

Appendix 3: Written consultation comments

No	From	Comment Received	Response	Action taken
1	Resident	Could the graphs on pages 11 and 12 have the WHO guideline marked.	Graph design throughout the document has been amended to include the following: <ul style="list-style-type: none"> • Current national standards • 2021 World Health Organisation Air Quality guidelines • 2030 Strategy aims 	Strategy graphs amended.
2		Questioned why river emissions so high compared to road traffic.	Section 1.1 explains that the data used is taken from the London Atmospheric Emission Inventory published by the Greater London Authority, and it is 'approximate and should not be viewed as absolute'.	No change made to the Strategy document.
3		New boats, whether for people transport or pleasure (sightseeing, river cruises, partying) must operate with electric traction between Tower Bridge and Waterloo Bridge as a condition of their operating license	This is not within the control of the City of London Corporation; however, we will include this in discussions with the Port of London Authority.	No change made to the Strategy document.
4		Take a few pollution readings from homes on the North side of River, for example those in Queenhithe Ward	Monitoring locations are reviewed annually. This will be included for the start of 2025.	No change made to the Strategy document.
5		No specific action listed in this Appendix dealing with River transport.	We will include this with our ongoing collaboration with the Port of London Authority. The City Corporation owns 5 vessels for use on the river. Two are petrol and 3 are diesel. Alternative fuels to diesel are considered when the engines are upgraded.	No change made to the Strategy document.
6	Greater London Authority	Clarify that the document is a combined Air Quality Action Plan and Strategy	This has been clarified by adding text to the 'Foreword' and 'Introduction'.	Strategy text amended.
7		WHO guideline levels added to graphs	Graph design throughout the document has been amended to include the following: <ul style="list-style-type: none"> • Current national standards • 2021 World Health Organisation Air Quality guidelines • 2030 Strategy aims 	Strategy graphs amended.

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8		Include an action on: Promoting and delivering energy efficient retrofitting projects in workplaces and homes	This is delivered as part of the Climate Action Strategy workstream where there are two projects relating to energy efficiency in buildings: <ul style="list-style-type: none"> Decarbonising our operational properties and housing estates Decarbonising our leased properties 	No change made to the Strategy document.
9		Include an action on: Regular Car Free days/ temporary road closure in high footfall areas	A focus of the City Corporation's updated Transport Strategy is: <i>Making the most efficient and effective use of street space by reducing motor traffic, including the number of delivery and servicing vehicles</i> It is delivering a number of pedestrian priority schemes and focuses on the needs of people walking and wheeling.	No change made to the Strategy document.
10		Include an action on: Reducing Emissions from Combined Heat and Power (CHP)	The use of Combined Heat and Power is discouraged through the planning process. New plant will continue to be addressed through planning policy and in the update to the Air Quality Supplementary Planning Document. Medium size CHP (above 1MWth) are regulated by the Environment Agency.	No change made to the Strategy document.
11		Include an action on Encouraging schools to joint TfL STARS (now TfL Travel for Life)	This has been added to Action 26.	Strategy text amended.
12		Include an action on: Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new and existing developments.	This is covered in the draft City Plan 2040 - policies S14 and OS1-5.	No change made to the Strategy document.
13		Include an action on: Expanding and improving Green Infrastructure (GI)	This is covered in the draft City Plan 2040 - policies S14 and OS1-5	No change made to the Strategy document.

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14		Action 1: Suggested outcome 'no reduction in air quality monitors' and 'monitor downtime does not exceed X'	Action 1 in the Strategy states that continuous analysers will be used at a minimum of five locations in the Square Mile. Detail added for all continuous analysers to achieve a minimum data capture of 90% over a calendar year.	Strategy text amended.
15		Action 2: Please detail on how it will be made public - if it's a City of London site - could you have a KPI on number of website visits?	Signposting to the location of monitoring data has been added to Action 2.	Strategy text amended.
16		Leading by example outcomes are incorrect – carried over from previous page	This was done in the design stage of the draft document and has been corrected for the final version.	Strategy text amended.
17		Action 4: More detail on improving energy efficiency of buildings – specific action and how it will be measured	For Action 4, the detail has been amended regarding Energy Performance Certificate ratings.	Strategy text amended.
18		Action 4: Add a date to develop Square Mile local area energy plan	The text has been amended to include an implementation date.	Strategy text amended.
19		Action 5: Add a target for reducing size of corporate fleet and date.	There is no specific target date for this as it is subject to operational requirements. All vehicle purchases and leasing are overseen by the Transport Coordination Group and replacement of any vehicle must be fully justified.	No change made to the Strategy document.
20		Action 9: Explain what regulatory powers we are asking for that will signify success	Text has been added to the outcome for Action 9 to clarify what powers are required.	Strategy text amended.
21		Add specific outcomes to action 10 if possible	Updated the detail to include measurable targets.	Strategy text amended.
22		Action 11: Investigate the impact of tall buildings on levels of air pollution at street level – by when	Text has been added to the detail of Action 11.	Strategy text amended.
23		Action 12: All roads in the Square Mile that meet the annual average national standard of 40µg/m3 – by what date	The date is already specified in the document – 2027.	No change made to the Strategy document.
24		Action 13: Respond to complaints and erect signs in hot spot areas. Add response time Provide awareness training to advise drivers to switch off when parked. Add a number of people to be engaged	Response time of 48 hours added. Annual engagement target added to the action.	Strategy text amended.

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25		Action 14: On-street and off-street parking charges applied based on vehicle emissions. – what % of roads and is this from day 1	Text has been amended to clarify that this is ongoing and is 100% of parking bays	Strategy text amended.
26		Action 15: Require air quality assessments for major developments – add all	It is not considered necessary to add the word all.	No change made to the Strategy document.
27		Action 15: Require developers to consider alternatives to diesel standby generators – how will this be done	The text has been updated to explain that this will be done by planning condition.	Strategy text amended.
28		Action 15: Outcome: New developments that do not have a negative impact on local air quality. Can this be changed to All developments will comply with policies	The outcome has been updated to reflect the recommendation.	Strategy text amended.
29		Action 16: Inspect construction sites and respond to complaints. Can this be changed to Respond to complaints within XX days Inspect at minimum XX construction sites per year	The detail has been updated to reflect the recommendation.	Strategy text amended.
30		Action 17 Undertake inspections of all sites to ensure compliance with the NRMM Low Emission Zone. Do you have a commitment to be part of the NRMM enforcement project? Also to check are you committing here to inspect ALL construction sites?	The text has been amended to provide clarity that we are committed to being part of the NRMM enforcement project and do inspect all sites that have NRMM that require regulation.	Strategy text amended.
31		Action 18: Request alternatives to diesel generators in new developments through the planning process. Can you set a target	This detail has been removed from Action 18 as it is provided for Action 15 and so is a duplication.	Strategy text amended.
32		Action 19: Run an awareness raising campaign for mobile food vendors and commercial cooking establishments. Can you please specify how you will monitor success - e.g. number of people engaged / number of tweets / number of food premises visited etc. per year	An engagement target has been added to Action 19.	Strategy text amended.
33		Action 20: Where combustion plant is installed, good dispersion of emissions will be required. How will this be monitored/ measured? e.g. 100% of all new combustion plant to terminate above the height of the nearest building	An outcome has been added to Action 20 regarding flue heights.	Strategy text amended.

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34		Action 21: Carry out risk-based inspections of prescribed processes in the Square Mile. How many per year	The number of prescribed processes can vary from year to year as operations close and open. There are currently two operations that are regulated but this may change during the life of the Strategy. The word 'all' therefore has been added to the detail of Action 21.	Strategy text amended.
35		Action 22: Annual inspections of retail premises that sell solid fuel How many inspected / engaged with	The detail for Action 22 has been amended.	Strategy text amended.
36		Action 23: Better informed colleagues. Outcomes like this could be expanded on. Better informed colleagues and Public Health input into policies and projects (including awareness raising/ behaviour projects) leading to better public health outcomes by sharing expertise	The outcome for Action 23 has been amended.	Strategy text amended.
37		Action 24: Promote the free CityAir Smart Phone App, the AirText service and Air Aware. How will you be promoting it	The detail for Action 24 has been amended to explain how it will be promoted.	Strategy text amended.
38		Action 24: add promoting the Mayor's air quality alert system	This has been added.	Strategy text amended.
39		Action 25: Clean Air Day events - Instead of "up to" - could you please do a minimum number?	A minimum number has been added.	Strategy text amended.
40		Action 26: What specific work is being done with schools?	This has been explained in the detail of Action 26.	Strategy text amended.
41		Action 27: Engage with business through the CityAir business engagement programme. How many per year	An engagement target has been added	Strategy text amended.
42		Action 28: Disseminate a leaflet about indoor air quality. How many, to whom?	Additional text has been added to the detail of Action 28 to explain how it will be disseminated.	Strategy text amended.

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43	Port of London Authority	<p>page 51 of the Appendix.</p> <p>The second paragraph currently lists the PLA targets stated in the 2020 Strategy. It would be ideal if these could be removed as these targets are to be reviewed for a 2026 Strategy progress update which means they could be out of date relatively soon within the lifespan of this document. Can I suggest that this reads: “Monitoring allows us to track any improvements in pollutants over time and can be used to help inform local authorities about the contribution of river vessel emissions.”</p> <p>Following from this point, some sentences in the last paragraph should also be amended as follows: By 2026 we do aim to hit our targets of emission reduction of 20% NOx and PM port wide Using knowledge gained from the MEP and other sources we will review our targets in 2026. Action plans within the Air Quality Strategy, the Net Zero River Plan, and Thames Vision 2050 will lead us to achieve targets outlined for beyond 2026, by aiding our operators reach their internal net zero targets as well as the overarching government target of net zero by 2050.</p>	Text amended as requested	Strategy text amended.
44		the Net Zero River Plan has been published, so the tense in the third paragraph should be changed to reflect this – from “will be published” to “was published”.	Text amended as requested	Strategy text amended.
45		The PLA supports the objectives of the CoLC AQS and is glad to be a partner in its delivery	Noted	No change made to the Strategy document.

