

Consultation Responses on London Borough of Haringey Air Quality Action Plan 2019-2024



This report provides a summary of the responses to the consultation on the Haringey's Draft Air Quality Action Plan 2019-2024 carried out between the 28th May to the 30rd July 2019. It has been produced to meet the requirements of Schedule 11 of the Environment Act 1995.

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1. Introduction and Overview

1.1. The draft Air Quality Action Plan (AQAP) was produced as part of the local authority's duty to London Local Air Quality Management. It outlines the actions that will be taken to improve air quality in London Borough of Haringey between 2019-2024. The proposed actions were grouped into seven categories by priority¹. Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between the 28th May 2019 to 30 July 2019.

1.2. Three main groups were consulted during the development of the Air Quality Action Plan. these comprised: -

- Internal stakeholders who will deliver the actions detailed in the plan
- Statutory consultees as required by the legislation
- The external stakeholders due to significant public interest in health issues and local air quality

1.3. **Internal Stakeholders:** The consultation of each relevant service areas was carried out before and during the development of the plan. This included the following service areas:

- Carbon Management & Homes for Haringey
- Development Management /Analyst & Systems Team
- Parks & Regeneration
- Public Health
- Smart travel
- Transport (including Parking Services Finance, Sustainable Transport – Operations, Sustainable Transport/Major Schemes Projects & Transport Planning)
- Strategic Procurement, Client & Commissioning
- Others (including Corporate Resources, Strategy & Communications, GLA and Enforcement Response)

¹ By order of priority, the following seven broad actions were proposed to reduce air pollution in Haringey:

1. *Monitoring and other core statutory duties: maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other very important statutory duties undertaken by boroughs, which form the basis of action to improve pollution;*
2. *Emissions from developments and buildings: emissions from buildings account for about 15% of the Nitrogen Oxides (NO_x) emissions across London so are important in affecting Nitrogen Dioxide (NO₂) concentrations;*
3. *Public health and awareness raising increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;*
4. *Delivery servicing and freight: vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions;*
5. *Borough fleet actions: our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example;*
6. *Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures; and*
7. *Cleaner transport: road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric)*

- 1.4. Comments and queries made by each service areas were considered prior to external consultation. All staff working for Haringey Council were further consulted during the public consultation.
- 1.5. **Statutory consultees as required by legislation:** It is a legal duty under Environment Act 1995 and the London Local Air Quality Management Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following parties were contacted directly by email.
- Residents
 - Local MPs and Members
 - Secretary of State
 - Environment Agency
 - Transport for London
 - All neighbouring local authorities, in particular the North London Cluster Group
 - Bodies representing local business interests and other organisations such as North London Chamber of Commerce and Enterprise
- 1.6. The Greater London Authority (GLA) was consulted during the development and consultation stages. They recommended more defined targets in relation to the Council's fleet and the localised solutions. These amendments were made, and the final draft agreed with the GLA. See Table 2 for full details of the GLA comments and amendments made to the plan as a result of them.
- 1.7. Eleven Statutory consultees responded to the consultation in total.
- 1.8. **External stakeholders:** the results of the consultation can be summarised as follows:
- 253 consultees responded to the AQAP consultation;
 - 85% were from Haringey resident;
 - 96% of the respondents said air pollution is important if not very important;
 - 42% agreed that the seven actions identified by priority will meet the needs of the borough and help reduce pollution;
 - 33% disagreed that the seven actions proposed in order of priority were appropriate and
 - 23% responded "I don't know",
- 1.9. The results of the consultation revealed that the proposed measures are generally acceptable and in overall agreement with that of the internal stakeholder consultation carried out prior. The consensus was that a combination of complementary initiatives is key to creating a positive impact in both the short and longer-term on-air quality in Haringey.
- 1.10. As emission from traffic is considered the main source of pollution in Haringey, initiatives with evidence of positive impacts on air quality in the short term such as traffic reducing interventions including charging for parking and enforcement, infrastructures and traffic management should be given priority. Pedestrianisation, road closures, temporary and permanent car free days as well as green infrastructure were particularly recommended as priority measures by most respondents. The consensus among the consultees was that good public transport coverage, good cycle and walking infrastructure, links to discouraging private use of petrol and diesel fuelled cars and encouraging alternative forms of transport could help resident and businesses improve air quality.

- 1.11. Better transport planning as well as a communications strategy with associated materials to build public awareness on air pollution was considered necessary to deal with pollution. In the longer term, behavioural change strategies to move people away from car use were considered warranted.
- 1.12. As with all London Borough Councils, vehicle idling was the most discussed problem. Stricter enforcement measures were recommended around schools and other vulnerable receptors.
- 1.13. Air pollution monitoring and audits were recommended at each school within Haringey.
- 1.14. Changing parking policies by increasing parking charges in line with the surrounding boroughs was suggested as source of additional revenue and to help reduce transboundary diesel car pollution.
- 1.15. More bold and ambitious actions with specific targets by Haringey Council will be welcomed by the residents. Further details of the consultation responses and proposed actions from Haringey Council are presented in the following sections.

2. Consultation Methods and Responses

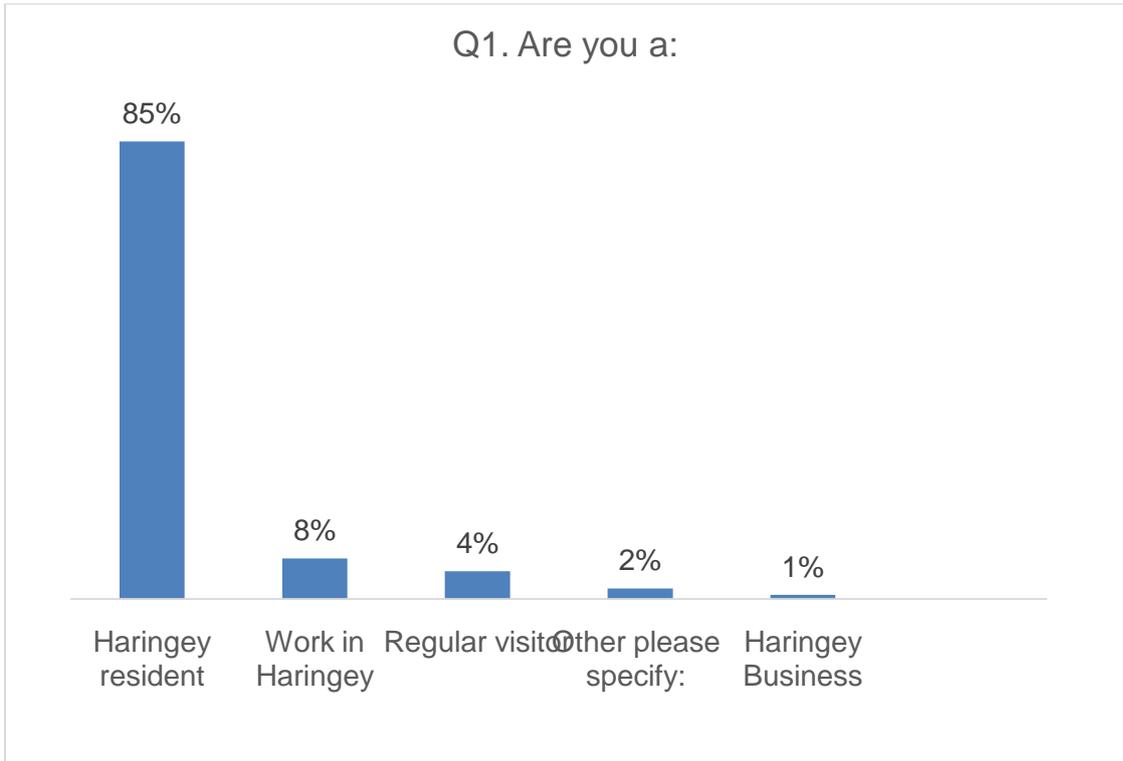
2.1. The methodology used for the consultation was presented in the communication and engagement plan in May 2019. Emails, questionnaires and face to face interviews during public workshops for example were used to gather the data.

- Responses to the consultation came from a range of external stakeholders and interested parties.
- In total 253 responses were received from external stakeholders, with only 2 from businesses exclusively. The following sections and Table 1 present the results of the consultation and responses from the questionnaire.
- Ten consultation responses were received from statutory stakeholders as summarised in Table 2.

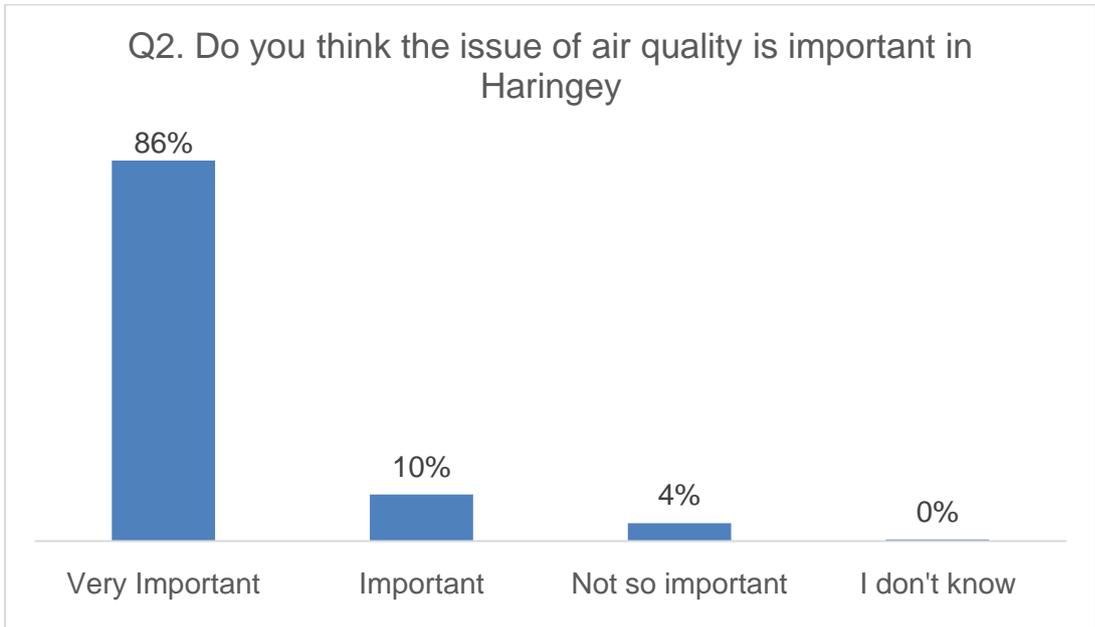
2.2. A summary of the responses to the questions are as follows:

Q1: Are you a:

- Haringey resident
- Work in Haringey
- Regular visitor
- Other please specify:
- Haringey Business

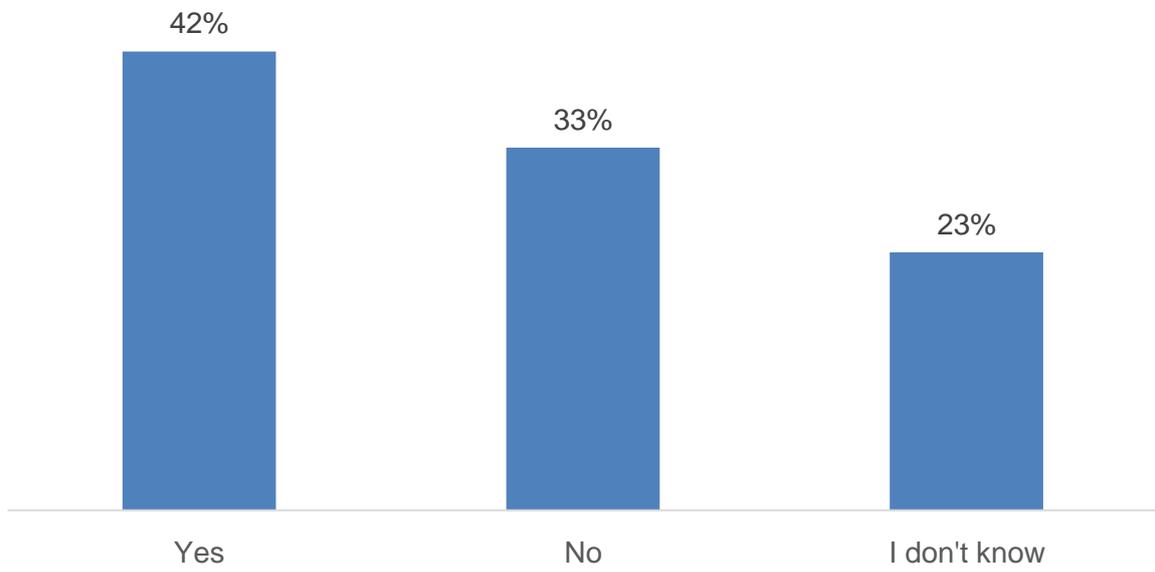


Q2: Do you think the issue of air quality is important in Haringey?



