% enforcement of air quality policies	Planning is already including the requirements in conditions for all relevant development. Pollution team will monitor the NRMM database	High
Emissions from devt and buildings		Review CHP policies to ensure that they meet the highest standards of air pollution control and are approved in developments only when they will lead to an improvement in air quality.						
Emissions from devt and buildings	7.	Ensuring Combined Heat and Power (CHP) and biomass air quality policies are met at all developments, including the GLA's NOX emission limits for heating plant.	Pollution Team/ Sustainability	PM, NO2 & CO2	Ongoing Reported on in annual ASR.	KPI % of major planning applications, target – 100%	AQ Officer to review air quality assessments/ Energy strategies to ensure compliance. A no biomass policy is already in place for the whole borough.	High
Emissions from devt and buildings	8.	Ensuring Air Quality Neutral policies are complied with at all developments and that 50% of new developments are 10% below the transport and buildings emissions benchmarks exceeded where possible.	Air Quality Officer	PM & NO2	Ongoing Reported on in the annual ASR.	KPI – % of major planning applications, target – 100%	[Would need to be incorporated into the new Local Plan] AQ Officer to review air quality assessments within the planning process, and monitoring and enforcement of building regulations to ensure compliance.	High
Emissions from devt and buildings	9.	Ensuring adequate, appropriate, and well located green space and infrastructure, including for walking and cycling, is included in all new developments with the Green Grid Strategy promoted and	Planning	Exposure reduction	Ongoing	Implementation will be monitored through the rollout of the green grid strategy & the	Currently being incorporated into the new Local Plan. Also See Green Grid	Medium

		adhered to in all major planning applications, master planning and in air pollution hotspots				planning database.	Strategy.	
Emissions from devt and buildings	10.	Encourage Require xx% of new developments to install alternative waste collection methods, such as ENVAC, to that reduce collection vehicle emissions.	Waste Strategy/ Development team	PM, NO2 & CO2	Ongoing.	Monitored by the Waste Strategy/ Development team	Currently being incorporated into the new Local Plan.	Medium
Emissions from devt and buildings	11.	Ensuring that the whole borough Smoke Control Zones is fully publicised and enforced. Look into extending the zone to incorporate the waterways.	Pollution Team	PM & CO2	Ongoing & October 17 for waterways inclusion if feasible	Monitor by ensuring all reports of the SCZ being breached being investigated Target 100% of reports		Medium
Emissions from devt and buildings	12.	Investigate the promotion and delivery of Deliver energy efficiency retrofitting projects in at least xx% of workplaces and homes using the GLA RE:NEW and RE:FIT programmes to replace old boilers with ones that meet NOx emission levels equivalent to or less than 40 mg/kWh/top-up lost insulation in combination with other effective energy conservation measures that deliver an Energy Performance Certificate rating of 'B' or better	Sustainability Team/ Pollution	NO2 & CO2	Ongoing	Project yet to be scoped		Medium High
Emissions from devt and buildings	13.	Enderby Wharf – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project will not lead to any significant adverse air quality impacts in the borough.	Pollution Team/ Planning	NO2 & PM	Measure – all consultations responded with air quality considerations a priority	Ongoing		Low
Emissions from devt and buildings	14.	Lead by example by ensuring the councils new Civic Centre is a best practice example of a sustainable and low negative emissions development in regards to air pollution and CO2.	Planning/ Sustainability / Pollution Team	NO2 & CO2	Building due for completion in 2021	Measure – development to be delivered to exceed all sustainability and air quality standards, including BREEAM		Medium

