

Annex 4: Responses and comments report from organisations and individuals

#	Name / Org	Section / Topic	Nature of Response	Consultation Response	Officers' Recommendation
1	Fred Schriever	Action Plan	Other	I would dispense with the questionnaire in the beginning asking whether people agree or are supportive. I wouldn't really expect you to get intelligent and useful data outcomes from the question. You will save some paper by deleting!	The consultation closed in October and we have received some useful feedback which is reported in annex 3.
2	Fred Schriever	Action Plan	Other	There is a long list of different ideas. However there is no indication of respective cost, benefit and probability of success for any of the items as well as best prioritisation. Presumably the money needs to come from somewhere, ie reduced budget for other objectives of the RBKC, higher council taxes, introduction of different taxes, central government or EU funding, public-private initiatives. The financing strategy needs to be included. Some people might say that lack of spaces at decent public schools is more of a priority.	In most cases, the budget for each action is already identified and agreed by the responsible service group. However, some actions would still require more work on this. Assessing some costs and particularly the benefits of some initiatives is not always possible and in other cases is very time consuming and the estimates are not always reliable. The decision was made at this stage not to include them in the Action Plan. However this will be reconsidered for some of the projects once the Action Plan is launched. For information, most of the funding comes from either central government (Defra) or through the Mayor of London's Air Quality Fund, or TfL's Local Implementation Plan.
3	Fred Schriever	Technical Appendices	Other	There are a number of data points in the draft paper which are not sourced. Stating that 7% of deaths in the council are related to particles sounds like false data. It doesn't take into effect lots of other factors like most people having worked in smoking offices.	All mortality and morbidity data is ultimately sourced from Public Health England information, some of it re-quoted from the Mayor of London's documents.
4	Fred Schriever	Action Plan	Other	Need to ensure that residents do not unfairly subsidise non residents who also create pollution in the council. People who have Diesel engines but drive less than 1000 miles a year aren't the cause of the pollution problem versus delivery trucks or people passing through the council.	The Council has no control over drivers passing through the borough. The diesel surcharge on resident parking permits is not intended to price people out of diesel cars, but to give a clear signal that the Council wishes residents to choose non-diesel cars.
5	Fred Schriever	Action Plan	Other	Need to look at other issues which make it difficult to change. ie conversation area zoning	The Borough is made up of an extensive historic environment with almost 75% of the Borough within conservation areas and

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				<p>makes it difficult, more expensive or slower to change windows. Obviously there are important objectives in these policies there is increased friction.</p>	<p>about 4,000 listed buildings. Whilst the Council is supportive of upgrading buildings for energy efficiency, these need to be balanced with conservation issues. The Council determines each case on its merit and follows guidance in the National Planning Practice Guidance (NPPG) on this issue that <i>“great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;”</i></p> <p>The London Plan is also part of the Council's development plan. The London Plan includes Policy 5.7: Renewable Energy. Part D. of this policy states <i>“All renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets, and to avoid any adverse impacts on air quality.”</i></p> <p>However, the Council is constantly looking at new technologies that could fit with this guidance and more options are likely to be made available to residents in the medium term.</p>
6	Fred Schriever	Action Plan	Other	<p>Coordination with other government agendas or even local councils. Eg. The DVLA has in the past given away a diesel car each year as part of a contest. There is already a central government tax on engine size. Why would taxing people twice be allowed or tolerated?</p>	<p>Noted. The diesel surcharge is intended to give a clear signal that the Council wishes residents to choose non-diesel cars. There is a growing recognition at all levels of government that diesel engines have harmful impacts. The permit charge is not a tax.</p>
7	Fred Schriever	Action Plan	Other	<p>Look at other waste or wasted opportunities in the RBKC. Eg. When the council waters the hanging baskets on my street, there is plenty of water that lands on the sidewalks. RBKC stopped delivering recycling bags to the Old Brompton Road library apparently as there was a cost issue. Bags are infrequently delivered to my building, so I periodically drive to the Town Hall to get new bags where I am limited</p>	<p>The Council's supplier for hanging baskets, Window flowers Ltd, have a policy in place to conserve water which include (but not only) a gel included in the soil material and a water saving design which significantly improves water retention and reduces amount of water needed.</p> <p>When the Libraries service moved to a self service model it meant that recycling bags could no longer be stocked. Recycling bags are delivered quarterly. If deliveries are not</p>

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				to two. Shredded paper can no longer be included in recycling bags.	being received then we would appreciate this being reported via Streetline. Shredded paper cannot be recycled as the damaged fibres make recycling difficult.
8	Fred Schriever	Action Plan	Other	Add trees in the many gardens, parks, squares and backyards. Plants convert some compounds to useful gases and trees provide shade. Lots of trees could be added on the south side of Cromwell Road between Earls Court Road and Warwick. General appearance will also be improved.	The Council has an active programme of tree planting, for not only amenity reasons, but to mitigate air pollution in the way suggested. There is in fact a planting scheme being worked on to add trees to Cromwell Road in the area identified.
9	Fred Schriever	Action Plan	Other	Slow down speed limits in RBKC particularly on North-South routes that attract pass-thru traffic	The main North-South road routes are controlled by TfL. Slowing the flow on these arterial roads is likely to cause more congestion and worsen air pollution.
10	Fred Schriever	Action Plan	Other	Introduce a bottle and can deposit law. Several states in the United States have this and it is effective at increasing recycling and reducing garbage along roads.	This is something for consideration at national level and cannot be introduced by the Council on its own.
11	Jennie Kettlewell	Action Plan	Support with condition	On p 11, you mention an aim of 30% carbon reduction from street lighting. That is good, provided lighting is not too dim to be safe. When I visit Kew (I know it is another Boro) I take a torch because the uneven pavements in reduced lighting are a trip hazard.	The Council has been reducing our carbon by using new more efficient technologies, but still maintaining the character and the brightness of our streets. These new technologies including LED lighting which maintains existing lighting levels but achieve savings in carbon emissions and energy cost. Dimming is not considered.
12	Jennie Kettlewell	Action Plan	Other	Some SUDS proposals I have seen advocate hard landscaping in woodland areas so that water can be drained off into the drainage system. Surely we should be exploring porous landscaping so that water is absorbed and does	Sustainable Drainage Systems are currently required in all development (not just major development) in-line with Local Plan Policy CE2: Flooding.

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				not have to overload the drainage system?	
13	Jennie Kettlewell	Action Plan	Other	The Friends are working with Holland Park management and the Parks Police to reduce vehicular traffic in the park. We need to protect the clean air in our parks.	We agree in principle however it is an operational site with multiple users so a compromise may need to be agreed. At present we are restricting access between 11am-4pm however we do need to act reasonably and allow emergency access. Parks Police has started to introduce electric vehicles within their fleet.
14	Cremorne Residents Association	Action Plan	Other	Given the crucial importance of achieving an effective programme of action to implement the Plan we very much regret that the Council did not see fit to organize any "public engagement events" in either SW10 or SW3 despite the fact that the three major east-west roads in Chelsea - the Embankment, the King's Road and the Fulham Road - are so often heavily congested, producing high levels of pollution particularly on the A3212/3220 leading up to the Earls Court one way system. Lots Village is bounded by these overloaded roads.	With limited resources we were only able to arrange three public meetings, but we did vary the times and spread the venues across the borough. We are very much aware of the poor air quality arising from the heavy traffic on our main roads, and a large part of the draft Action Plan is aimed at reducing vehicle emissions.
15	Cremorne Residents Association	Action Plan	Other	We strongly support your producing a joint Plan combining an air pollution action plan with a climate change strategy because Appendix V reveals a very alarming picture of health impacts in RBKC and neighbouring Westminster which are shown to be the worst boroughs in the country in this respect. These are also of course two of the most densely populated boroughs in the UK.	Noted. We are intent on increasing local awareness of the health impacts of global warming, and more immediately air pollution.
16	Cremorne Residents Association	Action Plan	Other	In view of this picture, major efforts surely now need to be made to curb any more large scale developments in RBKC which would only serve to aggravate levels of congestion and pollution, and further overload not only the roads but the essential infrastructure; Thames Water's	Policy C1 of the Council's existing Local Plan states that "New development will be coordinated with the provision of appropriate infrastructure to support development. The Council will require that there is adequate infrastructure to serve developments, including through the use of planning