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46	City and Hackney Public Health Team	<p>We commend the City of London for its comprehensive approach to improving air quality, and support alignment with the 2021 World Health Organisation (WHO) Air Quality Guidelines (AQG) interim targets. We believe aligning with these guidelines will lead to significantly better health outcomes for our communities, reducing the burden of non-communicable diseases and adverse health effects linked to poor air quality.</p> <p>The Hackney Public Health team fully supports the City of London's efforts to improve air quality and we continue to support the alignment with the 2021 WHO Air Quality Guidelines interim targets. Aligning with WHO guidelines significantly benefits the health and wellbeing of our communities. We are particularly keen to see strong, collaborative efforts across neighbouring borough boundaries and involvement of all stakeholders in the fight for clean air, and collective ambitions to meet the highest possible standards. We look forward to continued collaboration and partnership in achieving these critical goals for a healthier London.</p>	Noted	No change made to the Strategy document.
47		<p>Air Quality Monitoring</p> <p>Public Health supports the proposals made in section 1, particularly the use of live monitoring data being made available to the public.</p> <p>Recommendations:</p> <p>Ensure monitoring includes more localised sites in high-risk areas, such as near schools, dedicated cycle lanes, GP and Pharmacies and high pedestrian traffic areas / densely populated residential zones.</p>	Air quality monitoring locations are reviewed annually. These comments will be taken into account during the next review.	No change made to the Strategy document.

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48		Actively promote use of the Air Aware tool and guidance to the public in response to live data feeds, ensuring residents and visitors are able to navigate to better air quality areas at times when air quality is particularly poor	Air Aware is actively promoted and detailed in Action 24	No change made to the Strategy document.
49		This should be paired with the ambition to meet WHO guidelines, ensuring data accuracy in detecting when and where these stricter thresholds are achieved.	Noted. We go to great lengths to ensure we have data that is as accurate and precise as possible.	No change made to the Strategy document.
50		Work in partnership with NEL ICB to analyse hospital admissions and respiratory-related health issues related with air quality data to better understand and address the health impacts of air pollution, advocating for WHO guideline targets.	We currently work with North East London Integrated Care Service. We will raise any further opportunities for collaboration with the Integrated Care Board.	No change made to the Strategy document.
51		<p>Leading by Example</p> <p>Public Health supports the proposals made within section 2 and welcomes the adoption of green infrastructure and increased sustainable practices with a move towards a resident- and pedestrian-first approach (i.e. restricting the use of combustible engine vehicles during busy footfall periods.</p>	Noted	No change made to the Strategy document.
52		<p>Recommendations:</p> <p>Consider the use of zero-emission zones in the City to prioritise and encourage active travel.</p>	The Transport Strategy aims for 90% of motor vehicles entering the Square Mile to be zero emission capable by 2030 (Proposal 29).	No change made to the Strategy document.

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53		Monitor and publish the energy efficiency of operational buildings to demonstrate action against the proposed plans.	<p>As part of monitoring the City Plan, we track how each planning application complies with the London Plan's energy goals i.e. an on-site carbon reduction of at least 35% beyond Part L 2021 of building regulations.</p> <p>This information will be published through our City Plan monitoring reports and dashboards.</p>	No change made to the Strategy document.
54		<p>Collaborating with Partners</p> <p>Public Health supports the proposals made in section 3 and believes increased collaboration and partnership with both designated and non-designated Air Quality partners will enhance the delivery of this Strategy.</p>	Noted	No change made to the Strategy document.
55		<p>Recommendations:</p> <p>Much of the pollution across the City of London is not generated within the boundary; increased partnership with neighbouring boroughs, perhaps by a sub-regional task force, will help coordinate a pan-London effort to ensure consistency and sharing of best practices to achieve WHO standards.</p>	<p>We work with central London Boroughs through the Central London Air Quality Cluster group. The City Corporation also chairs the London wide Air Quality Steering Group.</p> <p>Partnership work takes place on various workstreams, current examples include idling vehicle engines and investigating emissions associated with commercial cooking.</p>	No change made to the Strategy document.
56		Partnership working across the City is strong and could be enhanced further by fostering relationships with residents, community groups and local business to ensure the "City Voice" is integral to Strategy and action across the City.	This will be reflected in work with the Business Improvement Districts and wider business engagement, as well as programmes such as AirAware, which resulted in local Air Quality Champions.	No change made to the Strategy document.
57		Partner with local universities or research institutions to conduct feasibility studies on how to move towards the WHO guidelines most effectively and the net economic impact of achieving this, or not.	External consultants undertook this work for us in 2023 and the outcomes of the report were used to set the aims for the draft Air Quality Strategy	No change made to the Strategy document.

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58		Young people face the potential burden of climate change and inaction - actively involve young people in information awareness, insights gathering and climate action activities.	The following text has been added to the detail of Action 26 covering working with schools and nurseries: 'Deliver assemblies, bespoke workshops, set up stalls at summer fayres, making the topic accessible and where appropriate linked into the school curriculum'.	Strategy text amended.
59		<p>Reducing Emissions</p> <p>Public Health supports the proposals made in section 4 and notes the positive reports of the weekly PM2.5 and PM10 averages recorded within the WHO Air Quality Guidelines on all but two occasions (PM2.5 breached Sept 4th, 2023 and PM10 breached on Aug 22, 2023). Public Health welcomes continued progress towards the WHO AQG and supports alignment with the interim targets.</p> <ul style="list-style-type: none"> ○ 	Noted	No change made to the Strategy document.
60		<p>Recommendations:</p> <p>UKHSA has developed a PILOT indicator to represent population level vulnerability to air pollution at LSOA level. This is a ranking of the level of vulnerability from low (1-2) to high (9-10) decile scores. We recommend the use of this tool to protect the most vulnerable populations in the City. Introducing more stringent measures to address engine idling, particularly for users of diesel motors, may aid this.</p> <ul style="list-style-type: none"> ○ Around Aldgate, Barbican and Moorgate stations, NO2 vulnerability is high. 	<p>This data was used to inform focussed action for awareness raising as part of a government funded project delivered with the London Boroughs of Hackney, Tower Hamlets and Newham.</p> <p>The City Corporation already takes a wide range of action to deal with unnecessary vehicle engine idling as detailed in section 5.1.1 of the Strategy.</p>	No change made to the Strategy document.
61		Remove annual season parking tickets for diesel vehicles and increase the on- and off-street parking charges for diesel vehicles to disincentive the use of these vehicles within the City.	The City of London has had an 'European Parking Award winning' emissions-based charging approach for several years. Diesel vehicles pay significantly higher charges than electric vehicles.	No change made to Strategy document.

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62		Continue the use and application of the principles of behaviour change theory to promote and encourage the use of active travel routes and public transport. Report findings and lessons learned for greater stakeholder engagement and improvement	The Transport Strategy aims for 90% of motor vehicles entering the Square Mile to be zero emission capable by 2030. Action 6 is included to ensure collaboration and forward thinking between air quality and transport.	No change made to the Strategy document.
63		Collaborate with industrial stakeholders to adopt cleaner technologies and practices, and enforce stricter emissions regulations to meet WHO standards.	We work with a range of organisations and public bodies to influence changes in process. Examples being the construction industry, the Environment Agency, Westminster Commission for Road Air Quality, Port of London Authority, Institute Of Couriers.	No change made to the Strategy document.
64		Following assessment of planning applications for air quality impact, which Public Health welcomes, introduce localised regulations that require construction projects to use cleaner equipment and practices to reduce emissions of PM10 and PM2.5. These regulations could be enforced through permits and inspections to ensure alignment with original planning applications. This has been effective in California, USA following introduction by The California Air Resources Board in 2007	Equipment used on construction sites in the Square Mile is very closely regulated, see section 5.2.3 of the Strategy.	No change made to the Strategy document.
65		Public Health and Awareness Raising Whilst Public Health endorses section 5, arguably, the whole Strategy pertains to public health and the department would welcome a naming update of section 5 to avoid minimisation of stakeholder perceptions to the key role and responsibilities of Public Health. This section is more appropriately named Health Promotion and Raising Awareness.	The title of chapter 6 has been amended as suggested	Strategy text amended.

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66		<p>Recommendations:</p> <p>Consult with Public Health on all health promotion campaigns and promotional material to ensure key messages and Strategy are aligned with broader messaging and community Strategy. For example, “reducing your personal exposure to air pollution” messaging may inadvertently place the individual at the centre of the problem, insinuating individual responsibility for the problem, a message we would recommend we move away from.</p>	Noted and will consult on future campaigns and promotional material as suggested.	No change made to the Strategy document.
67		<p>Inclusion of key Public Health Outcomes Framework (PHOF) indicators in all air quality briefings. Including the key PHOF indicators in all air quality briefings is essential to clearly demonstrate the direct link between air quality and health outcomes. Poor air quality is a significant contributor to cardiovascular and respiratory diseases, increasing the mortality rate, especially in vulnerable populations. By incorporating PHOF indicators into reporting, we can provide robust, evidence-based justifications for stringent air quality standards. This approach not only highlights the immediate health benefits of reducing air pollution but also supports the adoption of the WHO AQG. PHOF Indicators may include:</p> <ul style="list-style-type: none"> • Indicator 3.01: Fraction of mortality attributable to particulate air pollution • Indicator 3.07: Age-standardised rate of mortality attributable to particulate air pollution • Indicator 1.15: Statutory homelessness (prolonged exposure in people rough-sleeping) • Indicator 2.04: Under 75 mortality rate from cardiovascular diseases (including heart disease and stroke) • Indicator 2.24: Emergency hospital admissions for asthma (under 19 years) 	Noted. This will be addressed in future air quality briefings.	No change made to the Strategy document.