Q3: Do you agree that the 7 priorities identified will meet the needs of the borough and help to reduce pollution?

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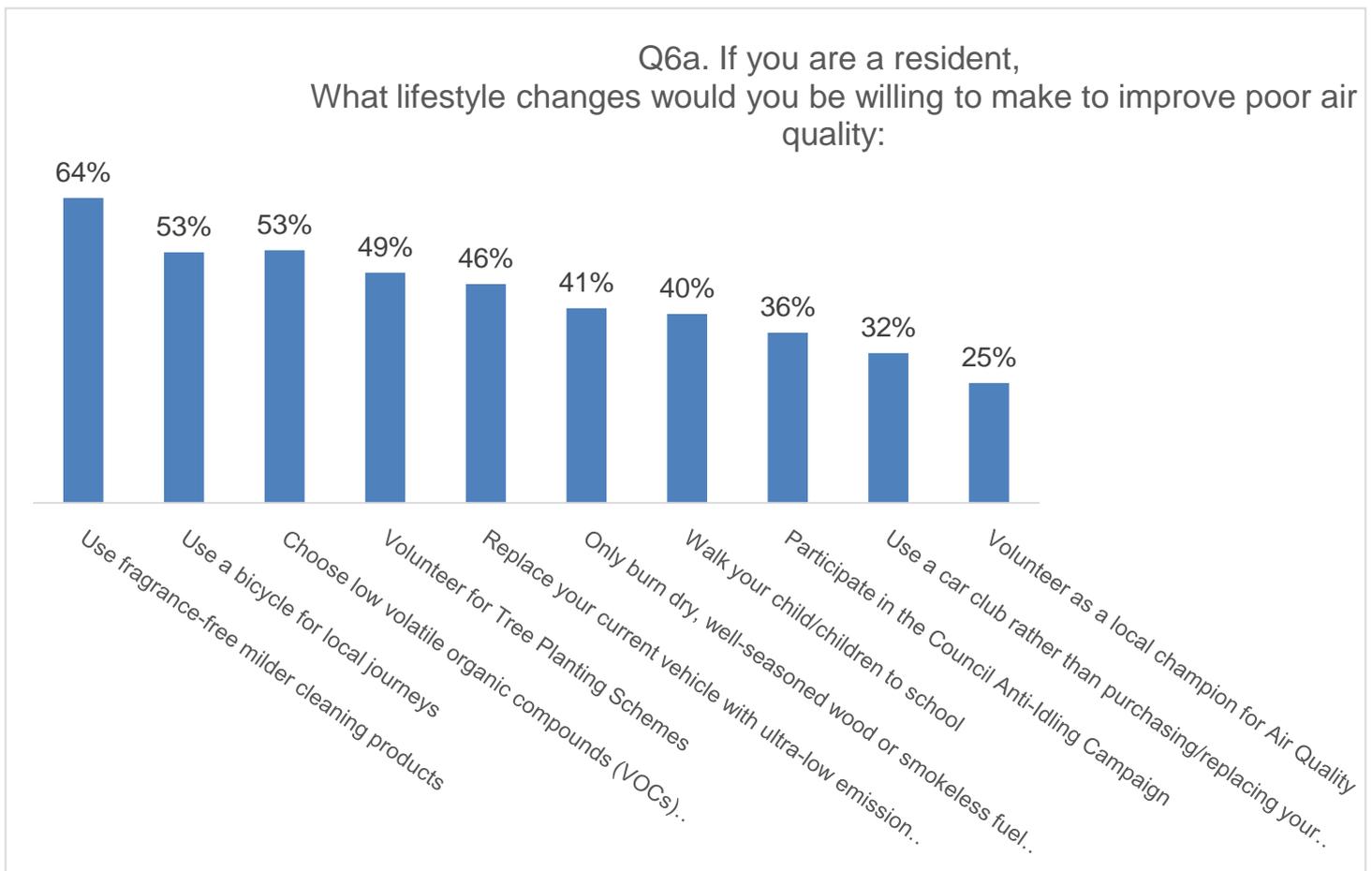
Q4. - If not, what other actions/measures, would you suggest

Q5. How might we improve the draft Air Quality Action Plan overall?

The qualitative responses are summarised in Table 1 and include the following recommendations:

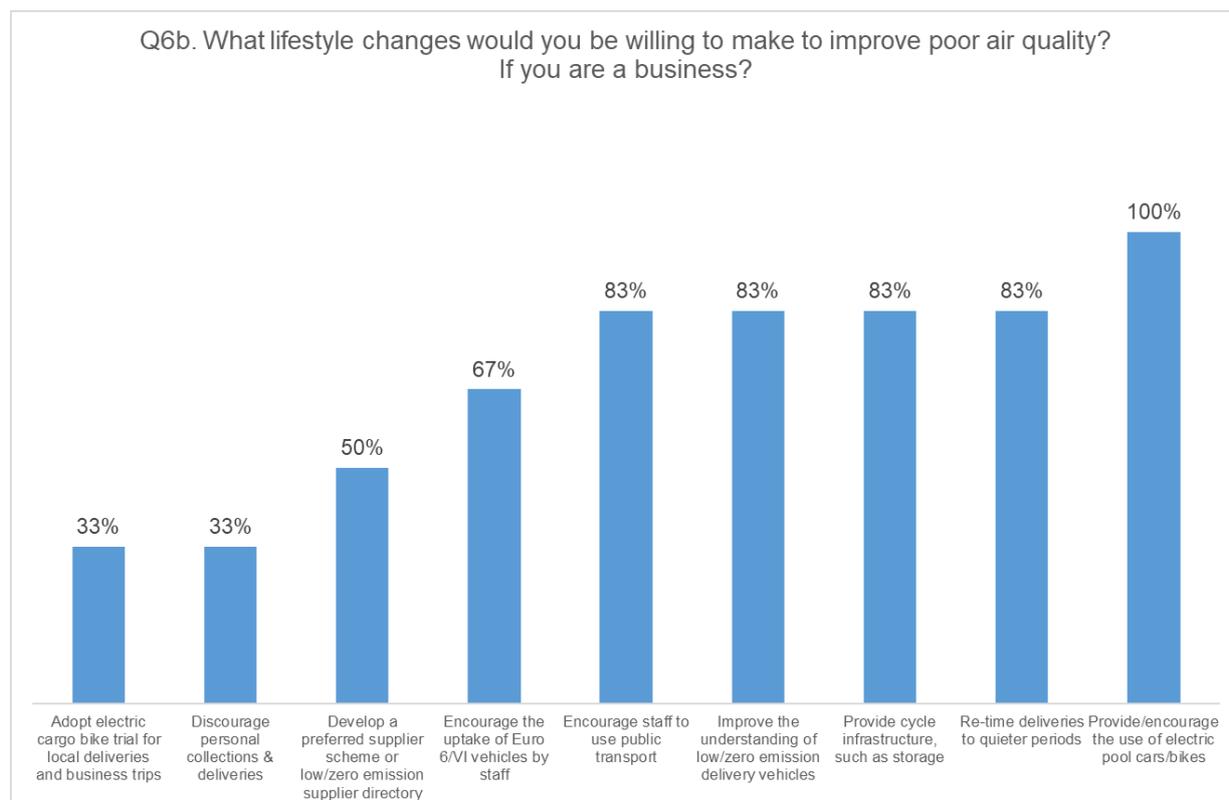
- Good cycling and walking infrastructure and public transport are necessary to create a behavioural shift away from private car use across Haringey.
- Increasing electric vehicle/bikes/scooters numbers have the potential to significantly reduce certain pollution emissions. Financial incentives, such as subsidies, can be effective in encouraging electric vehicle uptake.
- Suitable roadside barriers and street improvement may be a simple means of improving air quality.
- Low speed limits can have a prompt impact on air quality near roads, primarily through reducing the stop-start nature of the traffic flow.

Q6a: What lifestyle changes would you be willing to make to improve poor air quality? If you were a resident:



Q6b. What lifestyle changes would you be willing to make to improve poor air quality? If you are a business:

Six respondents answered the questionnaire as follows:



Only 2 of the 6 respondents identified themselves as businesses. The other four respondent also completed question 6a that was specially designed for residents.

Q7. What can Haringey Council do to help you make these changes?

- Provision of better and safe cycling and walking infrastructure. Extend walking opportunities away from main, polluted roads, e.g. link the Haringey passage to Finsbury Park, extend the pathway alongside the New River
- Provide secure, monitored cycle parking at all the borough's underground stations
- Enable easier charging for electric vehicles, by either providing a network of points outside domestic properties, or by finding a means of allowing residents to run cables from their properties to their vehicles
- Stricter penalties for polluting activities: idling, wood-burning stoves etc
- Replace speed humps with less polluting alternative traffic-calming measures Basically, more carrot and stick
- Provide residents with trees to plant & designate areas where they can be planted.
- Provision, improvement and protection of green infrastructure to protect biodiversity and improve mental health wellbeing amongst residents.
- Give more support to the arboriculture officer plus his staff with tree planting plus greening of the borough plus its valuable open spaces plus parks. A vital plus enormously important step towards better air quality plus health.
- Bring in laws to impose heavier fines for polluters & ban the most polluting vehicles from our roads.
- Pedestrianised more areas especially near shopping streets & schools & community buildings where people walk & cannot avoid breathing in the current dangerous air; Pedestrian crossing over Turnpike Lane top of the passage

- Cargo bikes for hire and cheaper public transport for all
- Help homes for Haringey get solar panels on social housing. Very unfair that private house owned got grants for this whilst those at the bottom of society- and the poorest have been left out of the equation, replace gas boiler as soon as possible.
- Car replacement will make us lose money by selling up LEZ Cars.
- Setup schemes to encourage residents to reach their objectives
- Encourage children to walk to school
- Include clear yearly targets within the plan and focus on measures that work.
- Deal with waste management issues including cleaning the street.
- Deal with other sources of pollution including aircraft and smoke pollution from restaurants
- Financial incentives for modal shift and invest on more recycling projects
- Put pressure on the company who run Haringey mainline rail station to improve access
- Subsidise alternatives or make alternatives more attractive e.g. safer cycling routes and lanes;
- Subsidise car clubs so they are more attractive /have better daily rates and are located close to homes (important for families with car seats)
- Subsidise home improvement leading to reducing of emissions
- Get involved with community events

3. Equal Opportunities Monitoring form

3.1. The following findings show that people age between 30-44 were the most interest in air quality:

- 0% <24
- 5% 24-29
- 40% 30-44
- 30% 45-59
- 7% 60-64
- 12% 65-74
- 2% 75-84
- 1% 85 -94
- 2% did not provide an answering to this question

3.2. Response were from a variety of people including:

- 4% Deafness or partial loss of hearing
- 0% Developmental disorder
- 2% Mental ill health
- 2% Physical disability
- 2% Other disability
- 1% Learning disabilities
- 4% Long term illness or condition
- 46% No disabilities
- 39% did not provide an answer to this question

3.3. Most questions in the Equal Opportunities Monitoring Form were not completed.

4. Conclusion and next stage

4.1. The AQAP has been amended to include any feasible recommendations made during the consultation. The main changes are:

- Inclusion of the Schools Street Action Plan, which is to be completed by March 2020. The Action Plan will look into the possibility of more school streets, road closures and enforcement action in order to improve air quality around schools.
 - Supply air monitoring data to Kings College so that Haringey's air quality can be shown on the London Air Network website, as well as on the Defra Arun website.
 - Consideration of more air quality monitoring sites throughout Haringey.
- 4.2. The Plan will be formally adopted by the Council and will be overseen by the Air Quality Steering Group. The Group will sit every quarter and review the progress of each action.
- 4.3. Many of the actions have funding and resources allocated to them. However, some have limited resources attached and may need input from third party organisation. Haringey will actively pursue alternative sources of funding to implement the actions recommended.
- 4.4. The Annual Status Reports published on the Council's webpage are produced as part of the Council's statutory local air quality management duties. The Report will include an update on the action plan measures as well as the latest air quality data.
- 4.5. The following documents should be read in conjunction with this consultation response for completeness.
- London Borough of Haringey Air Quality Annual Status Report for 2018 available at <https://www.haringey.gov.uk/sites/haringeygovuk/files/air-quality-report-2018.pdf>
 - Parks and Open Spaces Strategy available at <https://www.haringey.gov.uk/libraries-sport-and-leisure/parks-and-open-spaces/open-space-strategy>
 - Haringey's Transport Strategy available at <https://www.haringey.gov.uk/local-democracy/have-your-say-haringey/haringeys-transport-strategy-2018-consultation>
 - Low Emission Vehicle Strategy available at https://www.haringey.gov.uk/sites/haringeygovuk/files/draft_ultra_low_emission_vehicle_action_plan_-_full_document.pdf
 - Crouch End Liveable Neighbourhoods Project available at <https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/public-realm-improvements/liveable-crouch-end>
 - Local Plan: Development Management DPD available at <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd>
- 4.6. The following documents are still under development:
- School Street Action Plan (due in March 2020)
 - Parking Permits Strategy (Ongoing)
 - Transport Strategy March 2018
 - Transport Policy Statement (Ongoing)

Table 1 Air Quality Action Plan 2019-24 Table of Measures and comments received

Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Responses to the consultation came from a range of stakeholders and interested parties. The themes have been ranked by order of priority of the seven broad actions that were proposed to reduce air pollution in Haringey.

Seven broad priority actions:					
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>			4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>		
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
Monitoring and other core statutory duties	1	a) With the support of all relevant teams, monitoring to include maintaining the borough's two automatic and 13 NO _x diffusion tube monitors across the borough and expand monitoring networks, especially around school.	<p>The comments about monitoring from the consultation are as follows;</p> <ul style="list-style-type: none"> • Air Quality monitors should be installed in each school playgrounds. There is need for an additional monitor on Green Lanes to the south of the existing one which under-records the levels in the busier and more frequented section of the road • more monitoring to capture seasonal variations of air quality to include the worst-case scenario during in winter • air pollution measurement of different vehicles so that people know how polluting their own vehicle is • it is necessary to communicate monitoring effectively by making the data to residents in a visual way • effectively monitoring and reducing emissions from demolition and construction sites is considered warranted • monitoring of emissions from restaurants • include CO₂ and PMs monitoring on the plan • submission of monitoring data to Kings College for the LAQN as well as DEFRA's network to make available detailed map of the air quality across Haringey and London • Monitoring to assess the impact of GLA's low emission zones e.g. Wood Green and Tottenham High Road/Seven Sisters where only cleaner buses are being deployed • Co-operation between Haringey and the GLA Breathe London programme and the Kings College London 'toxic air supersite' in Honour Oak which will provide a better breakdown of the origins of pollutants e.g. Polish industry, distant farmlands. • Haringey should track Government research listed in Clean Air Strategy 2019 into emissions, for instance from brakes and tyres (i.e. resuspension) to be able to inform residents better. Defra has commissioned the University of Plymouth to understand the air quality implications. • Publicly signal pollution levels in hotspot areas • It was recognised that monitoring data remain rudimentary and that monitoring is a good way to focus efforts and to track improvement, but this should not be the main thrust of the strategy. 	<p>The comments made with reference to monitoring have been noted and the plan will be modified. Implementation of some of the additional measures will be subject to the availability of funding.</p> <p>Monitoring of air pollution levels within different vehicles and monitoring to assess the impact of GLA's low emission zones e.g. Wood Green and Tottenham High Road/Seven Sisters where only cleaner buses are being deployed are outside the scope of this AQAP.</p> <p>Haringey Council intend to continue looking for alternative sources of funding to implement most of the measures recommended.</p>	Accepted and change.
Emissions from developments and buildings	2	a) Investigate the potential for larger development areas to proactively assess air quality impacts	<p>Comments received about this action are as follows:</p> <ol style="list-style-type: none"> 1. It was reiterated that there should be a requirement for all new developments to provide green space equivalent to 15% of the footprint of the development itself, through the use of roof gardens, terrace gardens, and green walls. Plant more pollution-absorbing street trees. These should be car free; 2. Comments were made that it was unclear how significant and effective the measures will have, given the large contribution from high volumes of traffic in the borough, concentrated in certain localities, and which will continue to increase as a result of the extensive housing developments which are planned. 	<ol style="list-style-type: none"> 1. The requirement for green infrastructure is already considered in Haringey's planning strategy. 2. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication. 	No Change.

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Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		cumulatively	3. The LA should be planning for net zero emissions on all construction works within the borough 4. Lorry movements to and from building sites could be reduced if developers are pressed to do so. Measures to promote and support this could be included in part of the strategy. 5. Producing guidance by end of 2021 seems under-ambitious <ul style="list-style-type: none"> 2(a) 'Ensure that air quality assessment is dealt with adequately in planning applications' is inadequate. Planners should be trained and assessed on their understanding of potential air quality (and min CO₂) opportunities for new developments (more specific than at 5). Zero carbon offset should only be agreed where trained Planners concur that both max air quality and min CO₂ is incorporated in the design. 	3. Like most London Boroughs, Haringey Council is working toward zero emissions from all construction works. 4. As above 5. The Planning Dept consults with the Air Quality Officer and the Carbon Management Team at the design stage.	
		b) Ensuring emissions from demolition and construction are minimised	The Council and GLA – should press for zero-emissions equipment to be used on sites as soon as possible. This should include pumps and smaller plant running on metered mains electricity from adjacent sites where feasible. 2 (b) ' <i>London Construction Programme (LCP) project for new pan London... air quality to be a consideration...</i> ' and ' <i>Continue to ensure that construction related complaints (>10 units) are referred for enforcement</i> ' are both inadequate. All construction sites in Haringey to have clear signs saying what has been agreed re Air Quality and a hot line to report contraventions, as many people may be affected and not be aware, or not know where to complain to. 'increase inspection'(at3) could be conducted by volunteers if Haringey has insufficient staff.	1. Like most London Boroughs, Haringey Council is working toward zero emissions from all construction equipment. 2. All developments are required to comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 3. There are important upcoming changes to the NRMM requirements for engines of 37kW-560kW on sites in London in general. There is also a target for zero emissions from construction machinery throughout London by 2040. 4. Construction Management plan, Logistic management Plan and Air Quality management plan are a requirement for major developments in Haringey to address issues that may arise as results of construction/demolition activities including environmental pollution and air quality.	No Change.
	3	Ensuring enforcement of non-road mobile machinery (NRMM) air	1. A suggestion was made that enforcement of NRMM standards should include penalties for non-compliance. 2. The Council should press developers to use Stage V generators (including Hydrogen fuel-cell powered) as soon as possible.	1. To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ all major developments are required to meet the NRMM requirement. 2. From 1 st January 2020, all constant-speed	No change.

Seven broad priority actions:				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising					
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		quality policies		engines. e.g. generators will be required to meet EC Emissions Stage V. 3. Enforcement is being considered as part of wider London NRMM scheme.	
	4	Reducing emissions from CHP. Enforcing CHP air quality policy. Ensure smaller developments use ultra-low NO _x Boilers.	The Council should press for the replacement of existing fossil fuel combustion-based CHP engines as soon as possible.	1. This measure is already being implemented a part of the wider planning strategy and enable development to comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 2. Our Carbon Management Strategy is also available at https://www.haringey.gov.uk/environment-and-waste/going-green/reducing-co2-emissions .	No change.
	6	Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new and existing developments.	1. Greening should include major support for community growing projects including where these benefit groups with needs e.g. mental health/ refugee/ elderly/ vulnerable young 2. The LA should aim at least double the number of trees in Haringey, to absorb CO ₂ as well as improving air quality. This will probably mean strengthening the policies in DPD DM20 to achieve this.	1. This comment has been noted. 2. This measure is already being considered as part of the wider planning strategy and the ongoing Parks and Open Spaces Strategy.	No change.
	7	a) Declaring Smoke Control Zones and ensuring they are fully promoted	The consensus was that Point 7 is too vague and aspirational: some of the comments made include for example more control and regulation on restaurant, waste activities and the burning of appropriate fuel as follows: 1. Emission from restaurants (raised on several occasions) including smoke from meat-grilling establishments (Nando's, Chicken shops, Turkish restaurants, etc - the area around Wood Green Station and the library, green lanes. It was suggested that this measure needs to include wood smoke from restaurants	1. Haringey Council recognise that emission from restaurants can be a major problem and this source of pollution was reported in the GLA 2018 Annual summary report available on the website. Haringey has a strategy for dealing with smoke from restaurants. Enforcement Action is taken where standard operating procedures are not being met or adhered to.	1. No Change

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		<p>and enforced.</p> <p>To include: an awareness campaign, engagement with suppliers, and active enforcement.</p>	<p>2. Prohibit the use of unauthorised equipment including limiting the sale of wood for stove burning and charcoal for barbecues in local shops. Prohibiting the Domestic wood burning, Research and stricter rules with restaurant business fume extraction. Fumes & fatty deposits are pumped out in the densely populated areas from Harringay Green Lanes in the Ladder and Gardens Streets. restaurants using dodgy coal / bad chimney vents which pollute the atmosphere also, smoke is everywhere from businesses in Green Lanes to wood burning stoves and people burning rubbish in their gardens. Barbecues need to be stopped in parks.</p> <p>3. A concern about emission from waste incinerator which is located near the IKEA (Enfield) causes lots of air pollution, which is then dispersed to Haringey borough. Emission from recycling bin, the recycling bin collected by lorry coming from all over UK.</p> <p>4. Strict ban on bonfires and wood burners e.g. Finsbury Park is not pleasant on hot days and fire is a hazard. This is all serious pollution. Better controls over domestic fires and bonfires and Stop residents burning plastic.</p>	<p>2. "Section 18 of the Clean Air Act 1993" declare that all buildings and industrial or trade premises within London Borough of Haringey (LBH) are subject to Smoke Control Orders. Haringey is a smoke control area where only authorised fuel using 'exempt appliances as defined by DEFRA are permitted</p> <p>3. We will continue to raise awareness and enforce this regulation.</p> <p>4. As above.</p>	
		b) Ensuring that Smoke Control Areas are appropriately identified and fully promoted and enforced.	<p>1. There is a local problem in Haringey/St Ann's due to smoke/fumes from a high concentration of charcoal grills in restaurants in Green Lanes, but it's not clear if a Smoke Control Zone would help.</p> <p>2. Any zone needs the availability of staff to respond quickly at any time to complaints by monitoring and enforcement and also do frequent spot checks otherwise it is useless.</p> <p>3. Gardeners and allotment-holders have bonfires to deal with weeds and grass that if composted locally would not destroy seeds. Can there be provision – on allotments at least – for drying facilities and efficient burners that would reduce smoke from bonfires?</p>	<p>1. Enforcing Smoke Control Zone will reduce the use of unauthorised equipment and fuel, therefore reducing air pollution</p> <p>2. Haringey Council will continue to improve it services where as necessary.</p> <p>3. Provision of drying facilities and efficient burners cannot be currently guaranteed by Haringey Council. However, this comment has been noted and will be given further considerations.</p>	No change.
	8	Promoting and delivering energy efficiency and energy supply retrofitting projects in workplaces and homes	<p>Comments include:</p> <p>1. Create incentives (e.g. lower council tax) for non-carbon fuel generation at home: solar, wind turbine etc</p> <p>2. Phase out gas use in council-owned properties in favour of electricity/renewable sources, insist developers fit electric water boilers</p> <p>3. Encourage residents to use only renewable energy suppliers for gas and electricity</p> <p>4. Solar panels on social council and school buildings</p> <p>5. Building owner retrofit could include greater incentives e.g. one-stop shop teams (advice and full implementation) also as local employment initiative. This is key and needs to be properly funded.</p> <p>6. <u>Existing buildings – Haringey Homes</u></p>	<p>1. The Council does not have the power to do this currently.</p> <p>2. Electrical heating is often more expensive to operate than cleaner gas. This may then put the occupier at greater risk from Fuel Poverty. Communal heating systems are often cheaper and less emitting than individual gas boilers.</p> <p>3. The Council will continue to promote green energy suppliers alongside</p>	No change

