

# Air Quality Action Plan (2024 – 2029) Consultation Analysis

January 2024



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# Contents

1	Overview of consultation .....	3
2	Analysing the responses from the public.....	6
3	Analysing the responses from statutory consultees.....	17
4	Responding to the consultation .....	21
	Appendix A - Questions asked as part of the public consultation .....	39

# 1 Overview of consultation

## 1.1 Summary of consultation undertaken

In line with the current Local Air Quality Management Policy Guidance (LAQM PG) document, the council undertook a public consultation exercise on the proposed Air Quality Action Plan (AQAP). The consultation ran for six weeks from 31<sup>st</sup> October 2023 to 13<sup>th</sup> December 2023.

In determining a proportionate period for the statutory consultation, officers have followed Defra's practice of 4-6 weeks consultation on statutory matters (other than for national policy changes of greater broader significance). Other local authorities typically follow Defra's practice too.

Information about the consultation was emailed directly to statutory consultees, key partners, council members and known interested parties, such as local air quality interest groups and local bus operators. In addition, the consultation was publicised on our website, social media channels and a press release was issued.

Statutory consultees who were consulted on this action plan include:

- the Secretary of State
- the Environment Agency
- UK Health Security Agency
- DEFRA / LAQM
- National Highways
- local MPs
- Hertfordshire County Council (Public Health / Highways)
- neighbouring local authorities
- Hertfordshire police.

Respondents to the consultation were asked to provide information against ten questions, five of which were collecting general information such as name and location, while five focused on the contents of the proposed Air Quality Action Plan (AQAP). The questions can be found in **Appendix A** of this report.

## 1.2 Classification of responses

For the purposes of this report, respondents have been classified as either “public” or “statutory consultee”.

- Public – responses from the public, includes councillors, business owners and town councils.
- Statutory consultee – responses from the statutory consultees are from those listed in section 1.1 above.

## 1.3 Responses to the consultation

Overall, the council received 189 responses to the consultation (182 public responses and seven from statutory consultees). The public responses have been broken-down further to show how respondents identified themselves, the results can be found in **Table 1**. Most respondents to the survey were from the towns where the three air quality management areas are located, with 90 respondents living in Bishop’s Stortford, 27 in Hertford and 21 in Sawbridgeworth. **Table 2** shows where respondents identified themselves as living or working.

**Table 1 – Breakdown of how respondents classified as “public” identified themselves (n=182)**

Role	Percentage of Respondents
Private individual	82%
East Herts Council councillor	6%
Local business owner	4%
Town / Parish Council	4%
Town / Parish / County Council councillor	2%
Community group	1%
Hertford and Stortford Constituency Labour Party	1%

**Table 2 – Breakdown of how respondents classified as “public” identified where they live or work (n=182)**

Location	Percentage of Respondents
Bishop’s Stortford	49%
Hertford	15%
Other towns and villages in East Hertfordshire	15%
Sawbridgeworth	12%
Responses from outside East Hertfordshire	9%
Unspecified	1%

## 2 Analysing the responses from the public

### 2.1 Views on proposed actions

The public were asked to give their views through a series of open-ended questions, these being:

- Do you think the council's new air quality action plan will effectively address air pollution in the area? Give your reasons for your views.
- Which specific measures in the air quality action plan do you think are most important in combating air pollution?
- Are there any additional measures you believe should be included in the air quality action plan?
- Do you have any other comments regarding the air quality action plan?

Respondents often voiced similar concerns and ideas under all these questions and so it has proved useful to consider all the responses together, that is, respondents' opinions have been grouped together regardless of which actual question the view was given in response to.

In total, 182 respondents gave their views on the draft air quality action plan and all or some of the proposals it contains. Given the breadth of the action plan, respondents often gave very detailed responses and so all their views have been included, resulting in the total number of individual opinions and ideas expressed being greater than the number of respondents. For clarity, in all the analysis, the responses are represented as a percentage of all respondents, not all responses; this is the best way of presenting the frequency with which respondents gave a particular opinion. The number of respondents answering any particular question is represented by the letter "n" in each table or figure heading.

**Table 3 – Overall views and suggestions (n=182)**

View on the draft action plan / suggestion for focus of activity to reduce air pollution	Percentage of respondent
Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas	47%
Promote active travel / improve infrastructure for cycling, walking and/or public transport	43%
Do not introduce an ultra-low emission zone (ULEZ)	41%
Reduce new development and/or construction traffic linked to development so as to reduce traffic	36%
Support the council's air quality proposals but believe the plan should be more ambitious, have more detailed analysis, including covering particulates, address air quality beyond the air quality management areas and/or have concerns about the resources to implement the proposals	16%
Support the promotion of e-vehicles, including the number of e-chargers in the district	15%
The council should focus on the worst polluters and/or the more polluting vehicles first	15%
No confidence that the proposals will reduce air pollution	14%
Do not believe there is an air quality problem in East Herts	10%
The council should focus on pollution from aviation, agriculture and/or industry rather than vehicles	9%
The council should prioritise anti-idling efforts	7%
Support for introducing a ULEZ	7%
Support the plan and its proposals	6%
The council should provide real time air quality info and/or real time roadside signs	6%
The council should not be so focused on e-vehicles as they are expensive, unpopular and/or dangerous	5%



View on the draft action plan / suggestion for focus of activity to reduce air pollution	Percentage of respondent
The council should plant more trees/plants to absorb pollutants	5%
The council should introduce differential parking charges to disincentivise the most polluting vehicles	5%
Park and ride scheme needed in Bishop's Stortford	3%
The plan is too long / doesn't meet statutory guidance	3%
The council should focus efforts to reduce open fires in homes and/or bonfires	2%
The council should promote improved last mile drop off arrangements and/or e-cargo bike delivery	1%

**Table 3** reveals that the key finding in the draft air quality action plan, namely that the air pollution in the district's three air quality management areas is primarily caused by road traffic, is recognised by most respondents. There is, however, an almost equal split in the main two ways cited for tackling this, namely:

- reduce traffic congestion by building new roads so that motorists can avoid the air quality management areas and/or by increasing traffic flows through reduced temporary roadworks and traffic lights which some perceive as unnecessary – cited by nearly half of all respondents, 47%
- promote more sustainable alternatives to car use, including better cycling and walking infrastructure and improved public transport opportunities – mentioned by over two-fifths of respondents, 43%.

