Do you have any further comments about the draft Havering Air Quality Action Plan or suggestions for other practical actions, which could be taken to improve air quality in Havering? - further comments
Actually make proper changes to the boroughs roads to discourage driving and to prioritise walking, wheeling and cycling.
Allow reports to the council to be made by Third-party apps: "I love Clean Streets" or "FixMyStreet"
Yes- I would like to comment further in my PDF Universal Representation covering the importance of Traditional Design Codes whereupon I have cited leading Academics and Architects.
Act on the biggest problem first
Yes, concentrate on sweeping the roads, emptying bins, clearing drains. In short doing your job. This is not your job and you don't have the cash to do it.
No
As long as Arnold field Launders Lane is burning you are wasting your time on everything else. You have a duty of care to the redidents of Rainham you have forgotten us for too long.
You need to sort Launders Lane out first
There is currently no simple way of reporting incidences where people are burning non-smokeless fuel in ovens and fireplaces etc. When I have attempted to report this in the past, I have been advised to gain evidence myself, such as taking photos. This is difficult in the dark. In addition, the person concerned was advised that a complaint had been made by a neighbour, which was extremely unhelpful. If you want to actually deal with this issue, which is quite common, you should allow anonymous reporting and send officers to check during periods of cold weather, when it is most likely to occur.
I believe a good step to improve air quality would be to remove the excessive speed bumps especially on A roads as vehicles constantlt sliwing down then speeding up adds to air pollurion.
Instead of bringing in new actions the council should be focusing on its existing causes of pollution particularly Arnold's Field, Launders Lane. The council has and still is extremely slow putting in place a remediation plan.
Havering should object to MOTO Hospitality to build 2 huge service stations on the M25 at the boundary between Havering and Brentwood. It will destroy the green belt which for many reasons should be protected, not least its natural function for clean air. The green belt acts as the lungs of London
Most new electric vehicles are Chinese company, this represents a surveillance risk, particularly to Hong Kong BNO and Taiwanese citizens who now live in the UK. Before you introduce the law, those should be properly evaluated and investigated, thank you.
Regardless of other measures you put in place across the borough, unless Launders lane is resolved pollution will continue to spread across the borough causing health related and breathing issues for all. Children in schools are breathing this in day and night and it's totally unacceptable.

I don’t have the technical knowledge required to properly assess your air quality plans. I can, however, say that (a) they will be severely undermined, or they won’t work, if Moto is allowed to build two giant motorway service stations on the border between LBH and Brentwood; and (b) if LBH cared about air quality as much as the human health sciences clearly show it should, it would be making a formal objection to Brentwood Borough Council in response to Moto’s planning application. It hasn’t done that yet. I hope it will do so very soon. After all, Moto wants to use 45 hectares of the green belt, and the green belt is London’s lungs
See previous box.
Stop robbing people using air quality us excuse.
Launders lane what action are you taking now it has been declared contaminated
See above
Please don’t’ allow MOTO or any other service station. This will have a huge negative impact to our air quality
Treat the remediation of Launders Lane as a priority
As for trying to go electric. The damage by mining for the batteries and replacing them every 8 year avg .. look at the bigger picture
Take ownership of and extract all the waste from Launder’s lane asap
Urgently solve the contamination caused at Arnolds Field, Launders Lane, Rainham. The regular smoke in the broader area is so irritating.
Stop the school run in cars.
Any consultation is merely a way to appease the residents as the vast majority of these proposals will take place anyway, which ever way a consultation goes.