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1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising			4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport		
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		<p>through EFL retrofit programmes such as RE: FIT, RE: NEW and through borough carbon offset funds.</p> <p>to replace old boilers/top-up lost insulation in combination with other energy conservation measures.</p>	<p>a. Boilers – figs 8, 9a and 9b show how bad the NOx, PM10 and PM2.5 pollution is from domestic gas and boilers across the whole of Haringey, so therefore the pollution is much more dangerous in each specific home with an old boiler. 'Review procurement policy regarding replacement boilers' (at 8) is inadequate.</p> <p>b. As well as making sure that residents are aware of the dangers Haringey needs to raise sufficient funds to replace old boilers in Haringey's own homes, as RE: FIT, RE: NEW and carbon offset funds are likely to be insufficient.</p> <p>7. <u>Existing buildings - owner occupied</u> Typically, owners of old boilers are unaware of the health risks, so have no trigger to replace them with low emission/low carbon ones – or to explore zero carbon alternatives, such as heat pumps and solar thermal how water.</p> <p>a. Haringey needs to make sure that this sector is aware of the dangers (and opportunities for a healthier home and lower bills) e.g. expand the offer of the Parity Projects refurbishment, with an affordable repayment plan.</p> <p>8. Open fires – Investigation of 'complaints of dark smoke' within 5 working days (7) is insufficient, as the contravention will have ceased by then.</p> <p>a. There needs to be a streamlined process for members of the public to report contraventions for immediate action – using volunteers if Haringey has insufficient staff.</p> <p>9. <u>Existing buildings - private rented</u></p> <p>a. Typically, renters are not in a position to ask for cleaner boilers, and the legislation on EPC levels for new lets are inadequate. Haringey needs focussed carrots and sticks to make improvements in this sector.</p> <p>10. Haringey is obliged to administer the Domestic Private Rented Property Minimum Standard for domestic rented properties to get them to an E (unless the landlord has registered an exemption), which effectively allows landlords to continue with old boilers and the need for wasted heat. Haringey is also proposing licensing for landlords of Private Sector Properties to be presented to the Council in October 2019, covering Houses of Multiple Occupation (HMO) and non-HMO rentals.</p> <p>11. Enforce a requirement to licence, with a condition that old boilers are replaced, and adequate insulation avoids energy waste, before renting.</p> <p>12. The resident would welcome further Liveable Neighbourhood schemes with filtered side roads. Tree and shrub planting can absorb particulates from roads. This could be achieved through initiatives such as the 'Parklet' scheme employed by Hackney Council, or the formal support of community street planting - which is currently sometimes removed without warning to those supporting it.</p> <p>13. The necessity for grid upgrades in cooperation with other boroughs on better public transport networks was very urgent because the electric grid imposes constraints for (fast) charging.</p>	<p>switching suppliers to residents.</p> <p>4. The Council already has 0.5MW of Solar Panels on its social housing and schools. We are reviewing the number of installations and seeing if we can increase this based on business cases.</p> <p>5. The council uses Pan London organisations such as Retrofit Works / Parity Projects to aid the occupier install carbon reduction and air quality measures. This is a one stop service and has links to local employment.</p> <p>6. Funding schemes typically have specific criteria with respect to both eligibility of households and the type of intervention offered. Through Haringey's Affordable Energy Strategy, we have committed to using a carrot and stick approach within the private rented sector. We aim to try and seek grant funding, revise minimum property standards and utilise enforcement and licencing conditions to stimulate property upgrades. All of which should provide a positive contribution towards achieving or Carbon Management goals.</p> <p>7. As above</p> <p>8. As above</p> <p>9. As above</p> <p>10. As above</p> <p>11. As above</p> <p>12. Haringey Council is working up bids on these types of schemes to try and deliver with TfL</p> <p>13. Our charging point suppliers ensure there is enough electricity supply to accommodate charging, from slow to rapid. We will work with UK Power Networks to ensure we have adequate supply in future years</p>	

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			<p>14. Reducing the number of vehicles in the borough fleet, replacing the most polluting with hydrogen, electric, hybrid, biomethane and other cleaner vehicles when no other options remain. This action is very unambitious, suggesting that it is not possible to reduce the overall number of fleet vehicles. Business as usual with cleaner vehicles is not ambitious. On outputs, rather than committing to: 'Review staff travel payments to incentivise use of cleaner vehicles and minimise mileage', there should be a clear commitment to incentivise walking and cycling for work purposes over motorised transport.</p> <p>15. Investigate partnerships with electric vehicle fleets (e.g. Zipcar, E-Car) to increase the number of easy access vehicles across the borough.</p> <p>16. Much greater disincentives for internal combustion engine vehicles.</p> <p>17. Changing the Source London electric charging points to a more affordable option would help drive people to electric vehicles.</p> <p>18. Investigate charging points across the borough potentially linking with households with solar panels - fitting battery charging points for free in return for % of energy produced e.g. x hours per week but no other financial incentives.</p> <p>19. The ultra-low emission zone should also be extended, with immediate effect.</p> <p>20. ensuring that the drive to install charging infrastructure for ULEV vehicles for residents and commercial vehicles such as taxis continues.</p> <p>21. The move to electric cars will help but will take some time to have a significant effect, and delivery and other commercial vehicles will lag behind and seem likely to continue to increase in numbers due to internet shopping. More traffic jams are to be expected and electric vehicles continue to produce particulates from their tyres/brakes.</p> <p>22. The ULEZ discriminates against poorer people - much more needs to be done to provide them, as well as everyone else, with alternatives. There is no mention of public transport at all in the Action Plan - this is certainly not the primary responsibility of Haringey Council, but negotiation with TfL must be a priority.</p> <p>23. EV chargers must not be installed on the pavement or in ways that block potential cycle routes as was done in the first tranche of on-street EV chargers in Haringey. Installations should focus on off-street parking areas for shared vehicles (i.e. car clubs).</p>	<p>14. The Council is proactive with minimising, and electrifying, the Council fleet. This is being done through various means, such as the use of Clean Car's GPS technology to undertake a fleet review. The fleet review identifies which electric vehicle models are suitable, lifecycle costs and potential emissions saved. When lease contracts are up, an electric vehicle will be the preferred option if there is a suitable model available and it is economically viable. Various Council fleets are also trialling an electric van.</p> <p>15. Zipcar is available in the borough and other car club services will be introduced to the borough. Car clubs must demonstrate that a percentage of their fleet are electric. This percentage should increase overtime.</p> <p>16. Under the Council's parking and permit charges, combustion engine vehicles pay higher fees due to their tailpipe emissions. This mechanism is due to be reviewed.</p> <p>17. The Council recognise the need for competition in charging point providers. Through the Go Ultra Low City Scheme, the Council are introducing Chargemaster free standing charging points and Char.gy lamp column charging points. Whilst Source London are relatively more expensive than other charging point providers, they offer a unique deal to the Council in that they reimburse for lost parking revenue. This money is ring-fenced for the Council's Medium-Term Financial Strategy (MTFS), which funds the Council's services.</p> <p>18. The Council will investigate this.</p> <p>19. This is outside of the Council's remit. The</p>	

Seven broad priority actions:				4. <i>Delivery servicing and freight</i>	
1. <i>Air Quality Monitoring and other core statutory duties</i>				5. <i>Borough fleet action</i>	
2. <i>Emissions from developments and buildings</i>				6. <i>Localised solutions</i>	
3. <i>Public health and awareness raising</i>				7. <i>Cleaner transport</i>	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
				<p>Ultra-Low Emission Zone is led by the Mayor of London.</p> <p>20. The Council have an ambitious draft Ultra-Low Emission Vehicle Action Plan, which outlines the Council's charging point roll out for different user groups, including residents, businesses and taxis.</p> <p>21. The Council note that electric vehicles do not alleviate congestion or all air pollution. However, they provide a good option to those who require a vehicle. The Council's priority is to promote modal shift to active transport (cycling and walking) and public transport. This is reflected in Haringey's Transport Strategy (2018). Furthermore, other initiatives such as car clubs can reduce vehicle numbers.</p> <p>22. The Council agree that the ULEZ disproportionately affects the most vulnerable in the borough. Ensuring there are electric car clubs, for example, is one way to ensure that everyone has access to clean and affordable vehicle options. Public transport is captured in Haringey's Transport Strategy (2018).</p> <p>23. The Council agree with this and have devised a hierarchy to install slow and fast charging points: i) on a build-out in the road; ii) retrofitting street furniture (e.g. lamp columns); iii) on the pavement where 2 metres width remains and when there is significant benefit of the charging point being there. For rapid chargers, the hierarchy is as follows: i) off-street locations (e.g. car parks); ii) on a build-out in the road; iii) on the pavement where there 2 metres width remains and when there is significant benefit of the charging point being there.</p>	

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	9	Master planning and redevelopment areas aligned with Air Quality Positive and Healthy Streets approaches	No comments made		
Public health and awareness raising	10	<p>a) Public Health department taking shared responsibility for borough air quality issues and implementation of Air Quality Action Plans.</p> <p>Public Health Teams should be supporting engagement with local stakeholders (businesses, schools, community groups and healthcare providers). They should be asked for</p>	<p>1. Although the consensus was that good communication, publicity/promotion, education and advertisement should help raise awareness about pollution issues there was a suggestion from one respondent that promotion has very little impact on air pollution as opposed to processes and infrastructures that would be more effective. The LA should be more specific on the actions and upstream downstream actions designed to enhance clean transport. Invite the general public to co-design actions (like Climate CIC climathon in several cities).</p> <p>2. A public health campaign was recommended.</p> <p>3. It was recognised that a stronger emphasis should be put on public awareness with more specific points (e.g. the issue of idling needs to be tackled) because people are just not aware that they shouldn't do it. Other actions were as follows:</p> <ul style="list-style-type: none"> • Focus should be put on young people's education so that they can put pressure to their parents to change behaviour. • Ensure that streets are safer so people will walk more by increasing police presence; providing places for young people to go to. Stop people drinking on the high road/outside pubs/gambling establishments to improve the feel of the area making it a more pleasant place to walk. • Plant more trees to capture carbon and to make the area look nicer and more inspiring to be in Inform children to stand back from the road edge thus reducing their own exposure. • Connecting info on using cars in a responsible way with the process of administering the vouchers on a residents' and visitors' parking scheme. • Information to Haringey resident's car owners that 'cars should not be used in an anti-social way. • Idling campaign • A meaningful summary of the action plan should be made available on, the Council's website and available as a poster for community noticeboards • More public engagement events, perhaps asking school and college students to lead on devising their structure and material. • Engaging and consulting with communities, shops/traders, residents. Empowering these communities so that they are open and ready for this change. Having big fun events that promote car sharing, cycling etc 	<p>1. Haringey is putting put more emphasis on education and promotion to raise awareness and change behaviours.</p> <p>2. The superzone project tackles some of the social issues affecting the most polluted schools in Tottenham.</p> <p>3. All comments made have been forwarded to public health for consideration and action as required.</p>	No Change

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		their support via the DPH when projects are being developed.	<ul style="list-style-type: none"> • Get some views and suggestions from Haringey residents and come to an agreement to a solution • Public education of AQAP to help dissuade advise motorists of what upgrades are available. Statutory bodies staff to set the example by stop using cars but buses and wheeled vehicles only. Ban essential car use concept • education programme including booklets and videos in health hazards should be designed- leaflets • Haringey should 'require an audit of every school to identify measures to make sure the air is safe – including appropriate green measures, e.g. using the Mayor's toolkit as completed for Holy Trinity CofE and Lordship Lane. • Newham are installing monitors at every school and Haringey must do the same. • Haringey should apply for the Mayors Green Fund for the measures being applied, such as Green walls to absorb pollution. 		
		Directors of Public Health (DsPH) fully briefed on the scale of the problem in your local authority area; what is being done, and what is needed. A briefing should be provided	No comments made		
		b) Directors of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information	No comments made		

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		on air quality impacts on the population			
		c) 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	No comments made		
		d) Director of Public Health to sign off Statutory Annual Status Reports and all new Air Quality Action Plans	No comments made		
	11	Engagement with	The resident would welcome further Liveable Neighbourhood schemes with filtered side roads. Tree and shrub planting can absorb particulates from roads. This could be achieved through initiatives	Other Liveable Neighbourhood schemes are being considered to the east of the borough.	No change.