During the consultation period, the local media paid particular attention to the proposal in the draft plan to '*explore the feasibility of introducing road pricing or ultra-low emission zones (ULEZ) in the AQMAs*'. This idea, although making it clear that it focused on reviewing the benefits and costs of such an approach, was reported in the media as though it was an advanced proposal with the potential for imminent implementation. A sizeable minority of respondents to the survey chose to focus on the ULEZ idea, with:

- just over two-fifths, 41%, voicing their strong opposition to the idea
- 7% welcoming consideration of a ULEZ.

## 2.2 Views on likely effectiveness of proposals

Respondents were asked whether they felt the proposed air quality action plan would effectively address air pollution in East Herts. The results are displayed in **Table 4** below.

**Table 4 – Results to the question, “do you think the council's new air quality action plan will effectively address air pollution in the area?” (n=179)**

Response	Percentage of respondents
No - do not believe the plan will be effective	67%
Not sure if the plan will be effective	30%
Yes - believe the plan will be effective	3%

**Respondents who** feel the proposed action plan would benefit from actions to reduce development and/or reduce development-related comments are particularly doubtful of the plan’s likely effectiveness. The majority of those suggested more measures to tackle congestion and those who do not wish the council to explore a ULEZ also lacked confidence in the plan.

The perceived ineffectiveness of the proposed action plan is less pronounced among those who would like to see a focus on active travel. In this case, half of those with this opinion were doubtful the plan would be effective with 5% saying it will be effective but more than two-fifths (45%) reported they are unsure as to whether the plan will be effective.

Table 5 below examines how the level of confidence varies between those mentioning the top four concerns about the proposed plan as listed in **Table 3** above. Respondents who feel the proposed action plan would benefit from actions to reduce development and/or reduce development-related comments are particularly doubtful of the plan's likely effectiveness. The majority of those suggested more measures to tackle congestion and those who do not wish the council to explore a ULEZ also lacked confidence in the plan.

The perceived ineffectiveness of the proposed action plan is less pronounced among those who would like to see a focus on active travel. In this case, half of those with this opinion were doubtful the plan would be effective with 5% saying it will be effective but more than two-fifths (45%) reported they are unsure as to whether the plan will be effective.

**Table 5 – Do you think the council's new air quality action plan will effectively address air pollution in the area?**

	Concern / suggestion			
	<b>Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas</b> <b>Confidence among the 86 respondents raising this concern</b>	<b>Promote active travel / improve infrastructure for cycling, walking and/or public transport</b> <b>Confidence among the 79 respondents raising this concern</b>	<b>Do not introduce an ultra-low emission zone (ULEZ)</b> <b>Confidence among the 74 respondents raising this concern</b>	<b>Reduce new development and / or construction traffic linked to development so as to reduce traffic</b> <b>Confidence among the 66 respondents raising this concern</b>
No – do not believe the plan will be effective	74%	50%	78%	84%
Not sure if the plan will be effective	22%	45%	22%	16%
Yes – believe the plan will be effective	4%	5%	0%	0%

**Table 6** presents the levels of confidence in the plan broken by the place of residence of the respondent – looking only at the three towns with Air Quality Management Areas.

**Table 6 - Breakdown of respondents in towns with an Air Quality Management Area who also expressed their level of confidence in the action plan**

	Area of residence		
	Bishop’s Stortford (n = 87)	Hertford (n = 27)	Sawbridgeworth (n = 19)
No – do not believe the plan will be effective	77%	48%	68%
Not sure if the plan will be effective	22%	41%	32%
Yes – believe the plan will be effective	1%	11%	0%

**Table 6** indicates that respondents in Bishop’s Stortford have the least confidence in the proposed action plan; three quarters (77%) of respondents in the town do not feel confident. Confidence is split broadly 2/3 to 1/3 in Sawbridgeworth between those lacking confidence in the plan and those feeling unsure.

The picture is markedly different in Hertford. Here, just under a half of respondents (48%) report not feeling confident in the plan while two-fifths (41%) are unsure with a tenth (11%) believing that the plan will be effective in reducing air pollution.

The main concerns/suggestions within each town, as expressed by those with differing levels of confidence in the plan’s likely effectiveness, are presented in **Table 6**, **Table 7** and **Table 8** below.

**Table 7 - Breakdown of concerns / suggestion by confidence in the proposed action plan – Bishop’s Stortford residents (n=89)**

Confidence level	Top three concerns / suggestions (or more if tied)	Percentage of respondents
No – do not believe the plan will be effective	Do not introduce an ultra-low emission zone (ULEZ)	44%
	Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas	40%
	Reduce new development and/or construction traffic linked to development so as to reduce traffic	36%
Not sure if the plan will be effective	Promote active travel / improve infrastructure for cycling, walking and/or public transport	14%
	Do not introduce an ultra-low emission zone (ULEZ)	10%
	Support the council’s air quality proposals but believe the plan should be more ambitious, have more detailed analysis, including covering particulates, address air quality beyond the air quality management areas and/or have concerns about the resources to implement the proposals	7%
Yes – believe the plan will be effective	Promote active travel / improve infrastructure for cycling, walking and/or public transport	1%
	Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas	1%
	Support the plan and its proposals	1%
	Support for introducing a ULEZ	1%

