

Air Quality Action Plan 2020-2025



Summary of Responses to the Consultation

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Air Quality Action Plan 2020-2025



Summary of Responses to the Consultation

Our proposed Air Quality Action Plan outlines the actions that we will take to improve air quality in the London Borough of Bromley between 2020-2025.

Consultation Overview

Following the approval for consultation of the Draft Air Quality Action Plan (AQAP) 2020-2025 in March 2020, a consultation process was undertaken for 10 weeks between 25th June 2020 and 10th August 2020. This document summarises the consultation responses and the Council's response to the issues raised, including any resultant changes to the plan.

We thank all of those who took the time to read and contribute to the plan.

01

The Consultation Process

There were 3 main groups of consultees during the development of the Air Quality Strategy & Action Plan these were:-

- Internal services who will deliver the actions;
- Statutory consultees – required by legislation;
- The public – due to significant public interest in local air quality

Internal service areas

The draft consultation version of the current document had internal consultation from the action plan delivery service areas as it was being developed. The service areas were re-engaged once the public consultation had concluded, in order that specific comments raised could be addressed, and any necessary changes could be made to the final AQAP.

This included the following teams:

- Environmental Protection
- Environment & Leisure Service Development
- Communications
- Public Health
- Transport Policy
- Sustainable Travel & Road Safety
- Procurement
- Facilities Management
- Fleet Services
- Housing
- Development Management
- Planning Policy
- Noise & Nuisance
- Joint Enforcement

Statutory Consultees

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. Table 1 represents the statutory consulted and those who provided a response.

Statutory Consultee	RESPONSE
The Secretary of State/Defra	NO
The Environment Agency	NO
Transport for London	NO
Greater London Authority	YES
All neighbouring boroughs- (the London boroughs of: Bexley, Greenwich, Lambeth, Lewisham, Croydon, and Tandridge District Council and Sevenoaks & Dartford District Council).	NO

02

Summary of the GLA Response

The GLA noted that the AQAP was:

- Well written;
- Very well laid out;
- Informative;
- Contained lots of good actions;

Notwithstanding the above positive points, they provided constructive comments for improvement prior to formal approval being given. These included:

- Additional details for some actions ,
- Deadlines for actions to be included;
- Targets and KPIs for actions to be included;
- Firmer/clearer commitments required for some actions (e.g. around the Council's fleet).

These comments were circulated to all internal partners for their response and suggested amendments. These were then collated, together with those provided by the public, and the revised version containing the suggested amendments was sent back to the GLA, who provided their approval.

03

Summary of the Public Response to the Survey

Overall there were 869 responses from individuals and organisations to the consultation; 826 of these were received via online survey.

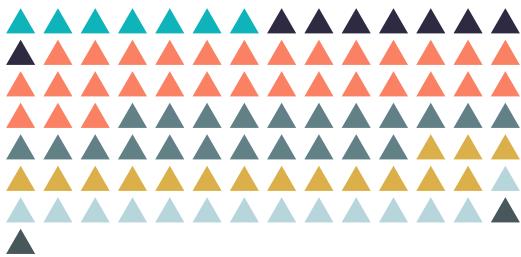
Several organisations or groups made comments, including: Bromley Green Party, St Mary's Church -Plaistow Lane, English Heritage, Scotts Park Primary School, Birkbeck Community Initiative, Barnmead Road Allotments Committee, 5th Bromley Scout Group, PTA Kent House Primary Academy, Friends of Cator Park & Alexandra Recreation Ground, NHS, Valley Primary School, KM&BCV RA, Greener & Cleaner Bromley & Beyond, Soroptimists Bromley, Bullers Wood School for Girls PTA, Bromley Living Streets, Children & Young People Programme Lead, PTA of Valley Primary & Pre-School, Bromley Youth Striker 4 Climate, Chislehurst and St Paul's Cray Commons Conservators, Bob Neill MP, Bromley Liberal Democrats, St. Olave's Environmental Society, Palace Estate Residents Association, Hayes primary PTA, Friends of the Earth Bromley, Friends of Unicorn Primary School, Chislehurst Eco Community, The Chislehurst Society, Environmental Action Coney Hall, Go Green Club.

This following section is divided into three parts. The first summarises who completed the survey. The second reports on online responses to the questions, and the third summarises the most popular suggestions to improve air quality in Bromley, and these in turn are divided by themes. A summary of comments that were out of scope have also been included, these have been noted, but no response provided.

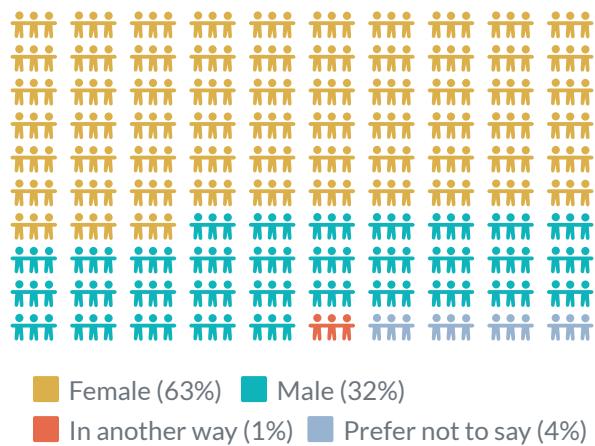
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Who Responded?