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				<p>requirement to construct a Counters Creek Storm Relief Sewer exactly illustrates the hidden costs of overdevelopment because the overloading of the sewage system directly reflects the creation of major new developments like Westfield Centre; this comes on top of the requirement to stop polluting the Thames by connecting sewers/CSOs to the Thames Tideway Tunnel; National Grid's 5 year project to enhance the main gas pipes running through the Royal Borough and parts of Westminster stems at least in part from closing the adjacent Fulham Gasworks so that the site can be turned into a large scale residential development.</p>	<p>obligations, working with infrastructure providers and stakeholders to identify requirements". Chapter 37 of the Local Plan sets out an Infrastructure Schedule setting out items of infrastructure necessary to support development planned in the Local Plan. This Schedule was updated as part of the Council's Infrastructure Delivery Plan in March 2014 as part of the CIL charge-setting process.</p> <p>The Council is working with Thames Water to address the lack of capacity of the Counters Creek Sewer System and is responding to Thames Water's consultations on proposals for a Counters Creek Storm Relief Sewer to ensure it is fit-for-purpose and future-proofed.</p> <p>The Council is also a Lead Local Flood Authority and adopted a Local Flood Risk Management Strategy in July 2015.</p>
17	Cremorne Residents Association	Action Plan	Other	<p>Because these three infrastructure enhancement projects will cause massive disruption over the next few years we believe it will be of crucial importance for the existing road system to be managed much more effectively to avoid the already alarming air pollution levels from deteriorating still further over the coming years.</p>	<p>Noted. We work closely with TfL, utility companies, developers and other bodies to coordinate road works and minimise disruption through our network management duty.</p>
18	Cremorne Residents Association	Action Plan	Other	<p>Although a good deal of work has clearly gone into drafting other parts of the Plan, the part covering transport crucially lacks sufficiently specific remedial action points. The Transport Objectives in Section 5 are themselves too narrowly focussed and don't really pick up some of the action points already in Section 6.</p>	<p>We believe the objectives are broad enough to facilitate introducing new measures focussing on transport as the opportunities arise. However we have to recognise that we are reliant on TfL, Defra and DoT to implement major schemes such as the proposed ULEZ.</p>
19	Cremorne Residents Association	Action Plan	Other	<p>We strongly believe the following action points need to be added to tackle the core issue of overloaded/polluted streets/health risks : The Council should urgently review with TfL (A)</p>	<p>A) TfL sets coach stopping points and routeings for some services (called the London Service Permit (LSP) routes. For services which are not LSP services, we would need to contact the Coach operator directly via the Confederation for</p>

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				<p>the disproportionate number of long distance coaches being channelled from Victoria down Royal Hospital Road onto the Embankment only then to go back up the one way system to the Cromwell Road, causing excessive mileage, congestion and pollution.</p> <p>(B) More effective means of curbing the significant numbers of articulated lorries, particularly from abroad, using this same route through Chelsea.</p> <p>(C) An extension of the Central London tighter emission control zone to cover RBKC.</p> <p>(D) The whole Earls Court one way system which produces long tail backs on the A3212/3220 during many periods ; the LDF/Core Strategy /Places (adopted several years ago) says under Key Issues and Potential Opportunities for this area that "The Council will work to unravel the One-Way System".</p>	<p>Passenger Transport (CPT). If you could please provide the name of the coach operator and the location, date, time and direction of travel of the coach (with registration number if possible), we will be able to establish who is the best person to talk to regarding the routing of coaches. The Council prefers to keep Coaches on major roads, even if the distance travelled is greater, rather than to direct coaches down residential streets.</p> <p>B) Noted - TfL and the Council prefer to keep HGVs on major roads, even if the distance travelled is greater, rather than direct coaches down residential streets. Royal Hospital Road is currently categorised as a 'B' road – a road intended to connect different areas, and to feed traffic between A roads and smaller roads on the network – as such it is likely to see some heavy goods vehicle traffic making longer journeys.</p> <p>C) We have restated our position to TfL that we would like them to investigate including the Royal Borough in the proposed ULEZ area from the start.</p> <p>D) The unravelling of the Earl's Court one-way system is one of the Council's long-term aspirations, but it will be difficult to achieve this without adding to congestion.</p>
20	Cremorne Residents Association	Action Plan	Other	<p>RBKC should itself introduce a much more rigorous regime on the Kings Road to eliminate or at least seriously curtail the widespread incidence of illegally parked vehicles on yellow lines blocking the two way flow of buses. The occasional traffic warden is not good enough.</p>	<p>Noted – whilst we do not have the resources to enforce illegal parking, or loading, on every length of every strategic road all day long, we will ask our parking enforcement contractor to be robust in dealing with illegal parking on the Kings Road.</p>
21	Cremorne Residents Association	Action Plan	Other	<p>RBKC should give much more notice of intended excavation work by utility firms requiring temporary traffic lights, and provide clearly signed advice a long way back as to alternative</p>	<p>Providing advance notice of works that require temporary traffic signals depends upon the type of works being carried out. The nature of urgent and minor works means that it is not possible to provide advance notice but in the case of major</p>

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				<p>routes where possible; the duration of the work should be clearly indicated and enforced.</p>	<p>works we do instruct work promoters to do this. This will often involve the erection of portable Variable Message Signs along the route affected. We would not advise of specific other routes to take but depending on the circumstances we would advise drivers to seek alternative routes.</p> <p>It is not a statutory requirement for works promoters to provide on-site information on duration/end dates so there is little we can do if they don't provide it, but for major works this is often provided at our request.</p> <p>In terms of enforcing works durations, we robustly challenge each permit application we receive if we feel the proposed duration is excessive. If works promoters fail to finish their works in time then we can fine them daily overrun charges ranging from £100 per day up to £10k depending on circumstances.</p> <p>Information on planned road works in the borough and their duration can be found in the weekly road works bulletin published on our website – https://www.rbkc.gov.uk/parking-transport-and-streets/your-streets/roads-and-pavements/roadworks</p> <p>Another useful online resource with a comprehensive list of all types of street and road works, including minor and immediate works, that are currently ongoing or that are due to take place please is the London Works Central Register on the Transport for London website http://public.londonworks.gov.uk/roadworks/home;jsessionid=0aee16430d6feb263e328f74e10a764ed68ea42a251.e34NaxyLchaMci0LaxuPb3yOch0Ke0</p>
22	Cremorne Residents Association	Action Plan	Other	<p>RBKC should introduce a regime of progressively increasing the cost of residents parking permits where the vehicles concerned have large</p>	<p>Our graduated resident parking permit scheme and the associated surcharge for older diesel vehicles encourages the take up of cleaner vehicles. Engine size and vehicle size do</p>

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				capacity engines and are so large that they hardly fit within parking bays. RBKC should also give serious consideration to increasing the cost of permits for households wanting second or more cars to be accommodated in resident parking bays in view of the fact that the number of permits issued each year far exceeds the number of spaces available across the borough.	not always correlate with emissions. We already charge a £67 supplement for second or subsequent resident parking permits.
23	Cremorne Residents Association	Action Plan	Other	RBKC should also give serious attention to the merits of following the example of some German cities which restrict the hours during which commercial vehicles can make deliveries in busy high streets, and of Paris where taxis are located at approved taxi ranks rather than being allowed to roam the streets for business, a practice which must in RBKC add considerably to pollution.	We do not have the legal powers or the enforcement capabilities to ban vehicles from using our roads at certain times. Consideration of any such restrictions would need to be led by central government or sub-regionally by TfL. The same applies to taxis which are regulated by TfL rather than the borough.
24	Cremorne Residents Association	Action Plan	Other	RBKC should ensure that existing Green Travel Plans of schools in the borough are not a dead letter particularly when such plans have been a part of the Panning Approval Process as in the case of the Chelsea Academy.	<p>We encourage schools to ensure that their Travel Plans gain TfL's Sustainable Travel: Active, Responsible, Safe (STARS) accreditation. STARS accredited schools are given access to extra funding, training and toolkits from both TfL and the Borough, as an incentive to continue progressing and improving their Travel Plans. This allows us to monitor school travel plan progress throughout the year, to compare modal shift, and to work with the schools on initiatives which will help them achieve their targets, ensuring that the travel plan becomes embedded in the school's daily working.</p> <p>Sometimes travel plans in schools do lapse, for example due to changes in staff, but we attempt to re-engage with those schools annually. Our School Travel Plan Coordinator will contact the Chelsea Academy for an update on their Travel Plan.</p>
25	Cremorne Residents	Action Plan	Other	Finally we note that the Plan advocates Greening Measures which we very much welcome	The Council's existing Local Plan Policy CE4 requires "development proposals to create opportunities... for attracting

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	Association			particularly if it leads to the replacement of very large, unsightly and distracting advertising hoardings on the A3212/3220 with Green Walls.	biodiversity and habitat creation".
26	Gillespie Robertson	Policy/Action Plan	Objection	<p>In essence, I suggest a radical re-write of the draft plan from the beginning, starting with an admission that on air quality the Council shares much responsibility with other public "authorities" for its past promotion of health-damaging diesel engines and continuing with deletion of all references to "carbon" when you mean CO2 ; but also omitting/deleting all the meaningless drivel about CO2 and "Climate Change." These omissions/deletions should take place no matter whether the offending text is regarding "extreme weather events" on which even the IPCC admits there is no evidence linking CO2 or temperature to such events, or whether regarding global temperature, where it is crystal clear that RBKC's and our residents' actions could not possibly have any remotely significant or measurable impact, even if climate/temperature sensitivity to CO2 were <i>several times</i> the already elevated maxima suggested by the most alarmist of the climate alarmists. If you, the author of this circular e-mail to which I am replying, are seriously interested in "climate science," may I recommend to you the work of Hubert H. Lamb, widely regarded as the "father" of this scientific subject. He must be turning in his grave at the appalling lack of scientific method and discipline and widespread disregard for truth among the alarmists.</p>	<p>We don't believe there is anything to be gained by a 'radical' rewrite of the draft plan. The Council has been aware of the higher emission of nitrogen dioxide and fine particles for some time, and has been taking steps to persuade residents to consider not buying diesel cars, through measures such as the surcharge on the car parking permit charges.</p> <p>Using the word carbon as shorthand for carbon dioxide is now common practice and we do not agree that climate change is meaningless. In fact together with the political, scientific and even economic consensus we regard climate change as probably the biggest challenge the world faces in the twenty-first century.</p> <p>The Council recognises the general scientific consensus that climate change is happening, that human activity is contributing to it significantly and that it has potentially damaging environmental, social and economic impacts. The Council has made its position clear in 2008 in its first Climate Change Strategy.</p> <p>The council believes in its role of leading by example. Modest local actions to address the causes and effects of climate change collectively will help to limit global warming.</p>
27	David B Taylor	Q3	Support with Conditions	1. Make a law that motorists who park up or loiter to switch their engines off or if caught get a £250	Changing laws is difficult and takes time, however we will consider what further deterrents and inducements might be