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		businesses as part of the 'Liveable Neighbourhoods' project in Crouch End	such as the 'Parklet' scheme employed by Hackney Council, or the formal support of community street planting - which is currently sometimes removed without warning to those supporting it.		
	12	Supporting Air text, promotion and dissemination of high pollution alert services.	No comments made		
	13	Encourage schools to join the TfL STARS accredited travel planning programme	No comments made		
	14	Air quality in and around schools	<p>A consensus was the AQAP failed to put more emphasis on protecting and improving public health, and in particular of reducing children's exposure to harmful NO₂ and PMs. Tackling Idling across the borough and around schools especially was the main subject of discussion. Suggestion include:</p> <ol style="list-style-type: none"> 1. Getting bus drivers to switch off engines at stands e.g. Tottenham lane. 2. penalised for parking on double yellow lines to wait for their children 3. enforce and fine drivers for vehicle idling around schools 4. education and campaign again idling 5. Cars use Alexandra Park road as a rat run from the north circular and the road is jammed with North Circular traffic at busy times. This massively increases the pollution at Rhodes Avenue Primary School and all the children walking to school. therefore, High polluting cars should be made to stay on the North Circular. 6. Reduce cars and emissions near playgrounds. 7. Introduce Low Traffic Neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey. 8. Given the strong emphasis on schools and protecting schoolchildren there should be a commitment to explaining to parents and the local community what they can do to make 	<ol style="list-style-type: none"> 1. As part of the London wide idling program funded by the Mayor, Haringey Council will be taking enforcement action and encouraging behaviour change to tackle idling. 2. Double yellow lines are enforced by CEO's 3. See 1 above 4. See 1 above 5. A School Street Action plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools. 6. See 5 above 7. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is 	No change

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			<p>their children safer, and what the Council is doing to achieve this. Examples for parents are making use of walking zones for travelling to school, supporting their school in joining the TfL STARS scheme, and supporting road closures around schools. There should also be mention of trialling green infrastructure such as hedge installation to protect schools on busy main roads, and tree planting on main roads themselves</p> <p>9. Schools need pollution screens as children are being exposed to high levels of pollution and Haringey has a duty of care to ensure children are learning in a safe environment!</p> <p>10. Spot people and vulnerable people being exposed to secondary smoking, and secondary toxic gas from vehicles.</p> <p>11. To include air filter systems in schools so the children aren't breathing in polluted air all day</p> <p>12. Encourage parents to walk or cycle their children to school instead of driving them by car</p> <p>13. Investigate the petrol station being so close to Rokesly school.</p> <p>14. Clean the street PM resuspension is common</p> <p>15. Although referenced at action 19(c), astonishing that School Streets are not mentioned in this action, let alone what should be here - a plan for their rapid roll-out across the borough.</p>	<p>also due for publication</p> <p>8. See 5 above</p> <p>9. See 5 above</p> <p>10. Commented noted</p> <p>11. Consideration is being given to auditing all schools in Haringey pending funds being made available.</p> <p>12. The active travel team currently promote alternative means of transport in schools through the TfL Stars scheme etc.</p> <p>13. Comment noted and passed on to relevant service.</p> <p>14. See 13 above</p> <p>15. See 5 above</p>	
Delivery servicing and freight	15	Update of procurement policies to reduce pollution from logistics and servicing.	Measure on delivery servicing and freight were found to be rudimentary by a respondent. A suggestion was made that small deliveries in the Borough be made by cargo bike, which could be available on a hire scheme as in Waltham Forest.	Haringey is considering delivery by cargo bikes for local deliveries in future projects to tackle emission from business activities.	Accepted and amended.
		Ensure local authority procurement policies include a requirement for suppliers with large fleets to have attained bronze Fleet Operator Recognition Scheme (FORS) accreditation or equivalent standard	No comments made		
		Priority	Include specific reference to cargo bikes: Businesses in Crouch End are already using cargo bikes	Cargo bikes for site deliveries in Haringey are	Accepted - Plan will be

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		loading for ultra-low emission delivery vehicles	for deliveries. TfL are trialling cargo bikes for site deliveries in Haringey. It is a huge oversight not to include these vehicles which are much cheaper, cleaner, take up less space driven and parked, present a lower risk of harming other road users due to smaller, lighter and lower top speed, along with lower infrastructure maintenance costs due to lower weight than electric vans.	an important consideration. Haringey is considering delivery by cargo bikes for local deliveries in future projects to tackle emission from business activities.	amended to include Business Low Emission Neighbourhood following successful bid for funding
	16	Reducing emissions from deliveries to local businesses and residents: Re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or Potentially additional cost depending upon type of contract and distance needed to travel	Other suggestions include: <ol style="list-style-type: none"> 1. small deliveries in the Borough be made by cargo bike, which could be available on a hire scheme as in Waltham Forest. 2. Encourage bus companies, car drivers and lorry drivers to switch to cleaner fuels. 3. Incentivise deliveries to high street stores to happen outside of peak times to reduce emissions when people are around Work with surrounding boroughs about how to tackle cross-borough traffic Work with railways. Work on mechanisms to help local businesses to lower need for transport - such as delivery sharing etc. 4. Introduce workplace parking levy for all businesses (including private schools) employing more than 10 staff. 5. GPS navigator should show the level of pollution in cars and on the hotspots being transited. Yearly Climation with population, schools, businesses to improve air quality (connect with Climate Kic https://www.climate-kic.org/ for resources). Pollution kills more than terrorism, share this fact widely. 6. The issue of pollution from aircraft flying over the borough should be addressed by campaigning against a third runway at Heathrow and discouraging people from taking so many overseas holidays plus business trips because most of the latter can now be covered by video link meetings. 7. Assist popular anti-idling project by supplying business card size stickers with message e.g. 'please switch off your engine, help to save a child's life' for popular use. 8. Indicate how Haringey will seek to work with neighbouring boroughs and other bodies across London to minimise delivery traffic. Commit to the provision of a cycle network safe for children to use. Price residents parking by market value, as it stands it represents a significant subsidy to private motor vehicle ownership. Provide safe, sheltered bike parking in residential areas. 	<ol style="list-style-type: none"> 1. Cargo bikes for site deliveries in Haringey are an important consideration. Haringey is considering delivery by cargo bikes for local deliveries in future projects to tackle emission from business activities. 2. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 3. See 1 above 4. See 2 above 5. This is outside the control of local authorities 6. This is outside the control of local authorities 7. As part of the London wide idling program funded by the Mayor, Haringey Council will be taking enforcement action and encouraging behaviour change to tackle idling. 8. See 2 above 	<ol style="list-style-type: none"> 1. Accepted - Plan will be amended to include Business Low Emission Neighbourhood following successful bid for funding 2. Points 2 – 8 No change

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Borough Fleet	17				
		a) Increasing the number of hydrogens, electric, hybrid, bio-methane and cleaner vehicles in the boroughs' fleet	<p>These measures were welcome, and the following suggestions were made that the measure should cover waste management firms such as Veolia.</p> <ol style="list-style-type: none"> 1. A respondent commented that improvements to Council fleet and procurement incentives will have little impact on commercial delivery vehicles and heavy through traffic which must account for the majority of the air quality problem. Need cleaner (electric) buses, rubbish vehicles, and other state/council fleet were suggested. In addition, a discussion on the necessity for grid upgrades in cooperation with other boroughs on better public transport networks was considered to be very urgent because the electric grid imposes constraints for (fast) charging. 2. Reducing the number of vehicles in the borough fleet, replacing the most polluting with hydrogen, electric, hybrid, biomethane and other cleaner vehicles when no other options remain. This action is very unambitious, suggesting that it is not possible to reduce the overall number of fleet vehicles. Business as usual with cleaner vehicles is not ambitious. On outputs, rather than committing to: 'Review staff travel payments to incentivise use of cleaner vehicles and minimise mileage', there should be a clear commitment to incentivise walking and cycling for work purposes over motorised transport. 	<ol style="list-style-type: none"> 1. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 2. See 1 above 	The report will be upgraded accordingly.
		Accelerate uptake of new ULEV in borough fleet	No comments made		
Localised solutions	18	Expanding and improving green Infrastructure (GI)	<ol style="list-style-type: none"> 1. Updating CPZ in Crouch End to complement that imposed by Islington Council to reduce localised air pollution: Pollution of Crouch End near Crescent Road N8, next to Coleridge School and the Parkland Walk which borders Islington by older/more polluting vehicles including vans, small lorries and old cars from nearby Islington streets using the streets as a free parking zone because our CPZ operates at a different time to theirs. This could be stopped simply by changing CPZ times, for example adding a 10-12 CPZ in Haringey streets and keeping the current 2-4pm restrictions 2. Implement notice board on highest levels of pollution (e.g. green lanes), to stipulate this to stop people parking and idling their engines. 3. Treat air pollution a public health emergency 	<ol style="list-style-type: none"> 1. A parking action plan is being developed that will consider this point. There is likely to be a formal public consultation on any suggestion made. 2. This comment has been passed on to transport-operation team for further consideration and action if feasible. 3. This comment has been forwarded to public health for consideration and action. 	No change.
	19	a) Low Emission Neighbourhoods (LENs)	<p>Low Emissions neighbourhoods and 19c) Trial of Road Closure around Schools and are the only ones I can see that would have an impact which would be widespread and significant.</p> <p>The resident will welcome further Liveable Neighbourhood schemes with filtered side roads. This should include Tree and shrub planting can absorb particulates from roads. 'Parklet' scheme</p> <ol style="list-style-type: none"> 1. Low traffic neighbourhoods in ALL residential areas to improve air quality around people's homes & discourage people making short journeys by car. 	<ol style="list-style-type: none"> 1. Other Liveable Neighbourhood schemes are being considered to the east of the borough. 2. A School Street Action Plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools. 	No change.