Age of Respondents



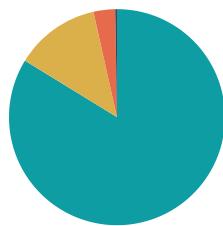
How People Described Themselves



03b

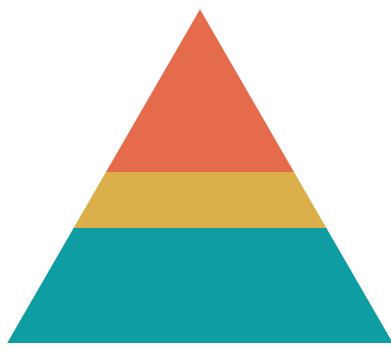
How did they respond?

How Important Do You Think Air Quality Issues Are Within Bromley



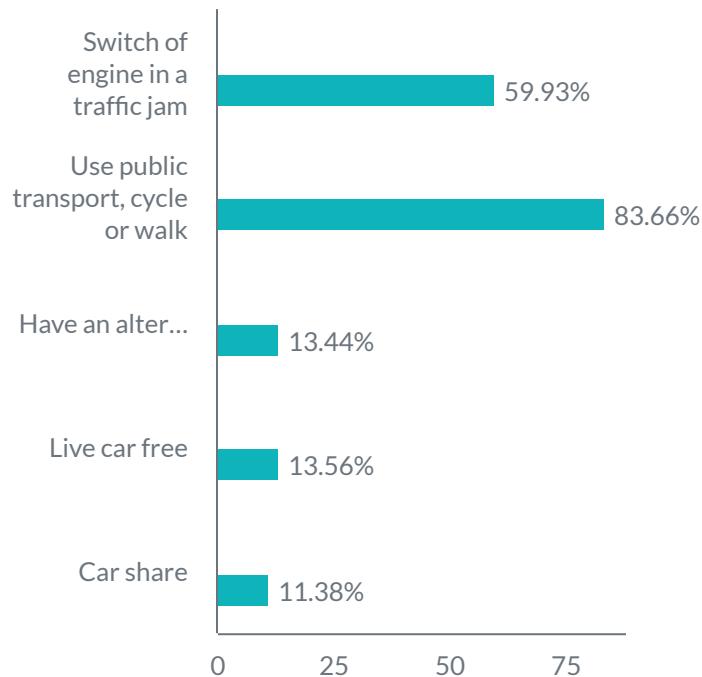
■ Very Important (83.78%)
 ■ Important (12.71%)
 ■ Not Important (3.27%)
 ■ Not sure (0.24%)

Do You Think The Proposals Will Help Improve Air Quality in Bromley?

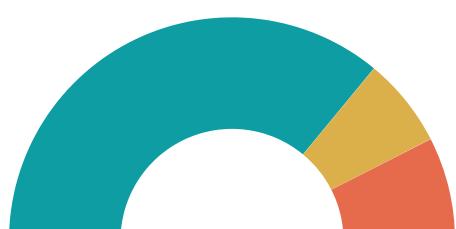


■ Yes (34.38%) ■ No (16.83%)
 ■ Not Sure (48.79%)

What Things Do You Already Do To Improve Air Quality?



Does Poor Air Quality Have An Impact On Y...



■ Yes (72%) ■ No (13%)
 ■ Not Sure (15%)

Summary of Responses by Theme

You were asked for your comments in relation to the proposal and what other measures you would recommend. All comments have been read and the key themes and points have been identified, summarised and are responded to below. Where appropriate to do, so the Plan has also been revised to reflect the feedback.

Theme 1: MONITORING and DATA

"It is not clear where the data comes from, graphics do not have sources and LAEI data is superseded".

The data is drawn from supporting empirical data sources, and links to these sources have now been included in the AQAP. The GLA approved the Council using the LAEI 2013, as this data set provided a bespoke modelling package to boroughs that predicted the levels of pollutants for 2020. The LAEI 2016 data has now been referenced and we will include LAEI 2019 future projections when made available by the GLA.

"There is a lack of actual data being used from monitoring stations...we need more of them "

All monitoring stations within London feed into the LLAQN network and the subsequent model. Based on actual monitoring London wide, a high degree of confidence can be had in the modelled data. Modelling has been widely used for many years and is very useful in predicting future trends. All data is subject to third party accreditation and modelled in accordance with guidance. This includes data from NOX tubes as well as from real time analysis. Monitoring spend does not have a direct impact on improvement in air quality.