Emissions from devt and buildings	15.	Improve the energy efficiency of John Onslow House to xx standard as part of the upcoming refurbishment.	Facilities/ Sustainability	NO2 & CO2	Due for completion by 2021	Measure – development to be delivered to exceed all sustainability and air quality standards. Monitoring of this will be done throughout the planning & implementation process.		Low
Emissions from devt and buildings		Reducing use of private cars by Tower Hamlets residents, prioritising areas with high car ownership, in conjunction with the Local Plan				KPIs - % new developments that are car free – 90% by 2021		
Emissions from devt and buildings		Increasing the use of ULEVs by Tower Hamlets residents, prioritising areas with low incomes and high car ownership, in conjunction with the Local Plan				KPIs - % of new developments with one EV car club space – 100% by 2021		
High Major Infrastructure Project	16.	Ensure potential emissions from river traffic are considered in applications for developments that will increase river traffic.	Pollution Team	NO2 & PM	Ongoing	Measure – all relevant development including air quality as a key consideration		Medium
High Major Infrastructure Project	17.	Ensure the Tideway Tunnel infrastructure project is sustainably delivered with the Construction Code of Practice adhered to and effective emissions mitigation in place during construction & operational phases	Pollution Team/ Planning	PM & NO2	Project due for completion in 2021.	Monitoring by no of air quality complaints received in regards to the construction works and assessment of monitoring reports		Medium
High Major Infrastructure Project	18.	Silvertown Tunnel – Ensure a thorough and robust evaluation of the Environmental statement, that methodologies used comply with current guidance and that the project (construction and post-construction) will not lead to any significant adverse air quality impacts in the borough. Ensure traffic modelling on which the air quality	Pollution Team/ Planning/ Transport	PM & NO2	Public examination closing 11 th April 2017. Decision expected in 2017.	Measure – all consultation deadlines met no adverse impact on air quality in LBTH; if adverse impacts occur, effective action is taken to remedy them		High

		statements are robust						
High Major Infrastructure Project	19.	Ensure that all future major infrastructure projects are adequately reviewed and assessed through the planning process to ensure no adverse impacts on air quality are minimised .	Pollution/ Planning	NO2 & PM	Ongoing	Target - 100% infrastructure projects reviewed and assessed.		High
Public health and awareness raising	20.	Director of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population – Air Quality officer to be consulted on JSNA	Public Health	Emissions reductions are indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing	Measure – adequate consideration given to air quality in the JSNA	Already included in the most recent JSNA, must ensure that up to date info is included in future assessments.	Low
Public health and awareness raising	21.	Strengthening co-ordination with Public Health by ensuring that at least one public health specialist within the borough has air quality responsibilities outlined in their job profile	Public Health	Emissions & concentrations reductions indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	Ongoing	Measure – at least one specialist to have AQ in their objectives		Low
Public health and awareness raising	22.	Director of Public Health to sign off all new Air Quality Action Plans	Public Health	Emissions & concentrations reductions indirect and unquantifiable, but enhanced co-ordination will benefit all air quality initiatives.	On production of each revised action plan every 5 years	Measure – all action plans to be signed		Low
Public health and awareness raising	23.	Support patients with heart and lung conditions by providing air quality advice to discharged patients, particularly vulnerable & those with heart/lung conditions. This would be a continuation of the 'Protecting Patient' work stream from the Barts Project	Pollution/ Public Health	Protect individual health	Tbc dependent upon funding identification	KPI- no of patients engaged with on air quality messages, no of maps given out.	See Global Action Plan website for further info on the previously run project https://www.globalactionplan.org.uk/cleaner-air-withbarts-health	Medium

Public health and awareness raising	24.	Support and Promotion of air quality awareness programmes such as airTEXT	Pollution Team	Protect individual health	Ongoing	KPI – AirText - æ 75% of residents vulnerable to air pollution signed up to service		Medium
Public health and awareness raising	25.	Develop and implement a communications strategy for disseminating air quality information in the borough.	Pollution/Communications	Indirect impact on emissions through awareness raising	March 2018	Measure – audience reached with air quality messages		Medium
Public health and awareness raising	26.	Encourage schools to join the TfL Sustainable Travel Active Responsible Safer (STARS) accredited travel planning programme by providing information on the benefits to schools and supporting the implementation of such a programme	Development Team /School travel Officer	NO2, PM & CO2	Ongoing	KPI - % of schools signed up. Target 70% by 2021. Secondary KPI - % of trips made by car for schools that are part of the scheme. 2016 – 40 schools signed up so far.		Medium
Public health and awareness raising	27.	Air quality at schools – Roll out the cleaner air for schools program that was previously run in 2 schools, to more schools in high pollution areas.	Pollution Team	NO2, PM & CO2 & awareness raising	2 schools per year funding dependent	Target – project run at 2 schools per year See: http://www.looplabs.org/casestudies/ for case study of previous project		High
Public health and awareness raising	28.	Pollution Audits in schools. Support the GLA in their program to provide air quality audits in 2 schools	Pollution Team	Audit will generate a plan to reduce pollution levels.	First tubes to be installed by June 2017 and then ongoing.	Target – 2 school audits carried out.		Low
Public health and awareness raising	29.	Schools anti-idling project, engagement with schools and installation of anti-idling signage at school parking areas in high pollution areas.	Pollution Team	NO2, PM & CO2	All signs to be procured and installed by July year 2017	% of schools with signs installed, target 100%; % schools with reduced local air pollution levels – 75%	See appendix for further info on proposed project.	High
Public health and awareness raising	30.	Schools Environmental Theatre Project	Pollution Team	Awareness raising	Aim to run at 20 schools per year	KPI – number of schools/ pupils engaged	See appendix for further info on proposed project.	High Medium