For the action of Review monitoring network and consider expansion, I would like to see monitors at all schools in the borough at a minimum, and additionally all health centres ideally. I would like air quality enforcement action to be considered for Launders Lane. For the action "Renewable Energy installation within LBH Corporate estate." I would like to see this extended, or another action added, to include the Council's housing stock, in addition to this action and carried out at the same time as action 2.11 An action I think is missing is New tree planting - there should be a target to increase trees, particularly urban street tress and an action to introduce a mechanism for residents to suggest locations for new street trees across the borough.
Air travel is the problem
GET THE GALLOWS CORNER FLYOVER FINISHED AND STOP PASSING THE BUCK ONTO THE WATER COMPANY REPLACING THE WATER MAINS!!! PENALISE COSTAINS FOR THE OVERRUN!!!
No try sorting out the crime and potholes first.
Get Gallows Corner flyover completed. Get rid of ULEZ - it's a money making scam. Launders Lane - again get it sorted. If you want people to use public transport it has to be the cheapest option to travel by and it's not. Local schools for local people.
Havering initiatives can be thwarted by actions of other authorities such as Khan and water and gas services causing road chaos
Sort out Launders Lane you bunch of hypocrites
Please oppose any proposed building of service stations by moto on m25. Extra traffic through local roads. Extra lorry's and potential staff using local roads will drive up poor air quality. I have a young son, we moved here to get away from poor air in London. Local residents love the area, respect it and look after it. Please don't approve these plans it will decimate the area and our quality of air.
Object to the Moto/Welcome Break proposed construction of 2 service stations
Perhaps you could objext to the current plans for the new service stations
The quicker tfl sorts out Gallows Corner the quicker air quality will improve for residents whose roads are clogged up with traffic.
Say no to the development of services in green belt which will bring 100s of cars and Lorrie's into the area which will impact air quality

Let it be known to neighbouring council Brentwood that a Moto Service station will make life for all residents less healthy if this project goes ahead.
You really need real staff able to come in site on demand to see the issues.
Air quality has not changed wjth the implementation of ULEZ. All about money. Electric vechicle s are heavy, destroying roads. Batteries are expensive and need desposing of when tbry reach end of life. Let people have choice of what to drive. Stop taxing motorists off the road s. Which are in a v poor state
Figure 5-7 can be improve - cant see figure/ text
You mention good air quality is really important for human health, and obviously our Green Belt cleans the air, however there is currently plans for Moto to build by M25 and you have not opposed against this. This will have a huge impact on the air quality in surrounding roads on haverings border, effect our green belt land, will this not undermine Havering's Air Quality improvement plans?
Has an air quality assessment been conducted on the proposed Moto Service station? I am.very concerned about the air quality impact from the work required as well as the likely increase in stationery vehicles.
Stop increase in vehicles stopping and idling eg proposed motorway services. Constant slowing and accelerating vehicles. HGVs etc
Please formally review the proposals around the additional service stations: - removing forests - impacting wildlife - more construction activity - increased levels of traffic in Havering to access the site for years to come. - consider extending ULEZ to Noak Hill Road as it's used as a route around and causes risk to local wildlife and affects listed buildings from vibrations of the traffic.
By objecting to the plans to allow Moto to build 2 service stations on Green Belt land near Brentwood.
Whilst the aim for drivers to move to electric vehicles is laudable, unfortunately the cost is prohibitive for many, including me. Havering should back up the Air Quality Action Plan by objecting to the proposed M25 service areas. The slip road for one would be in Havering, and both MOTO sites are on Havering's boundary, the Chequers Road one being on land formerly part of Havering. These will create vehicle exhaust pollution which will travel into Havering when the wind is light or blowing from that direction, affecting residents in Noak Hill and Harold Hill in particular, including schools and Dagnam Park/The Manor.
Proposals to reduce polluant traffic ie cars, lorries etc would be ideal and to outright stop the recent proposal for a Motorway Services on the M25 neighbouring the Havering borough
Please oppose the building of two moto service stations on the M25
Discourage car use and encourage all forms of public transport.
No to MOTO it will drastically increase air pollution both during construction and then when in operation
Don't build a service station especially on green belt. Ludicrous proposal if you are serious bout clean air