**Table 8 - Breakdown of concerns / suggestion by confidence in the proposed action plan – Hertford residents (n=27)**

Confidence level	Top three concerns / suggestions (or more if tied)	Percentage of respondents
No – do not believe the plan will be effective	Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas	30%
	Promote active travel / improve infrastructure for cycling, walking and/or public transport	11%
	Support the promotion of e-vehicles, including the number of e-chargers in the district	11%
	Do not introduce an ultra-low emission zone (ULEZ)	11%
Not sure if the plan will be effective	Promote active travel / improve infrastructure for cycling, walking and/or public transport	22%
	Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas	19%
	Support the council’s air quality proposals but believe the plan should be more ambitious, have more detailed analysis, including covering particulates, address air quality beyond the air quality management areas and/or have concerns about the resources to implement the proposals	11%
	Support the promotion of e-vehicles, including the number of e-chargers in the district	11%
Yes – believe the plan will be effective	Support the council’s air quality proposals but believe the plan should be more ambitious, have more detailed analysis, including covering particulates, address air quality beyond the air quality management areas and/or have concerns about the resources to implement the proposals	11%
	Promote active travel / improve infrastructure for cycling, walking and/or public transport	7%
	The council should introduce differential parking charges to disincentivise the most polluting vehicles	7%

**Table 9 - Breakdown of concerns / suggestion by confidence in the proposed action plan – Sawbridgeworth residents (n=21)**

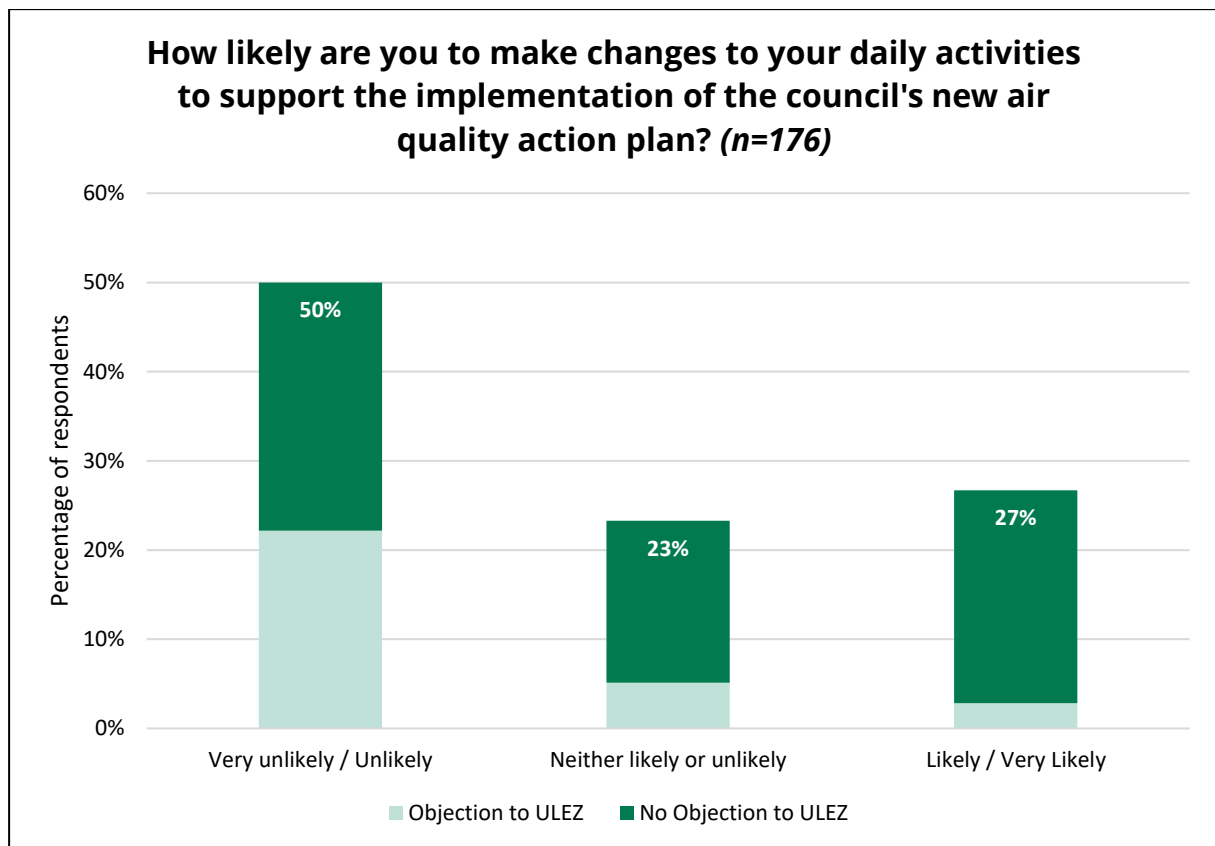
Confidence level	Top three concerns / suggestions (or more if tied)	Percentage of respondents
No – do not believe the plan will be effective	Reduce new development and/or construction traffic linked to development so as to reduce traffic	33%
	Reduce congestion / provide better road infrastructure / build bypasses around the air quality management areas	30%
	Promote active travel / improve infrastructure for cycling, walking and/or public transport	15%
	Do not introduce an ultra-low emission zone (ULEZ)	15%
Not sure if the plan will be effective	Reduce new development and/or construction traffic linked to development so as to reduce traffic	15%
	The council should focus on the worst polluters and/or the more polluting vehicles first	15%
	Promote active travel / improve infrastructure for cycling, walking and/or public transport	11%
	Support the council’s air quality proposals but believe the plan should be more ambitious, have more detailed analysis, including covering particulates, address air quality beyond the air quality management areas and/or have concerns about the resources to implement the proposals	11%
	Support the promotion of e-vehicles, including the number of e-chargers in the district	11%
	The council should prioritise anti-idling efforts	11%
Yes – believe the plan will be effective	No respondents saying ‘yes’	



### 2.3 Views on effectiveness of proposal in leading to behaviour change

Error! Reference source not found. below presents respondents' views on the likelihood of changing their behaviour in response to the action plan. Given the strength of opinion regarding ULEZ, the responses shown in the figure have been split between those expressing a view against ULEZ and those not having a negative view.