This site of the current real time monitor was chosen to reflect a typical background location to provide trend data, and funding is being sought .

The Council is increasing its passive monitoring sites, and is installing an additional 20 NOX tubes near to sensitive receptors, this will bring the total of locations of passive monitoring up to 30. The data from these tubes is submitted alongside the data from the real time monitor to add further to the Council's ability to monitor air quality.

"It is not clear where the data comes from, graphics do not have sources and LAEI data is superseded".

The plan has been revised to include links to data sources for the Local Atmospheric Emissions Inventory. The data is provided by the Local Authority Emissions Inventory and is bespoke for Bromley. It was confirmed by the GLA that the data displayed is the modelled data for 2020 and that the 2016 data does not have the forward prediction.

"Some people feel as though the Council is hiding urban issues by distorting models/data"

The modelled data is very sophisticated and covers the whole of London and the data used to supply this study is verified by independent scrutiny. The extension of the AQMA and AQFA's demonstrate that Air Quality is considered on an area basis.

"Why aren't figures based on 24hr mean as well as annual means, as the annual mean is not a true reflection"

All figures and their averages are based on Government published guidelines, and all data is approved by Kings College University. However real-time is undertaken at the Harwood Avenue monitoring station, this includes hourly, weekly, quarterly and annual means are recorded. These reports can be viewed online here:

http://www.erg.kcl.ac.uk/weeklysitereport/WSRGraphs.asp?site=BY7&startdate=31-Jul-2020&la_id=5

"Bromley claims to meet all national indicators, this is false as PM2.5 has not been monitored for over 7 years"

PM2.5 has been added to the monitoring requirements in recent times due to concerns about the pollutant. Notwithstanding this, the modelled LAEI data shows that this index should be met in 2020, as does the 2018 modelled data for DEFRA. Indeed, DEFRA's indicates that Bromley has lower levels than most London Authorities and is close to the lower WHO guideline level for this pollutant.

Although the GLA have already approved this plan, we have asked that this point be clarified by the GLA, and will rectify the report if necessary.

"We think more research should be undertaken on the impacts of air quality"

The guidance for producing the AQAP has been followed, and Public Health are fully conversant with the impact poor air quality has on health. Their views have been incorporated into the actions within the matrix. Any new findings from future independent research will be taken into account.

"Why have you stopped monitoring Benzene, 3-Butadiene, Carbon monoxide, Lead and Sulphur Dioxide? These levels may be low now, but they could rise".

The objectives for these pollutants have been met for several years and are well below the air quality objectives, as such the GLA do not expect London Authorities to report on these pollutants.

"We think that Bromley should coordinate with neighbouring Boroughs"

Bromley is part of the South West London Air Quality Cluster Group. All neighbouring authorities were invited to take part in the consultation. Coordination is also undertaken through national UK strategy.

Theme 1: MONITORING and DATA continued...

"There is a lack of confidence in Harwood monitoring station as it malfunctions sometimes, and we think the location is wrong."

The location was chosen historically based on scientific/specialist advice and screening/monitoring data available at the time of procurement. This site provides us with the ability to compare long term trends over time. As we are a member of the LAQM network, they provide additional data scrutiny, and they also publish data in real time.

See:http://www.erg.kcl.ac.uk/weeklysitereport/wargraphs.asp?site=BY7&la_id=5 start date=23-May-2020)

In addition, all data is also subject to independent audit, and the facility itself is audited, and a new maintenance and servicing plan has recently been implemented by an accredited engineering company. Having said that, no equipment is infallible, and on the occasions a malfunction occurs, it is addressed and rectified as soon as possible.

Bromley Council data is highly comparative with our neighbouring boroughs, and the servicing plan above is making a positive difference.

Notwithstanding malfunctions, all analysers will have missing data as they all need periodic calibration and maintenance. The data ratification process takes this into account and, where there has been significant data loss, it switches to an annualisation calculation to provide an indicative value for annual average pollutant concentrations.

The most noticeable recent problem pertains to the newly installed PM2.5 monitor, which has experienced teething problems, and these are being addressed.

The data above is reported within Bromley's ASRs.

"We ask that the Council commit to a mid-plan progress report in 2022/23"

Progress is reported through the Annual Status Report (ASR).

"Is Bromley's AQAP compliant with the legal framework on what should be included, and what pollutants should be measured?"

The GLA have endorsed the AQAP and associated matrix. Bromley is compliant with the legal framework.

"We think that Bromley is shifting the blame of poor air quality to inner London boroughs "

Air pollution by nature is transient, and the verified data collated by the GLA is used to determine the source of pollutants. It is clear from that data, and the maps provided by the LAEI, that inner London is one of the main sources of transboundary pollution.

Theme 2: Transport and Travel

"Why don't you introduce congestion charge to Bromley?"

TFL operate this scheme; there is no indication that it will be applied in Bromley.

"Introduce 20mph speed limits"

This is not Council Policy and is not currently under consideration.