Public health and awareness raising	31.	Citizen Science air quality monitoring project	Pollution Team	Awareness raising	6 month project to be completed by March 2017.	Target – engage 30 people in a six month project		Low
Public health and awareness raising	32.	Work with Residential Providers to develop and implement a strategy for disseminating air quality information to their tenants	Pollution Team/ Communications	Protect individual health	March 2018	Measure audience reached with air quality messages 50% residents taking action to reduce air pollution and protect themselves from it		Low
Public health and awareness raising	33.	Use Health and Wellbeing Board to get existing and all future public sector and RP partners to pledge to increase the number of, electric, hybrid, and cleaner vehicles in their fleets.	Public health	Total reduction in NOx PM10 tailpipe emissions from all vehicles replaced.		No of pledges/ updates. 80% of public sector and PR partners commit to increase ULEV vehicles; 50% of these commit to 50% ULEV fleets		Low High
Delivery servicing and freight	34.	Continue to ensure that Procurement policies to include a requirement for suppliers with large fleets to have attained silver Fleet Operator Recognition Scheme (FORS) accreditation or equivalent, or gold as a preference	Procurement team	NO2, PM & CO2	Ongoing	Measure – actions implemented in policies		Medium
Delivery servicing and freight	35.	Investigate updating Procurement policies to ensure sustainable logistical measures, including no new purchase of diesel vehicles for the Council-owned fleet and no use of diesel vehicles in the Council-contracted fleet , are implemented (and include requirements for preferentially scoring bidders based on their sustainability criteria)	Procurement Team	Reduction in NOx PM10 and CO2 associated with more sustainable logistics.	Policies updated by 2020 2018	Measure – actions implemented in policies		Low
Delivery servicing and freight	36.	Investigate re-organisation of freight to support consolidation (or microconsolidation) of deliveries, by setting up or participating in new logistics facilities, and/or requiring that council	Planning/ Engineering Team	NO2, PM & CO2	March 2019	Implementation of freight consolidation scheme: xx% reduction in road	Target area for freight consolidation is the Isle of Dogs	Low Medium