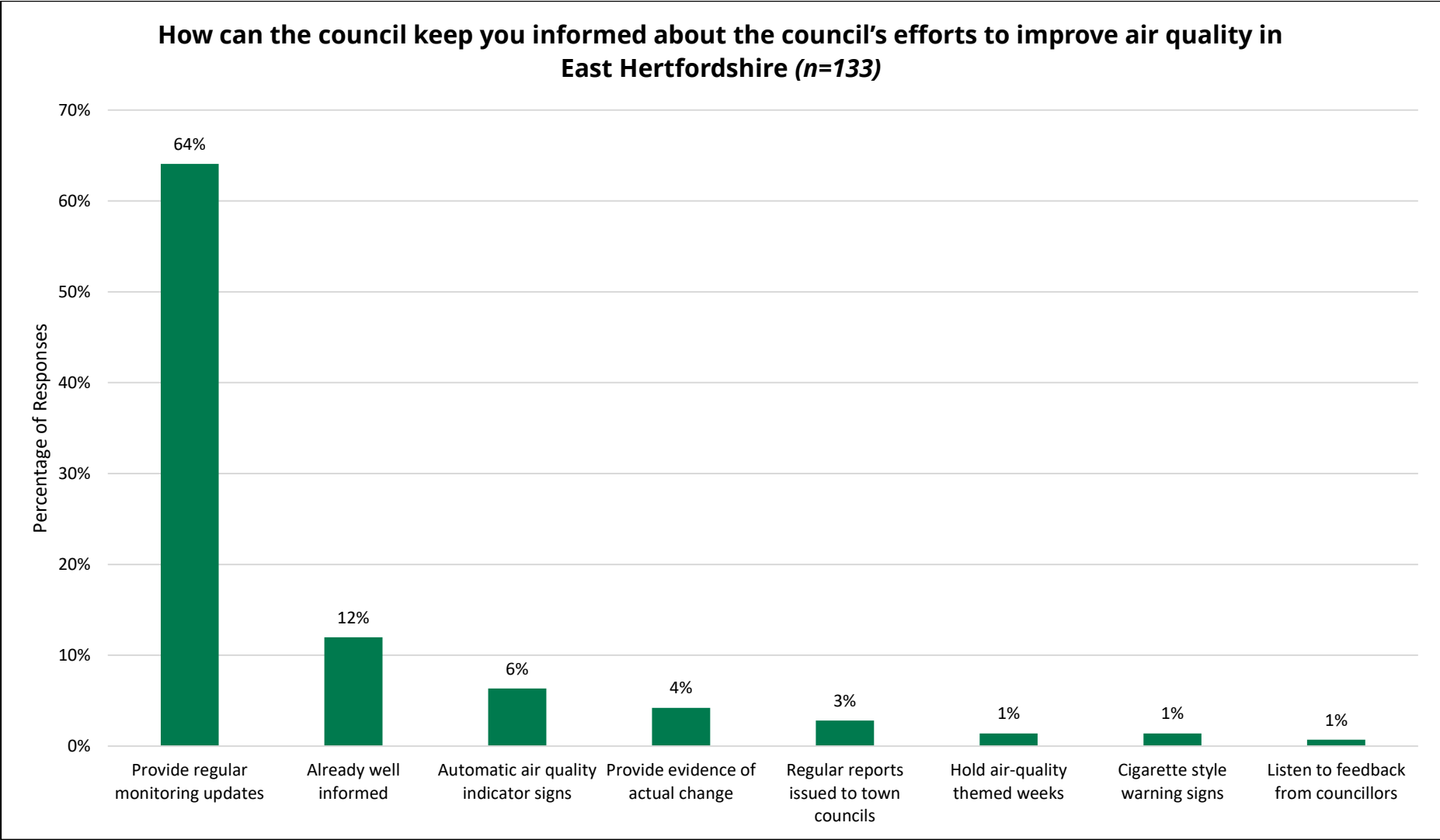
**Figure 1 – Breakdown of responses to the question about personal change to support the AQAP (n=176)**



### 2.1 Views on how the respondents would like to be kept informed

In total, 133 respondents expressed views on how they would like to be kept informed about the council's work on air quality. While the vast majority of respondents (68%) stated they wanted regular monitoring updates, they did not go into how they would like to received them.

Figure 2 – Breakdown of responses to the question about how best to keep people informed



### 3 Analysing the responses from statutory consultees

#### 3.1 Statutory consultees who responded

In response to the consultation on the AQAP, the council received seven responses from statutory consultees. The responding bodies were:

- DEFRA / LAQM
- UK Health Security Agency
- the Environment Agency
- National Highways
- Hertfordshire County Council
- Epping Forest District Council
- South Cambridgeshire District Council.

#### 3.2 Summary of responses

The responses from the statutory consultees were positive, with recognition of the need for the council and relevant agency to work together to help improve air quality.

Statutory consultees made both substantive and editorial suggestions. All points made have been considered in detail by officers and the Executive Member for Environmental Sustainability, with amendments to the report made.

The substantive comments and corresponding amendments are as follows.

Agency	Agency's comment	Council's response
Defra	Utilise the Defra action plan template for the detailed actions presented in Section 4 so as to expand on anticipated timescales and funding	The council believes that Defra's template for the detailed action plan may not be easy to follow for all readers. It does, however, include a range of useful information for Defra and others, therefore, while Section 4 retains the more simplified action plan, the same actions have been represented at Appendix I using Defra's template
Environment Agency	Make greater reference to reducing particulate matter	See discussion of particulate matter under the consideration of the UK Health Security Agency's comments below