"Discourage use of cars and reduce number of cars and provide alternative forms of transport"

This is already within the matrix as a result of encouraging modal shift, such as cycling, the use of public transport and walking. This is also a key thrust of the MTS and the Council's own Transport Strategy.

National Government is currently trialling the use of e-Scooters and Bromley is engaged in a watching role and will help facilitate their use if they prove to be safe.

" Why aren't motorcycles are not mentioned in the plan?"

Whilst motorcycles also cause pollution and do not promote active travel they are very low contributors to air pollution as shown through source apportionment work thus they do not feature in the plan.

" Why don't the Council introduce more places to park as to stop cars circling and wasting petrol?"

This would simply encourage more car trips and waste precious land and would have the opposite effect of improving the environment, air quality and personal health. Even prior to the pandemic the main centres of Bromley, Orpington, West Wickham, etc., have parking supply that exceeds demand.

" Will the Council Provide park and ride facilities?"

The Council's strategy is to improve all modes of transport, and encourage modal shift as far as is possible to reduce car journeys. Park and ride has been provided in previous years prior to Christmas, with only very limited take-up.

Theme 2: Transport and Travel continued...

"Why doesn't the Council ban diesel ice cream vans?"

The Council has investigated powers to prevent the use of polluting ice cream vans, but the national powers are not adequate to enforce this. Further it would not be appropriate to single out any one type of business.

"Could the Council consider removing parking spaces along congested roads to improve flow of vehicles"

This is dependent on location. The more northerly parts of the Borough have properties that lack off-street parking, so those residents have no alternative. Whilst flow may improve as a result of those actions traffic speed often increases which risks creating a new safety problem. On-street parking can be a deterrent for use by through traffic also helping make the respective neighbourhoods safer

"Change phasing of lights to stop idling cars"

The traffic flow through the borough is subject to modelling which is used to maximise flow and reduce idling and congestion. TfL, who manage traffic signals across London review junction performance to ensure that they are all running as efficiently as possible, thereby minimising delays, queues and idling.

"We want the Council make clear which A-roads they have responsibility over"

Maps are available to show the roads which are not under Council control - namely the A21 and much of the A232

"Why don't Bromley have low traffic neighbourhoods?"

Prior to the suspension of funding from TfL such objectives featured in the aspirations of the MTS and Bromley's own Transport Strategy, although emergency funds for social distancing in relation to Coronavirus has enabled some of that philosophy to be achieved.

"Why don't you introduce higher parking tariffs?"

Parking tariffs were increased in 2019, but these will only be increased further as genuine alternatives are developed, otherwise the higher charges become nothing more than a tax. Also, when considering charges, this must be balanced against local business need to prevent traders being adversely affected. Further, not all car parks are within the Council's control.

"We should introduce more speed cameras in the borough"

The placing of speed cameras is under the jurisdiction in London of TfL and the Police. There is strict criteria that is considered for their installation, this includes having regard to for their installation, this includes the number of serious speed related collisions at any location. As such, speed cameras are more aligned with road safety.

"We would like to see more electric / hybrid buses, and want to know what you do when buses are idling?"

Whilst TfL are responsible for all local bus services across Greater London, Bromley has been fully supportive of these proposals, helping identify land that might be used for bus charging facilities. TfL have already embarked on an extensive programme of rolling out hybrid and all electric buses, e.g. Service 320, Catford – Biggin Hill. However, this rollout has been paused due to the Coronavirus pandemic.

Where enforcement Officers see buses idling, they will be asked to switch their engines off, if drivers do not comply they may be issued with a PCN.

"We want more charging points for electric vehicles"

Bromley has a number of charging points and the Council engages with OLEV on a regular basis. We work in partnership with Bluepoint London, and charging points have been implemented across the Borough since 2016; this is a clear outcome of the Borough's Transport Strategy.

"Why don't you increase the number of people who use buses, and reduce the number of bus routes, by diverging to other roads?"

The routing of buses is the remit of TfL, and the measure suggested would not necessarily increase bus usage.

"We think cut through roads should be reduced"

This is considered on a case by case basis when a positive outcome will result; as to do otherwise simply shifts a problem to another location.

"Why don't you remove parking spaces along congested roads to improve flow of vehicles?"

This option is location dependant. The more northerly parts of the Borough have properties that lack off-street parking, so those residents have no alternative but to park their vehicles on the road. Moreover, whilst flow may improve as a result of those actions, traffic speed often increases, which risks creating a new safety problem. Additionally, on-street parking can be a deterrent for use by through traffic also helping make the respective neighbourhoods safer.

"Why don't you introduce more places to park, as this would stop cars circling and wasting petrol?"

This measure would simply encourage more car trips, and would have the opposite effect of improving the environment, air quality and personal health. Even prior to the pandemic the main centres of Bromley, Orpington, West Wickham, etc., have parking supply that exceeds demand.

Theme 2: Transport and Travel Continued...