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68		Ensure air quality is consistently included and measured in all rapid and full health impact assessments in line with the City Plan 2040	Air quality is included in the City Corporation Health Impact Assessment Guidance Note, 2021, under Healthy Environment and Design and Healthy Housing.	No change made to the Strategy document.
69		In partnership with Public Health, develop educational programmes for schools and communities to raise awareness about air pollution and encourage behaviour change in the next generation.	The following detail has been added to Action 26: 'In partnership with public health, deliver assemblies, bespoke workshops, set up stalls at summer fayres, making the topic accessible and where appropriate linked into the school curriculum'	Strategy text amended.
70		Monitor and publicise live air quality data at all healthcare and educational sites across the City of London	Monitoring takes place at schools and nurseries, though, apart from at the Aldgate School, the data is not live due to budget constraints. Pollution alerts are sent to all schools and health care sites. Annual reports including monitoring data is given to all schools and nurseries.	No change made to the Strategy document.
71		In partnership with Public Health, develop comprehensive, year-round, behaviour change campaigns that encourage the public to adopt low-emission lifestyles, such as using public transport, cycling, and reducing energy consumption at home, all aimed at meeting WHO guidelines.	Additional detail has been added under Action 24 to confirm that we will collaborate with Public Health regarding behaviour change campaigns.	Strategy text amended.

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72	Barbican Association	<p>The City had flurry of activity a few years ago, but not much seems to have happened by way of improvement recently. For example, there seems to be little action on stopping drivers idling their engines, little attempt to make consolidation and last mile delivery a reality – in that delivery lorries and vans still clog the City’s streets – and little attempt to stop the use of diesel generators.</p>	<p>The City Corporation takes a wide range of action to deal with unnecessary vehicle engine idling as detailed in section 5.1.1 of the Strategy</p> <p>The City Corporation has no authority to ban diesel generators. There is an action in the Strategy to work with building owners to investigate options for reducing emissions, and use an alternative means of providing emergency back-up power.</p> <p>The Transport Strategy seeks to reduce the number of freight vehicles within the Square Mile by 15% by 2030. The Air Quality Supplementary Planning Document is scheduled to be updated, emissions from both service and delivery vehicles and generators will be included in the document.</p>	No change made to Strategy document
73		<p>The Barbican Association, representing the residents of the Barbican Estate, as people who live in the City have a keen interest in improving air quality. And while the proposed Strategy includes good words, we think it is not ambitious enough.</p> <p>We think that it should adopt a tougher set of standards and a wider set of pollutants: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health</p>	<p>Greenhouse gases are covered by the Climate Action work stream.</p> <p>The Strategy focuses on pollutants that are, or have been, at a level that is considered to be harmful to health. This reflects our statutory obligations.</p>	No change made to the Strategy document.
74		<p>The Strategy should also include indoor air quality indoor and ensure that it complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO2), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs), and carbon dioxide (CO2) concentrations in indoor air.</p>	<p>There is no statutory obligation, and no authority, for local authorities to deal with indoor air quality. However, the Strategy recognises the potential impact on health and contains an action to raise awareness of the health impacts of poor indoor air quality.</p>	No change made to the Strategy document.

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75		We also think that it is disappointing that the Strategy does not focus more on local actions and targets rather than national ones – though we accept that much of the air pollution in the City comes from outside.	The Strategy contains a number of actions that will be delivered locally as well as a range of collaborative action reflecting the fact that most of the pollution measured in the Square Mile comes from outside the boundary.	No change made to the Strategy document.
76		Nevertheless, a considerable amount of air pollution comes from van and lorry traffic in the City – and we would expect to see more action to enforce consolidation and reduced deliveries to office buildings. For example, Moor Lane sits alongside residential flats yet it sees a constant flow of deliveries to the new Deutsche Bank building at 21 Moorfields. Not only did the City allow the developer to change the original proposal to site deliveries in Fore Street Avenue, where they would not have impacted residents so much. But also there is no sign of consolidated deliveries and last mile delivery by small electric vehicles. There is nothing in this Strategy to reassure us that that will change.	The Supplementary Planning Document is scheduled to be updated, emissions from service and delivery sources will be included.	No change made to the Strategy document.
77		Another source of obvious and major air pollution is construction sites – yet we are told that commercial kitchens are the biggest source of air pollution for particulates in the City. That seems hard to credit to anyone who lives next to one of the City's many many large demolition and construction sites.	According to the London Atmospheric Emissions Inventory and City specific research, commercial cooking is the largest sources of PM _{2.5} emitted in the Square Mile whereas construction is the largest source of PM ₁₀	No change made to the Strategy document.
78		We would propose some local actions that would have an effect: No demolition work at weekends in residential areas	This has previously been considered and consulted upon, Members agreed to allow the hours of 9am to 2pm on Saturdays only.	No change made to the Strategy document.
79		A reduction in freight traffic on City streets by challenging and enforcing traffic management plans for office developments and enforcing consolidation – so as to result in far fewer journeys	The Supplementary Planning Document is scheduled to be updated, emissions from service and delivery sources will be included.	No change made to the Strategy document.

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80		A bar on diesel generators when power can be supplied from the grid	The City Corporation has no authority to ban diesel generators. There is an action in the Strategy to work with building owners to investigate options for reducing emissions, and use an alternative means of providing emergency back-up power. Diesel fuelled generators in new developments are discouraged where possible.	No change made to the Strategy document.
81		All measures to reduce the urban heat island effect – because that would in turn reduce air pollution. Most urban realm plans in the City are completely unambitious in terms of greening and the planting of mature trees. Witness the paucity of trees in the Bank junction remodelling and in the proposed public realm for King Edward Street.	This is covered by the Climate Action workstream	No change made to the Strategy document.
82		Such measures should also include retrofitting rather than wholesale demolition	This is addressed in the Planning for Sustainability Supplementary Planning Document and the Carbon Options Planning Advice Note 2023.	No change made to the Strategy document.
83		Finally, improved monitoring is necessary – for a wider variety of pollutants (most of the City’s monitors are for NO2) – and more prominent publication of the data. This should also focus on sensitive receptors such as residences, hospitals, schools.	Data is available on Air quality in England (airqualityengland.co.uk) and in annual reports on the Corporation web site. Schools and nurseries receive tailored reports with data. Monitoring takes place at Barts Hospital, schools and nurseries and main residential areas. Air quality monitoring in the Square Mile is reviewed annually.	No change made to the Strategy document.
84	Clean Air in London	CAL wishes to thank you and your predecessors on the Committee and officers in the City of London Corporation (the “City”) for engaging so positively with CAL on air quality policy matters over 15 years. The City’s leadership on action to improve air quality has been exemplary for over 70 years	Noted	No change made to the Strategy document.
85		There is much misunderstanding, even among international policy makers, of words such as ‘net zero’, ‘carbon neutral’, ‘air quality neutral’ and ‘air quality positive’. Instead, please focus on achieving ‘zero air emissions’ throughout the City in your AQS.	The Air Quality Strategy addresses emissions of air pollutants and the Climate Action Strategy addresses the emissions of carbon.	No change made to the Strategy document.

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86		<p>The European Union is likely to set new limit values for nitrogen dioxide (NO₂) and fine particulate matter (PM_{2.5}) of 20 µg/m³ and 10 µg/m³ respectively to be achieved by 1 January 2030 with no unconditional time extensions and a pathway to achieving the new WHO air quality guidelines.</p> <p>The AQS should align fully with any such EU environmental rules as a minimum. The UK's national air quality targets are hopelessly out of date and the previous government's Environment Act 2021 air quality targets for PM_{2.5} of 10 µg/m³ by 2040 are risible. Please also align fully to the recent G7 commitments on air quality in paragraph 14 on page 24 of their communique²</p>	<p>The Strategy sets a pathway for ongoing improvements and working towards the WHO 2021 Air Quality Guidelines. These are tighter than the current UK national standards. If the aims are achieved before 2030 work to improve air quality will not cease.</p> <p>Any new targets set at a European level will be reviewed once published, and due regard taken of the recent G7 commitments to air quality.</p>	No change made to the Strategy document.
87		<p>Much has changed since the City proposed its Emissions Reduction (Local Authorities in London) Bill. CAL encourages you to make clear in your AQS that things have moved well beyond the ambitions set out in that Bill and that you need specific powers now to achieve zero and ultra-low emissions from all combustion plant throughout the City by 1 January 2030 including boilers, commercial cooking, generators, non-road mobile machinery ("NRMM") and combined heat and power plant ("CHP").</p> <p>Please share with the new Government and CAL by 31 October 2024 the precise legislative and regulatory details of the changes you need to achieve this outcome</p>	Noted and to be considered as part of the workstream for the proposals set out in the Bill.	No change made to Strategy document
88		All regulated pollutants are important. Please therefore extend your AQS to include all key pollutants and commit to publish annual status reports on PM _{2.5} . Ozone is especially important	PM _{2.5} and ozone data are both reported in our annual status reports and available on the Air quality England web site.	No change made to the Strategy document.
89		Please expand and join up the air quality monitoring and alerts network including increased monitoring of black carbon and ultra fine particulate matter (PM _{0.1}).	Consideration will be given to measuring black carbon and ultra fine particulates as part of the annual review of monitoring. This will be subject to funding.	No change made to the Strategy document.