	Suggestion that planning policies and guidance should seek to reduce emissions from plant used on development sites	It is felt that this is already covered within the action to <b><i>Create a sustainable design and construction code of practice (CCOP)</i></b>
UK Health Security Agency	Suggestion that it would be beneficial to provide the reader with useful resources section, explaining how air pollution can impact their lives, including indoor air quality, which is especially important for individual households and might strengthen the public health case for local actions	Hyperlink added to the Clean Air Hub website which is promoted by the UK Health Security Agency as being a primary source of detailed information about the health effects of air pollution
	Make greater reference to reducing particulate matter. More specifically, make reference to the new national targets for PM <sub>2.5</sub> levels	<p>The Environmental Targets (fine particulate matter) (England) Regulations 2023, brought in under Environment Act 2021, has for first time brought in objectives, both to be met by 2040, to reduce PM<sub>2.5</sub>, these being:</p> <ul style="list-style-type: none"> <li>• annual mean concentrations of to be 10 µg/m<sup>3</sup> or lower</li> <li>• population exposure to PM<sub>2.5</sub> to be reduced by 35% compared with 2018 levels.</li> </ul> <p>While the consultation draft mentioned particulate matter, it would be appropriate to make more explicit reference to council's need to consider these recently established national targets for PM<sub>2.5</sub> reductions, particularly as during the lifetime of our air quality action plan, a national interim PM<sub>2.5</sub> target of 12µg/m<sup>3</sup> by January 2028 will come into effect.</p> <p>The revised action plan makes more explicit reference to PM<sub>2.5</sub> and an additional action has been added to the action plan:</p> <p><b>Monitor and act upon emerging guidance on the new national PM<sub>2.5</sub> objectives.</b></p> <ul style="list-style-type: none"> <li>• Use and report on data from the existing and new continuous air quality monitors in each AQMA.</li> </ul> <p>With partners, identify potential actions required to address any PM<sub>2.5</sub> levels in excess of national objectives.</p>

In addition to the above, below are some of the general comments received from statutory consultees.

### **DEFRA / LAQM**

“While the draft AQAP doesn’t specifically use the latest Defra report template, the report is thorough and clearly set out in a custom theme, and contains the relevant overall content, sections and tables covered in the template.

“Overall, the AQAP is very well considered, with extensive detail presented on the formulation of the Plan, the costs/benefits of measures and the overall likely reductions in concentrations as a result of implementation of the Plan. Additionally, the layout of the document is clear and concise throughout, even if the latest template has not been strictly adhered to. The draft AQAP is therefore accepted, and many elements could be considered examples of best practice.”

### **The Environment Agency**

“We are pleased to see East Herts District Council (EHDC) has used national legislation, policies, strategies and resources to aid in the planning and development of the Air Quality Action Plan (AQAP), and that these have helped identify issues and aid development of EHDC’s four key air quality priorities.

“It is encouraging to see that EHDC has identified Bishop’s Stortford, Sawbridgeworth and Hertford as three areas where the annual mean average of Nitrogen Dioxide has been breached and has taken positive action in declaring them Air Quality Management Areas (AQMA), and subsequently produced the AQAP to tackle and reduce air pollution in each AQMA.

“Finally, it is good to see that the Environment Agency and EHDC is in agreement that we both need to cooperate and work together, not just with one another – but also with the other partners, stakeholders and organisations to secure a positive outcome for the AQAP.”

### **UK Health Security Agency**

“The AQAP provides detailed information about current exposure to air pollution in East Hertfordshire District Council (EHDC), applying both quantitative and qualitative methods. Additionally, extensive modelling data

on nitrogen oxides and particulate matter is attached to this action plan. The EHDC identified the main source of air pollution in all AQMA areas, as well as recognised and quantified pollution types that cannot be attributed to the AQMAs and are of external origin. The action plan measures are prioritized in accordance with current and future air pollution types. Moreover, the AQAP illustrates the potential impact of the action plan measures in numbers, which is highly beneficial in regard to communication and future evaluations.”

## 4 Responding to the consultation

The council has considered in detail the key issues (these are identified as key as they have been raised by at least 10 respondents) with a view to determining whether (a) the current proposed actions within the action plan address the issue, (b) a proposed action needs to be amended or clarified or (c) a new action is required to address the issue more fully.

The council's responses, broken down into the four main priorities are given in **Table 10, Table 11, Table 12** and **Table 13** below.

**Table 10 - Priority 1: Reduce the impact of traffic levels and congestion on air quality**

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
1.1	<p><b>Continued expansion of EV infrastructure</b></p> <ul style="list-style-type: none"> <li>• Expanding the current electric charging points for electric vehicles on council owned land.</li> <li>• Explore possibility of on street lamppost chargers on residential streets.</li> <li>• Continued promotion of e vehicle uptake.</li> </ul>	<ul style="list-style-type: none"> <li>• Increased provision of charging points encouraging EV uptake. Leads to direct reduction in NO<sub>2</sub> emissions.</li> </ul>	<p>East Herts Council &amp; Hertfordshire County Council</p>	<p>The consultation found 15% of respondents calling for continued or greater focus on supporting the switch to e-vehicles, including increasing e-charger provision.</p> <p>The council is currently negotiating a contract with a third-party that will see over 140 new e-chargers, including rapid chargers, installed across the district, including in more rural locations.</p> <p>The consultation also found 5% were concerned about the promotion of e-vehicles, feeling them to be expensive, dangerous and/or not as good for the environment as claimed. The comments appeared to indicate that some people are drawing on unreliable sources of information, therefore, there is arguably a role for the council in guiding people to more robust information about e-vehicles.</p> <p><b>Proposed amendment to the action plan:</b> Amend the <i>'Continued promotion of e vehicle</i></p>



No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
				<i>uptake' action to 'Continued efforts to provide information and support to enable residents to make informed choices as to when and if to switch to an e-vehicle'.</i>
1.2	<p><b>Explore emissions-based parking charges</b></p> <ul style="list-style-type: none"> <li>• In council owned car parks.</li> <li>• For council issued parking permits.</li> </ul>	<ul style="list-style-type: none"> <li>• Further incentives to encourage EV uptake. Leads to direct reduction in NO<sub>2</sub> emissions.</li> </ul>	East Herts Council	<p>During the consultation, 5% suggested differential car parking charges to disincentivise polluting vehicles.</p> <p>This indicates a level of support for this action.</p>
1.3	<p><b>Explore Last Mile Delivery possibilities within the district</b></p> <ul style="list-style-type: none"> <li>• By replacing diesel delivery vehicles with ultra-low emission electric vehicles or zero-emission bicycles/e-cargo bikes (operating from depots).</li> <li>• Through the introduction of pick-up/drop-off points, meaning companies can distribute a large number of parcels to fewer locations.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduction in delivery vehicle emissions and numbers also reducing congestion.</li> </ul>	East Herts Council & Hertfordshire County Council	<p>While not frequently mentioned by respondents, support for this did come up during the consultation. It is perhaps to be expected that the benefits of different means of last mile delivery are not widely recognised and so it will prove useful to continue to explore this and raise awareness.</p>