		suppliers participate in these				vehicle deliveries		
Borough fleet/ council contracted fleet actions	37.	Join a recognized appropriate driver award scheme, e.g. Fleet Operator Recognition Scheme (FORS) or Van Excellence & achieve certification	Development , Compliance and Commission in Department – Fleet management team.	NO2, PM & CO2	Achieve certification by Dec 2017	KPI – certification awarded. http://www.vanexcellence.co.uk/ https://www.forsonline.org.uk/cms/		Low
Borough fleet/ council contracted fleet actions	38.	Increasing the number of, electric, hybrid, and cleaner vehicles in the boroughs' fleet and ending purchase of new Council-owned and council-contracted diesel vehicles	Development , Compliance and Commission in Department – Fleet management team.	NO2, PM & CO2	Phase 1 by Dec 2017 & then ongoing fleet review	Monitoring of the fleet profile & records. KPI – No of 20% ULEV's in borough fleet by 2020; no purchase of new diesel vehicles after 2018	Application being submitted to the DEFRA grant to cover difference in costs for vehicle replacement by electric rather than Euro 6.	High
Borough fleet/ council contracted fleet actions	39.	Accelerate uptake of new Euro VI vehicles in borough fleet	Development , Compliance and Commission in Department – Fleet management team.	NO2 & PM	Total fleet upgrade to meet ULEZ Standards in time for ULEZ implementation	Monitoring of the fleet profile & records	KPI - % of ULEZ compliant vehicles in fleet.	High
Borough fleet/ council contracted fleet actions	40.	Real-time Telematics monitoring of fleet driver behaviour and subsequent driver training	Development , Compliance and Commission in Department – Fleet management team.	NO2, PM & CO2	Phase 1 – Jan 2017, first 75 vehicles; Phase 2 – Jan 18, next 75 vehicles; Phase 3 – 2019, all others.	Number/ % of vehicles fitted with telekinetic monitoring. Number/% of drivers training		Low
Borough fleet/ council contracted fleet actions	41.	Utilise round optimization for council fleet to reduce vehicle miles	Development , Compliance and Commission	NO2, PM & CO2	March 2019	Fleet manager to monitor progress		-

			in Department – Fleet management team.					
Borough fleet/ council contracted fleet actions	42.	Procure a cargobike for regular delivery of literature to councillors	Travel Plan Engineering Team	NO2, PM & CO2	To be purchased and in use by December 2017	Monitoring will be carried out on how often the bike is used instead of a car. KPI - % of deliveries made by the bike. 100% target.		Low
Borough fleet/ council contracted fleet actions	43.	Project 2020: use the procurement process to ensure all waste & Recycling collection vehicles in the new contract are as low emission as possible by prioritising tenders with the highest proportion of low emission vehicles, including no diesel vehicles	Waste Strategy	NO2, PM & CO2	2020	This will be monitored through the contract management.		High
Borough fleet/ council contracted fleet actions	44.	Project 2020: utilise round optimisation to reduce vehicle mileage for waste collections	Waste Strategy	NO2, PM & CO2	2020	Target – All rounds reviewed and amended where necessary.		High
Localised solutions	45.	Investigate installing Green Infrastructure, such as green walls, green screens or living roofs at schools in polluted areas. Linking in with the Green Grid and Open Spaces Strategy, focusing on schools, hospitals and air pollution hotspots.	Pollution Team	Project still to be scoped	Project still needs to be scoped	Project still needs to be scoped	See appendix	Low
Localised solutions	46.	Low Emission Neighbourhoods (LENS)	Pollution Team	NO2, PM & CO2	Project completed by end of year 2020.	Monitoring of the project will be carried out by the project board	See appendix	Medium
Localised solutions	47.	Engagement with businesses – ZEN Project	ZEN Project Officers	NO2, PM & CO2. Awareness raising.	Zen phase 2 April 16 – March 19	ZEN officer to monitor. KPI – no of businesses engaged with & no of pollution reducing measures implemented.	www.zeroemissionnetwork.com	High
		Investigate innovative means to tackle air pollution, e.g. Airlabs or Filt Air, or						

		local competition for solutions						
		Reduction in overall travel through mixed-use developments to promote local employment and recreation opportunities				KPI?		
Cleaner transport	48.	Discouraging unnecessary idling by taxis, coaches and other vehicles. Anti – Idling engagement project. Focused on air pollution hotspots and hospitals.	Pollution Team	NO2, PM & CO2. Awareness raising	3 year project August 16- August 19	Monitoring the number of people engaged & social media reach. Target to run 6 idling action days per year.	See appendix	Low
		Encouraging use of ULEVs within Tower Hamlets				KPI – xx% of new parking spaces for ULEVs – 30%		
Cleaner transport	49.	Increasing the proportion of electric, hydrogen and ultralow emission vehicles in Car Clubs.	Parking Services	NO2, PM & CO2	Ongoing	KPI - % of vehicles provided by car club that are ULEVs – 75% by 2021		Medium
Cleaner transport	50.	Review parking permit fee banding to encourage lower emission vehicle choice.	Parking Services	NO2	Ongoing	Measure – parking fees reviewed amended to encourage (U)LEVs	Should be preceded by an education & awareness campaign	High
		Review Council-operated pay and display parking banding to encourage low emission vehicle choice and discourage use of the most polluting vehicles				Measure – parking pay and display fees reviewed amended to encourage (U)LEVs		
Cleaner transport	51.	Installation of residential electric charge points	Parking Services/ Pollution Team	NO2, PM & CO2	Ongoing	Measure – no of charge points installed – xx#	Project already on going, report on options being prepared for cabinet	High
Cleaner transport	52.	Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	Parking Services/ Pollution	NO2, PM & CO2	Ongoing	Measure – no of rapid chargers installed – xx#	Locations needed for installation. Existing and new taxi ranks to be prioritised	High
Cleaner transport	53.	Investigate reprioritisation of road space to smooth traffic flow, reduce congestion, improve bus journey times, cycling and pedestrian experience, and	Engineering	NO2 & PM	Projects yet to be scoped	Projects yet to be scoped KPI –		Low High