"Why don't you stop council employees driving to work?"

Parking for Council employees is status based depending on the requirement of a vehicle for their role. Many officers need to respond to service requests in real-time, and also work unsocial hours.

"We'd like more segregated cycle lanes introduced, and for you to prevent parking in cycle lanes"

This is part of the national cycling strategy supported by Bromley Council; new cycle routes are planned for delivery in 2020/21 in Albemarle Road, Beckenham Road, Crofton Road and Kangley Bridge Road.

Improved cycling facilities are another key outcome of the MTS and Borough Transport Strategy, and this year a key new cycle and pedestrian route in Crofton Road, Orpington will be introduced. This will provide a high quality, dedicated route to the station, and will also result in new verges, rain gardens and significant tree planting to enhance the greening of this important corridor.

In addition to the above, more segregated cycle routes are being installed or developed.

Parking in cycle lanes is enforced by the Council's own Civil Enforcement Officers, where the road is a Borough road or part of the TLRN, and when parking restrictions are in place.

"Why doesn't the Council provide showering facilities at work, so more people can cycle to work?"

There are facilities for staff to shower at the London Borough of Bromley.

"Why don't the Council increase cycle routes and promote car sharing/pooling?"

Cycle routes around Shortlands are being developed, this is one of a number of sustainable measures (including the promotion of car pooling) that has been supported by the Council through its own Staff Travel Plan and has offered support to local employers to set up similar approaches.

"Bromley should follow example of Walthamstow to create mini Hollands"

The desire to provide more better quality cycle facilities is a key objective of the MTS and the Borough's Transport Strategy and, if appropriate, the Council would be happy to consider their use. Shared spaces to manage vehicle and pedestrian conflict are also more aligned to road safety.

"We think the existing cycle scheme should be extended for younger children"

Family training which is provided, and younger children are included as part of this. There are no plans to extend this scheme further at the moment.

"The Chislehurst society is willing to contribute financially towards traffic modelling, cycle route planning and electric charging points for Chislehurst"

This may be considered once an acceptable design has been provisionally agreed.

"As the Council controls 97% of the roads, it should have more influence on the volume of traffic"

The Council already implements measures to try to give road users options as to how they travel, but ultimately cannot control how people travel.

"There should be a safe pedestrian crossing at Chislehurst War Memorial"

The Council is seeking a design that will accommodate a crossing without causing congestion, that would lead to additional "rat running" in nearby residential streets and past nearby schools.

"Why aren't there bike hire stations?"

Bromley Council supports all forms of modal transport shift, and will continue to work with public bike hire schemes. Bike hire has been trialled in the Borough (Lime e-Bikes), however, the trial is currently suspended.

"The Council should promote car share schemes and clubs like Zipcar"

This will be given consideration.

"Idling traffic at junction A234 and Kent House Road/Royston remains a serious concern, can't you do something about this and encourage people to buy stop/start vehicles?"

The Council cannot influence drivers in queuing traffic to turn off engines or to purchase stop/start vehicles.

Theme 3 : Parks, Verges and Highways

"Why doesn't the Council change the policy on regular grass verge cutting to once or twice a year? And, not undertake mowing when dry and also use a cylinder mower with a higher cut level?"

The council has already implemented a cylinder mowing regime for all of its parks and open spaces. In accordance with horticultural best practise the height of cut is gradually lowered at the start of the cutting season and raised again towards the end of the season. Initially the length of the grass on completion of a cut was at 25mm, but these are now managed closer to 50mm for both operational and environmental reasons.

During very dry conditions cutting frequencies are suspended or reduced where that is not possible. As part of the Council's Draft Parks and Open Space Strategy, the Council is looking to adopt maintenance regimes that better support biodiversity, ecology and sustainability. As part of this exercise, and subject to Health and Safety criteria, the council will identify verges for repurposing. This repurposing programme would potentially result in some verges receiving a bi-annual maintenance regime.

Grass verges are still cut using a rotary mower regime, as the coarse verges would have a detrimental effect on cylinder mowers, moreover, these mowers are more tolerant to debris like stones and sticks. In addition, comparatively, the productivity rates are more efficient using the rotary mower on verges, and this brings its own environmental benefits. Finally, the rotary mower regime is more versatile and cost effective.

"Can the Council cease the use of mechanical leaf blowers on hard surfaces?"

The Council is considering alternatives to blowers as method of cleaning.

"Mechanical suction sweepers sometimes run out of water but the operator continues to use them and causes lots of dust".

Mechanical suction sweepers should not be operated without water. The Council will ask the Street Environment Contractor to address this through training with their staff. If residents have any specific incidences where this occurs, please contact the council with details.

"We want more residential roads to have a 7.5 tonne limit, and for HGV's to be restricted to main thoroughfares, and not allow rat runs to occur"

Weight restriction orders are intended to protect old or weak bridges and structures, or bar heavy vehicles from areas unsuitable for their size or if they pose a danger, for example narrow roads, as such this issue pertains to safety rather than air quality. Notwithstanding this, there is no duty placed on the Council to enforce this legislation pertaining to this issue, and currently enforcement is with the Police.