Don't build a unwanted unnecessary service station on green belt
NO TO MOTO!
Educate the public on the effect of pollutants and how This plan will help them Also in schools as it's the young people who will affect in the future
Stop MOJO in your Borough!
I thoroughly endorse anything Havering are planning to improve air quality, and to that end I hope and assume that they will do all they can to block planning permission for the MOTO services as that would clearly be hugely detrimental to the quality of air in and around Havering.
Stop any plans that would encourage more vehicles to use this area such as motorway service stations (proposed) Stop giving electric cars subsidies because they are impacting our roads being heavier than standard vehicles. Give your people a fair choice on what fuel they want to use. I'm sure many residents are put at a disadvantage by being forced to use electric vehicles because of the initial cost of these cars.
The plans for the moto service station does not align with your plans for cleaner air . It would bring many more polluting vehicles to the area and mean a loss in our important green belt.
Stop pollution before you have no control and can not (quick wins), by stopping areas creating pollution (Moto building a massive Service Station). This will allow you to poor resources and money into areas that need it.
I am very concerned about the potential effects of the proposed motorway service stations at J28 of the M25 - the enormity of the additional traffic generated will increase air pollution significantly as well as having many other deleterious consequences.
Say No to the proposed motorways.
By Havering County Council refusing Moto's service Station plans, this would improve Haverings air quality before it is affected any further.
Yes. Dont let MOTO build on green belt. This is very immoral, against all previous legislation

As I am sure you are aware, trees are excellent for reducing all the pollutants listed within the document.
Currently, Thames Chase Trust has access to the Trees for Climate grant. This multi-million pound national programme is responsible for planting thousands of hectares of trees over the past five years, with some taking place in the London Borough of Havering. I have successfully worked with several Havering Council staff members over the past two winters, planting trees in parks and along one road. We have several more projects planned for this winter and I am ever hopeful and pursuing more collaboration in the future.
However, from this document there are several clear opportunities for this grant to apply to the work the Council is committed to undertaking over the next five years. See below.
Theme 2.16. Tree planting could take place during the construction of these infrastructure projects to further reduce emissions in the area, as well as creating a greater aesthetic appeal of the projects themselves.
Theme 3.2. We could work with the School Streets programme to plant more trees on roads with schools on them, both improving air quality in those areas and discouraging cars from "bumping up" on the pavement so close to school entrances.
Theme 5.1. Tree planting goals here should be much higher, aligning with the Councils Climate Change Action Plan to ensure collaborative working internally at the Council. Both Public Highway trees and Green Space trees can be funded with support from the Trees for Climate grant we operate.
Theme 5.2. We can offer funding for tree planting to support the creation of Low Emission Neighbourhoods, as one part of the projects required to achieve such goals.

Can I request that, once this document has final approval and sign off, we work together to undertake extensive tree planting throughout the London Borough of Havering to help achieve the above themes? This can and should be planned over several winters to ensure that our right tree, right place policy for tree planting is met, as well as spreading the risk of tree failure over several years, in case of extreme temperatures causing unusually high failure rates. This problem will become worse the longer we delay.

DO NOT DESTROY OUR GREEN BELT! SAY NO TO MOTO!

Object and reject plans of new moto service station on m25.