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
1.4	<p><b>Installation of additional anti-idling signage</b></p> <ul style="list-style-type: none"> <li>• Previous campaigns saw anti idling signage and messaging which was promoted in local businesses and council car parks.</li> <li>• We plan to roll out the message wider and to create more permanent signs around schools and other public spaces.</li> </ul>	<ul style="list-style-type: none"> <li>• Less idling increased awareness. Leads to direct reduction in NO<sub>2</sub> emissions.</li> </ul>	East Herts Council & Hertfordshire County Council	The consultation found 7% of respondents calling for continued or greater promotion of anti-idling.
1.5	<p><b>Continued promotion of our four key air quality campaigns</b></p> <ul style="list-style-type: none"> <li>• Air Quality Alert System – a free to use, health based digital notification system which notifies users of days when air quality is poor in their area to help them make more informed choices about their activities that day.</li> <li>• Electric vehicle uptake – continued promotion to increase e-vehicle uptake.</li> <li>• Herts liftshare scheme – a free to use liftshare scheme matching</li> </ul>	<ul style="list-style-type: none"> <li>• Improved health outcomes for vulnerable residents.</li> <li>• Increased awareness of air pollution.</li> <li>• Increased uptake of electric vehicles.</li> <li>• Reduction in lone journeys and vehicles.</li> <li>• All lead to direct reduction in NO<sub>2</sub> emissions.</li> </ul>	East Herts Council & Hertfordshire County Council	<p>The council's role in promoting behaviour change is perhaps implicit in a sizeable proportion of respondents' comments. Of note, the air quality campaign priorities align with:</p> <ul style="list-style-type: none"> <li>• the 43% supporting promotion of and practical steps to encourage active travel</li> <li>• the 15% believing the council should focus on the worst polluters / most polluting vehicles first</li> <li>• the 6% calling for real time air quality info and/or real time roadside signs.</li> </ul> <p>Interesting, 5% of respondents commented that the action plan is not ambitious enough.</p>

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
	<p>users and locations to reduce lone journeys.</p> <ul style="list-style-type: none"> <li>Clean Air Day – national air quality campaign to highlight the effects of air pollution and positive ways in which we can all make a difference.</li> </ul>			<p>Thus, there is a case for continued and more ambitious air quality campaigns.</p> <p><b>Proposed amendment to the action plan:</b> Add actions to:</p> <ul style="list-style-type: none"> <li>install at least one real-time air quality sensor in the Bishop's Stortford and Sawbridgeworth AQMAs and another on in the Hertford AQMAs</li> <li>explore ways to make the real-time air quality data more accessible and visible</li> <li>work with residents and community groups on priorities for air quality campaigns and seek external funding for this wherever possible.</li> </ul>
1.6	<p><b>Review the effectiveness of travel plans for schools and businesses</b></p> <ul style="list-style-type: none"> <li>Review the travel plans produced for local schools and businesses near the AQMAs to establish their effectiveness on reducing pollution in the AQMA.</li> </ul>	<ul style="list-style-type: none"> <li>Understand the effectiveness of travel plans.</li> <li>Work to improve the implementation and effectiveness of travel plans.</li> </ul>	East Herts Council & Hertfordshire County Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to encourage active travel. It is felt this demonstrates support for this action.

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
1.7	<p><b>Explore the feasibility of introducing road pricing or ultra-low emission zones (ULEZ) in the AQMAs</b></p> <ul style="list-style-type: none"> <li>Review the benefits and costs.</li> <li>Review the impact these could have on the air quality in the AQMAs.</li> </ul>	<ul style="list-style-type: none"> <li>Reduce traffic in congested areas.</li> </ul>	East Herts Council & Hertfordshire County Council	<p>The council recognises that inclusion of exploration of ultra-low emissions zones (ULEZ) has caused much comment during the consultation, with most mentioning ULEZ being against their introduction:</p> <ul style="list-style-type: none"> <li>41% of respondents told us they are against ULEZ</li> <li>7% of respondents were keen to for the council to consider ULEZ.</li> </ul> <p>The council believes it would be failing in its duty to tackle air pollution and thus promote public health if it didn't consider how other authorities are tackling the problem and see whether any lessons applicable to East Herts can be learnt. Thus, the reference in the action plan to <i>exploring</i> road pricing / ULEZ. The aim of the wording was to indicate the council wishes to investigate the pros and cons of ULEZ in the local context as part of its commitment to thorough examination and public engagement on all <i>possible</i> options for reducing air pollution.</p> <p><b>Proposed amendment to the action plan:</b> amend this action to read:</p>

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
				<p><b>Investigate the possible pros and cons of new options being adopted by other local authorities, such as road pricing and ultra-low emission zones (ULEZ) in the AQMAs</b></p> <ul style="list-style-type: none"> <li>• Understand the relevance, benefits and costs of road pricing / ULEZ within the context of East Herts' AQMAs.</li> <li>• Involve residents, community groups and statutory stakeholders in better understanding the possible pros and cons of new approaches such as road pricing / ULEZ as part of the council's overall aim to engage everyone in the shared endeavour to reduce air pollution.</li> </ul>
<p><b>Issue for consideration: Reduce congestion</b></p>			<p>Hertfordshire County Council</p>	<p>Almost half (47%) of all respondents called for continued/renewed/new efforts to reduce congestion such as providing alternative routes to the AQMAs such as bypasses around the Hertford and Sawbridgeworth AQMAs and promoting greater use of the A1184/A120 which is large part forms a bypass around Bishop's Stortford. New road building is both contentious and relatively expensive while, often simply encouraging</p>