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				fine.	<p>effective as a new action to add to the plan once it is launched</p> <p>We created an information leaflet and the information is accessible on the council website. This leaflet is distributed to drivers in problem locations such as South Kensington and Knightsbridge. The leaflet explains the problems surrounding idling engines and the penalties that can be enforced by Council officers. Officers conduct walkabouts of problem areas and interact with drivers who are deemed to be idling their engines unnecessarily.</p> <p>Virtually all drivers either turn off their engines or drive away, but officers will issue fixed penalty notice when they are met with a refusal to cooperate.</p> <p>The issue is also going to be raised as part of the promotion of school travel plans to prompt parents, who are still driving their children to school, to switch off their engines when they arrive at the school.</p>
28	David B Taylor	Q3	Observation	2. Get Capital Radio to stop their traffic flights over London by 11pm and get a quite aircraft as this one is unbelievably noise.	This has no bearing on air quality and the Council has no control over aircraft flights
29	David B Taylor	Q3	Support with conditions	3. Make all car and truck manufacturers test their pollution levels in real life on roads instead of behind closed doors in science labs as the VW fiasco has open our eyes to their duplicity and to our government's ineptness over these laws and conditions of testing vehicles inappropriately!!	We are and will continue to lobby Government to improve vehicle testing to better reflect real conditions.
30	David B Taylor	Q3	Support with conditions	4. All new housing be environmental friendly and sustainable, i.e. non polluting boilers and instead use geothermal where applicable	<p>These issues are more suitably dealt with through Building Regulations rather than planning.</p> <p>The Government has undertaken a Housing Standards review and it is Government policy as set out in a Written Ministerial Statement that "From the date the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying</p>

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					<p>bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This includes any policy requiring any level of the Code for Sustainable Homes to be achieved by new development; the government has now withdrawn the code, aside from the management of legacy cases.”</p> <p>Therefore the Council cannot set new Housing Standards for energy within its planning policies. Council's existing Local Plan Policy CE1 requires Code Level 4 for residential development over 800 sq m. The Council will continue to require Code Level 4 equivalent for energy until the commencement of this part of the Deregulation Bill as set out in the Written Ministerial Statement.</p>
31	David B Taylor	Q3	Support with Conditions	<p>5. Make the polluters pay not the derisory sums they are paying at present but more realistic as there are 10,000 people getting murdered by these pollutants from vehicles. 7,000 people over 65yo and 3,000 under 6yo; it's a unbelievable disgrace!!!!</p>	<p>We introduced the diesel surcharge in 2008 and it currently stands at £19. We plan to increase it to £40 in 2016 and remove the exemption for Euro 5 diesel vehicles in 2017. The surcharge is not intended to price people out of diesel cars, but to give a clear signal that the Council wishes residents to choose non-diesel cars.</p> <p>The Council's existing Local Plan Policy CT1 requires that all new development is 'permit free' i.e. there is no residents parking permit for on-street parking. This serves to manage the pressure for on-street parking as well as to discourage car use.</p> <p>The Council's existing Local Plan Policy CE5 Air Quality alongside its Air Quality Supplementary Planning Document (SPD) already sets out some detailed requirements for new developments regarding air quality.</p>
32	David B Taylor	Q3	Other	<p>6. Get somebody in charge of the environment with balls and the legal framework to back up the</p>	<p>This is aimed at central government and does not require a response from the Council.</p>

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				new laws that are needed urgently to protect the humans and the environment too.	
33	Ken Macdonald	Q3	Objection	Air quality in London has nothing to do with climate change. Emissions from cars, buses and lorries are the key factor in air pollution. Climate change theory, I understand, posits that CO2 will heat the Earth up a bit. Whether that's true or not, CO2 is not harmful when breathed whereas diesel particulates, for example, are. It's those types of emissions that the council should concentrate on reducing.	We agree that air pollution is an immediate threat to health, but the Council supports the Government and scientific consensus that climate change in the near future also threatens health, the economy and the ecosystem on which we depend on survival. Furthermore, air quality and climate change are fundamentally interrelated as both emissions of CO2 and air pollutants (NO2, PM), arise from the same combustion processes such as homes, industry, vehicle engines and power generation.
34	None Given	Q3	Support with Conditions	Air quality is crucial irrespective of views about climate change. If it helps air quality to join it to climate change plans then I would agree.	Noted
35	Jacqueline Medcroft	Q3	Support with Conditions	Air quality should be the priority as this is killing residents. Climate change is generally a longer strategy.	Air quality is being given a high priority by the Council, but as remarked reducing the impact of climate change needs long term action from now onwards. Furthermore, the Council acknowledges alongside political, scientific and even economic consensus that climate change is emerging as one of the major challenges and one of the biggest health threats of the 21st century. Therefore, it is committed to taking action and supporting our residents to adapt to the impacts of climate change and extreme weather events.
36	Sam Garbett	Q3	Support	An example of when separating climate change and air quality hasn't worked is in movement away from petrol engines to diesel engines in cars/taxis. Diesel is less polluting in regards to greenhouse gases and climate change (less CO2) but the increase in diesel use has been a public health disaster in terms of air quality. Climate change is still a difficult issue to convey and in encouraging behaviour change. Air pollution is a more immediate and potent reality	Agreed and noted

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				and easier to convey, and hopefully by combining policies we can make progress on both.	
37	James Best	Q3	Support with Conditions	As long as climate change action (long term, universal) and air quality action (short-term, local) do not get in each others' way and slow down the latter, then it must be right to combine.	Noted
38	x	Q3	Support with Conditions	I agree that action has to be taken to slow down the effect the industrial society has on climate and air quality. I however do not think the general public, i.e. the poorest should fit the bill, but rather those that have profited, even if through generations from this pollution.	Noted The Council generally supports the Polluter Pays principle. Furthermore, the Council is committed to helping and providing support to vulnerable people.
39	Mrs. J. Heffron	Q3	Objection	I attended one of the public sessions (Oct 6, Brompton Lib) and came away feeling as follows: London air pollution is a specific known problem that must be solved. It stands on its own. It does not need to be allied with any other issue and doing so might dilute, delay or even derail the whole effort. I am not expert on either but there may be no good to come of linking this specific problem and its handling, treatment and resolution with the far wider issue of climate control.	We are unable to accept this argument. The programmes to deal with the two issues are not in conflict and by working together we can more effectively tackle the emission sources, which are the same.
40	Ahmed Ali	Q3	Objection	I believe these should stay as they are at the moment. Meaning not to join them together.	We do not agree with this view. The programmes to deal with the two issues are not in conflict and by working together we can more effectively tackle the emission sources, which are the same.
41	Sophie Rollo	Q3	Support with Conditions	I think both climate change and air quality are important issues, but I feel air quality is the more important issue at this stage.	Air quality is being given a high priority by the Council, but as remarked reducing the impact of climate change needs long term action from now onwards.
42	None Given	Q3	Support with Conditions	Important thing is to have clear and strong action to improve air quality and reduce damaging emissions.	Noted

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				No view as to best way to do that re policy although logic says they should complement not contradict and if resources are limited best to pool them.	
43	None Given	Q3	Support with Conditions	Improving air quality (and noise pollution) should be the priorities although climate change should be part of public policies.	Air quality is being given a high priority by the Council, as is noise pollution, but climate change needs long term measures from now onwards and by combining the actions we make more effective use of resources with a focus on the same emission sources.
44	Mary Bakker-Cole	Q3	Support with Conditions	Reducing emissions will clarify the air we are breathing, and a diesel car ban would be a great start. People are concerned about where they can plug in electric cars, and this issue needs to be addressed, suppose you live in a flat? Or can't find a parking space outside your house? That is a tricky one.	We do not have the legal powers or the enforcement capabilities to ban vehicles from using our roads, on the basis of their fuel type. However we have restated our position to TFL that we would like them to investigate including the Royal Borough in the proposed ULEZ area from the start. We aim to install 12 additional on-street electric vehicle charging points by 2016. In choosing suitable locations, our considerations include existing demand, current parking occupancy levels and network spread – so all areas of the borough are covered.
45	Mr Andy Almond	Q3	Support with Conditions	Seems very sensible to combine the two. However you must be careful that the serious local issues of air quality (lack of it) is not diluted by the wider issue of climate change, which tend to be linked to global issues.	Air quality is being given a high priority by the Council, but climate change needs long term measures from now onwards and by combining the actions we make more effective use of resources with a focus on the same emission sources.
46	P Cramer	Q3	Objection	They should be separate issues although there is some relation between them.	We do not agree with this view. By working on them together we can more effectively tackle the emission sources, which are the same.
47	Anthony Walker	Q3	Support with Conditions	We consider that there is a considerable overlap between the two subjects and that they would benefit from a co-ordinated approach. We are however concerned that this does not diminish	Noted. With regard to noise and light pollution we have a Noise and Nuisance Team that also operates outside office hours.