Act of delays due to redevelopment of gallows corner

Dear Team I am writing to formally object to the proposed changes in Havering's new Air Quality Plan, specifically the decision to remove Rainham as an area designated for targeted action to reduce air pollution. Rainham continues to experience significant air-quality challenges, particularly following the designation of Launders Lane as contaminated land. The dangerously high levels of PM2.5 and other pollutants associated with this site pose a serious threat to public health, particularly for children, the elderly, and those with respiratory or cardiovascular conditions. Given these circumstances, it is both illogical and unsafe to downgrade Rainham's status within the borough's air-quality priorities. I therefore request: A clear explanation for why Rainham is being removed from Rainham's Air Quality Action Plan Immediate reconsideration of this decision Evidence and criteria used to justify the change Assurance that the health and safety of Rainham residents will remain a priority in all future environmental planning I look forward to your prompt response and trust that Havering Council will act responsibly to safeguard our community.
Petition the government to extend the ULEZ zone to include the M25. Since the introduction of ULEZ I have noticed that the black soot that falls on my window sills has increased. The increase has clearly come from those polluting that have been pushed out of central London. There should be a minimum requirement for the heavy goods vehicles that use our roads and come from the continent.
I am most concerned about the potential construction of Moto service stations that will result in a significant increase in pollution within ~1 mile of my property.
Air quality action plans need to include the addressing of aircraft pollution, industrial pollution and shipping pollution along with all other forms of pollution. Plans should drawn up and executed on a national, rather than local basis. Having said that, local solutions will help, but often they can be unwelcome because they can be financially orientated, rather than be created in order to ensure a big improvement. A very recent example of local pollution has been the lighting of fireworks and bonfires. The prohibition of the use of wood for heating and cooking would be difficult to enforce, as would the excessive use of cars idling in order to keep their air conditioning/heating on.
If you stop the problem of pollution before it happens this surely this will save money and time for the council. By getting involved with the stopping of Motos plans to build this service station on Haverings boarder (which is on green belt land) this would be a quick win for you.
Stop the moto service station planned
No to Moto

It is very hard for me to answer some of your questions because I am a Brentwood Borough resident. However I live close to the boarder with Havering and therefore Haverings air quality and their plans to improve it affects me. The proposed two Moto M25 service stations fall within both Brentwood and Haverings areas, If Havering allows for it to go ahead it will have an extremely negative effect on the air quality for both Havering and Brentwood.

Sending a file directly to environmental health on behalf of Havering Friends of the Earth.
The responses on the form above are my personal responses.

Proposed Amendments to the AQAP - We respectfully request the following additions/amendments:

NEW ACTION 1.6: Mineral Extraction Site Air Quality Monitoring

Action ID 1.6
Action Name: Require independent, real-time air quality monitoring at mineral extraction sites

Description: Install and operate council-controlled PM10 and PM2.5 monitoring equipment at the boundaries of active and approved mineral extraction sites within the borough.
Monitoring data to be publicly accessible in real-time via the Council's website.
Responsibility: Public Protection / Planning

Cost: Medium (£50K-£500K) - Funded via Section 106 planning obligations

Expected
Impact: No direct emissions reduction, but critical for understanding local air quality impacts and enforcing compliance

Timescale: Short-Medium Term

Outputs/KPIs:
All active mineral extraction sites to have boundary PM10/PM2.5 monitoring within 12 months of approval
Real-time data published on Council air quality dashboard
Annual compliance reports published

NEW ACTION 1.7: Residential Buffer Zone Monitoring

Action ID: 1.7

Action Name: Establish permanent air quality monitoring stations in residential areas within 500m of mineral extraction sites

Description: Install Breathe London sensors or equivalent continuous monitoring equipment at representative residential locations near quarry operations to measure actual resident exposure.

Responsibility: Public Protection / Public Health

Cost: Low (£10K-£50K) - Funded via Section 106
Expected
Impact Critical for protecting vulnerable populations and verifying operator claims

Timescale: Short Term
Outputs/KPIs:
Monitoring stations operational within 6 months of quarry commencement
Data integrated into Council's air quality network
Automatic alerts when thresholds exceeded

AMEND ACTION 2.1: Expand Construction Emissions to Include Extractive Industries

Current wording focuses only on development construction.
Proposed addition:

"This action also applies to mineral extraction operations (quarries, aggregate processing) which generate significant PM10 and PM2.5 emissions through excavation, crushing, screening, stockpiling, and associated HGV movements. All mineral extraction planning permissions shall include enforceable conditions requiring:

Dust Management Plans reviewed and approved by Public Protection

Wheel washing facilities

Covered/sheeted HGV movements

Speed restrictions on haul roads

Continuous water suppression on active working areas

Cessation of operations during adverse weather conditions

Independent third-party monitoring at operator's expense"

AMEND ACTION 1.5: Expand Launders Lane Monitoring Scope

Current scope: Focused on landfill fires at Arnolds Field
Proposed expanded scope:

"Monitoring shall also capture emissions from any existing or future mineral extraction, waste processing, or industrial operations in the Rainham/South Hornchurch corridor, including but not limited to quarry operations, aggregate processing, and associated HGV traffic."