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90		<p>The WHO 2021 air quality guidelines apply outside and indoors except in occupational settings (where other regulations apply). Please therefore set out clear delivery plans for tackling indoor air quality within the City including within the surface level of major transport hubs. CAL set out the position in 20233. The subsequently published British Standard BS 40102-1:20234 should be taken as the benchmark for air quality in all developments and planning permissions.</p>	<p>The draft City Plan 2040 contains the following policy: <i>Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions</i></p> <p>Monitoring on the London Underground is undertaken by TfL.</p>	<p>No change made to the Strategy document.</p>
91		<p>CAL recommends that the City's Policy and Resources Committee have an explicit oversight role in ensuring that air quality delivery plans are reviewed and consulted upon when national limits are exceeded. This would be consistent with calls from the Office for Environmental Protection.</p>	<p>The governance pathway has been agreed to be the Port Health and Environmental Services Committee.</p>	<p>No change made to the Strategy document.</p>
92		<p>The quickest, simplest, cheapest and most effective way to achieve zero air emissions throughout the City by 2040 or earlier is to require every development and significant refurbishment to be 2040-ready before it is occupied. Otherwise, you will be permitting combustion plant that is likely to have an economic life beyond 2040 or make it necessary to strip out a whole building at a later date to install equipment that could easily have been installed now while other work is underway. The Mayor of London's aim of 'net zero' by 2030 makes this the more likely date than 2040. We need all-electric buildings now which will require major investment in local infrastructure</p>	<p>Most large developments have air source heat pumps, and the only on-site combustion is back up diesel generators. Developers are required to assess alternatives to diesel.</p> <p>This will be reflected in the revised Air Quality Supplementary Planning Document</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
93		<p>In planning decisions, please ensure that compliance with legal limits and guidelines is measured to at least one decimal point (e.g. 40.1) and that exceedances are judged absolutely or by City officers not 'dismissed' as 'negligible' or 'insignificant' by third parties acting for developers. For example, strict 'limit values' apply almost everywhere. Cumulative air quality impacts, taking full account of all permitted development, must be taken into account in every planning decision.</p>	<p>The focus of planning policy is to minimise on site combustion for managing both air pollution and emissions of carbon</p> <p>The draft City Plan 2040 includes the following policies:</p> <p><i>Developers will be expected to install non-combustion energy technology where available</i></p> <p><i>Development that would result in a worsening of the City's nitrogen dioxide or PM10 and PM2.5 pollution levels will be strongly resisted</i></p>	<p>No change made to the Strategy document.</p>
94		<p>It is vital that emissions from outside the City are reduced sharply to protect public health and achieve climate targets. Ammonia and methane emissions from agriculture are a serious problem. Please therefore encourage the adoption of culturally sensitive plant-based menus by default by all public institutions in the City by 2030. New York hospitals have shown what can be done</p>	<p>We collaborate with a high number of external stakeholders and our Air Quality Partners to ensure that emission reductions are experienced on a regional and national scale.</p> <p>Emission controls are in place nationally for methane, and national action for controlling ammonia is set out in the national Clean Air Strategy 2019.</p> <p>Our Climate Action Strategy has a target to achieve net zero throughout the value chain by 2040 and has established a Purchased Goods and Services project to deliver this. This project collaborates with suppliers to reduce emissions and deliver low carbon products and services, including our food suppliers and subsequent supply-chains.</p>	<p>No change made to the Strategy document.</p>
95		<p>CAL urges the City to require zero air emissions from all river traffic and the use of onshore electric power for ships in all of its ports by 2030.</p>	<p>This is not within the control of the City Corporation. However, we will include it with our ongoing discussions with the Port of London Authority</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
96		Last but not least, CAL urges the City to put greatest emphasis in its AQS on achieving zero air emissions within the City by 2030 together with clarity for the Mayor and the new Government on what powers its needs to achieve that. Other lobbying and similar initiatives may be of little value.	The Climate Action Strategy commits the CoL to achieve net zero by 2027 across the City Corporation's operations.	No change made to the Strategy document.
97	An individual	It is wrong to charge parked vehicles scaled charges as while they are parked they do not emit any pollutants. This is effectively an unfair and discriminatory tax on the poorer people in Society that can't afford to upgrade their car and that have already paid £27.50 per day in other taxes: Congestion Charge and ULEZ.	The City discourages all private motor vehicle traffic but particularly wants to discourage the more polluting vehicles from driving in the Square Mile. Emissions-based on and off-street parking tariffs are one method we use to do that. The City's emissions based charging is separate from Transport for London's ULEZ and Congestion Charge schemes.	No change made to the Strategy document.

98	UK Health Security Agency	<p>UKHSA's position is that some pollutants, such as nitrogen dioxide and particulate matter (PM), are non-threshold – i.e. there is no known level of exposure below which health impacts don't occur. This means that any improvement in air quality, even below Air Quality Objective Levels and Standards, is associated with benefits to people's health. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants, address inequalities (in exposure) and maximise co-benefits (such as by increasing active travel and physical exercise or improving access to and quality of greenspaces). As outlined in our 2019 review of interventions to improve outdoor air quality and health, we recommend that evaluation is embedded in the design of interventions from their outset and to systematically gather evidence of their impact and effectiveness. We suggest that it is beneficial to seek the implementation of the evaluation methods at the planning stage.</p> <p>It is important that local authorities keep working to reduce levels of air pollution not only in Air Quality Management Areas (AQMAs) but across the wider local authority area. The evidence around the role of fine and ultrafine fractions in the health effects of air pollution is growing. As identified within the Draft Air Quality Strategy, in 2021 the World Health Organization reduced their guideline level for fine PM (PM_{2.5}) from 10 µg/m³ to 5 µg/m³. In January 2022, the Committee on the Medical Effects of Air Pollutants (COMEAP), an expert committee of the Department of Health and Social Care, published updated guidance on the health evidence relevant to setting PM_{2.5} targets. This was intended to inform the Department for Environment, Food and Rural Affairs (Defra's) development of air quality targets under the Environment Act 2021. The advice included that reducing concentrations below the WHO guideline value of 5 µg/m³ would benefit public health.</p> <p>UKHSA supports measures to reduce sources of air pollution and people's exposure, such as those outlined in the revised AQS, as well as measures targeting defined areas where elevated levels of pollution have been observed, such as on areas of the A3211 with modelled</p>	Noted	No change made to the Strategy document.
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No	From	Comment Received	Response	Action taken
		annual nitrogen dioxide (NO ₂) exceeding the standard of 40 µg/m ³ in 2022. The actions proposed to reduce emissions by reducing vehicular use may additionally benefit public health through physical activity and increased levels of pedestrian street activity and social interaction. There are also indirect health co-benefits from reduced congestion, noise, and improved road safety, which are mentioned within the aims of the Strategy.		
99		Chapter 1, section 1 – there is no reference to Table 1.1 in the main body of text. We also suggest that the AQS includes detailing the objectives for NO ₂ , PM _{2.5} , and PM ₁₀ that are to be achieved, alongside ambitions that have been chosen by the City Corporation.	Text has been added to reference Table 1.1. The objectives are included in this table.	Strategy text amended.
100		Air pollution particularly affects the most vulnerable in society and often has a strong correlation with equalities issues because less affluent areas are often those with poorest air quality. There is potential for the Climate Action Strategy, as detailed in Chapter 3, to disproportionately affect some groups of people. Without support, action on air quality may have the perverse impact of increasing inequalities, and we would encourage that sensitivity analysis procedures be used to explore and quantify the impact.	An Equalities Impact Assessment has been completed for the Air Quality Strategy.	No change made to the Strategy document.
101		Chapter 5, section 5.1.2 reports that there are efforts to, “promote the use of cargo and e-cargo bikes by providing accommodating cycle lanes and associated infrastructure”. We advise that with any implementation of electric vehicle promotion, or electric vehicle charging points, the potentially hazardous nature of lithium ion battery fires is considered, and where necessary the fire brigade are informed with strategies in place to respond to potential lithium ion battery fires.	To be noted when any promotion is to take place, ensure any health and safety implications are clearly explained.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
102		Chapter 5, section 5.2.2 states that, "Construction has been identified by the LAEI as the highest source of PM ₁₀ emitted in the Square Mile". We recommend the AQS include more detail on how the City Corporation aims to bring forward measures to tackle emissions caused by construction and demolition including time frames of implementations, and whether existing construction works will require changes to their mode of operations to reduce air pollution emissions.	A revised Code of Practice will be published in the next 12 months. These comments will be taken into account in the update.	No change made to the Strategy document.
103		Chapter 5, Section 5.2.5 notes that, "Commercial cooking is the largest source of PM _{2.5} emissions at 37%. Work is underway to consider how emissions from this sector can be reduced". We would recommend that further details are included on what work is being conducted to reduce emissions from this sector as this is not currently detailed.	The Strategy details the work that will be undertaken.	No change made to the Strategy document.
104		The revised AQS provides detailed information about current exposure to air pollution in The City of London. In summary, interventions that are aimed at reducing air pollution can contribute to increased life expectancy and also help reduce premature deaths from cardiovascular and respiratory disease. We encourage a focus on improving air quality as a whole including interventions that reduce emissions, whilst also embracing measures that can be adopted at an individual level such as promoting active travel and awareness of the effects of air pollution on health. We also encourage evaluation strategies to be put in place where possible to monitor the effectiveness and share wider learning. UKHSA recognises and agrees with the evidence-based information provided by the City Corporation on the chronic and acute health impacts of air pollution, particularly on the most vulnerable human receptors.	Noted. The actions in the Strategy reflect these comments We measure the impact of interventions through the extensive air quality monitoring network. This information is shared with London boroughs	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
105		<p>Editorial notes</p> <ul style="list-style-type: none"> • Chapter 4, Table 4.1 -there is no visible white bottom border between 'The Environment Agency' and 'The Port of London Authority'. • Chapter 2, section 2.4 – please write out the abbreviation 'LAEI' in full when using it for the first time. • The revised AQS may benefit from providing a glossary for the acronyms mentioned throughout. Notably, the terminology “Commercial Heat and Power” is used within section 5.2.4 and abbreviated to CHP; which may be confused with the commonly used abbreviation 'CHP' for 'Combined Heat and Power'. 	<p>A technical glossary is already included and has been expanded following consultation.</p> <p>A thorough review of the Strategy has been completed to ensure consistency regarding terminology.</p>	<p>Strategy text amended.</p>