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				attention on other forms of pollution such as light and noise which we consider are also of importance.	
48	Frederick Smith	Q3	Support with Conditions	With Air Quality and Climate Change, one cannot be played off against the other. We need clean and genuinely sustainable transport options like walking and cycling to be prioritised and public transport to be powered by electricity from renewable resources.	We carry out many projects and initiatives to encourage cycling, walking and the use of public transport over the private car. These include cycle training, Legible London wayfinding schemes and our network of 'Quietway' cycle routes.
49	James Best	Q7	Support with Conditions	Ambitious but necessarily so, given the priority of keeping our streets and homes healthy.	Noted. We share the concern about improving health inside and outside the home.
50	Mrs. J. Heffron	Q7	Support with Conditions	As noted above, I feel that to combine this issue with air pollution could be counterproductive. Also, as I commented at the public session, you make this process quite difficult for people, most of whom are working and have zero time for parsing back and forth through these copious documents. Suggest: state the situation with London air pollution. State your action plan. Keep it very short. Then think of the five or six or seven things you really want to know from the public and just ask those straight out with easy reply mechanism. No one has time for a question one place and searching back through documents to find what is being referred to in another.	<p>We do not agree with this view. By working on them together we can more effectively tackle the emission sources, which are the same.</p> <p>We note the suggestions on the consultation exercise and will bear them in mind for future consultations.</p>
51	Not Given	Q7	Support with Conditions	Generally, there are many good ideas, but more could be done to ensure some ideas are adopted. E.g. encouraging schools to have better travel plans, discouraging car owners from leaving their engines on while waiting, etc. Such issues need to be combined with better traffic enforcement.	<p>Noted – we already work closely with the borough's schools on travel planning to encourage school travel by active modes.</p> <p>We created an information leaflet which explains the problems surrounding idling engines and the penalties that can be enforced by Council officers. Officers conduct walkabouts of problem areas and interact with drivers who are deemed to be idling their engines unnecessarily.</p> <p>Virtually all drivers either turn off their engines or drive away, but officers will issue fixed penalty notice when they are met</p>

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					with a refusal to cooperate. The issue is also going to be raised as part of the promotion of school travel plans to prompt parents, who are still driving their children to school, to switch off their engines when they arrive at the school.
52	Janet Bagby	Q7	Support with Conditions	I do not see how traffic in the borough is being addressed. The Congestion Charge oddly helped reduce traffic in the Earls Court one-way system. Now such traffic is as bad as ever. Noise pollution exists alongside the air pollution which results from vehicles of all sizes virtually parked along the involved routes. It would be good to have continuous monitoring done on the air quality and on the traffic and on the noise. Such monitoring should be publicised and perhaps ongoing results made visible to residents and to drivers through the use of signage.	Noted. The Council employs a wide range of measures to reduce traffic levels in the borough. The Council does continuously monitor air quality with four of its five monitoring stations sited on or close to roads. The monitoring results are publicised on the Council's website, but we will give further thought to publication methods. The Council has no direct powers to reduce traffic noise and therefore does not routinely monitor it.
53	Niklas Ahman	Q7	Support with Conditions	I find the policies around cycling and car use 'tame'. There is a real opportunity to reduce the high level of air pollution from cars by doing everything possible to: 1. Encourage local residents to use public transport/cycle/walk. 2. Discourage people from coming to RBKC in cars. 3. Discourage people travelling through the area to other end destinations using cars. It would be a simple task to simply close 1/3 of all roads to cars and make them car free or only for local residents. There is no reason that we should have so many cars passing through the local area. Why is there such a priority that all roads are reserved for cars and there are barely any dedicated cycle roads. Is there a reason why a minority of commuters (cars) have domination of road use? Prioritize other transport methods by cutting out car filled roads.	1. We carry out many projects and initiatives to encourage cycling, walking and the use of public transport over the private car. These include cycle training, Legible London wayfinding and our network of 'Quietway' cycle routes. 2. Our parking policies deter people commuting by car into the borough by car. The whole borough is a controlled parking zone, and the vast majority of visitor bays have a maximum stay of no more than four hours. 3. This would not be practical or effective as it would most likely displace traffic and the associated emissions to other roads. It would certainly not be a simple task.

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54	Sam Garbett	Q7	Support with Conditions	Not enough focus on regulation (law change) and using lobbying and partnerships. Appreciate that the council only has certain tools and certain competences and much has to come from central government but plans need to be more far reaching.	The Council regularly lobbies Government urging it to increase action on air pollution and climate change, most recently in response to Defra's September proposals to meet the nitrogen dioxide objectives. The dynamic nature of the Council's Plan is intended to facilitate the addition of further plans and expansion of those that are successful.
55	Sam Garbett	Q7	Support	Good to see that tackling fuel poverty and improving quality of council homes are included in 5. Objectives.	Noted.
56	x	Q7	Other	Policy is one thing, but there is neither the will of the real polluters or the clout of enforcement agencies to reign in any other than the lowest common denominator.	Progress has been made in tackling emissions of both air pollutants and greenhouse gases, as referred to in the technical appendices. We accept that much more needs to be achieved, and this may now be spurred on by the threat of fines imposed by the EU.
57	Ken Macdonald	Q7	Objection	The council should not waste time with policies about climate change. They should concentrate entirely on improving the air we breathe, especially for those of us that live near the Westway. Reducing CO2 emissions, the crux of climate change policy, will do nothing to achieve this.	Air quality is being given a high priority by the Council, but climate change needs long term measures from now onwards and by combining the actions we make more effective use of resources with a focus on the same emission sources. According to the latest carbon footprint data published by the Department of Energy and Climate Change in June 2015, the carbon emissions per capita in RBKC are the third highest in Greater London after the City and Westminster. Therefore, the Council is committed to reduce both borough-wide and in-house carbon emissions.
58	Gideon Nellen	Q7	Support with Conditions	The objectives seem fairly modest and given the urgency of the issue, and the likelihood of the objectives not being met, I feel that the objectives could be more ambitious.	Inevitably the Council must work within the scope of its powers and its locality. At the same time, the Council regularly lobbies Government urging it to increase action on air pollution and climate change, most recently in response to Defra's September proposals to meet the nitrogen dioxide objectives. The Objectives are intentionally broad to ensure that a wide

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					range of actions may be applied. As the Action Plan is live, new actions may be applied to tackle issues as they are identified or when solutions become available.
59	Jacqueline Medcroft	Q7	Support with Conditions	The policies to reduce air pollution do not go far enough. How about a segregated cycle lane in Kensington high street and Notting Hill Gate? Larger increases for diesel vehicles in parking permits. More electric charges points than proposed.	<p>While segregated cycle lanes might encourage more people to cycle along that route, the experience of the East-West Superhighway suggests that such lanes would reduce traffic capacity and increase congestion – with negative impacts on air quality.</p> <p>We introduced the diesel surcharge in 2008 and it currently stands at £19. We plan to increase it to £40 in 2016 and remove the exemption for Euro 5 diesel vehicles in 2017. The surcharge is not intended to price people out of diesel cars, but to give a clear signal that the Council wishes residents to choose non-diesel cars.</p> <p>We aim to install 12 additional on-street electric vehicle charging points by 2016. This will give a reasonable geographical coverage across the borough. We will review their use before committing to any additional charging points.</p>
60	Jacqueline Medcroft	Q7	Observation	What progress has been made since the last policy dated 2008-2015? Air quality has worsened not improved since then.	<p>Progress has been made in tackling emissions of both air pollutants and greenhouse gases, as referred to in the technical appendices. The Council prepares annual reports on this progress for Defra which is available on our website. We accept that much more needs to be achieved, and this may now be spurred on by the threat of fines imposed by the EU.</p> <p>The Council also publishes an annual Carbon Performance Report, and in 2014/15 the Council managed to reduce the carbon emissions from its own operations and buildings by 26.8 per cent (or 28.3 per cent when data is weather corrected) compared to 2007/08.</p>
61	Jacqueline	Q7	Observation	Nothing has been done to prevent engine idling- I	We created an information leaflet and the information is