NEW ACTION 2.17: Air Quality Conditions for Mineral Development

Action ID: 2.17
Action Name: Require Air Quality Assessments and mitigation for all mineral extraction applications
Description: All planning applications for mineral extraction (sand, gravel, aggregates) shall be

required to submit comprehensive Air Quality Assessments including dispersion modelling for PM10/PM2.5 and demonstrate how WHO guideline values will be achieved at nearby sensitive receptors.

Responsibility: Planning / Public Protection
Cost Very Low (developer funded): Expected
Impact High - prevents approval of operations that would harm local air quality

Timescale: Immediate/Ongoing

Outputs/KPIs
100% of mineral applications include AQ assessment
Refusal of applications that cannot demonstrate compliance
S106 agreements secure monitoring funds

Supporting Evidence
National Planning Policy Context

The National Planning Policy Framework (NPPF) paragraph 180 states

"Planning policies and decisions should contribute to and enhance the natural and local environment by... preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution"

The National Planning Practice Guidance on Minerals specifically addresses air quality:

"Dust emissions from minerals workings can have a significant impact on neighbouring land uses and sensitive receptors... Dust assessments should be proportionate and consider both the source and the pathway"

WHO 2021 Guidelines

The AQAP correctly references the WHO 2021 guidelines, which tightened PM2.5 from 10 to 5 $\mu g/m^3$. Mineral extraction sites are significant PM sources that must be addressed to meet these targets.

Havering-Specific Considerations

Havering is identified as a Preferred Area for mineral extraction in the London Plan
The borough already hosts active quarry operations

New residential developments (e.g., St Georges Park, Beam Park) are located near potential extraction areas

The Ingrebourne Marshes SSSI and other sensitive receptors require protection

Specific Questions for the Council

1. Why are mineral extraction sites not specifically addressed in the AQAP, given their known contribution to particulate emissions?

2. Will the Council commit to requiring independent, council-operated monitoring (not operator self monitoring) for all mineral extraction permissions? 3. What mechanisms exist to ensure Section 106 contributions from mineral developments fund adequate air quality monitoring? 4. How will the Council ensure real-time public access to air quality data from monitoring near industrial/extractive sites? 5. Will the Council adopt the WHO 2021 PM2.5 guideline of 5 µg/m³ as a target, rather than only the current UK objective of 20 µg/m³? Conclusion Havering's Air Quality Action Plan is comprehensive in addressing traffic, construction, and domestic sources of pollution. However, the omission of mineral extraction sites represents a significant gap that should be addressed before the plan is finalised. We urge the Council to: 1. Add specific actions for monitoring near quarry/mineral sites 2. Require independent monitoring funded by operators but controlled by the Council 3. Expand Action 1.5 to cover all industrial sources in the Rainham corridor 4. Include extractive industries in construction dust provisions (Action 2.1) 5. Publish real-time monitoring data for full public transparency We request confirmation that these proposals will be considered and a written response to the questions raised above.
You are building a data centre on greenbelt, a motorway on greenbelt, houses on greenbelt, industrial estates on greenbelt, you are removing trees, hedgerows and fields
Listen to the people of Rainham nearest launders lane that are affected
We need road space taken from motor vehicles and given over to cycles. Be brave.
Recently visited GP with a throat problem, which I've had since waking up several times in the summer with smoke in the house from Arnold's Farm. Horrible burning sensation and not felt the same since. So what's the point of all this until that is clear first.
Minimise large construction and road usage- maximise green belt and green areas. Reduce wood burning / fires
You are vile , you are Labour in disguise . This is about money and nothing else. REFORM all the way
Increase parking fees, with higher fees for SUVs, with less parking spaces in, for example, Romford centre and around schools; introduce, or increase, low traffic neighbourhoods; educate drivers that the aim of ULEZ is to improve health, not to tax drivers; more car free days in shopping areas; more traffic law enforcement; press TfL to provide more buses and more routes, especially at weekends; change traffic light timing to try to stop cars 'jumping' the lights, which leads to congestion, tail-backs and idling; tougher laws on domestic waste burning; plant more trees (using community/ business