106	Barbican & Golden Lane Neighbourhood Forum	<p>Air quality in the City of London has improved through the efforts of the Corporation and the Mayor of London. Despite this, and especially for residents who breathe it all day, every day, the City’s air is still not clean. Nor is it healthy.</p> <p>Because the City has, traditionally, taken a lead in this area we would like to see an ambitious set of commitments in the coming five years of this new Strategy and the Action Plan. We urge the City to;</p> <ol style="list-style-type: none"> 1. Adopt targets that reflect the WHO guidance on what is “healthy air” 2. Do more than simply “support regional and national efforts” to bring air pollution down 3. Immediately – stop demolition and polluting construction at weekends, reduce freight traffic, reduce the current number of diesel generators 4. Over the longer term – reduce urban heat island, improve greening at street level (especially trees), ensure that retrofit rather than wholesale demolition is the norm 5. Improve monitoring – focussing on sensitive receptors (residents, hospitals, schools) as well as roadside locations 6. Publish all background and budget information and progress. 	<p>The Strategy recognises the WHO guidance on what is healthy air, which goes beyond national standards. The Strategy’s aims are to work towards, the WHO guideline levels.</p> <p>The actions in the Strategy detail that we are taking a range of specific local action to reduce levels of air pollution, in addition to supporting wider national efforts.</p> <p>This has previously been considered and consulted upon, Members agreed to working hours 9am to 2pm on Saturdays only</p> <p>This is covered City Corporation Whole Lifecycle Carbon Options Planning Advice Note 2023 and the Planning for Sustainability SPD 2023.</p> <p>Monitoring takes place close to all schools, Barts Hospital and main residential areas</p> <p>The overall departmental budgets have been reported to PHES quarterly although these do not show specific AQ spend. The budget for 24/25 is £373k. External funding opportunities will be explored to support the delivery of the Strategy.</p> <p>Annual progress reports are available on the City Corporation web site.</p>	No change made to the Strategy document.
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No	From	Comment Received	Response	Action taken
			The London Atmospheric Emissions Inventory, which contains data on all emission sources, is available on the GLA web site	
107		The WHO Air quality guidelines recommend levels and interim targets for common air pollutants: PM, O3, NO2, and SO2. The targets set within the draft City Air Quality Strategy falls well below the level deemed “healthy” by the WHO, refers to fewer pollutants and do not go far enough to meet the City’s stated “Vision” of a “Square Mile has air that is healthy to breathe”. Small particulates (PM2.5 and below) are especially harmful to health and the City’s target is twice the WHO guideline, for example (see below).	<p>The aims of the Strategy are to have air quality that is better than national standards.</p> <p>SO₂ was monitored at Senator House, Queen Victoria Street from 2001 to 2013. During this time there were no exceedances of the three SO₂ national objectives, or of the 2021 WHO Air Quality Guideline.</p>	

No	From	Comment Received	Response	Action taken
108		<p>In the UK it has been estimated that the mortality burden of long-term exposure to particulate matter (PM 2.5) in 2008 was equivalent to nearly 29,000 premature deaths in those aged 30 or older. "It is likely that removing exposure to all PM 2.5 would have a bigger impact on life expectancy in England and Wales than eliminating passive smoking or road traffic accidents"⁵ according to the Institute of Air Quality Management.</p> <p>The City's AQS is not ambitious enough on small particulates and does not cover all the pollutants in the WHO 2021 guidance. It also ignores pollutants such as carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs) which may be found indoors.</p> <p>In order to make a meaningful difference to air quality the targets also need to reflect the degree of Population Exposure so that measures are focussed on improving air quality where people are. This includes recognising that local City residents cannot escape the local air pollution at the end of a working day.</p> <p>More ambitious and more relevant targets (and monitoring) are needed to make the AQS a credible policy.</p> <p>As Public Health England says "Poor air quality is the largest environmental risk to public health in the UK, as long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy"⁶</p>	<p>There is no statutory obligation, and no authority, for local authorities to deal with indoor air quality. However, the Strategy recognises the health impacts and contains an action to raise awareness of the health impacts of poor indoor air quality.</p> <p>Annual reports are produced detailing progress with actions and air quality data that demonstrates improvements in air quality due to the implementation of policy.</p> <p>Carbon monoxide at roadside was monitored in the Square Mile at roadside a few years ago. Concentrations were very low and consistently met national standards.</p> <p>The focus of the Air Quality Strategy is to improve air quality across the whole of the Square Mile.</p>	<p>No change made to the Strategy document.</p>

109		<p>Creating healthy air has to involve collaboration at regional and national level. However, the City's strategic goal should also include direct local action. It should also seek to target the sources of pollution from existing buildings and not just when new development is proposed.</p> <p>The City's AQS says "We will manage emissions of pollutants from construction sites; ensure new developments are low emission; tackle unnecessary vehicle engine idling and reward the best practice of our partners" and yet there is little evidence of firm, effective policy action to back up this claim. The Forum agrees with the City's intention, and we would like to see the following action in support of it.</p> <p>Immediate action – stop demolition and polluting construction at weekends, reduce freight traffic, stop diesel generators</p> <ul style="list-style-type: none"> i) Demolition and construction account for high levels of air-borne pollutants, including the direct release of small particulates (PM10, PM2.5 and PM1). Other London Boroughs ban dust-generating demolition work at weekends – the City of London should do the same; ii) All demolition sites should be required to monitor for construction dust (according to the City's annual AQ monitoring report, 2023, only 8 planning applications were required to); iii) The City's aim to "consider how we can help to manage pollutants associated with diesel standby generator plant" is far too tentative. There are around 200 generators operating in the City, with around 600 further residual generators, and 76 filming events a year probably also using temporary generators⁷. 	<p>This has previously been considered and consulted upon. Members agreed to the working hours of 9am to 2pm on Saturdays only.</p> <p>The Code of Practice states: Continuous air quality monitoring will normally be required on large sites adjacent to sensitive premises such as residential properties, schools and St Bartholomew's hospital. This may include dust slides for assessing nuisance dust and real time monitoring to assess PM2.5 and PM10.</p> <p>We have no powers to regulate the use of diesel generators in existing buildings so need to work with Facilities Managers to minimise emissions where possible.</p>	
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No	From	Comment Received	Response	Action taken
		<p>The City's Strategy needs to include action to reduce the reliance on diesel-powered generators in <i>existing</i> buildings and to ban the use of temporary diesel-powered generators for filming;</p> <p>iv) Require Air Quality Impact Assessments in all major planning applications and any schemes generating more than 25 additional servicing vehicles a day (according to the City's annual AQ monitoring report, 2023, only 19 planning applications had an air quality impact assessment which was reviewed for air quality impacts)</p>	<p>We have started looking into generators used in filming and have been gathering information on diesel generator use. We have been investigating options to encourage cleaner forms of energy and will be continuing this work over the next year.</p> <p>We review all relevant planning applications for air quality impacts and make recommendations for mitigation. Not all applications will have a formal air quality impact assessment, they may instead have an Air Quality Neutral Assessment or Air Quality Positive Assessment. Details can be found in the Air Quality Supplementary Planning Document which is due to be updated in 2025.</p>	
110		<p>As the National Centre for Earth Observation says "In cities, urban heat islands occur where the land surface is densely covered with roads, pavement, buildings, and other surfaces that absorb and retain heat. This effect increases energy costs, air pollution levels, and heat-related illnesses and fatalities." It is a significant environmental problem in the City of London. The Air Quality SPD must be updated to bring in an Air Quality Positive approach to all development, including measures to reduce the damaging Urban Heat Island Effect, full retrofit-first to avoid damaging demolition wherever possible, much greater emphasis on providing ground-level greening and street trees, and an Air Quality Impact Assessment for all major and medium-sized schemes</p> <p>Since the City planners had previously announced an intention not to produce any new SPDs, the Forum would like confirmation that both the Air Quality SPD and the City's Code of Deconstruction and Construction will be updated within 12 months to implement much-needed air quality improvements.</p>	<p>A revised Code of Practice will be published in the next 12 months and these comments considered.</p> <p>Work has commenced on a review of the Air Quality Supplementary Planning Document.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
111		<p>The City needs a monitoring and analysis system that collects the right data, in the right locations. There are currently very few monitors of anything other than NO₂, and most of these are roadside.</p> <p>The City has a very high workday population, a static residential population, a hospital, several schools and millions of visitors annually. The concentrated release of pollutants in the City of London, therefore, has widespread impact. The density of demolition and construction work, for example, and the intensity of polluting delivery vehicles and through traffic, are squeezed into a small area geographically, and affect a very high number of people.</p> <p>A review of monitoring stations and data is needed, followed by an expansion of monitoring stations to collect more information on PM_{2.5} (and smaller) and other pollutants, given the weight of evidence that these are the really serious ones.</p> <p>Ignoring data on demolition needs to stop. It is a major source of very damaging air pollution, and requires proper monitoring.</p>	<p>Nitrogen dioxide is measured at the greatest number of locations as it varies spatially much more than PM₁₀, PM_{2.5} and ozone.</p> <p>Monitoring locations are reviewed annually, the next review is due in November 2024.</p>	<p>No change made to the Strategy document.</p>
112		<p>The City analysis of “activities that emit relatively high levels of very fine particles (PM_{2.5})” done by Ricardo uses a model that does not include demolition data. Its conclusion about “commercial cooking” is based on a desktop model which applies a nested set of assumptions to a single twenty-five year-old study of short order cooking in the USA. No wonder the report’s author describes the result as “surprising”.</p> <p>Such modelling is not a robust basis for policy-making. Accurate data needs to be collected from sensitive receptor sites such as residential areas, schools and hospitals, where the most vulnerable people breathing the air are, and from demolition and construction sites.</p>	<p>A computer model is just one tool that we use for decision making. We have also made two unsuccessful bids for funding to measure PM_{2.5} associated with commercial cooking as there is a lack of good data available. We will continue to seek opportunities for funding to conduct research into this area.</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
113		<p>Finally, admirable progress has been made by the City in making timely NO2 data available by a variety of means. We would like to see such transparency extended to the modelling used by the City and the financial data that informs policy implementation. As we understand it no planning applications had S106 agreements which included requirements to improve air quality, nor were there any planning applications requiring CIL payments that include a contribution to improve air quality in 2023.</p>	<p>The overall departmental budgets have been reported to Port Health and Environmental Services Committee quarterly The Air Quality budget for 24/25 is £373k. External funding opportunities will be explored to deliver aspects of the new Strategy.</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
114		<p>In 2016, the Mayor of London awarded the City of London Corporation £990,000 over three years to implement a Low Emission Neighbourhood (LEN). This was to be matched by the City, creating a budget of £1.98m. The intention was to focus on three areas: Barbican, Guildhall and St Barts to make “improvements to Beech Street and the cultural hub, support the Barbican Estate’s plans for freight consolidation and electric charge points and build on previous air quality engagement projects with Barts Health NHS Trust, Barbican residents and local businesses.”⁹</p> <p>At the time the annual average nitrogen dioxide concentration in Beech Street was 85 g/m³ (down slightly from 2015 when it was 89 g/m³) . In 2017 it was 85g/m³. In 2017 the annual average nitrogen dioxide concentration in Fore Street was 41g/m³ and in Silk Street, 42 g/m³.</p> <p>By 2018 the City was running out of time to implement the traffic reduction element of the Low Emissions Neighbourhood (funding having been granted on a “transformational” scheme), either in Beech Street or Moor Lane, which was proposed by officers as an alternative.</p> <p>In 2020, without consultation, the City implemented a zero-emission traffic scheme for the short, tunnelled section of Beech Street, at a cost of £2.4m sourced from CIL/OSPR10. The legality of this was challenged in the High Court and in July 2023 the City closed the project</p> <p>Earlier in 2024, the City started work on a “Healthy Neighbourhood” scheme which would, on the face of it, be an area-based approached as was promised in 2016. Subject to Committee approval a consultation on this is due in the autumn of 2024, meaning that it is unlikely that work will start before 2025, nine years on from the original plan.</p> <p>Improving the air quality in the Barbican and Golden Lane neighbourhood Area, in which the majority of the City’s residents live, is a priority and needs to be planned properly and implemented without further delay.</p>	<p>Delivery of the Strategy will improve air quality everywhere in the Square Mile and the aim is to go beyond national health-based standards.</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
115	Resident (Air Quality Champion)	A full glossary of the terms etc used would be helpful.	<p>The glossary has been expanded to include extra items.</p> <p>A thorough review of the Strategy from draft to final has been completed to ensure consistency with terminology.</p>	Strategy text amended.
116		City Corporation's 2019 decision to introduce a 15mph speed limit throughout the Square Mile, subject to approval by the Department for Transport, should be resurrected.	<p>The 2019 proposal was rejected by the Department for Transport due to challenges relating to enforcement and the accuracy of speedometers at lower speeds.</p> <p>In terms of vehicle emissions, a reduction of speed from 20mph to 15mph does not guarantee a reduction of tailpipe emissions (NOx, PM10, PM2.5).</p>	No change made to the Strategy document.
117		<p>The recent decision to allow black cabs – Hackney Carriages but not private hire EVs - to use the Bank junction, whether or not rejected by TfL, should be reversed.</p> <p>Although over fifty percent of the black cabs may be zero tailpipe emission enabled, there doesn't appear to be any evidence as to how often that ability is used in the Square Mile. The loss of the Beech Street Zero Emission Scheme isn't even mentioned despite its success in reducing emissions there. Unfortunately, any replacement scheme will almost certainly mean an increase in pollution on the roads forming its boundaries.</p>	<p>Members voted to allow taxis unrestricted access through the Bank junction for a trial period. Dependant on TfL approval this trial is set to start in Spring 2025 and run for a maximum period of 18 months.</p> <p>NO₂ monitoring will continue at the junction regardless of the decision made by TfL. Any additional monitoring will be assessed following the TfL decision.</p>	No change made to the Strategy document.
118		Although air quality control comes under the oversight of Port Health & Environmental Services, (PHES), its implementation is the responsibility of a Division of the Environment Department. As a result, the air quality team officers appear to be principally engaged in enforcement rather than determining policy, particularly in relation to development. For instance, the need to constantly enforce the Deconstruction and Construction Code of Conduct is the result of planning policy supporting development rather than the environment.	Enforcement is only part of the function of the Air Quality Team. The team also develops policy e.g. the Air Quality Strategy and the Air Quality SPD.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
119		<p>Whatever the Port of London Authority's policies, the need to reduce air pollution from craft using the Thames doesn't appear to be a concern of the Strategy. The Uber Boat by Thames Clippers' fleet has three hybrid powered boats but the other 18 are solely diesel powered. The 22 boats operated by the Marine Policing Unit all appear to be powered by fossil fuels and, of course the tugboats used to pull the barges serving Walbrook Wharf are similarly powered. What proposals are there to eliminate the use of boats powered by fossil fuels on the Thames controlled by the PLA and that includes cruise ships?</p>	<p>Emissions from Walbrook Wharf tug boats and viable alternatives are to be investigated under Action 10.</p> <p>These points will be considered as part of our ongoing collaboration with the Port of London Authority.</p>	<p>No change made to the Strategy document.</p>
120		<p>My revisions include the use of abbreviations throughout after the relevant word/phrase/tile etc has been abbreviated.</p>	<p>A thorough review of the Strategy has been completed to ensure consistency with terminology.</p>	<p>Strategy text amended.</p>
121		<p>Woodburning shouldn't be a problem within the Square Mile, unless there are bar-bques or from boats moored on the Thames. However, that will not be the case in the 11,000,000 acres of land outside the City and, may be, not on the other HRA estates. What measures are City Corporation implementing to eradicate this source of pollution?</p>	<p>The Strategy covers air pollution in the Square Mile, which is our statutory responsibility.</p> <p>A workstream for the Climate Action Strategy is looking into decarbonising our operational properties and housing states. This work will have a positive impact on air quality.</p> <p>Where open space works are completed through Habitat Grant funding, any burning is strictly prohibited. For tree works, where possible all arisings are left on site as standing/fallen deadwood or woodchip rather than being burnt.</p>	<p>No change made to the Strategy document.</p>
122		<p>"Nitrogen dioxide" – The chemical formula is NO₂, and this is shown in parenthesis as an abbreviation but "nitrogen dioxide" is used almost entirely throughout. The abbreviation/formula should replace "nitrogen dioxide". This is also the case with both Nitric Oxide (NO) and Nitrogen Oxides (NO_x). Although "particulate matter" is abbreviated to "PM₁₀" and "PM_{2,5}" and these abbreviations are used virtually throughout, "particulate(s)" and "particulate matter" are also used.</p>	<p>A thorough review of the Strategy has been completed to ensure consistency with terminology.</p>	<p>Strategy text amended.</p>