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	Medcroft			see it every day in th borough and no one does anything to stop it.	<p>accessible on the council website. This leaflet is distributed to drivers in problem locations such as South Kensington and Knightsbridge. The leaflet explains the problems surrounding idling engines and the penalties that can be enforced by Council officers. Officers conduct walkabouts of problem areas and interact with drivers who are deemed to be idling their engines unnecessarily.</p> <p>Virtually all drivers either turn off their engines or drive away, but officers will issue fixed penalty notice when they are met with a refusal to cooperate.</p> <p>The issue is also going to be raised as part of the promotion of school travel plans to prompt parents, who are still driving their children to school, to switch off their engines when they arrive at the school.</p>
62	Frederick Smith	Q7	Support with Conditions	<p>These measures are insufficient to provide clean air in RBKC. Much more must be done to address emissions from vehicles and this should include pedestrianising streets, building cycle lanes and reducing car parking to get people out of their cars.</p>	<p>The most polluted roads are generally the most difficult to pedestrianise, as by their nature they tend to carry the highest volumes of traffic.</p> <p>Pedestrianising such streets would most likely displace traffic and the associated emissions to other roads. We are introducing a comprehensive network of Quietway cycle routes on our backstreets and avoiding the main roads for less confident cyclists. Our parking policies and parking standards for new developments are all aimed at discouraging car use. The number of visitor parking bays on street has reduced by 419 over the past five years, as the Council has provided alternative uses such as cycle hire docking stations.</p>
63	David B Taylor	Q7	Observation	<p>Totally inadequate as usual from your committee and so called environmental dept boffins. Your pissing into the wind with these inadequate laws, you really need to wake up!</p>	<p>Criticism noted but not accepted. The Action Plan is substantial and lends itself to more measures to be added as the Action Plan itself is a live document.</p>
64	Anthony Walker	Q7	Support with conditions	<p>We agree with the objectives provided that a flexible approach is adopted which allows priorities to change as information emerges. For</p>	<p>The aims and objectives will remain constant for the duration of the Plan. However there is flexibility to alter the emphasis of the actions and add specific measures as circumstances</p>

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				example, the recent disclosure that car emission figures cannot be trusted places a greater emphasis on traffic for the time being but that may change over the next twelve months.	change.
65	Anthony Walker	Q7	Support with Conditions	The opinion from Robert McCracken QC for Clean Air in London suggests that more can be done through the planning system and although planning are entitled to rely on other departments such as environmental health they do not have to do so. We therefore consider more weight should be given to the risks of pollution in the planning process particularly as we are in a Borough where the EU limits are regularly exceeded.	<p>The Council's existing Local Plan<https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan> Policy CE5 Air Quality alongside its Air Quality Supplementary Planning Document (SPD)<https://www.rbkc.gov.uk/planning-and-building-control/planning-policy/supplementary-planning/air-quality-spd> already sets out some detailed requirements for new developments regarding air quality.</p> <p>The Council has also produced a Code of Construction Practice which may have a wider positive impact on air quality. We are not certain from the comments what additional measures are being suggested to be taken forward through the planning process.</p> <p>The Council's Local Plan Policy CE1 on Climate Change, which seeks to reduce carbon dioxide emissions, will at the same time help to reduce air pollutant emissions. This is also true of the London Plan as it applies to the Council's development plan.</p> <p>The Council's existing Local Plan Policy CT1 requires new development to be 'permit free' i.e. there is no residents parking permit for on-street parking. This serves to manage the pressure on on-street parking as well as to discourage car use.</p>
66	Janet Bagby	Q10	Observation	Again, traffic needs to be addressed urgently!	Noted
67	Niklas Ahman	Q10	Observation	Be bold and do more!	Inevitably the Council must work within the scope of its powers and its locality. At the same time The Council regularly lobbies Government urging it to increase action on air pollution and

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					climate change (most recently in response to Defra's latest proposals).
68	Ken Macdonald	Q10	Objection	Forget about reducing CO2 which is harmless to humans when breathed. Concentrate on reducing emissions we know are harmful when breathed by humans.	We do not agree with this view. By working on them together we can more effectively tackle the emission sources, which are the same. Both poor air quality and climate change have a direct impact on the health and well-being of humans and the natural environment.
69	Gideon Nellen	Q10	Support with conditions	I suggest that the actions could, in case of vehicle emissions be strengthened. E.g. the cost of residents' permits could be significantly increased, particularly for second permits.	We introduced the diesel surcharge in 2008 and it currently stands at £19. We plan to increase it to £40 in 2016 and remove the exemption for Euro 5 diesel vehicles in 2017. The surcharge is not intended to price people out of diesel cars, but to give a clear signal that the Council wishes residents to choose non-diesel cars. We already charge a £67 supplement for second or subsequent resident parking permits.
70	David B Taylor	Q10	Objection	Inadequate!	Noted. Without knowing in which respects the responder regards the Plan as inadequate we are unable to comment further.
71		Q10	Observation	Introducing times during the day when no cars are allowed on to main roads to reduce traffic and car trips - particularly during school run times and on football match days. Using traffic enforcement to encourage shifts in behaviour.	This would not be practical or effective as it would most likely displace traffic and the associated emissions to other roads. By diverting heavy traffic flows onto the local road network, we would risk increasing congestion at junctions, creating new pollution hotspots.
72	Anthony Walker	Q10	Observation	Now that basements are restricted to less than 50% of a garden the planners should actively encourage by providing links to relevant sites allowance for trees and other suitable green planting.	The 50% limit is to ensure amongst other things that enough open space remains undeveloped to enable natural planting. Similar comments have been made in response to consultations on the basements policy. The Council maintains its previous response that it cannot condition landscaping for (relatively) small domestic gardens as such conditions will not be enforceable (one of the key tests for valid planning conditions). This was part of the reasoning behind the 50% restriction.

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73	Anthony Walker	Q10	Support with conditions	We have found that many drivers of vehicles parked with engines running are very willing to switch them off. We consider that there needs to be more of a publicity campaign to encourage them to do so. Particularly around shopping areas where cars come and go frequently and where a leaflet under the windscreen wiper campaign might be effective.	<p>We are looking closely at new ways to discourage engine idling, and it is likely that in this respect measures will be added to the Plan once it is launched.</p> <p>We created an information leaflet and the information is accessible on the council website. This leaflet is distributed to drivers in problem locations such as South Kensington and Knightsbridge. The leaflet explains the problems surrounding idling engines and the penalties that can be enforced by Council officers.</p> <p>Officers conduct walkabouts of problem areas and interact with drivers who are deemed to be idling their engines unnecessarily.</p> <p>Virtually all drivers either turn off their engines or drive away, but officers will issue fixed penalty notice when they are met with a refusal to cooperate.</p> <p>The issue is also going to be raised as part of the promotion of school travel plans to prompt parents, who are still driving their children to school, to switch off their engines when they arrive at the school.</p>
74	Mrs. J. Heffron	Q10	Other	See my prior comment. State the actions here. Don't ask people to go back and hunt through verbiage to find what you are referring to.	We are not certain where the perceived problem lies. We deliberately relegated most of the facts and figures into appendices to simplify the text supporting the actions.
75	Frederick Smith	Q10	Support with conditions	The proposed on street measures are far too weak and will still leave a road network here where motor vehicles are prioritised 95% of the time. In addition to items 43-45, you need to be improving existing cycle provision, upgrading advisory cycle lanes to mandatory wherever possible and increasing their width to 2m to allow cargo bikes, overtaking and people to cycle safely with kids. Safety concerns are the number one thing stopping people taking up cycling; RBKC should be pushing for CLOCS to be used on all construction contracts within the borough via	<p>Motor vehicles are not prioritised over other vehicles. Where we have cycle lanes we will review their width, but in general we find that where lanes would have greatest value, e.g. busy shopping streets, they would also be in conflict with other kerbside functions, such as servicing activity and bus stops.</p> <p>We are introducing a comprehensive network of Quietway cycle routes on our backstreets and avoiding the main roads for less confident cyclists.</p> <p>Planning to comment on our position regarding developers and</p>

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				planning and should implement it for all their construction contracts. RBKC should also lobby the mayor for CIRAS to be made available to all TfL contracted buses and also implement it for RBKC's own fleet of vehicles.	the Construction Logistics and Cycle Safety (CLOCS) and Confidential Incident Reporting & Analysis System (CIRAS) initiatives.
76	Jacqueline Medcroft	Q10	Other	They do not go far enough.	Inevitably the Council must work within the scope of its powers and its locality. At the same time The Council regularly lobbys Government urging it to increase action on air pollution and climate change, most recently in response to Defra's September proposals to meet the nitrogen dioxide objectives.
77	Janet Bagby	Q11	Observation	Again, pay attention to the traffic, particularly in the Earls Court one way system.	Noted, but no specific suggestion for reducing traffic is made - the Earl's Court one-way system is part of the Transport for London Road Network.
78	Niklas Ahman	Q11	Support with conditions	Be bold do more, spend the money required. The long term health costs of the pollution will be higher than a bit of investment today to improve the situation.	We agree with this comment although expenditure must always remain within the available budgets.
79	Anthony Walker	Q11	Observation	From consultation with the ESSA (Edwardes Square Scarsdale and Abingdon Association) Trustees we would like to stress how important the residents of the area consider pollution to be. We consider that Councillors need to be aware how significant it is and engage more with the community in raising awareness. The workshop we attended as part of this consultation only had four attendees. Why was this? Should dissemination of information take place through local societies?	The Council fully shares the Association's view of the serious health threat posed by air pollution. We were also disappointed by the numbers attending the consultation meetings and will be seeking new ways to engage residents and the public in improving air quality.
80	Sam Garbett	Q11	Support	Good luck. It's the challenge of our time.	Noted
81	Michael Stock	Q11	Support	Good plans overall - especially pleased with the great variety of useful actions including pushing	Noted