funded initiatives); more public education of the dangers of air pollution and the measures residents can take to help (initiatives through schools are good)

MY response:
I was delighted to see The Havering Air Quality Action Plan 2025 to 2030 but as I read it I became disappointed. It contains some laudable targets but as my particular interest relates to the promotion of Active travel and reduction of reliance on the use of cars, if we are to tackle air quality, the pollution caused by road transport needs to be addressed in a more radical and urgent way..
So, if the targets are to be achieved, I believe that the action plan needs to be far stronger with specific proposals.
FEAR PREVENTS GROWTH OF ACTIVE TRAVEL:
A In 2016 and 17 I attended a course on Monday Evenings in Southend. I started by cycling to and from the stations, but I switched to using the car because:
1 I always had to stand on the train with my folded bike.
2 Travelling home by train at 10 o'clock at night, I felt unsafe due to Southend Station seeming to be unattended and empty except for a few passengers who were often inebriated. I felt vulnerable!
B Last year, following heart surgery, I attended Recuperation Classes at the YMCA Roneo Corner. I used public transport to travel from Upminster to Roneo Corner. When returning home, I had to use the crossings to reach bus stops. Although the crossing worked, it was evident from the changing road scene that traffic regularly collided with the safety fences. The speed and weight of traffic that passed in proximity to me was scary. I am therefore not surprised that there were very few pedestrians using these crossings. If we are to increase the use of public transport and reduce the use of the car, we first ensure that pedestrians feel safe to use pavements and crossings.
C In central London:
1. the overall reduction in traffic speed to 20 mph has made my cycling there feel safer than cycling in Havering.
2. The provision of signposted Quiet Routes (I regularly use Q2, Q6, Q7, Q5, NCN23 and C2, 3 and 4 as well as separate Cycle paths eg Embankment!)
3. The growth of cyclist numbers has been undeniable, give humans the infrastructure and they will turn to cycling and Active Travel.

REGARDING: P24 ACTION POLICY 2
The plan mentions consultations and mentions the Over 50s Forum, to form a walking club and organise led rides.
This is of course laudable. But I do not understand why other organisations have not been mentioned! For example, other organisations that I should have expected to figure might include:

1. Havering CTC /Cycling Uk,
2. London Cycle Campaign,
3. Havering Cyclists,
4. Hornchurch Cycle Club,
5. Cycle Confident
6. The Alpine Walking Club
7. The Ramblers Association
8. U3A

Since 2019 I have promoted weekly rides under the name Upminster Slowbies. I have come to recognise that most locals leave their bikes in the garage through fear! I haven't been approached to attend any consultations. I am available if asked!
To provide training in schools is wonderful, to provide secure cycle parking may be a positive BUT if there is no infrastructure then there is only fear that prevents cycling and the growth of active travel.
I believe Havering Council must develop an understanding of cyclists' and pedestrians' real needs in

order that it can approach TfL with informed proposals.
To this end I should have liked to see a proposal somewhere in the report that reflects:
“Council will enter dialogues with local Cycle and community organisations to develop a number of smaller and larger schemes that may include play streets and highlight quieter signposted routes from the separate “Havering-villages” to a variety of locations with likely cycling/walking-times expressed in minutes:
1. Queens Hospital and major neighbourhood health centres,
2. Town Hall,
3. all railway stations,
4. educational centres,
5. Satellite shopping areas,
6. Neighbouring boroughs,
7. Havering’s excellent country parks,
8. Provision of a secure and staffed bike park/hub near Romford Station, operating 7 days a week 7am > 8 pm in Romford Town Centre with a staff that guarantee cycle security and can provide bike servicing.
I look forward to hearing of further and more open consultations enabling an improving environment with less pollution and less fear of fast and heavy traffic.
Yours truly,
Nick Butler