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			<p>2. Introduce Low Traffic Neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey.</p> <p>3. <u>Promote the introduction of low-traffic neighbourhoods</u>, to stop through-traffic from using small residential streets, and to make the use of cars by residents rather more inconvenient (at present Satnavs are encouraging drivers to use residential streets, and the volume of traffic on main roads is consequently going down)</p> <p>4. Some LENSs could be implemented largely with Transport Regulation Orders without huge cost. E.g. restrictions on private motor traffic in Turnpike Lane and Wightman Road to reduce congestion and improve efficiency of public transport e.g. 144 and 41 buses.</p> <p>5. Space for expanding green infrastructure should be found by reducing on-street car parking spaces.</p> <p>6. This action is far too vague. It needs to commit to delivery of a set number of LENSs over a set timeframe.</p>	<p>3. See 1 above</p> <p>4. This comment has been forwarded to Transport team for consideration and action.</p> <p>5. See 4 above</p> <p>6. See 4 above</p>	
		b) Low Emission Vehicle Strategy	<p>1. Good to see canal boats included here. We should ask Canal & River Trust to implement policy that boats using solid fuel heaters should NOT moor adjacent to residential properties.</p> <p>2. This action is very unambitious. Neighbouring boroughs are getting on with implementing school streets - this action does not commit to any action.</p>	Haringey will be working in collaboration with Canal & River Trust	Accepted and changed.
		c) Trial of Road Closure around Schools	<p>The word "trial" should be removed, and actual road closures suggested:</p> <p>Several comments were made to stipulate that the transport plan incorporated in the action plan was weak compare this to all surrounding boroughs transport planning. The general public strongly suggested that the following measures:</p> <p>1. More temporary (e.g. Wightman Road) and permanent road closures because the major source of pollution is from road transport</p> <p>2. Measure to render commuting through the borough impossible to restrain traffic</p> <p>3. Have traffic restrictions and incorporate pedestrian areas</p> <p>4. School streets for every school even on main roads</p> <p>5. Prioritise pedestrian, cycle and public transport routes, movements and safety and convenience.</p> <p>6. Especially welcome closure of roads around schools</p>	<p>1. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication</p> <p>2. See 1 above</p> <p>3. See 1 above</p> <p>4. A School street Action plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools</p>	No change.
		d) Public recognition of businesses that contribute to good air quality	No comments made		

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Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		e) Publicity of air quality status and Council activity	No comments made		
Cleaner transport	20	Ensuring that Transport and Air Quality policies and projects are integrated	<p>Most respondent welcome measures related to cleaner transport. Suggestions include:</p> <ol style="list-style-type: none"> 1. further traffic reducing measure could include extending community transport to serve people less able to walk/cycle/use public transport e.g. carers with double buggies plus toddlers, or elderly. This could be council sponsored- community- local employment project. 2. Much stronger measures to discourage car use and encourage the use of public transport or cycling (but given that cyclists on the road take up much more space than in a bus or train, I would put the emphasis on improving and promoting public transport in our crowded borough). 3. The ULEZ extension to the North Circular will mean many Haringey residents being priced out of their daily commute and unable to afford a ULEZ compliant car. To make this transition easier, residents need to have viable alternatives. Car sharing, cycling and public transport will be possible for many, but not residents. Haringey should make sure: Residents are fully informed of the ULEZ and are aware of their options Haringey makes sure more and better infrastructure for cyclists is built (bike racks/hangers, protected cycleways). 4. We would like the Borough to commit to participating in at least one car free day each year. 	<ol style="list-style-type: none"> 1. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 2. See 1 above 3. See 1 above 4. Haringey is participating in a pan London Pedestrian Healthy Street project which requires participants to implement street closures on an agreed annual 'Healthy Streets Day'. 	No Change.
	21	Discouraging unnecessary idling by taxis and other vehicles	<p>A consensus was the AQAP failed to put more emphasis on protecting and improving public health, and in particular of reducing children's exposure to harmful NO₂ and PMs. Tackling Idling across the borough and around schools especially was the main subject of most discussed. Suggestion include:</p> <ul style="list-style-type: none"> • Assist popular anti-idling project by supplying business card size stickers with message e.g. 'please switch off your engine, help to save a child's life' for popular use • Getting bus drivers to switch off engines at stands e.g. Tottenham lane. • penalised for parking on double yellow lines to wait for their children • enforce and fine drivers for vehicle idling around schools • education and campaign again idling • Cars use Alexandra Park road as a rat run from the north circular and the road is jammed with North Circular traffic at busy times. This massively increases the pollution at Rhodes Avenue Primary School and all the children walking to school. therefore, High polluting cars should be made to stay on the North Circular. • Reduce cars and emissions near playgrounds. • Introduce Low Traffic Neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey. • Given the strong emphasis on schools and protecting schoolchildren there should be a commitment to explaining to parents and the local community what they can do to make 	<p>Dealing with idling by taxis and other vehicles is being considered as part of the wider pan London project funded by the MAQF as advertised on the Council webpage located at https://www.haringey.gov.uk/business/licensing-and-regulations/environment-and-waste/pollution-control/air-pollution/no-engine-idling-animation.</p> <p>Our Parking Action Plan due for publication also includes consideration to enforce idling vehicle.</p> <p>A School Street Action Plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools.</p>	No change

Seven broad priority actions:					
1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			<p>their children safer, and what the Council is doing to achieve this. Examples for parents are making use of walking zones for travelling to school, supporting their school in joining the TfL STARS scheme, and supporting road closures around schools. There should also be mention of trialling green infrastructure such as hedge installation to protect schools on busy main roads, and tree planting on main roads themselves</p> <ul style="list-style-type: none"> Schools need pollution screens as children are being exposed to high levels of pollution and Haringey has a duty of care to ensure children are learning in a safe environment! Spot people and vulnerable people being exposed to secondary smoking, and secondary toxic gas from vehicles. To include air filter systems in schools so the children aren't breathing in polluted air all day Encourage parents to walk or cycle their children to school instead of driving them by car Investigate the petrol station being so close to Rokesly school. Cleaning the street PM resuspension is common 		
	22	Regular temporary car free days	<p>The implementation of more car/traffic free days was encouraged across the borough with special emphasis on most polluted areas like focus areas. An example of traffic-Free Sunday was suggested on Green Lane.</p> <p>One-off car free days are worthwhile events but are not likely to lead to a meaningful change in transport behaviour and we are not aware of any evidence that they do. Some car free days should be used to gain community buy-in for larger scale, permanent area-wide traffic removal.</p>	Car free events and road closures are also being considered as part of the pan London pedestrianisation scheme funded by the MAQF.	No change
	23	Using parking policy to reduce pollution emissions	<p>Enforcement and higher fee were the main interventions to reduce pollution across Haringey. following suggestions were made:</p> <ol style="list-style-type: none"> Ban car parking on Green Lanes and other high streets CPZ hours should be in accordance with surrounding boroughs deprioritise car parking and move parking onto ladder roads and create a better flowing well provision traffic strategy that prioritises buses, cycling and walking Stop catering to non-local North/South traffic in the borough Introduce workplace parking levy for all businesses (including private schools) employing more than 10 staff. Introduce free parking for electric vehicles charging more for parking and charging more for parking permits where two or more vehicles are used by one household. This measure could help reduce the number of petrol and diesel vehicles in the borough. It was recognised that this measure will have regressive effects because it encourages paving over of front gardens, and doesn't hit those in properties large enough for off-street parking, which tend to be higher income households More vehicle free areas & pedestrianised streets e.g. Muswell Hill Broadway & Crouch end. Higher costs for parking & the curtailment of people turning front gardens full of plants into car parking spaces full of concrete enforce and fine drivers for vehicle idling around schools. Reduce parking spots, increase fee for gas cars, and free parking for electric cars. Provide subsidies for hybrid and electric cars Closure all public, Council, NHS PLUS CCG car parks and make allowances for disable and 	<ol style="list-style-type: none"> This recommendation will be considered in the parking action plan due for publication. See 1 above. See 1 above. See 1 above. This is being considered by colleagues in Transport Planning/Caron Management EV's receive a substantial discount. Although EV's produce far less pollution they do still produce Particulate Matter from brake dust, tyre wear and congestion and so should pay a fee for this. As part of PAP we shall be seeking to introduce an incremental fee for multi-car households. This may be considered through further Liveable Neighbourhood type schemes. See 1 above. 	No change

Seven broad priority actions:					
1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			<p>two wheeled transport. E.g. In Zurich, it is easier to drive through easily but difficult to stop and paid.</p> <p>14. limit public space used for parking and limit public space used for car lanes/driving</p> <p>15. penalised parents for parking on double yellow lines to wait for their children</p> <p>16. This again is key. The Council should be reducing the number of parking spaces for private fossil-fuel motor vehicles across the borough.</p>	<p>10. Enforcement vehicle idling will be addressed as part of the Pan London Idling project funded by the MAQF.</p> <p>11. PAP considers reducing parking spaces in CPZs should demand/occupancy allow and for these spaces to be converted to EVCP's, planting etc.</p> <p>12. Haringey will continue to search funding the implement this measure.</p> <p>13. Noted</p> <p>14. see 11</p> <p>15. Enforcement vehicle idling will be addressed as part of the Pan London Idling project funded by the MAQF</p> <p>16. See 11.</p>	
	24	a) Installation of Ultra-low Emission Vehicle (ULEV) infrastructure (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations): Support GLA in the Expansion	<p>The following measures were suggested:</p> <ol style="list-style-type: none"> 1. Anti-car measures are regressive and hammer the poorest who can least afford to pay and help deal with air pollution. 2. Ban non-electric car use across the borough, increasingly from a few days a year. 3. Investigate partnerships with electric vehicle fleets (e.g. Zipcar, E-Car) to increase the number of easy access vehicles across the borough. 4. Much greater disincentives for internal combustion engine vehicles 5. Massively increase the number electric car charging points 6. Changing the Source London electric charging points to a more affordable option would help drive people to electric vehicles. 7. cleaner (electric) buses, rubbish vehicles, and other state/council fleet imminently. 8. Investigate charging points across the borough potentially linking with households with solar panels - fitting battery charging points for free in return for % of energy produced e.g. x hours per week but no other financial incentives. 9. The ultra-low emission zone should also be extended, with immediate effect. 10. ensuring that the drive to install charging infrastructure for ULEV vehicles for residents and commercial vehicles such as taxis continues 11. The move to electric cars will help but will take some time to have a significant effect, and delivery and other commercial vehicles will lag behind and seem likely to continue to increase in numbers due to internet shopping. More traffic jams are to be expected and electric vehicles continue to produce particulates from their tyres/brakes. 12. The ULEZ discriminates against poorer people - much more needs to be done to provide them, as well as everyone else, with alternatives. There is no mention of public transport at all in the Action Plan - this is certainly not the primary responsibility of Haringey Council, but negotiation with TfL has to be a priority. 13. EV chargers must not be installed on the pavement or in ways that block potential cycle routes 	<p>The suggestions have been noted and will be given further consideration as part of the wider actions to reduce air pollution across Haringey.</p>	No change.

Seven broad priority actions:					
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		n of ULEZ	as was done in the first tranche of on-street EV chargers in Haringey. Installations should focus on off-street parking areas for shared vehicles (i.e. car clubs). 14. car replacement will make us lose a lot of money for selling up LEZCAR..Can I claim compensation? How to stop cars commuting through Haringey from/to central London city and west end, are they the highest polluters		
		b) Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs	A respondent would like to see full support for car clubs and the provision of more dedicated parking for these.	The following provides link to car clubs https://www.haringey.gov.uk/parking-roads-and-travel/travel/car-clubs-haringey	No change
		c) Increase the introduction and use of Car Clubs across the borough	No comments made		
		Free or discounted parking charges at existing parking meters for zero emission cars. Free or discounted residential parking permits for	The Council should encourage a shift to low- or zero-emission vehicles by setting charges for resident's parking permits more steeply against emissions of pollutants and CO ₂ .	Increasing of parking charges is due for consideration by the Cabinet and parking.	No change.