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
				<p>greater car use, with the associated air pollution risks.</p> <p>A sizeable proportion of respondents called for better planning and/or co-ordination of roadworks to increase traffic flow and thus reduce pollution due to idling and braking.</p> <p>While a major thrust of the air quality action plan is to reduce the level of traffic, the council recognises that cars and other private vehicles will remain a key element of travel in the district given its character, therefore, efforts to reduce roadwork-related congestion should be included.</p> <p><b>Proposed amendment to the action plan:</b> add the following action:</p> <p><b>Hertfordshire County Council, East Herts Council and other stakeholders to maintain dialogue about any emerging operational and/or technical means of minimising congestion.</b></p> <ul style="list-style-type: none"> <li>• Wherever possible, minimise congestion due to planned roadworks.</li> <li>• Encourage vehicular journeys which cannot reasonably be replaced by active travel alternatives to avoid the AQMAs.</li> </ul>

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
	<b>Issue for consideration: PM<sub>2.5</sub></b>		East Herts Council & Hertfordshire County Council	<p>Some 16% of respondents felt the action plan should be more ambitious, with a proportion of these calling for a greater emphasis on monitoring and reduced particulate matter, specifically PM<sub>2.5</sub>. The UK Health Security Agency and the Environment Agency made similar points.</p> <p>While the consultation draft mentioned particulate matter, it would be appropriate to make more explicit reference to council's need to consider the recently established national targets for PM<sub>2.5</sub> reductions.</p> <p><b>Proposed amendment to the action plan:</b> add the following action:</p> <p><b>Monitor and act upon emerging guidance on the new national PM<sub>2.5</sub> objectives.</b></p> <ul style="list-style-type: none"> <li>• Use and report on data from the existing and new continuous air quality monitors in each AQMA.</li> <li>• With partners, identify potential actions required to address any PM<sub>2.5</sub> levels in excess of national objectives.</li> </ul>
	<b>Issue for consideration: More planting to absorb pollutants</b>		East Herts Council	Some 17% of respondents suggested planting of trees and other plants to absorb air pollutants and thus improve air quality.

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
				<p>The council recognises that:</p> <ul style="list-style-type: none"> <li>• trees, especially certain species such as London plane trees and horse chestnuts, can absorb and metabolise nitrogen dioxide and thus convert this pollutant into less harmful compounds</li> <li>• trees can capture and reduce particulate matter which is a major component of air pollution from vehicle emissions. Leaves and bark can act as filters, trapping particles and preventing them from circulating in the air.</li> </ul> <p>It's important to bear in mind, however, that while trees offer valuable contributions to air quality improvement, they are not a standalone solution. Promoting public transport, adopting cleaner vehicle technologies and finding ways to incentivise or enforce emission standards are the crucial actions to reduce vehicle-related air pollution, with new planting acting as a complementary and additive measure.</p> <p>The council already has an annual tree planting programme; in 2022, for example, the council planted 586 additional trees on its own land. In addition, the council has identified £25,000 in 2024/25 for new trees.</p>



No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
				<p>These tree planting programmes are well-established and so a new action is not proposed for the air quality action plan, although efforts to site trees/plants as near to the AQMAs as possible will be explored.</p>
	<p><b>Issue for consideration: Focus on pollution from aviation, agriculture and/or industry rather than vehicles</b></p>		<p>East Herts Council &amp; Hertfordshire County Council</p>	<p>The analysis reported in this air quality action plan shows that pollution in the three AQMAs primarily stems from traffic, therefore, it would be remiss of the council not to focus the majority of its efforts on traffic-related pollution first.</p> <p>While not an action for this action plan, the council's Environmental Health team undertake regular licensing and monitoring work of particularly polluting industrial processes, such as emissions from crematoriums, concrete crushers and dry cleaners.</p>

**Table 11 - Priority 2: Mitigate the impact of future growth on air quality**

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
2.1	<p><b>Hertfordshire Essex Rapid Transit (HERT)/ The A414 Corridor Strategy</b></p> <ul style="list-style-type: none"> <li>The HERT will deliver a step-change in the passenger transport network through an accessible, reliable and affordable east-west transit system which connects people easily to where they live, work and visit which could reduce private vehicle use in, most notably, the Hertford AQMA.</li> </ul>	<ul style="list-style-type: none"> <li>Increased provision of public transport, reduction in overall vehicle numbers.</li> <li>Leads to direct reduction in NO<sub>2</sub> emissions.</li> </ul>	Hertfordshire County Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to encourage active travel, including improved public transport. It is felt this demonstrates support for this action.
2.2	<p><b>Continued adherence to our sustainability SPD and air quality neutral policies</b></p> <ul style="list-style-type: none"> <li>Using the upcoming district plan review to strengthen the planning policy in relation to air quality.</li> </ul>	<ul style="list-style-type: none"> <li>Reduction in building emissions and construction emissions.</li> </ul>	East Herts Council	The council is required by law to make provision for new housing development to meet local need. If the council were to seek to reduce development to significantly below local need levels as informed by nationally set methodologies, developers would in all probability apply to the national Planning Inspectorate

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
2.3	<b>Create a sustainable design and construction code of practice (CCOP)</b>	<ul style="list-style-type: none"> <li>Reduction in construction emissions.</li> </ul>	East Herts Council	<p>to review the decision. The Planning Inspectorate would form a view based on the level of local need and could overturn the council's decision. It is in the local interest for the council to set planning targets and policies and designate sites so as to exert maximum control over the numbers, type, location, environmental sustainability and other standards of new housing.</p> <p>The CCOP would seek promote the use of machinery that meets or exceeds the latest emissions standards set out in national regulations.</p>