"Why don't the Council plant more trees, or plant wild flowers and greenery, including on grass verges to absorb pollutants?"

The Council operates an annual tree establishment programme for highways, parks and woodland sites. Over the past ten years we have achieved a net gain in the number of trees retained within the borough. Tree establishment is not limited to simply planting trees, they require maintenance. Along with budgetary limitations the logistical ability to maintain young trees as they establish is a sensible limiting factor in the total number of trees planted each year. The Council are currently progressing a scheme to create/expand woodlands in the borough which if successful, will substantially increase the number of trees growing within the borough.

With 7,000 acres of green space, Bromley is one of the greenest boroughs in London, and the Council continues to maintain greenery and wildflowers in its green spaces. Many of the real benefits from trees include particulate capture and CO₂ sequestration. The Council proactively plants tree species which trap particulates in their bark removing them from the air, however, when the long-term viability of tree planting is considered, these species are not suitable for every location, which is critical in allowing trees to develop into maturity.

The Council organises for the planting of wildflowers on some grass verges across the borough. The Council's ability to extend this will be determined by its financial position.

Theme 4 : Housing

"Why don't you invest in home insulation to cut emissions?"

The Fuel Poverty work stream can assist in referring viable candidates to the right national and regional work schemes. We cannot currently pay for these ourselves as it would be cost prohibitive to provide such a scheme for all homes. The council is instead looking at a programme for upgrades to schools, this allows for a public collective benefit of expenditure, and this is a fairer process than selecting individual households.

Theme 5 : Planning

"We want the Council to prevent paving of green verges and gardens"

This has been addressed within the Council's Local Plan Policies, and it is covered through street parking audits undertaken by the Highways Team. Development on Garden Land is assessed against Policy 3 of the Bromley Local Plan. In the many cases, existing houses will have permitted development rights to install hard surfaces, subject to conditions (see Class F, Part 1 of Schedule 2 to of the General Permitted Development Order). This subject is also covered by the National Planning Policy Framework.

"Why don't you limit car use in planning applications?"

This is covered on a case by case basis through the planning application process. Local Plan Policy 31 requires any new development likely to be a significant generator of travel to encourage walking and cycling through the provision of appropriate facilities. Parking levels are assessed against relevant Local Plan and London Plan standards on individual planning applications.

"More solar alternatives in developments should be used"

Local Plan Policy 124 requires the potential for renewable energy to be assessed as part of the design of new major development, in meeting carbon reduction targets on site. All major developments are required to follow the Lean/Clean/Green GLA energy hierarchy, we cannot promote solar PV usage where it is not appropriate to do so.

The council also looks for any ways it can increase efficiencies and performance including renewable energy such as power to CCTV units.

"Why don't you include landscaping as a planning condition?"

Where appropriate to the scale of development, landscaping schemes are sought by planning condition on relevant planning permissions.

"CEMP's should be required for all sites, not just those that are considered to be major"

Construction Management Plans are required for Major Planning Applications, either at application stage or to be secured by planning condition. This is regulated by Planning Policy and measures required must be necessary and proportionate to the proposed development, as such, it cannot be automatically applied to all development.

"We don't want the Council to build any additional office blocks, as there is already a lot of empty office space in the borough"

Bromley's Local Plan was adopted on 16 January 2019 and, in conjunction with the London Plan it is used to determine planning applications. When an application has been received by the local planning authority it is published and there is an opportunity for representations (either for or against) to be made on a proposal.

Whilst we will take account of all representations received, it must be remembered that the planning process is in place to ensure that, in the development of land or buildings, the public interest is taken fully into account. Whenever we receive representations to a proposal we will consider them fully which may result in an amendment to the proposal.

"Can the Council ban all dry cutting of masonry?"

This issue covered within Construction Management Plans through the planning system.

"Why is there is no specific action directly relating to bonfires on construction sites?"

This issue is already controlled through statute and enforcement where possible.

"Why hasn't an action been included to ensure that ultra-low NOx boilers are used?"

This action is included within the action plan under action 4, and is required where appropriate through the planning system.

Theme 6 : Schools

"Why don't you provide low cost air quality monitors for schools?"

The Council's monitoring is designed to look at air pollution in sensitive locations, and this includes schools as required by the guidance. Action point 1 includes a commitment to reviewing existing and emerging technology. This information can be shared with schools, however at present that data suggests that expenditure in this area would be disproportionate. In addition, the data that is used to inform the modelling needs to be independently verified, and individual monitoring stations would not be part of this scope.

"We would like the Council to extend green screen testing for schools"

The benefits of this are being trialled, it would not be appropriate to commit to extending such a project prior to the outcome of the initiative at Valley Primary School

"It is vital that air quality data both with and without green screens be collected and published"

Fortunately

Theme 6 : Schools Continued ...