Seven broad priority actions:					
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>			4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>		
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		zero emission cars and/or surcharge on diesel vehicles below Euro 6 standards for Resident and Controlled Parking Zone permits			
		d) Installation of residential electric charge points including within developments	<ol style="list-style-type: none"> 1. This section is misleading as there is no such thing as 'free' parking. If no revenue is made via charging for car parking, the upkeep/enforcement etc. costs fall to Council taxpayers. We therefore strongly oppose providing a subsidy to car drivers in this manner. Lower emission vehicles should be encouraged through price signals that disincentivise the most polluting, not through subsidising owners of cleaner vehicles. 2. Haringey currently charge over £30 per annum for a secure residential cycle parking space. There should never be a circumstance when the charge for parking a car is less than the cost of parking a bicycle. 3. In addition, there is no such thing as a 'zero emission car', a more accurate way to describe a fully electric car, which still emits considerable emissions in manufacture and use, is 'zero tailpipe emission'. 	These comments have been noted and will be given further consideration.	No change.
		e) Installation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	No comment	No comment	No Change

Seven broad priority actions:				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising					
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		f) Reprioritisation of road space; reducing parking at some destinations and or restricting parking on congested high streets and A roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic	The Council should re-allocate road space away from private motor vehicles. Major schemes are needed, not minor tinkering. Wightman Road, Turnpike Lane, Green Lanes are all potential routes where a big shift to cycling and bus use could result.	Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication	No change.
	25	Provision of infrastructure to support walking and cycling To enable cycling by increasing the number of secure cycle parking spaces.	Provision of adequate infrastructure was considered to be at the top priority to reduce air pollution in Haringey. A greater priority was recommended on encouraging cycling through the implementation of cycling infrastructure to recognized quality standards. The following measures were suggested: 1. Create protected cycle lanes on Green Lanes and other high streets 2. promote more use of bike and dramatically increase bike racks/hanger on the high road and in front of shops to enable people to run errands and do their shopping on their bike to mimic the Dutch model. 3. Interactive panels should be visible on the critical hotspots around schools, main arteries, crossroad. Also, actions with Driving school instructors to educate new drivers. 4. Poor driving ability is a major cause of polluting behaviour. GPS navigator should show the level of pollution in cars and on the hotspots being transited. Yearly Climation with population, schools, businesses to improve air quality (connect with Climate Kic https://www.climate-kic.org/ for resources). Pollution kills more than terrorism, share this fact widely.	Haringey has a Transport Strategy that presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication.	No change

Seven broad priority actions:				4. Delivery servicing and freight	
1. Air Quality Monitoring and other core statutory duties				5. Borough fleet action	
2. Emissions from developments and buildings				6. Localised solutions	
3. Public health and awareness raising				7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			<ul style="list-style-type: none"> 5. A Dutch style cycle infrastructure which includes protected bicycle lanes along the main arteries... moving prioritisation away from motor vehicle traffic and onto cycling and other green acceptable alternatives like e-scooters. 6. Firm commitment to create cycle paths on every main road to change behaviour 7. Safe cycling to create less pollution. 8. Protected cycling infrastructure on the main roads (e.g. A10, West Green Road, Philip Lane, Lordship Lane, Hornsey Hill, etc) 9. Cycle paths (segregated and safe) on all roads. Where roads are too thin for 2-way motor traffic and parked cars, close them to such traffic and thereby discourage unnecessary and polluting car journeys. 10. Make buses, walking and cycling so easy that driving is a last resort. 11. More cycle lanes and build bike hangers, parking spots and bike-friendly areas 12. Dealt with broken glass on the ground, which is barrier to cycling in Haringey 13. to promote walking & cycling infrastructure. The commitments to increasing walking and cycling uptake need to be strengthened. 14. Reduce car park spaces, replace with wider pavements, bike parking, bike paths 15. Incentivise walking/travelling by bicycle by reducing council rates for those who live in a more sustainable way 16. Build a segregated northbound bike path on Green Lanes and widen the pavement. Make the bus lane on Green Lanes 24hr no parking. Increase parking charges. Make bike lockers free to use. Filter 50% of all residential side roads. Enforce pavement parking with tow trucks. Remove parking facilities on high streets. 17. Widen roads such as park road to avoid stationery vehicles stuck in traffic causing unnecessary and nasty pollution 18. Haringey staff/employees need to be incentivised to walk or cycle or take public transport to walk. 19. Emphasis on changing some of our spaces and making a real difference in making better cycle lanes that make it less dangerous for cyclists and much more accessible. 20. Better linked cycle paths and better cycle training for children, young people and vulnerable adults. 21. It was suggested that some specific proposals to changes in infrastructure, where and how cycling infrastructure could be improved would be useful. Also, specific ideas for changes to high road pollution areas such as traffic reduction by making one-way roads or blocking some roads at one end (thinking of the Haringey ladder roads). 22. Encourage people to cycle to schools and shops. 23. Increase provision of on-street cycle storage lockers to keep up with demand (as recommended by Tottenham Carbon Commission): this should be revenue-neutral, as they are rented out. However, rentals should not exceed resident car parking rates. Promote 'car share' clubs and designated parking provision for them. 24. increase segregated one-way cycle infrastructure, e.g. best practice "Copenhagen" style, ref. http://www.copenhagenize.com/ https://gehlpeople.com/ 25. place the segregated one-way cycle infra. to accommodate shortest route from A-B (not "Quite"/detour routes); 26. on existing streets, along both sides of waterways and railway tracks (e.g. New River) together with segregated walking infrastructure – use waterways for cargo transport on electric boats to connect to cargo bicycle infrastructure (think Amsterdam/Copenhagen/Venice waterways) 		

Seven broad priority actions:					
1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			27. This section seems to suggest that cycle parking is the greatest infrastructural impediment to cycling in Haringey. All the evidence suggests otherwise, that a lack of safe places to cycle (due to the continued prioritisation of space and routes for motor vehicles) is the greatest barrier to more cycling in Haringey. This action needs to be much more specific about what infrastructure is required to increase walking and cycling.		
26. Actual AQAP structure			1. Whilst the measures are announced are clearly well intentioned it remains to be seen if they're sufficient to have an impact on air quality in the absence of broader London wide initiatives. e.g. improvements to council fleet and procurement incentives will have little impact on commercial delivery vehicles and heavy through traffic which must account for the majority of the air quality problem 2. You need to have very specific goals which must be measurable. This means an absolute focus on numbers and dates. You must aim to reduce for example transport pollution by (. fill in the date.) and by this much (fill in the amount/percentage). You should plan how to do this with strict measures (for example absolute road closure for x distance around schools at drop-off and pick-up times). To discourage is not good enough. It has to be forbidden and it has to be law. 3. It is not clear what these priorities are. Are they in the 2010-18 report? The objectives seem reasonable although there are no targets so 'improve' and 'involve' can be achieved easily. Engage residents in agreeing a vision 4. Where are and what are the 7 priorities 5. You'd need to show me the 7 priorities. 6. The proposals are vague. This is especially the case for neighbourhood solutions. Nothing specific is proposed. There will still need to be efficient access for vehicles. Disabled drivers are not mentioned at all. Are they to be trapped at home? 7. You need to address the issue of pollution from aircraft flying over our borough by campaigning against a third runway at Heathrow and discouraging people from taking so many overseas holidays plus business trips (most of the latter can now be covered by video link meetings) 8. Overall strategic priority for transport and built development planning	The comments have been noted. Please note that the AQAP follows a template and priority rating recommended by the GLA.	No change

Table 2 Air Quality Action Plan 2019-24 Statutory Consultees Received

Date	Ref.	Organisation	Summary of theme and comments received	Council's consideration/Response	Impact or Change
24/09/2019	1	Greater London Authority	1. Monitoring and other core statutory duties: <ul style="list-style-type: none"> • specify how many additional monitoring stations will be installed and • 80% data capture not enough. 2. Emissions from developments and buildings: <ul style="list-style-type: none"> • Produce guidance earlier than 2021, • Define how we will promote the energy performance regulations to commercial and 	1. Install 20 new diffusion tube monitors by 2020, Over 90% data capture 2. Guidance published by the end of 2020, Promote the Minimum Energy Performance Regulation requirements to commercial and residential landlords on	

			<p>residential landlords and</p> <ul style="list-style-type: none"> • Include the Council's targets for retrofits/carbon reduction. <p>3. Delivery servicing and freight:</p> <ul style="list-style-type: none"> • Deadline date of 2030 for all actions too far away, • Provide specific deadlines for all actions. <p>4. Localised solutions:</p> <ul style="list-style-type: none"> • All actions too vague provide specific actions with deadlines • Include your local targets from your cycling and walking action plan. 	<p>the Council's website and via Haringey's Home Finder Scheme and Private Sector Housing team at Landlord forums and Reduce CO₂ emissions by 40% by 2020 and being Zero-Carbon by 2050.</p> <p>3. Publication of new procurement strategy to include pollution reduction measures by end of 2019, increase the no> of ULEV in council owned fleet by 80% by 2021, review use of electric pool cars for staff use and investigate viability of buying more by 2021, review Staff Travel Plan to include travel payments to incentivise use of cleaner vehicles and minimise mileage and investigate Tax benefits of electric vehicles: fossil fuelled vehicles – consider including salary sacrifice schemes for employees – by Mar 2020, Incentivise providers of Passenger transport to use electric/low emission vehicles through the procurement process – Mar 2020.</p> <p>4. Introduce a policy of maximising green infrastructure in all regeneration schemes and large scale developments March 2020, investigate options for green infrastructure in schools in areas of higher pollution subject to funding as part of the school street action plan by Mar 2020, develop a new parks strategy to be delivered by end of year 2020, delivery of 40 additional trees in Wightman Road by 2020, 60 per year thereafter and apply to the Urban Tree Challenge Fund to fund up to 750 trees over two years. 81% of all trips to be made by foot, cycling or public transport by 2021 (88% by 2041), 20% of residents within 400m of a cycle network - by 2021 and 41% of residents doing at least 2X10mins (or 1 block of 20mins) of active travel per day by 2021.</p>	
10/07/2019	2	Ferry Lane Action Group (FLAG)	<p>5. FLAG recognised by Homes for Haringey as the resident's group for the Ferry Lane Estate in Tottenham supports the action plan in general. It was suggested that London-wide schemes such as the Ultra-Low Emission Zone are likely to deliver the greatest benefit in combination of local actions.</p> <p>6. Tottenham Hale is one of the areas with the highest pollution levels in the borough, and this will include parts of the estate nearest Ferry Lane. And we are all affected when we go to the station, retail park or beyond.</p> <p>7. The plan also mentions dealing with pollution from canal boats (in action 19b). This can</p>	<p>All the comments made have been noted</p> <p>The suggestion to restrict mooring within residential areas is being considered within the plan.</p>	Accepted and changed to include restriction of mooring

			<p>be from engines and from stoves burning wood or coke. Usually the engines are only in use for short periods, but the stoves can be burning and creating smoke and invisible fumes for long periods in winter. This has a direct effect on residents in flats or houses adjacent to the river. The fumes can rise and blow straight into windows.</p> <p>8. It was suggested the Council to work with the Canal & River Trust to implement a policy that boats using solid fuel heaters should not moor adjacent to residential properties. That will not stop boat-dwellers keeping warm, but it would mean they have to moor on other stretches when they need to burn. Meanwhile boats with gas-fired heaters could still moor here.</p>		
23/07/2019	3	Natural England	<p>9. Natural England does not consider that the London Borough of Haringey's Air Quality Action Plan poses any likely risk or opportunity in relation to our statutory purpose, and so made no significant comment on this consultation.</p>	Comment noted.	No change.
26/07/2019	4	Environment Agency	<p>10. Unfortunately, the EA we are not able to provide detailed comments on every Air Quality Action Plan received. Therefore, a summary of issues/priorities that are common to each air quality action plan and where possible/appropriate, was provided.</p> <p>11. It is important to note that we are not aware of any waste facilities or other industrial installations regulated by the Environment Agency in the London borough of Haringey that are causing or contributing to failures of air quality standards.</p> <p>12. It is encouraging to see that consideration within the planning stage of development(s) and construction is playing a role in the London borough of Haringey's Air Quality Action Plan 2019-2024 - i.e.: the intensification of activities (e.g.: waste management facilities) may require to be fully enclosed within the future.</p> <p>13. Also, it is good to see that the Environment Agency and the London borough of Haringey agree in that we both need to cooperate and work together, not just with one another – but also with the other London borough's and in line with the London Plan</p>	The comments have been noted.	No change.
26/07/2019	5	Haringey Liberal Democrat	<p>To whom it may concern,</p> <p>Please see below the Haringey Liberal Democrat response to the Air Quality Action Plan. The online survey is focused on getting data, it was not easy to provide our response in a well-presented way, so I have emailed it.</p> <p>***</p> <p>I am Haringey Liberal Democrat spokesperson on the Environment. I am replying on behalf of the fifteen Liberal Democrat members of Haringey Council.</p> <p>We welcome most of the individual measures in the Plan. However, taken as a package, they do not amount to an adequate response to the problem of air pollution.</p> <p>We know that poor air quality causes a wide range of health issues and is a contributor to many fatalities in our borough. We also know that children are most vulnerable to its effects.</p> <p>It also stands apart morally from many other public health concerns. While it would be misguided, in the extreme, to ignore the existence of societal factors that influence the propensity to smoke; drink to excess; or eat a poor diet, at some level one usually has to make an active choice to smoke a cigarette, drink a glass of wine or eat a burger. By contrast, we all have to breathe and can exert only limited control over the quality of the air we inhale. There simply is not a practical way to live in Haringey without being hurt by air pollution.</p> <p>This creates an ethical imperative for us to tackle poor air quality in a far more forthright</p>	<p>The comments have been noted.</p> <ol style="list-style-type: none"> 1. A School street Action plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools. 2. Air quality is measured on an hourly basis by the 2 continuous monitoring stations within the borough. 3. See 1 above 4. Enforcement vehicle idling will be addressed as part of the Pan London Idling project funded by the MAQF. 5. The Council is considering monitoring particulate matter. 	No change