No	From	Comment Received	Response	Action taken
123		<p>The Strategy appears to be out of date in several respects. Obviously, the loss of the Emissions Reductions (Local Authorities in London) Bill came too late for mention, but the lack of movement through Parliament, since December 2021, is ignored. Again, the proposed part reversal of the very effective “All Change at Bank” scheme came too late to be acknowledged. Additionally, City Corporation approved the Local Area Energy Plan in October 2023.</p>	<p>Parliament was dissolved on 30th May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6, the action remains the same.</p> <p>Members voted to allow taxis unrestricted access through the Bank junction for a trial period. Dependant on TfL approval this trial is set to start in Spring 2025 and run for a maximum period of 18 months.</p> <p>Confirmation has been added that the LAEP has been adopted.</p>	<p>Strategy text amended.</p>
124		<p>In “Foreword”, “the”, “the draft” and “this” are all used before “Strategy”. The self serving use of “ambitious” in respect of City Corporation’s policies does nothing to improve the outcomes of the same.</p> <p>The claim that “the majority of the pollution comes from beyond our boundary” requires evidencing.</p> <p>Turning attention to “relatively high” PM2.5, although obviously welcome, seems to be rather late in the day. Again, very welcome but where health is being affected, is there any excuse for not trying to eliminate the problem? Going beyond “statutory obligation” in such circumstances should be a given.</p>	<p>The Foreword has been updated to reflect that it is a final version</p>	<p>Strategy text amended.</p>
125		<p>The Strategy is 2025-2030 but “Delivering Healthy Air in the City of London” – shows it as 2025-30. This page has the first mentions of the World Health Organisation (WHO), the Greater London Authority (GLA) and Transport for London (TfL).</p>	<p>A thorough review of the Strategy has been completed to ensure consistency with terminology.</p>	<p>Strategy text amended where required.</p>
126		<p>The “Technical Glossary” on page 4 has “μ” unnecessarily in bold; mis-spells both “Micrometre” and “metre”; and uses both “Microgram” and “Microgrammes”, as well as “gram”. Also, the “s” on “Kilowatt” is contradictory.</p>	<p>A thorough review of the Strategy has been completed to ensure any spelling mistakes have been corrected.</p>	<p>Strategy text amended where required.</p>

No	From	Comment Received	Response	Action taken
127		Under 1, "Introduction", "people" is unnecessary. Again, "micrometers" but should be "µm" anyway and "the pollutant" is also unnecessary. The aims of the Strategy, "Reducing emissions" is only "4" of the five areas of delivery and should be "1".	A thorough review of the Strategy has been completed to ensure any spelling mistakes have been corrected. The five areas of delivery are not listed in terms of hierarchical importance.	Strategy text amended where required.
128		Under 1.1, "Source of Air Pollution in the Square Mile", GLA and TfL should be abbreviated as per 2.4. The abbreviation of both Nitrogen Oxide and Nitric Oxide isn't repeated. There appears to be no evidence to confirm the sources of pollution either in the text or the graphics.	A thorough review of the Strategy has been completed to ensure consistency with terminology. The references are provided in the footnotes of the page.	Strategy text amended where required.
129		Under 1.2, "Health Impacts of Air Pollution", as air pollution has an effect on health, what is the relevance of "elevated concentrations"? "London" is superfluous in the description of the "Coroner". If there is "no clear evidence of a safe level of exposure", isn't City Corporation being complacent in not accelerating pollution reduction?	Comments noted. The aims of the Strategy are to improve air quality beyond current national standards.	No change made to the Strategy document.
130		Under 2, "Air Quality", there is a reference to ozone monitoring. However, according to the information in Appendix 4, ozone is only monitored at the Guildhall, not even at The Aldgate School. If the data in the Strategy is provisional, why is it being consulted on now?	Ozone is only monitored at one location, Guildhall. Ozone is a regional pollutant, and concentrations will not vary measurably across the Square Mile. Ratified (final) monitoring data for 2023 is now available and included in the Strategy.	Final data for 2023 added to the Strategy document.
131		Under 2.5, "Air Quality Monitoring on the Wider City Corporation Estate", the stated intention is to monitor ozone at a minimum of five sites, why is this not presently the case?	The stated intention is not to monitor ozone at five locations. This is not necessary as ozone is a regional pollutant and concentrations will not vary measurably across the Square Mile.	No change made to the Strategy document.
132		Under 3, "Leading by Example", why is it only "large contracts" that include a "no vehicle engine idling policy"? "Unnecessary" engine idling is illegal. The Corporate Plan commitment would be welcome were it translated into practice.	Removed the word large. For any contract, both for the Square Mile and other City Corporation sites, engines must be switched off when vehicles are stationary for longer than one minute.	Strategy text amended.