**Table 12 - Priority 3: Support residents' make active travel choices**

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
3.1	<p><b>Support expansion of Herts Lynx on demand public transport scheme</b></p> <ul style="list-style-type: none"> <li>Increased coverage and provision of the transport leading to increased use of this form of public transport, reduction in private lone journeys from rural areas of the district through the AQMAs.</li> </ul>	<ul style="list-style-type: none"> <li>Reduction in vehicles and emissions in the AQMAs.</li> </ul>	Hertfordshire County Council & Department for Transport	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to encourage active travel, including improved public transport. It is felt this demonstrates support for this action.
3.2	<p><b>Investigate potential implementation of 'footstreets' in central Hertford</b></p> <ul style="list-style-type: none"> <li>Footstreets minimise the volume and impact of cars within certain areas making them more attractive and safer places for people to walk.</li> </ul>	<ul style="list-style-type: none"> <li>Increasing active travel.</li> <li>Reducing vehicle numbers and therefore emissions.</li> </ul>	East Herts Council & Hertfordshire County Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to improve the streetscape for pedestrianisation, such as pedestrianisation schemes. It is felt this demonstrates support for this action.
3.3	<p><b>Develop personalised travel planning for residents</b></p> <ul style="list-style-type: none"> <li>Highlighting the public transport options within their area.</li> </ul>	<ul style="list-style-type: none"> <li>Increased public transport use, reducing private vehicle numbers and emissions in AQMAs.</li> </ul>	East Herts Council & Hertfordshire County Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to encourage active travel. It is felt this demonstrates support for this action.

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
3.4	<p><b>Active Travel Campaign working with schools and businesses</b></p> <ul style="list-style-type: none"> <li>Continuation of the council's active travel campaign which has so far reached 11 schools.</li> </ul>	<ul style="list-style-type: none"> <li>Increased awareness of air pollution sources and outcomes. Increased active travel and public transport uptake.</li> </ul>	East Herts Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to encourage active travel. It is felt this demonstrates support for this action.
3.5	<p><b>Local Cycling and Walking Infrastructure Plan (LCWIP)</b></p> <ul style="list-style-type: none"> <li>Projects to improve the commuter infrastructure for non-motorised users between residential areas and towns.</li> <li>Promotion to encourage use.</li> </ul>	<ul style="list-style-type: none"> <li>Increased uptake of active travel due to increased provision and links. Reducing car usage.</li> </ul>	Hertfordshire County Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to improve the cycling infrastructure. It is felt this demonstrates support for this action.
3.6	<p><b>Exploration of increased on street town centre cycle parking</b></p>	<ul style="list-style-type: none"> <li>Increased uptake of active travel, reducing private car usage.</li> </ul>	East Herts Council & Hertfordshire County Council	The council notes the 43% of respondents calling for / supporting promotion of the council's efforts to improve the cycling infrastructure. It is felt this demonstrates support for this action.

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
3.7	<b>Creation of an East Herts standalone air quality website</b>	<ul style="list-style-type: none"> <li>Increased awareness, access to information and resources.</li> </ul>	East Herts Council	<p>Implicit in many of the responses to the consultation was a call on the council to provide more and more relevant information about air quality, for example, real-time air quality readings in the three AQMAs.</p> <p>In addition, some 10% of respondents made comments to the effect that they do not believe there is an air quality problem in East Herts.</p> <p>The consultation found many respondents feeling they could not be confident in the action plan.</p> <p>Having a standalone website should, it is felt, increase the visibility of the council's information and advice.</p> <p><b>Proposed amendment to the action plan:</b> add the following sub-action:</p> <ul style="list-style-type: none"> <li>Provide annual updates on the council's website on progress against the action plan.</li> </ul>

**Table 13 - Priority 4: Reduce East Herts Council's own impact on air quality**

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
4.1	<p><b>New council procurement rules</b></p> <ul style="list-style-type: none"> <li>• Consolidate and reduce deliveries to council buildings.</li> <li>• Promote e-vehicles through East Herts Council waste management contract.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced vehicles driving through AQMA to council offices.</li> <li>• Reduction in vehicle emissions throughout district from council procured vehicles.</li> </ul>	East Herts Council	<p>Perhaps understandably, the consultation feedback focused on the council's proposed work with the community and stakeholders rather than actions aimed at the council 'getting its house in order'. That said:</p> <ul style="list-style-type: none"> <li>• the action to reduce separate deliveries through aggregation would, it is hoped, reduce the number of vehicles driving through the AQMAs, especially the Hertford AQMA given the location of the council's main office</li> <li>• promoting the uptake of more e-vehicle through the renewal of the council's waste management contract would help address the suggestion made by 15% of respondents that the council should focus on the worst polluters and/or the more polluting vehicles first.</li> </ul>
4.2	<p><b>Create East Herts Council workplace travel plan for staff</b></p> <ul style="list-style-type: none"> <li>• Continuing facilitating home working arrangements.</li> <li>• Promotion of car share schemes, public transport opportunities and council's cycling facilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced car journeys, increased uptake in active travel.</li> </ul>	East Herts Council	<p>This action addresses the 43% of respondents wishing to see continued or more effort to promote active travel.</p>

No.	Action	Benefits	Responsible Agency	Consultation findings and council's response
4.3	<p><b>Work with colleagues in Trading Standards to ensure the Domestic Solid Fuels Regulations are complied with</b></p> <ul style="list-style-type: none"> <li>• Help with promotion and messaging.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduced emissions.</li> </ul>	East Herts Council	While only a small minority (2%), some respondents suggested actions to reduce open fires. This action will address that.



## Appendix A - Questions asked as part of the public consultation

- What is your name?
- In case we have any questions about your consultation response, please include your email address so that we may contact you.
- Which description best describes the capacity in which you are answering this question?
- Please indicate the area where you live or the area your business is located/operates by providing the first part of your postcode, for example "SG13 8", or your nearest town/village.
- Do you think the council's new air quality action plan will effectively address air pollution in the area?
- Which specific measures in the air quality action plan do you think are most important in combating air pollution?
- Are there any additional measures you believe should be included in the air quality action plan?
- How likely are you to make changes to your daily activities to support the implementation of the council's new air quality action plan?
- What could the council do more of to keep you informed about the council's efforts to improve air quality in East Hertfordshire?
- Do you have any other comments regarding the air quality action plan?