			<p>manner than this plan envisages, that would probably necessitate a fundamental rewrite to make it more ambitious and include more specific actions and targets. This would probably also require the injection of additional resources into this area by the Council.</p> <p>However, if the current plan is retained then we would recommend the following modifications:</p> <ol style="list-style-type: none"> 1. It needs to reflect the resolutions of the motion entitled “improving air quality around schools” passed by Full Council on the 18th March 2019. At present, the plan only discusses School Streets in the context of a pilot at Lordship Lane Primary School. School Streets have long been successful and this plan should follow other boroughs in including a full programme across Haringey. At a minimum it should include the fact that a School Street action plan is due in March 2020, as set out in the motion. 2. Monitoring of pollution levels needs to account for variations depending on the time of the day, week and year. For example, it would be wrong to conclude that the area around a school was not a pollution hotspot unless the reading was taken during drop-off or collection times. 3. The Council should consider taking on a ‘corporate’ responsibility for ensuring that children in Haringey are not exposed to unsafe levels of air pollution. 4. More rigorous enforcement of no-idling rules. This could potentially include an ‘invest to save’ approach, where more enforcement officers are funded by the fines they collect. The Council should also encourage its own staff and councillors to become trained to act as no-idling volunteers. 5. The Council should commit to the reintroduction of PM 2.5 and 10 monitoring and remove the language in action 1 making this conditional evidence showing there is a need. The adverse public health impacts of these kind of very fine particles are well documented by the World Health Organisation among other sources. If the claim is that we need evidence that the levels of these pollutants have reached dangerous levels in Haringey, then this is likely to be more evident if the Council monitors these pollutants. 		
30/07/2019	6	Tottenham & Wood Green Friends of the Earth	<ol style="list-style-type: none"> 1. <i>Tottenham & Wood Green Friends of the Earth strongly support the action plan in general and reiterated their concerns about the health impacts of air pollution, and recognised that most of the sources of pollution are also sources of carbon dioxide and so tackling these sources is vital for averting the worst of climate breakdown, as well as yielding immediate health benefits.</i> 2. <i>It was noted that an overall weakness, that the key actions that will deliver greater benefits are mostly dependent on securing funding. Therefore, increasing revenue from increasing parking permits charges to fund action to cut pollution and greenhouse gas emissions was suggested. With this increased income the Council could improve monitoring, give residents more feedback about the need to constrain car use, and can deliver the more sustainable transport options such as School Streets, Cycle Storage, Active Travel, and better footpaths set out in the action plan, in the Zero 50 route map, and in the draft walking and cycling strategy.</i> 	<ol style="list-style-type: none"> 1. Our carbon management plan explain how carbon dioxide specially will be tackle within the borough and both plans are complementary. 2. increasing parking permits charges to fund action to cut pollution and greenhouse gas emissions will be suggested to the relevant parking team within Haringey Council. It is likely that changing current parking policy will go through formal consultation. 	No change.
30/07/2019	7	PHE London-North East and North	<p>It is clear from reading them that this is aimed at residents or businesses located in Haringey rather than corporate partners/stakeholders so I don't think it would be appropriate for us to take part in this part of the consultation. But do get back to me if you disagree</p>	Comment noted	No change.
31/07/2019	8	Highgate Society Sustainable Living/Transition Highgate and Hornsey/ Wood	<ul style="list-style-type: none"> • The questionnaire was poorly designed and any inferences from the questionnaire would distort policy decisions. It was however suggested that the draft air quality has improved from the previous version and that that the intention to work collaboratively across all the relevant departments is extremely hopeful. • It was further suggested that the actions need to be clear and deliverable, but there are 	Comments noted.	No change

		Green Labour Climate Change and Environment Group	<p>several examples where 'explore', 'where practicable' etc are used, and these should be replaced by specific immediate actions. Sequential plans should become parallel plans. In some cases, where there are already regulations in place, enforcement needs to now be enacted e.g. open fires, vehicles blocking charge points etc.</p> <ul style="list-style-type: none"> The above actions are particularly important now that Haringey Council has declared a Climate Emergency it is vital to do as much as possible as soon as possible to minimise climate breakdown, and these actions aimed at reducing Air Pollution will also do this. Further comment was in accordance other suggestions made as detailed in Table 1. 		
31/07/2019	9	Haringey Living Streets	<p>The need for an Air Quality Action Plan has never been greater. Air pollution is a major concern affecting the health of everyone and particularly children and old people. Haringey Living Streets is therefore pleased that the Council is beginning to recognise this problem.</p> <p>The major cause of pollution is from road traffic and its reduction is therefore a key objective. This is not adequately dealt with in the plan. Much stronger measures are needed to cut road traffic. Measures can be divided between controls and incentives.</p> <p>Controls include:</p> <ul style="list-style-type: none"> Restrictions on the number of parking places and extension of CPZs Higher charges for parking Parking restrictions to permit free movement of walker and cyclists particularly around schools More low traffic neighbourhoods where through traffic is banned Giving priority to walking and cycling overpowered vehicles Lower speed limits: 20mph on all roads and lower limits in busy areas. <p>Incentives include:</p> <ul style="list-style-type: none"> Awareness campaigns Better access to public transport (where this is within the Council's control) Better walking and cycling routes. This includes moves to ensure that pavements are kept in good repair, that road crossings are made more pedestrian friendly and that pavements are not cluttered with unnecessary street furniture, including electric vehicle charging points Promotion of cargo bikes for deliveries. <p>A key measure proposed is the replacement of fossil fuel with electricity. Whilst electric vehicles solve the problem of tailpipe emission and is a necessary measure for essential vehicles such as refuse collection vehicles and buses, it goes nowhere near eliminating pollution from brakes, tyres and road dust nor from emissions produced in manufacture. It also does nothing to deal with danger and congestion, factors discouraging walking and cycling. Promotion of electric cars as an alternative to fossil-fuelled cars is therefore not something which should be encouraged.</p> <p>We look forward to seeing a timetable of action to implement the measures described. The comments specific measures have been added to Table 1.</p>	Comments noted	No change

31/07/2019	10	Haringey Cycling Campaign	<p>The overall view of Haringey Cycling Campaign is that the actions proposed within the AQAP for transport emissions are not anywhere near as ambitious or far-reaching as they should be as detailed in the following section.</p> <ol style="list-style-type: none"> 1. At a time where there is growing recognition of the damage being done to our health by poor air quality, coupled with a climate emergency, there has never been a more appropriate time for bold action to get us out of our cars and on to truly clean, active transport. This draft air quality action plan, whose proposals for transport appear to be aimed mainly at converting existing trips by fossil fuelled motor transport to battery powered motor transport, is completely incompatible with the Council's declared climate emergency, and is often incompatible with at least three out of the four outcomes of Haringey's adopted transport strategy. As such this plan is not fit for purpose. 2. This plan will not help us to deal with poor air quality in the urgent manner that is required and will not tackle the other negativities of car-based travel in urban areas including the epidemic of inactivity and the pressing need to reduce road danger. Haringey needs to think again and come back with much bolder plans to reduce car travel and increase the mode share of walking and cycling. We have perhaps 12 years to avert a climate catastrophe, we have no time to waste in more studies considering what action might be taken, or in promoting the use of slightly cleaner cars. From the evidence of other boroughs, we know what works to enable more walking and cycling and improve air quality: a dense cycle network separated from traffic; low traffic neighbourhoods; and slower vehicle speeds. This plan contains no firm commitment to deliver any of those things, while containing firmer commitments to deliver de facto subsidies for car drivers in the form of 'free' parking and other benefits. 3. The Minister of State for Transport recently suggested that converting all existing fossil-fuelled car trips to EV powered car trips would be a 'total policy failure'. However this action plan appears to be a plan for just that scenario, where the vision for transport in Haringey seems to be one where the roads are just as congested as they are now, where the roads are just as hostile as they are now, and where transport poverty is even more stark for those not able to afford a car - but one where car drivers are encouraged and subsidised to drive slightly cleaner vehicles. Any reasonable assessment of transportation in future urban areas would conclude that we need fewer cars not cleaner cars, unfortunately there is little in this action plan that will facilitate this transition. In the midst of a climate breakdown it is irresponsible in the extreme to encourage further use of transport that is so carbon intensive in both manufacture and use. 4. This document's actions appear to reflect a desire to maintain business as usual, while deferring the difficult decisions needed to reduce the convenience of the car for shorter journeys. The upcoming Environment Bill is likely to set public bodies a legally binding commitment to reduce particulate pollution, with an obligation on local authorities to take additional action to protect children and the elderly. This action plan appears to think promoting the use of vehicles that emit considerable amounts of non-tailpipe particulate matter is a sensible way forward. The consequence of this policy, and the putting off of 	<ol style="list-style-type: none"> 1. The measures being proposed aim to reduce emissions 2. Cycle network separated from traffic; low traffic neighbourhoods; and slower vehicle speeds are considered as part of the plan. 3. There is proposal for Cleaner transport (Action 20) to improve public health and reduce air pollution in our plan. 4. Comment noted. 5. At least 42% of the consultee agreed that the seven actions identified by priority will meet the needs of the borough and help reduce pollution. 	No change
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6/08/219	11	Islington Council	<p>Islington agreed that pollution is a transboundary problem the therefore it is very important to work together to improve air pollution not only in our borough but also more widely. Islington Council's welcomes the actions that Haringey council intent to tale to take many of the main sources of pollution with actions proven to improve air quality. In particular, the greater link to Public Health, actions focusing on schools and businesses, and initiatives to reduce emissions from transport and encourage a shift to active travel. We look forward to seeing the outcomes of the planned actions and hope Haringey will share their learnings where possible.</p> <p>It was suggested that the two boroughs work together to develop a joint initiative similar to the joint activities they currently undertake with Hackney Council where we have developed Ultra Low Emissions Streets towards the south of our borough.</p> <p>Haringey could learn from other boroughs. For example, Islington already has parking surcharges in place for diesel vehicles and is working with the canal and river trust on reducing emissions from canal boats.</p> <p>A provision of further information from dated scheme mentioned in the AQAP such as Mayors Air Quality Funding for Low Emission Neighbourhoods or the first school street in Haringey was suggested.</p>	Haringey will continue collaborative working with other boroughs.	No change.
28/07/2019	12	Resident	<p>I also agree with many of the measures being considered such as reducing the number of road traffic journeys and reducing the emissions and the harm of any journeys.</p> <p>However, my general understanding is that the best way to reduce the harm from vehicle emissions is to sperate pedestrians, cyclists and children from vehicles. It has been demonstrated that for every meter one is from traffic the affects and pollution reduce dramatically, especially if there is an element of nature between the two parties.</p> <p>Therefore, that is my main focus. The separation of people from traffic, and the promotion of non-traffic journeys, thereby reducing traffic and making these journeys more pleasurable, creating a virtuous circle, where people will decide that walking or cycling is</p>	Comments noted.	No change.

		<p>the best journey option.</p> <p>I have also focussed on my locality as I understand the geography and issues in more detail, however I feel these measures would benefit a large proportion of people in the area and I would support any such measures in other locations not mentioned.</p> <p>Therefore, from the action plan I have focussed on these stated aims:</p> <ul style="list-style-type: none">○ Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures - for example; expanding and improvement of green infrastructure and Low Emission Neighbourhood programmes.○ Infrastructure - increase cycling and walking infrastructure○ Other measures include: Promote Walking and Cycling		
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