"**The school curriculum should be more creative and educate children on the topic"**

We work with schools through our Healthy Schools Programme, and this covers various aspects of healthy lifestyle.

The Carbon Management Team are looking into setting up a partnership to provide material to primary schools free of charge to learn more about sustainability, including air quality. We plan to start with 10 schools for one academic year to trial the initiative. In addition, the Council will be helping deliver a junior citizen program in future years where this subject is hoped to feature.

"**The actions listed in action numbers 14 and 25 are likely not to achieve anything. Instead more commitment to school streets and low traffic neighbourhoods may be beneficial"**

All actions to improve air quality are valid. School Streets is an interesting idea and partner schools will be spoken to during the life of the plan. The actions included in the plan have been chosen because they are likely to have the most effect, and link to other partner's actions.

"**We would like roads next to schools closed to cars during drop-off and pick-up"**

Temporary school streets are being implemented at a number of schools this September.

"**We would like anti-idling literature and campaigns for schools"**

The Borough was due to commence an anti-idling campaign outside schools in April. This was delayed by lockdown and will now commence in the Autumn, and appropriate literature will be distributed.

"**We would like double yellow lines and zig zag near schools to avoid dangerous parking and idling"**

Such measures are constantly reviewed as part of the school travel plan process.

"**Theme 3 action 13 does not quantify how many Gold, Silver and Bronze accreditations should be achieved to constitute success"**

The matrix states that currently 76% of schools have active travel plans, and the target seeks to maintain a level where more than 75% of schools have an active travel plan, with a target score for quality of >180.

Theme 7 : Public Protection and Businesses

"**We want the Council to encourage retailers to not use un-environmentally friendly practises e.g. leaving doors open in winter, turning lights off after they close"**

We will work with our Business Improvement District leaders to reach out to commercial properties and retailers to promote behavioural changes that result in energy reductions e.g. turning off lights after close, keeping doors closed in winter. We will make the benefits of this approach (such as reduced energy bills) apparent to our businesses.

"**We would like the Council to support zero waste shops and their use"**

Waste minimisation is a priority for the Council, and we will consider how to promote the use of Zero Waste shops.

"**Why is the Council not aiming for PM 2.5 levels to be below 10?"**

The Council has committed to try and achieve the levels set by the WHO for this particulate. However it should be noted that PM2 is particularly transient and therefore comes from a number of sources outside of the Council's control.

"**Why doesn't the Council ban bonfires and wood burners, and inform people on the health risks associated with bonfires and make bonfires easier to report?"**

Wood burning stoves and their fuels are subject to new national controls to deal with this problem. There is no byelaw pertaining to bonfires in this borough. New model byelaws were introduced by Government in 2013, and the set that pertains to nuisance is the Good Rule and Government model byelaw set 8.

Section 235 of the Local Government Act 1972 enables district and borough councils to make byelaws for the good rule and government of the whole or any part of the district or borough and for the prevention and suppression of nuisances. However, the law is explicit in that byelaws cannot be made under this section if provision for the purpose in question is made, or may be made, under any other enactment. As bonfire/smoke nuisance is covered by the Environmental Protection Act 1990 and the Clean Air Act 1993, and as all new byelaws must be agreed, there is no option to introduce a byelaw under section 235.

With regards to nuisance bonfires, the Council investigates complaints received, provides advice and guidance concerning pollution, and takes enforcement action where appropriate. Bonfires can be reported through the Borough's website and Contact Centre, the Council's web site is currently being improved and new forms for reporting complaints will be developed as a part of that work.

Theme 7 : Public Protection and Businesses Continued...

"We would like to Council to stop any further expansion of Biggin Hill Airport, as the cars and traffic cause pollution"

Air pollution from Biggin Hill due to flights does not significantly affect air quality in Bromley, and surface access traffic is subject to planning control and would be covered through that route if any expansion plan was submitted.

"The Council needs to place a limit on flights and emissions from Biggin Hill, and also divert planes"

Limits are already in place with BHA as per the lease and London Biggin Hill has committed to a lower amount of take off and landings than permitted. BHA has a long established history in the borough, its niche business model does not encourage a mass uptake of air travel.

Air pollution from Biggin Hill due to flights does not significantly affect air quality in Bromley, and surface access traffic is subject to planning control and would be covered through that route if any expansion plan was submitted.

" We think the area around Biggin Hill Airport should be monitored more"

Action point 1 seeks to achieve this through local agreement with the airport.

"Why is Biggin Hill the main beneficiary of the additional investment for monitoring?"

The Council is not proposing any direct investment to monitor air quality at the airport, however the installation of a monitoring station is being considered by local agreement through the life of the plan.

"We would like the Council to provide more information and educational literature to residents"

As stated within the action plan, new guidance will be circulated through Council publications and promoted to stakeholders.