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				for RBKC to be included in the ULEZ and good to see walking and cycling now given the priority needed.	
82	Michael Stock	Q11	Observation	I may have missed it but I could not see any proposals for Planning to be more supportive of eco-retrofit projects such as external wall insulation and solar panels etc.	<p>The Council has an existing Local Plan Policy CE1 (c): Climate Change that promotes a hierarchical approach for new development to use and require energy efficient building design, construction and materials, use of passive design, natural heating and ventilation. For suitable large scale schemes encourage district heating systems (such as in the Worlington Green scheme and Earl's Court redevelopment) and promote on-site renewable and low carbon energy sources.</p> <p>In terms of identifying large scale retrofit projects the Council is limited by the Borough's character comprising an extensive historic environment with almost 75% of the Borough within conservation areas, and about 4,000 listed buildings. Whilst the Council supports upgrading buildings with renewable sources of energy such as solar panels and fabric improvements, these need to be balanced with conservation issues. The Council determines each case on its merit and follows guidance in the National Planning Practice Guidance (NPPG) on this issue that "great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;"</p> <p>The London Plan is also part of the Council's development plan. The London Plan includes Policy 5.7: Renewable Energy. Part D. of this policy states "All renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets, and to avoid any adverse impacts on air quality."</p> <p>that could fit with this guidance and more options are likely to</p>

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					be made available to residents in the medium term.
83	Michael Stock	Q11	Observation	Generally I wonder if some of the targets could be more ambitious?	As the Plan develops we will be looking to see how actions can be enhanced.
84	Frederick Smith	Q11	Objection	I don't think this will achieve what is needed and by 2021 this is likely to be superseded by events. I think a more ambitious plan is needed to avoid the council ending up on the back foot needing to revisit a plan and react to events and public pressure.	In most areas the Council on its own is limited in what it can achieve and is dependent on the Government and the Mayor of London to introduce significant interventions to slow down climate change and improve air quality. However there is scope in the design of the Action Plan to alter the emphasis of individual plans and add additional measures in response to changing circumstances.
85	Enrica Groeller	Q11	Support with conditions	I think air quality in the borough is extremely important issue that has to be addressed more urgently than done so far!	Noted. Progress has been made in tackling emissions of both air pollutants and greenhouse gases, as referred to in the technical appendices. We accept that much more needs to be achieved, and this may now be spurred on by the threat of fines imposed by the EU.
86	Sophie Rollo	Q11	Support with conditions	I think both climate change and air quality are important issues, but one of my main gripes with living in London is poor air quality. As a mother of four, I would be very supportive of the council acting drastically to reduce pollution. I think there should be huge incentives for people to use public transport and also to drive 'cleaner' cars. Also there should be penalties for drivers who sit in their cars/lorries/buses with their engines running. We have a yellow line outside our house and it seems to attract people who stop there for extended periods of time leaving their engine running. Also the amount of traffic needs to be dramatically reduced. Schools should be advised to accept local children rather than children who are driven to school by car every day. This would improve traffic, safety and pollution and give schools a greater sense of being in a community.	<p>Our graduated resident parking permit scheme and the associated surcharge for older diesel vehicles encourages the take up of cleaner vehicles. We introduced the diesel surcharge in 2008 and it currently stands at £19. We plan to increase it to £40 in 2016 and remove the exemption for Euro 5 diesel vehicles in 2017.</p> <p>We work closely with the borough's schools on travel planning to encourage school travel by active modes.</p> <p>The Council must comply with the government's policies and guidance with regard to the catchments within which schools accept children.</p> <p>We created an information leaflet and the information is accessible on the council website. This leaflet is distributed to drivers in problem locations such as South Kensington and Knightsbridge. The leaflet explains the problems surrounding</p>

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					<p>idling engines and the penalties that can be enforced by Council officers. Officers conduct walkabouts of problem areas and interact with drivers who are deemed to be idling their engines unnecessarily.</p> <p>Virtually all drivers either turn off their engines or drive away, but officers will issue fixed penalty notice when they are met with a refusal to cooperate.</p> <p>The issue is also going to be raised as part of the promotion of school travel plans to prompt parents, who are still driving their children to school, to switch off their engines when they arrive at the school.</p>
87	Andrea Walker	Q11	Support	It is vitally important and it must be carried out with close attention.	This support is welcome and the Council is giving air quality improvement a high priority. It is equally concerned about reducing the impacts of climate change.
88	x	Q11	Objection	Not nearly draconian enough and the real offenders will just flout policy as always as they know they can.	In most areas the Council on its own is limited in what it can achieve and is dependent on the Government and the Mayor of London to introduce significant interventions to slow down climate change and improve air quality.
89	Ken Macdonald	Q11	Objection	Please do not dilute work to improve air quality with the distraction of reducing harmless CO2. I know some people believe CO2 will heat up the Earth. Perhaps this is true. If it is, anything we do in RBKC will have no impact with the huge increases in CO2 emissions we can confidently expect in coming years from the likes of China and India. If you do decide to go down the CO2 reduction path using council taxpayers' money, you should declare how much your actions will cost and how much they will reduce the Earth's temperature in 10 years, 20 years and 50 years.	The Council recognises the general scientific consensus that climate change is happening, that human activity is contributing to it significantly and that it has potentially damaging environmental, social and economic impacts.
90	David B Taylor	Q11	Objection	Please rethink your whole attitude to life on this planet and city and you might make life more tolerable for us all, your present ideas are weak	In most areas the Council on its own is limited in what it can achieve and is dependent on working with the Government and the Mayor of London to introduce significant interventions to

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				and don't go far enough. People are dying because your laws and ideas are too weak!	slow down climate change and improve air quality.
91	Mr Andy almond	Q11	Oservation	The aims are the easy part it is the implementation. The only sensible way to get more people to cycle is to provide safe segregated cycle lanes, such as the ones being built in Central London. Anything else will always be a compromise. There is no way on God's earth I would wish any children I know to cycle in streets within RBKC as a way of getting to and from School. This is a tragic state of affairs when we value cars and trucks ability to get from A to B more than kids on bikes. There needs also to be better action against TFL when they fail to maintain their roads to the same standards as RBKC. How badly maintained roads are able to exist in RBKC TFL controlled roads? Does RBKC not have the power to recharge TFL for works to maintain red routes that the fail to do?	<p>The growth in popularity of cycling over recent years shows that segregated cycle lanes are not a prerequisite for modal shift to cycling. TfL's own traffic forecasts show that segregated lanes are likely to increase congestion across a wide area. This is likely to have negative consequence for air quality. While segregated cycle lanes will be attractive to many potential cyclists, we do not agree that anything else, such as our Quietway cycle routes, are a compromise.</p> <p>TfL is the highway authority for Red Routes and is solely responsible for maintaining them. If you have specific examples of poorly maintained Red Routes we would be happy to draw them to TfL's attention.</p>
92	Jacqueline Medcroft	Q11	Observation	The council must do more.	In most areas the Council on its own is limited in what it can achieve and is dependent on working with the Government and the Mayor of London to introduce significant interventions to slow down climate change and improve air quality. Also, as the Action Plan is live, new actions may be applied to tackle issues as they are identified or when solutions become available.
93	Gideon Nellen	Q11	Support with conditions	The policies and objectives are welcome but I feel could be strengthened given the significance of the risk. The impact of a third runway should be considered and opposed on air quality and environmental grounds.	Support for the policy and objectives is welcome and the Council shares the view that the risks are very significant. However In most areas the Council on its own is limited in what it can achieve and is dependent on working with the Government and the Mayor of London to introduce significant interventions to slow down climate change and improve air quality.
94	Ariane	Q11	Observation	What is the Councils policy on the conversion to	The Council has an existing Local Plan Policy CE1 (c): Climate

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	Braillard and Francesco Cincotta			<p>sustainable energy, such as solar or wind energy, on listed or historical buildings? I am thinking specifically of situations where solar panels would need to replace some off tiles.</p>	<p>Change that promotes a hierarchical approach for new development to use and require energy efficient building design, construction and materials, use of passive design, natural heating and ventilation. For suitable large scale schemes we encourage district heating systems (such as in the Wornington Green scheme and Earl's Court redevelopment) and promote on-site renewable and low carbon energy sources.</p> <p>The issue of conversion to sustainable energy, such as solar or wind energy, on listed or historical buildings is very relevant to this Borough as it is characterised by extensive historic environment with almost 75% of the Borough within conservation areas, and about 4,000 listed buildings. Whilst the Council is supportive of upgrading buildings with renewable sources of energy such as solar panels and fabric improvements, these need to be balanced with conservation issues. The Council determines each case on its merits and follows guidance in the National Planning Practice Guidance (NPPG) on this issue that "great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;"</p> <p>The London Plan is also part of the Council's development plan. The London Plan includes Policy 5.7: Renewable Energy. Part D. of this policy states "All renewable energy systems should be located and designed to minimise any potential adverse impacts on biodiversity, the natural environment and historical assets, and to avoid any adverse impacts on air quality."</p> <p>However, the Council is constantly looking at new technologies that could fit with this guidance and more options are likely to be made available to residents in the medium term.</p>