No	From	Comment Received	Response	Action taken
133		Under 3.3, "Climate Action Strategy", as the CAS came into effect in March 2021, the 66% reduction between 2018 and 2021 preceded the CAS. If 100% of electricity purchased by City Corporation since 2018 has been from renewable sources, what was the point of the 15-year PPA, even if over 50% of City Corporation's electricity "comes" from that source? There is a reference to the Emissions Reduction (Local Authorities) Bill in the commitment box but that will need to be removed.	<p>The PPA was procured to reduce carbon emissions and also costs to the City Corporation It supports the national transition to renewable energy and securing long-term energy supply.</p> <p>The date in section 3.3 has been changed from 2021/2022 to 2022/2023 as per Taking Climate Action: Our Progress 2023.</p> <p>Parliament was dissolved on 30th May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6, the action remains the same.</p>	Strategy text amended.
134		Under 5.1, "Transport Emissions", "unnecessary" isn't defined. From experience, this would include black cabs at ranks, refrigerated vans, security vans and emergency vehicles but there is some doubt as to whether, in the case of the latter, idling engines are necessary when parked.	Comments noted.	No change made to the Strategy document.
135		Under 5.2.1, "New developments" the statement that "planning policy" is "an important mechanism for improving air quality" requires justification, at least. The Air Quality SPD is now over seven years old and requires updating. The CoP's title is the "Code of Practice for Deconstruction and Construction Sites". The current, Ninth Edition, dates from 2019.	<p>Air quality is a material consideration in planning and there is policy in place to reduce any impacts from development.</p> <p>Work is underway to update the Supplementary Planning Document, and there is a specific action in the Strategy for this.</p> <p>A revised Code of Practice will be published in the next 12 months</p>	No change made to the Strategy document.
136		Under 5.2.3, "Non-Road Mobile Machinery", limiting the power rating between an arbitrary range of outputs appears counterproductive. Why can't all NRMM be regulated?	<p>37-560kW was specified by the Greater London Authority when the NRMM LEZ was originally implemented in 2015.</p> <p>A revised Code of Practice will be published in the next 12 months.</p>	No change made to the Strategy document.
137		Under 5.2.4, "Commercial Heat and Power", using "planned" heat networks -1 may be difficult. 3 refers to using low-emission CHP "only where there is a case for it". What does this mean as 4, "use ultra-low nitrogen oxide gas boilers" has no such qualification?	<p>Comment noted.</p> <p>Emission limits for Combined Heat and Power Plant and boilers are specified in the current Supplementary Planning Document. These will be reviewed as the SPD is updated.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
138		Under 5.2.7, “Environmental Permitting Regulations” – shouldn’t this be “Controlling” instead of “Permitting”? – what is the relevance of “to air”? It would be more encouraging if “minimise” was replaced with “prevent” pollution. As 1st January 2024 was six months age, does all the relevant plant have permits?	<p>The regulations are called the Environmental Permitting Regulations (EPR), and these are not solely for emissions to air, they also cover aspects such as waste, water and flood risk.</p> <p>The Environment Agency is the regulatory body for the EPR and associated regulations.</p>	No change made to the Strategy document.
139		In the box at the end of 5.2, “Reducing Emissions”, surely, the further action shouldn’t stop at reducing NO2 concentrations simply below 40µ/m3 but towards 30µ/m3? There should be more than mitigating NRMM emissions and reducing emissions from standby power generation. If Chimney stacks are lower than adjoining buildings, dispersion will affect those buildings. Promoting and enforcing Smoke Control areas etc should be a given.	<p>The aim of the Strategy is to achieve 90% compliance with the WHO 2nd interim target (30µg/m³). If this achieved within the timeframe of the Strategy efforts will continue to improve concentrations further. The highest concentrations of annual mean NO₂ remain at roadside locations, therefore a further action has been added to achieve compliance with 40µg/m³.</p> <p>Emissions from NRMM are regulated through the London-wide NRMM Low Emission Zone, and the required stage for NRMM will be tightened in 2030.</p> <p>Backup generators are assessed through planning and will be a focus of the revised Supplementary Planning Document.</p> <p>Dispersion of pollution is assessed through the planning process and for larger appliances, through the Clean Air Act 1993.</p>	No change made to the Strategy document.
140		Under 6, “Public Health and Raising Awareness”, the actions to increase public awareness of, and understanding about, air pollution is only relevant because pollution levels are dangerous to health. Surely more effort to reduce air pollution further than the intentions of the Strategy must be a priority. This is even more essential with the higher-than-average mortality rate from particulate air pollution in the City. The advice offered in leaflets has the semblance of desperation rather than ambition.	Comments noted.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
141		Under 6.1, "Provision of Information", there seems to be a conflict. According to the third paragraph, "high levels of air pollution occur in the City of London on a small number of days in any year and instances of very high levels of air pollution are now very rare". However, according to the fifth paragraph, the "CityAir" App "provides advice to users when pollution levels are high or very high" but if that's all, there seems to be little point in it!	Comments noted.	No change made to the Strategy document.
142		City Corporation may have no statutory obligation re indoor air quality. However, that can't apply in respect of its safeguarding obligations to children in City nurseries and schools, as well as its HRA estates both within and without the Square Mile.	<p>Monitoring of air pollution is undertaken at schools and nurseries in the Square Mile. Action Plans and reports are completed for the schools and nurseries, and they include monitoring results and relevant information for each location.</p> <p>Pollution alerts are sent to all schools and health care sites.</p> <p>The Strategy is for air pollution in the Square Mile, as this is where our Air Quality Management Area applies.</p> <p>A workstream for the Climate Action Strategy is to decarbonise our operational properties and housing states. This will have a positive impact on air quality.</p>	No change made to the Strategy document.
143		<p>In the box at the end of 6, "Public Health and Raising Awareness", the Director of Public Health is part of the City Corporation/LB Hackney partnership which "works to improve the health and wellbeing of both the resident population of the City of London and more than 400,000 people working in the Square Mile" ("About the Public Health Team", City Corporation, website 03/06/2024). However, the partnership also works within LB Hackney and that should be acknowledged.</p> <p>In what way and how will City Corporation "work with schools and nurseries in the Square Mile"? Although raising awareness of the health impacts of poor indoor air quality is to be appreciated, there needs to be action to improve it.</p>	<p>Comment noted.</p> <p>Additional text has been added to the detail of Action 26.</p>	Strategy text amended.

No	From	Comment Received	Response	Action taken
144		Action 1: Will ozone levels be monitored at all five sites? If so, from when?	Ozone is monitored at the Guildhall. There are no plans to increase the number of ozone monitoring sites in the Square Mile.	No change made to the Strategy document.
145		Action 4: Wasn't the Square Mile Local Energy Plan introduced in October 2023?	It has been confirmed in the Strategy that the Local Area Energy Plan has been adopted.	Strategy text amended.
146		Action 7: "Require" would be preferable to "encourage" under "Action". Under the "Detail", "reduce" is preferable to "assist in reducing".	Zero emission capable vehicles are promoted rather than required as there are not always zero emission vehicles available to fulfil a specific function e.g. in our Open Spaces. The text has been altered to be more succinct.	Strategy text amended.
147		Action 9: The Bill, under "Action", needs both re-introduction and progressing through Parliament. Presumably the "Details" will be implemented with the 32 London Boroughs and not in isolation to them.	Parliament was dissolved on 30 th May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6. The action remains the same. Collaboration will continue with London boroughs through Air Quality Cluster and Steering Groups.	Strategy text amended.
148		Action 10: "Air Quality Partners" should be "AQP".	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended
149		Action 11: Presumably City Corporation has the expertise needed in respect of the first "Detail", but this doesn't seem feasible in isolation from the third "Detail". The investigation envisaged in the second "Detail" should have been carried out before the construction of tall buildings was promoted by City Corporation.	Comment noted.	No change made to the Strategy document.
150		Action 12: Surely, the "Action": should be "reduce" and not "assess options for reducing"? The first "Detail" suggests there are roads other than those currently being monitored. How will these be identified? The second "Detail" seems quite straightforward in implementation.	Roads are identified by a combination of air quality monitoring and modelling. Detail has been added to explain we will work with Air Quality Partners to develop and implement plans to reduce pollution.	Strategy text amended.