Response to the Havering Council Air Quality Action Plan 2025–2030

Introduction

Barking, Dagenham and Havering Green Party welcomes the opportunity to respond to Havering Council's draft Air Quality Action Plan (AQAP) 2025–2030.

We recognise that the Plan is broadly compliant with statutory requirements and contains a wide range of proposed actions. We acknowledge the recent idling campaigns and the start of transitioning to EV vehicles undertaken by the Council.

However, we note that the plan largely rolls forward unachieved commitments from the 2018–23 AQAP, lacks sufficient ambition, and does not set out SMART (Specific, Measurable, Achievable, Relevant and Time-bound) targets capable of delivering a meaningful improvement in air quality for Havering residents.

Given Havering's high levels of car dependency, industrial land uses in the South of the borough, applications for new quarry sites, and clear tangential evidence of the Launders Lane fires affecting residents' health, the borough requires a far more robust, urgent and outcome-focused strategy.

Overarching Concerns

1. Lack of SMART Targets and Measurable Outcomes

The draft AQAP contains many actions but very few quantified outcomes. Most actions rely on broad language such as "encourage", "support" or "seek funding", without:

baseline data

quantified emissions reductions

defined milestones or deadlines

Key Performance Indicators (KPIs)

Without these, it will be impossible for councillors, residents or regulators to assess whether the Plan is succeeding or delivering value for money. This perpetuates a pattern from the 2018–23 AQAP, where numerous commitments were not delivered and are now simply carried forward.

We recommend:

Clear borough-wide and hotspot-specific targets for NO_2 and PM2.5 reduction

Annual reporting against KPIs

Explicit comparison with the previous AQAP's unachieved actions

Key Policy Areas of Concern

2. Car Dependency and Car Sharing

Havering is one of the most car-dependent boroughs in London, yet the Plan lacks a coherent strategy to reduce private car use.

We are particularly concerned that:

The potential withdrawal from London of private car-sharing providers such as Zipcar is not addressed

That in rejecting a council-run car-sharing scheme, a genuine alternative is not presented, for example partnering with a company like LiftShare, promoting schemes like Co Wheels, or working with local communities to establish co-operatively owned car clubs

Recent Council consultations (e.g. on library closures) have explicitly assumed residents will drive to access services, undermining air-quality objectives

We recommend:
A clear commitment to maintaining and expanding car-sharing provision, including public, cooperative, commercial or not-for-profit models

Integration of air-quality objectives into service access planning, to reduce car-based travel to council-run services

3. Electric Vehicle (EV) Transition
While the Plan references fleet electrification and EV infrastructure, it lacks firm commitments, timelines and guarantees.
Given evidence from other councils — such as research commissioned by Kent County Council from Cenex — that EV transition delivers relatively rapid operational cost savings alongside emissions reductions, the absence of cast-iron commitments in this political climate is concerning.
We recommend:
Explicit targets for Council fleet electrification (e.g. % BEV by specific years)

A clear timetable for phasing out diesel vehicles

Transparent business cases setting out cost savings, emissions reductions and health benefits

4. Low Emission Neighbourhoods (LENs)
Seeking external funding for Low Emission Neighbourhoods is welcome, but funding alone will not deliver these schemes.
Experience across London shows that public understanding and consent are critical to successful implementation. We know that residents want traffic calming in ‘rat run’ roads and less traffic congestion, as well as less pollution, but imposing LENs have turned the public against them.
We recommend:
Early public engagement through citizens’ assemblies or deliberative forums

Clear communication of health, safety and air-quality benefits

Community co-design prior to final scheme proposals

Without this groundwork, LENs risk becoming undeliverable regardless of funding availability.