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95	GLA/TFL	Action Plan/PH	Support	It's great that the plan includes a foreword from the Cabinet Member for public health as well as environment. This is a best practice approach.	Noted
96	GLA/TFL	Action Plan	Support	The introduction on health impacts is very strong and well worded.	Noted - since our last Action Plan much more evidence of health damage from air pollution and climate change has emerged.
97	GLA/TFL	Action Plan	Support	It's very positive that the action section will be a living document - we support that approach, which is in line with the new London Local Air Quality Management proposals.	Noted
98	GLA/TFL	Wood burning stoves	Support	Action 9 on wood burning stoves is interesting; we would very much like to see any measurable outcomes from this project, please do keep us informed.	Noted. For the time being this is aimed at open hearths rather than wood stoves. Initially we should concentrate on a publicity drive.
99	GLA/TFL	Emissions/pollution	Support	Action 27: it's excellent to see a specific action around dust and emissions and NRMM. As this is such a major source of emissions in London we are really relying on borough support and commitment to help enforce the NRMM LEE.	Noted
100	GLA/TFL	Fleet/transport	Support	Actions 32-33: we welcome RBKC's review of fleet and encourage their participation in TfL's forthcoming Low Emission Commercial Fleet programme, which will help to provide guidance to fleet operators.	Noted. This will need significant coordination between the various departments involved. Noted
101	GLA/TFL	ULEZ	Support with conditions	Action 75: whilst we are open to an increase in the size of the ULEZ, we do not believe that aligning the scheme boundaries with administrative boundaries is a practical solution. TfL are discussing potential options for the future of the London-wide Low Emission Zone (LEZ) and the ULEZ with boroughs. We would welcome	Noted, but if the NO2 objective is to be met before 2025, the proposed ULEZ and probably the LEZ will need to be stricter. we are engaging with TfL on its 'Expanding ULEZ or Tightening LEZ' project.

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				further engagement with RBKC on this. Any alteration to the proposed ULEZ would be subject to full feasibility testing and public consultation.	
102	GLA/TFL	ULEZ	Objection	Action 81: taxis are subject to a 15 year age limit. As part of the ULEZ TfL will be operating a voluntary decommissioning scheme for taxis over the age of 10 years, which will include most Euro 3 Taxis. This scheme will be introduced when the zero emission capable taxis become commercially available (2018 at the latest). We consider that encouraging early removal of the Euro 3 vehicles from the fleet will be more effective in reducing CO2 and air pollutants than retrofitting older vehicles and would also help stimulate the uptake of the new Zero Emission Capable taxis. A Euro 3 DPF retrofit scheme is likely to discourage drivers from decommissioning their vehicles, due to the initial investment in the retrofit. As such we would not recommend pursuing a Euro 3 diesel particulate filter retrofit policy.	Noted. Perhaps as an alternative we should lobby for the 10 year voluntary decommissioning scheme to be mandatory as originally proposed
103	GLA/TFL	Transport	Objection	Action 82: taxi drivers are required to undertake a Driving Standards Agency assessment which includes elements of eco-driving. TfL has promoted additional eco-driving training for taxi and PHV drivers through trials in 2011-12 and 2012-13.	We welcome this TfL initiative and would like to see it rolled out further.
104	PHE	Adverse impact	Observation	Sealing buildings to increase their energy efficiency could lead to increased exposure to indoor pollution unless ventilation control is simultaneously improved.	Fair comment and we will ensure that comprehensive advice is available including ventilation requirements.
105	Labour Group	Air pollution	Observation	Particular concerns from our residents over the impact of pollution from the A40 flyover.	The Council is very concerned about all roads in the borough where high concentrations of air pollutants occur, and our planned actions take into account these hotspots.

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106	Labour Group	generic	Support with conditions	Welcome emphases of the plan. However we also believe that the Draft Plan needs to be made more robust to reflect the real urgency.	Fair comment, but to a large extent we are dependent on central government and the Mayor of London for measures that will enable a more robust approach.
107	Labour Group	Carbon emissions	Observation	In the borough carbon emissions have increased by 8% since 2005 whilst they have decreased by an average of 18.8% elsewhere in London.	The latest estimations of carbon dioxide emissions for Local Authorities for 2005-2013 published by the Department of Energy and Climate Change (DECC) in June 2015 shows a decrease in 2013 for RBKC in both borough-wide carbon emissions and emissions per capita. We will be using the DECC' new data for 2013 to update our Technical Appendices.
108	Labour Group	generic	Support	The integration into a joint plan of our targets for improving air quality and mitigating climate change. Such joined up thinking is necessary and overdue.	Noted
109	Labour Group	generic	Support	The stress in the Draft Plan on the need to tackle these environmental issues for reasons of public health. It is good to see a joint forward to the document from both Cllr Ahern, The Cabinet Member for Environment, Environmental Health and Leisure and Cllr Weale, the Cabinet Member for Adult and Social Care and Public Health.	Noted. The Council is determined to take a "joined up" approach to this multi-faceted issue.
110	Labour Group	AQ	Support	Welcome Discouragement of burning of logs and house coal.	Initially we shall be concentrating on a publicity drive.
111	Labour Group	Housing	Support	Welcome Support for vulnerable residents to reduce energy consumption and bills.	Noted, this is being given priority.
112	Labour	Housing	Support	Welcome Installation of ultra-low NOX boilers in	Noted

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	Group			Council housing.	
113	Labour Group	Housing	Support	Welcome Raising awareness on air quality & climate change issues amongst council tenants.	Noted
114	Labour Group	Transport	Support	Welcome Improving walking & cycling access to White City.	The Council's existing Local Plan sets out a Key Diagram, Infrastructure Schedule and Policy CV9 (also see paragraphs 8.1.11 / 8.3.7) which supports better connections and legibility between the Borough and White City.
115	Labour Group	Transport	Support	Welcome Increasing public awareness of vehicle emission controls.	Noted
116	Labour Group	Transport	Support	Welcome Increasing public awareness to reduce engine idling.	<p>Noted, more details of awareness raising initiatives will be available once the plan is worked up</p> <p>We created an information leaflet and the information is accessible on the council website. This leaflet is distributed to drivers in problem locations such as South Kensington and Knightsbridge. The leaflet explains the problems surrounding idling engines and the penalties that can be enforced by Council officers. Officers conduct walkabouts of problem areas and interact with drivers who are deemed to be idling their engines unnecessarily.</p> <p>Virtually all drivers either turn off their engines or drive away, but officers will issue fixed penalty notice when they are met with a refusal to cooperate.</p> <p>The issue is also raised as part of the promotion of school travel plans to prompt parents to switch off who are still driving their children to school.</p>
117	Labour Group	Transport	Support	Welcome Encouraging residents to choose low emission vehicles by raising diesel surcharge.	Noted

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118	Labour Group	Transport	Support	Welcome Increasing on-street charging points for electric vehicles.	Noted
119	Labour Group	Transport	Support	Welcome Encouraging car clubs to go electric.	Noted
120	Labour Group	generic	Observation	the Plan must be clearer that the Environmental and Public Health gains are its main aims.	We feel that the joint foreword by the Cabinet Members underlines the environmental and public health aims, but we will look again at the wording.
121	Labour Group	generic	Observation	Public Health and environmental gains that are the main objectives of the Action Plan, above the need "to minimise any financial risk.	We feel that the joint foreword by the Cabinet Members underlines the environmental and public health aims, but we will look again at the wording.
122	Labour Group	Air quality	Observation	Since both the GLA and Defra have written to the Council asking us to deal with our non-compliance with annual air pollution targets, we need urgently to create a robust, and effective Plan that proves that we aren't wilfully neglecting to take the necessary action, and thereby save us from being fined.	In fact it is Defra and the Mayor of London that can do most in the short term to avoid EU fines. In implementing this plan The Council will be striving to achieve the most it can within the powers currently available.
123	Labour Group	Generic	Observation	The proposed Action Plan is too similar to and does not sufficiently improve the previous 2009-2014 Action Plan.	There are bound to be similarities with the previous Plan, because actions that proved to be effective are worth continuing. In other respects it is different in that it is combined with climate change, and is 'dynamic' in that the aims and objectives will remain the same but the actions once achieved will be replaced by new measures. It is the first time that climate change has a formalised action plan.
124	Labour Group	Monitoring	Observation	In the Draft Action Plan, there is no assessment, from monitoring stations and other local sources, describing what the Borough's annual pollution map looks like. Nor is this then linked to adequate and substantial measures that are necessary to meet the gravity of the situation.	The draft Action Plan is accompanied by technical appendices, one of which (Appendix IV pp 11-18) sets out the current pollution situation with monitoring data and also shows this on a map.