		reduce emissions caused by congested traffic with priority for air pollution hotspots				<p>implementation of a 'mini Holland scheme' by 2021;</p> <p>KPI – timed road closures – at least four in air pollution hotspots [around schools] by 2021;</p> <p>KPI – removal of on road parking – at least 50 parking spaces removed by 2021</p> <p>KPI – pedestrianized streets – at least two in air pollution hotspots by 2021</p> <p>KPI – segregated cycleways – provision tripled by 2021 [Mayor of London commitment]</p>	
Cleaner transport		Reduction of private motor vehicle movements (including taxi and PHV) in the borough, matching ambition in the Mayor of London's Draft Transport Strategy		NO2, PM & CO2		KPI – 10% reduction in private motor vehicle movements by 2021	High
Cleaner transport	54.	Continue to provide/ ensure provisions of infrastructure to support walking and cycling including on street residential secure parking lockers, cycle routes, cycle permeability schemes, traffic management area reviews	Engineering/ Planning	NO2, PM10 & CO2	Ongoing	Implementation of the Cycling and Walking Strategies	High
Cleaner transport	55.	Continue to encourage staff sustainable travel by providing Dr Bike services and staff subscriptions to the TFL cycle hire scheme for site visits	Staff Travel Plan, Engineering Team	NO2, PM & CO2	Ongoing	Measure – no of Dr Bike sessions run each year & no of cycle hire trips – xx #	Low
Lobbying and	56.	Push for Tower Hamlets, and the	Pollution	NO2 & PM	3 rd	Measure – all	High

Partnership		Blackwall and Silvertown tunnels , to be included in the ULEZ through partaking in the TFL Consultation process	Team/ Place DMT		consultation due in 2017	consultations responded to with a cross department response by the due date		
Lobbying and Partnership	57.	Ensure responses to all government and regional consultations focus on reducing or eliminating emissions of Local air pollutants and CO2.	Pollution Team/ Sustainability / Planning	NO2, PM & CO2	Ongoing	Measure – all consultations to assert councils position on emissions reductions.		Medium
		Lobby and work with TFL to reduce emissions from road vehicles in air pollution hotspots on TFL controlled roads, by reducing speed limits and reprioritizing road space						High
Lobbying and Partnership	58.	Lobby and work with TFL to reduce emissions from buses in the borough e.g. through green bus corridors. Work with other statutory Services to reduce emissions – LFB, NHS etc	Pollution Team/ Transport	NO2 & PM	Ongoing	Measure – no of routes that convert to Low emission/ hybrid technology.		High
Lobbying and Partnership	59.	The development of a Mayors Air Quality fund within Tower Hamlets	Pollution Team	NO2 & PM		2017/18 budget review. Spending to be monitored by budget holder.		High
		Lobby and work with TFL to ensure that the Silvertown tunnel development does not reduce air quality in Tower Hamlets, and that if it does appropriate remediation measures are taken						
		Work with other nearby boroughs to reduce traffic, including through freight consolidation						

ⁱ <http://hackneyandtowerhamletsfoe.org.uk/air-pollution>

ⁱⁱ <https://www.facebook.com/OurAirOurHealth/>