5. Adoption of WHO Air Quality Guidelines
The draft AQAP relies primarily on UK national air-quality limits, which are significantly weaker than World Health Organization (WHO) guidelines and increasingly recognised as outdated.
We recommend:
Formal adoption of WHO guideline limits (including PM2.5 at 5 µg/m³) as the benchmark for policy evaluation, monitoring and success

Explicit reporting against WHO standards alongside statutory UK limits

6. Monitoring and High-Risk Sites (Including Quarries)
We share the serious concerns raised by Havering Alliance and others regarding inadequate monitoring, particularly in the south of the borough and near potential quarry sites.
Specific concerns include:
Insufficient independent monitoring near Launders Lane quarry and other industrial areas

Over-reliance on operator self-monitoring, which lacks public trust

The action to "undertake monitoring around Arnolds Field, Launders Lane" being framed as non-urgent and medium term, despite known hospitalisations, and both residents and schools being advised to keep windows closed for extended periods

We recommend:
Bringing forward the commitment to the deployment of council-controlled PM10 and PM2.5 monitoring at Launders Lane and nearby residential areas, and for this to be maintained until no fires have been recorded for a period of 12 months

Additional monitoring points in industrial zones in the south of the borough

Monitoring funded via Section 106 developer contributions

Public, real-time access to monitoring data

Explicit inclusion of quarries and mineral extraction within the AQAP, including dust control, HGV movements and mandatory Air Quality Assessments

Ignoring quarry pollution leaves a critical gap in Havering's air-quality strategy and places nearby communities at continued risk.

7. Trees and Green Infrastructure
Havering has experienced the largest loss of tree cover in London between 2018 and 2024 (Greater London Authority). This is incompatible with effective air-quality management.
Trees play a vital role in:
filtering particulate pollution

reducing exposure on residential roads and rat-runs

calming traffic and reducing vehicle speeds

We recommend:
More ambitious tree-planting targets - like-for-like replacements and 50 additional trees a year does not get us anywhere near 2018 tree cover levels

A defined percentage of new and replacement trees to be located on the public highway and residential streets

Evaluate the use of street trees as a traffic calming measure, and increase the numbers of trees on housing estates and in less affluent neighbourhoods

8. Heat Pumps and Building Retrofit
The Plan promotes low-carbon heating but does not sufficiently acknowledge that heat pumps are only effective and cost-efficient in well-insulated buildings.
We recommend:
Stronger linkage between heat-pump installation, insulation standards and retrofit support

Clear guidance to ensure value for money and long-term reductions in emissions

9. Anti-Idling Enforcement
While anti-idling initiatives are welcome, enforcement on the ground remains inadequate.
We are aware of persistent idling at specific schools in the borough, such as Squirrels Heath Primary and St. Edwards Academy, often lasting 30-40 minutes.

We recommend:
Targeted, time-specific enforcement around schools

Clear reporting on enforcement activity and penalties issued

Integration of anti-idling enforcement with school travel planning Conclusion In its current form, Havering's Air Quality Action Plan 2025–2030 is cautious rather than transformational. It is action-heavy but outcome-light, and insufficiently ambitious to address known pollution sources and health impacts in the borough. We urge the Council to: Replace aspirational language with firm commitments Adopt WHO air-quality standards Strengthen independent monitoring, particularly near quarries and industrial sites Set SMART targets with clear timelines and accountability Only through a more robust, transparent and ambitious approach can Havering deliver the step-change in air quality that residents urgently need.
Use of current UK limits to map borough give false reassurance. AQAP could be clearer that there is no safe level of particulate air pollution Could also make mention of indoor air pollution - e.g. wood burners add to home owner's exposure as well as contribute to external pollution,
I'm asthmatic, I never had any problems before ULEZ in Havering so it couldn't have been that bad.