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125	Labour Group	generic	Observation	Two of the areas identified in the plan, Transport and Greening Measures need to be taken together and integrated further into an overall vision to create a borough in which we have Living Streets and Active People.	In implementing the Plan measures that are linked will be coordinated. Noted. We incorporate sustainable drainage and tree-planting into our transport and public realm improvements where appropriate and practical.
126	Labour Group	Transport	Observation	The main aim of reducing levels of motor traffic and increasing walking and cycling is absolutely essential.	Noted
127	Labour Group	Greening measures	Observation	The installation of further greening measures and the creation of healthy outdoor spaces and green infrastructure, as outlined in the Plan, are also absolutely essential to getting people on their feet and on their bikes.	We share this view but with regard to cycling safety and highway provisions are equally important.
128	Labour Group	Greening measures	Support with conditions	Members of the Public Realm Scrutiny Committee were able to read the extremely positive results on the impact on air quality of the erection of a green screen at St Cuthbert and St Matthias's School. This wonderful project needs to be replicated both urgently and extensively, not only in places where our children are educated, but throughout the borough, and especially near the most polluted roads.	Green screens undoubtedly have air quality, educational and awareness raising benefits. However the cost effectiveness of expanding the project has to be compared to other measures such as installing air filtration for school accommodation.
129	Labour Group	Public health	Observation	New action suggested: the overall vision of <i>Living Streets and Active People</i> be introduced to give the aims clarity and direction.	This can be considered once the Plan is launched.
130	Labour Group	Public health	Observation	New action suggested: awareness be raised of <i>indoor</i> air quality, and how residents can monitor and address that.	The Plan already has actions (3 and 6) to address indoor smoking quality. However other harmful air pollutants are also a concern of Public Health England and we will look to see what can be added in future to this Live plan.
131	Labour	Buildings	Observation	New action suggested:	Noted. The Council's existing Local Plan Policy CE1(c)

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	Group	and New Developments		Require all Council developments to install individual renewable energy generation, and to require this via the Planning process in all private Borough developments.	requires a hierarchical approach for all new developments and not just Council developments (which would also be covered). This includes at CE1(c) (iii) <i>"on-site renewable and low-carbon energy sources."</i>
132	Labour Group	Buildings and New Developments	Observation	New action suggested: Require, as part of the planning process, that green roofs and walls be incorporated into every major development.	<p>The Council's existing Local Plan Policy CE1: Climate Changes seeks to reduce carbon dioxide emissions. It includes a hierarchical approach at CE1(c) which includes efficient building design, construction and materials, use of passive design, natural heating and ventilation. For suitable large scale schemes encourage district heating systems (such as in Wornington Green and Earl's Court redevelopment) and promote on-site renewable and low carbon energy sources.</p> <p>Green roofs can provide multiple benefits (water quality, reduction of surface water run-off, biodiversity etc.). They are considered as Sustainable Drainage Systems (SuDS) as they are able to attenuate surface water run-off Sustainable Drainage Systems are currently required in all development (not just major development)in-line with Local Plan Policy CE2: Flooding.</p> <p>Regarding Green Walls, they can also be considered SuDS but their uptake has not been very high in the borough. That could be due to different issues: maintenance, availability of a proper location within the development, appropriateness within the historic/conservation context, etc. They are dealt with on a case-by-case basis where proposed.</p> <p>The Council cannot require green roofs and green walls on all major developments as there are other means of achieving energy efficiency and reducing surface water run offs. Green roofs and green walls may not be suitable for each scheme and there can be different solutions to meet the Council's policies on Climate Change and Flooding.</p>
133	Labour Group	Transport	Observation	New action suggested: Prioritising the least polluting forms of transport by re-designing the	We carry out many projects and initiatives to encourage cycling, walking and the use of public transport over the private

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				Borough's road space to give priority to buses, cycling, disability vehicles, taxis, business vehicles and walking.	car. These include cycle training, pedestrian improvements and our network of 'Quietway' cycle routes. However, giving priority to some modes of travel implies giving less space to the others, which would most likely result in more congestion and pollution. Giving priority to diesel powered black cab taxis and business vehicles will not improve air quality.
134	Labour Group	Transport	Observation	New action suggested: Introducing a 20mph speed limit to create a more cycling and walking friendly environment.	Whilst 20 mph limits are one of the tools the GLA suggests as part of its air quality action planning toolkit, that same toolkit acknowledges that the direct impact of 20mph limits on air quality is negligible at best. Similarly there is currently no firm evidence to suggest that they encourage a switch to more active modes. Whilst we therefore have no current plans for a borough-wide 20 mph speed limit, we are participating in the Department for Transport research project as a borough without widespread 20 mph speed limits and await its results with interest. We will also continue to monitor the impact of other borough-wide 20 mph schemes in London.
135	Labour Group	Transport	Observation	New action suggested: Responding more positively to the Mayor of London's vision for dedicated cycling infrastructure by supporting the creation of Superhighways through the Borough.	One of the Council's concerns about a Cycle Superhighway along Kensington High Street was the impact that reducing the road from four lanes to two would have on traffic congestion, and therefore air quality. Tf's modelling outputs for its East-West superhighway have done nothing to suggest that the Council was wrong to have these concerns.
136	Labour Group	Transport	Observation	New action suggested: Introducing measures, via road design and traffic management, to limit through-traffic in the Borough.	Measures to limit through traffic would most likely simply displace it and the associated emissions to other roads without such measures.
137	Labour Group	Transport	Observation	New action suggested: Introducing on-road vehicle emissions testing for all vehicles, and especially for VW vehicles, banning vehicles that fail the manufacturers official exhaust emissions levels.	Vehicle emissions testing is much more effectively carried out by VOSPA the Government Agency that already carries out regular tests. However we are lobbying the Government (ref: response to Defra Consultation 12.9.15) to improve emission tests of new vehicles to properly reflect on-road conditions.

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138	Labour Group	Transport	Observation	New action suggested: Requiring council/Tri/Bi-Borough contractors, and their sub contractors, to only use vehicles that emit manufacturer-stated levels of pollutants from their exhausts.	This is best dealt with by central government – see recommendation above. More generally including environmental and health criteria into specifications for contracting out is an area of opportunity that the council will investigate further.
139	Labour Group	Greening measures	Observation	New action suggested: Raise the target for the installation of one green roof to 10 over the 5 year period. These could be on existing council and private properties and on new developments.	Noted. Very dependent on funding and resources available. From a cost / benefits perspective, new developments are the more suitable opportunities.
140	Labour Group	Greening measures	Observation	New action suggested: Install 25 more green screens over the 5 year period, like the successful scheme at St Cuthbert and St Matthias's School. These should target the most polluted areas and help the most vulnerable: The Westway, Cromwell Road, school sites for example.	Green screens undoubtedly have air quality, educational and awareness raising benefits. However the cost effectiveness of expanding the project has to be compared to other measures such as installing air filtration for school accommodation.
141	Labour Group	Lobbying	Observation	New action suggested: Affirm the Council's opposition to a third runway at Heathrow that would drastically increase pollution from approx 240,000 extra flights and a significant surface traffic increase.	Noted - we remain opposed to the expansion of Heathrow on environmental grounds.
142	Labour Group	Special measures for High Pollution days	Observation	New action suggested: Closing to traffic dangerously-polluted roads such as Cromwell Road, and roads near schools and hospitals, for example.	Noted – however, closing strategic roads such as the Cromwell Road would most likely simply displace traffic and the associated emissions to other roads. By diverting heavy traffic flows onto the local road network, we would risk increasing congestion at junctions, creating new pollution hotspots.
143	Labour Group	Special measures for High Pollution	Observation	New action suggested: Lobbying the Mayor of London to close TfL roads on days when they are dangerously polluted or	Noted – though this would most likely displace traffic and the associated emissions to other roads.

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		days		Defra notifies high pollution days in London.	
144	Labour Group	Special measures for High Pollution days	Observation	New action suggested: Allowing all, except essential Council staff, to work from home.	Working from home is already a well established practice within the Council. Smarter working is a key element of the council agenda and will lead to more home working and more mobile working with the objective to reduce unnecessary travel time. It is worth noticing that home working is not always more energy effective as it depends on the way to commute and on the need to warm your home.
145	Labour Group	Special measures for High Pollution days	Observation	New action suggested: Allowing buses, low-emission vehicles, bicycles and emergency vehicles only to use Council controlled roads.	The Council does not consider that a ban on standard cars and goods vehicles is a credible transport policy.
146	Labour Group	Special measures for High Pollution days	Observation	New action suggested: Lobbying the Mayor of London to allow free Bus, Underground and Overground travel on such days.	The Council is not convinced that making public transport free during high pollution episodes would be a cost-effective way to deliver mode shift from the private car. The loss of revenue would have serious consequences for TfL's finances and investment programme. It seems unlikely that the majority of people driving private cars in Kensington and Chelsea are doing so because they cannot afford to use public transport.