"Air quality isn't bad enough to warrant all this expenditure"

The Council has a legal duty to meet the objectives set in legislation. The Plan represents a proportionate and objective response to air quality as an issue for Bromley as well as meeting statutory requirements.

"Will Bromley declare a climate emergency and set up a task force with community engagement?"

The Council has closely monitored the situation, and has regard to its own footprint, however, it is not anticipated that a climate emergency will be declared. Having said that Bromley does recognise climate change, and has set out an ambitious target of being carbon neutral by 2029. In addition, the Council is currently exploring setting up a green growth recovery board, which will have some relationship with external stakeholders and will, in part, discuss air quality as an issue.

"Will the Council tackle the dust on station platforms from train brakes?

The rail industry is undertaking an initial research programme, and this will significantly improve the understanding of rail's overall impact on air quality. Future updates to the Air Quality Strategic Framework will log their progress of this work and highlight new initiatives and targets as the knowledge base grows and the GB rail industry moves forward.

"Why does the plan has less targets than 2010?"

The current action plan is written in accordance with previous plan had additional gases/pollutants included in the remit. Technological advances have removed their presence in concentrations considered harmful, and the need to monitor them has been removed. As a result, the plan has less targets.

"People believe the plan should commit the Council to meeting the 'Air quality guideline'"

In 2016 the Mayor of London introduced the London Local Air Quality Management system for London (LLAQM). All boroughs are now required to work in accordance with this new guidance.

Theme 8 : Waste

"The Council should promote Bromley's green waste collection "

Bromley Council is highly supportive of green waste and recycling and will continue to invest in this area. The Council continues to promote the green garden waste collection service by:

- Advertisement on refuse lorries
- Press releases
- Posters and postcards at the Household Reuse and Recycling Centres
- Website information
- Social media campaigns
- Advertisements in Bromley High Street
- Council newsletters including Environment Matters

Theme 8 : Waste Continued...

"Why doesn't the Council offer free collection of hazardous or bulky materials e.g. sofas etc. and, why isn't there concession for disabled people for recycling collection

Household recycling collections are free of charge, however, the Council does set charges for the non-statutory green garden waste and bulky waste collection service. These charges are set at a level that enables the Council to recover the costs of collecting these waste types, and no charge is made for the disposal. There are currently no plans to introduce a concession for these waste services.

"Waldo Road waste depot should be hosed down to prevent dust from travelling, and the booking system should be kept in place"

There is a dust suppressant system in place at Waldo Road Refuse and Recycling Centre .

The booking system could not be maintained indefinitely, as it would limit the amount of waste the Council is able to collect.

Accroyns used in this Report and the AQAP

airTEXT	Air pollution forecasts for Greater London	LAQM	Local Air Quality Management
AQA	Air Quality Assessment	LAQN	London Air Quality Network
AQAP	Air Quality Action Plan	LB	London Borough
AQFA	Air Quality Focus Area	LEN	Low Emission Neighbourhoods
AQLV	Air Quality Limit Values	LEZ	Low Emission Zones
AQMA	Air Quality Management Area	LIP	Local Implementation Plan
AQMS	Air quality Monitoring station	LLAQM	London Local Air Quality Management
AQN	Air Quality Network	NRMM	Non-Road Mobile Machinery
AQO	Air Quality Objective	NO2	Nitrogen Dioxide
ASR	Annual Status Report	NOx	Nitrogen Oxides
BEB	Buildings Emission Benchmark	PCN	Penalty Charge Notice
CAB	Cleaner Air Borough	PM10	Particulate matter less than 10 micron in diameter
CAZ	Central Activity Zone	PM2.5	Particulate matter less than 2.5 micron in diameter
CEMP	Construction Environmental Management Plan	RE:FIT	Is a procurement initiative for public bodies wishing to implement energy efficiency measures and local energy generation projects on their assets
CEO	Civil Enforcement officer	RE:NEW	Is the Mayor's award-winning programme to help make London's homes more energy efficient.
CHP	Combined Heat and Power	SEELS	Salix Energy Efficient Loans
CIL	Community Infrastructure Levy	SCA	Smoke Control Area
CLP	Continuous Logistics Plan	SDP	Strategic Development plan
DEFRA	Department for Environment, Food and Rural Affairs	SPG	Supplementary Planning Guide
DES	Driving Efficiently and Safely	TEB	Transport Emissions Benchmark
EV	Electric Vehicle	TfL	Transport for London
ECO	Energy Company Obligation	ULEZ	Ultra Low Emission Zone
EFL	Energy Facts Label		
Euro VI	European Emission standard number 6		
FORS	Fleet Operator Recognition Scheme		
FPN	Fixed Penalty Notices		
GLA	Greater London Authority		
GULCS	Go Ultra Low City Scheme		
HEYL	Healthy Early Years London		
HGV	Heavy Goods Vehicle		
JSNA	Joint Strategic Needs Assessment		
LAEI	London Atmospheric Emissions Inventory		