No	From	Comment Received	Response	Action taken
151		<p>Action 13: The “Action” should be “prevent” rather than “discourage” and be implemented already. The first “Detail” is frustrated by government failure to produce statutory restriction signage, thus requiring a verbal warning before a valid PCN can be issued. The second “Detail” requires prominent signs along the lines of those used by Sheffield City Council. I recently sent the Chair of PHES a copy of those notices as well as a link to the engine idling page of that council’s website. The third and fourth “Details” have merit like the now abandoned volunteer sessions. These were effective – whether solely or with other London Boroughs - in getting the message across. The difference in attitude of drivers over the five years being a positive change and it’s good to know that funding may have been secured to re-start voluntary monitoring. Notably, the Strategy omits reference to City Corporation’s 2020 Traffic Management Order with its £80 fine, supported by the intention to lobby the Department for Transport for new signage. What was the outcome of that lobbying?</p>	<p>The wording has been reviewed and no changes have been made.</p> <p>A specific design for anti-idling signs has been approved by the City Corporation. If there are any further changes, from the City Corporation or from DfT, these will be implemented when relevant.</p> <p>Funding from the Mayor’s Air Quality Fund has been secured for a 4th round of London wide work to tackle unnecessary engine idling. We are part of this project and will be implementing actions in 2025.</p> <p>Action 13 refers to the issuing of Penalty Charge Notices for unnecessary vehicle engine idling. Further information, including the escalation to an £80 fine, is available on the air quality section of the City Corporation website.</p>	<p>No change made to the Strategy document.</p>
152		<p>Action 14: Surely there should be a policy of reducing available parking spaces, if only for offending vehicles. This also applies to the “Detail”.</p>	<p>As of 28th October 2024, emissions-based charges will be introduced in car parks.</p>	<p>No change made to the Strategy document.</p>
153		<p>Action 15: Who will implement the “Action” and how? The same question applies to the first and second “Details”. The first sentence of the third “Detail” should be deleted unless “encourage” is replaced by “require”. In the fifth “Detail”, “consider” should be replaced by “use available”. As mentioned above, the updating of the Air Quality SPD is long overdue.</p>	<p>Officers will continue to review all relevant planning applications with regards to air quality.</p> <p>These comments will be considered further during the update to the Air Quality Supplementary Planning Document.</p>	<p>No change made to the Strategy document.</p>
154		<p>Action 16: This is welcomed but there must be effective sanctions for breaches of the first “Detail”. Inspection under the second “Detail” also needs responses with teeth to breaches of regulations.</p>	<p>Comments noted.</p> <p>A revised Code of Practice will be published in the next 12 months.</p>	<p>No change made to the Strategy document.</p>

No	From	Comment Received	Response	Action taken
155		Action 17: Again the “Action” is welcomed but the mitigation must have teeth. The first “Detail” should be practised already. The second “Detail” requires more than understanding.	We ensure that any construction site with NRMM is audited periodically. The ‘Beyond Construction’ is a GLA led project to document NRMM used across London outside of standard construction settings, e.g. in street works.	No change made to the Strategy document.
156		Action 18: Another welcome “Action” but which also needs teeth.	Backup generators are assessed through planning and will be a focus of the revised Supplementary Planning Document.	No change made to the Strategy document.
157		Action 19: Again, a welcome “Action” but surely ascertaining which part of the commercial cooking process is responsible for the emissions should be the first step. The two “Details” should then follow.	We have made two unsuccessful bids for funding to measure PM _{2.5} associated with commercial cooking to understand which parts of the cooking process contribute most to PM2.5 emissions. We will continue to seek opportunities for funding to conduct research into this area.	No change made to the Strategy document.
158		Action 20: If chimney stacks aren’t above the adjoining buildings, where are the emissions dispersed to?	Any combustion flue should terminate above the roof height of the development. The location of surrounding buildings is considered when the planning application is reviewed.	No change made to the Strategy document.
159		Action 22: Surely, this is a statutory obligation for City Corporation?	It is a statutory obligation to ensure the Smoke Control Area is enforced. We work to ensure food premises are aware of the restrictions in terms of fuel and appliances.	No change made to the Strategy document.
160		Under Appendix 4 “Monitoring Data, Further Assessment”, there’s a specific reference to “ozone” and the fact that it has been measured at the Guildhall since 2024 - despite not being required through the LLAQM Framework - because ozone “has an impact on health at high levels”. However, the claims that ozone is a “primarily a secondary pollutant, therefore there are no major emission sources in the Square Mile”; “most of the ozone is instead formed in the air from reactions between other pollutants”; “pollutants photochemically react outdoors in the presence of sunlight to produce ground-level ozone”; and “similar reactions can occur with nitrogen oxides as a precursor” all require both explanation and evidencing.	This document is an overarching Strategy, therefore detailed definitions and explanations of technical aspects are considered unsuitable for the average reader.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
161		Under Appendix 5: "Air Quality Partner Commitments": The EA: What is "BAT" an abbreviation for? No evidence is produced to support the claim that flue gas abatement systems have a "high capture efficiency" which means "Waste Incineration Plant are low emitters of particulate matter". What proof is there that there are no new or existing MCP within 800 metres of the City boundary and why is that distance significant?	Table A5.1 summarises the responses received from our Air Quality Partners These have been written by the AQPs therefore are contextualised from their point of view. The Environment Agency has provided details on all Medium Combustion Plant, Specific Generator or Environmental Permits in the Square Mile, and within a reasonable distance of our boundary. The response received included the 800m buffer. <i>BAT is Best Available Technique</i>	No change made to the Strategy document.
162		The PLA: The final paragraph appears to be written by the PLA.	Table A5.1 summarises the responses received from our Air Quality Partners. These have been written by the AQPs therefore are contextualised from their point of view.	No change made to the Strategy document.
163		The GLA and TfL: Is it the buses or the fleet that operates across London? The periods "10-14 years" and "once a route contract has ended" may not coincide, so the introduction of new zero-emission buses may be delayed. It would be helpful if the diesel only route was identified. That seven routes still operate Euro V+SCRT and Euro V+SCRT/Euro VI presumably means that six routes operate hybrids that require replacement but only three of these will become fully electric in 2024/25 with the diesel only route. When will the other three routes become electric?	We will continue to collaborate with the GLA and TfL on a range of issues including emissions from buses that operate in the Square Mile.	No change made to the Strategy document.
164		Under Appendix 6: "Air Quality Policies in the Draft City Plan", as the Plan hasn't been adopted yet, any comment now would be premature.	Comment noted.	No change made to the Strategy document.
165		Under "Air Quality Strategy 2025-30: Delivering Healthy Air in the City of London" – "Our Vision", surely "aim" is better than "vision"? Under "Why us?", the Corporate Plan should be irrelevant to what must be a humane policy. Under "Our Aims", the first target seems to have been achieved already; and "before" should replace "by" in the other two. The changes under "Who we will work with" should be self-explanatory.	The aim of the previous Strategy (2019-2024) was for 90% of the Square Mile to meet an annual average of 40 µg/m ³ for NO ₂ . The revised Strategy has updated this aim to 90% of the Square Mile to meet an annual average of 30 µg/m ³ . In 2022 76% of the Square Mile was below 30 µg/m ³ therefore this aim has currently not been met. All other comments noted.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
166		Under "Technical Glossary", the additions are to complete the definitions.	The Technical Glossary has been reviewed and updated.	Strategy text amended.
167		Under 1, "Introduction", there is a growing population of students in the City, which is often ignored. The 11,000 acres are outside the Square Mile. "United Kingdom" seems more professional. The change in the following paragraph and correction in the next one should be self-explanatory. Hopefully, the ozone comment is self-explanatory.	Text updated following comments received. Ozone is not part of the LAQM statute and is assessed at a national level.	Strategy text amended.
168		Under 1.1, "Source of Air Pollution in the Square Mile", the questions require answers.	The references for the sources of information are detailed in the footnotes of the page.	Strategy text amended.
169		Under 2.1.1, "Continuous Monitoring", an explanation as to why there was a change of site seems necessary to justify it.	As stated in the Strategy the monitoring site had to be relocated due to changes in office accommodation.	No change made to the Strategy document.
170		Under 2.1.2, "Non-continuous (Passive) Nitrogen Oxide Monitoring", an explanation for the increases is required.	Detailed trend analysis is not part of the Strategy as it is an overarching document. Commentary on trends is provided in the annual status reports.	No change made to the Strategy document.
171		Under 2.2, "Particulate Matter, PM10", the level for Bell Wharf Lane at the beginning of 2023 is higher than the level for Upper Thames Street at the end of 2021, so it's reasonable to assume that the level for the latter at the beginning of 2023 would have been higher than the one for Bell Wharf. This questions the reason for change of site.	The Upper Thames Street (PM ₁₀) and Walbrook Wharf (NO ₂) monitoring sites were amalgamated into a single site on Bell Wharf Lane in 2022/23 due to access restrictions and changes in office accommodation. Continuation of monitoring at the previous two locations would have been preferable. The new location was chosen for longevity and the site has been designed to house the two analysers.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
172		Under 2.3, "Particulate Matter, PM2.5", an explanation would be appreciated for there being different sites.	<p>The air quality data for 2023 is now final and has been included in the final version of the Strategy.</p> <p>The PM2.5 analyser at The Aldgate School experienced a number of mechanical faults in 2022 that caused the annual data capture to be lower than usual.</p> <p>Monitoring of NO₂, PM₁₀ and PM_{2.5} is not completed at every monitoring site. The current network includes a roadside and background site for each of the three pollutants.</p>	No change made to the Strategy document.
173		Under 2.5, "Air Quality Monitoring on the wider City Corporation Estate", as these sites are outside the Square Mile, the logical question is why the relevant London Borough isn't doing the monitoring. This question also extends to City Corporation's HRA estates other than Golden Lane and Middlesex Street. The ammonia point is obvious, but confirmation would be appreciated.	<p>Monitoring on the City Bridges is undertaken for the City Bridge Foundation.</p> <p>The Strategy is for air pollution in the Square Mile. The Climate Action Strategy has a workstream to look at decarbonising our operational properties and housing states. This will have a positive impact on air quality.</p> <p>Ammonia is primarily emitted during storage and spreading of manures, slurries and fertilisers. It reacts in the atmosphere to form particulate matter. The 2019 UK Air Quality Strategy includes a summary of ammonia as an air pollutant.</p>	No change made to the Strategy document.
174		Under 3.1, "City Corporation Fleet", as it's not clear, confirmation of the number of City Police vehicles included in the 122 vehicles and the type of propulsion should be stated.	City police vehicles are not included in the 122 vehicles owned or leased by the City Corporation.	No change made to the Strategy document.
175		Under 3.2, "Procurement Strategy", my comment re the FM Conway fleet is from observation. As far as NRMM are concerned, there is no evidence that any attempt to require zero emission ones is made. The final bullet point isn't understood.	<p>The current Highways Construction and Maintenance contractor for the City of London has zero emission targets to report against.</p> <p>The potential options are not limited to those listed. If innovative approaches are proposed, these would be evaluated individually.</p>	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
176		Under 3.3, "Climate Action Strategy", how is the effect of inflation being addressed? The insertion of "reducing" is necessary.	The impact of inflation has been detrimental to the delivery programme and, though it was considered, inflation remains as 'unforeseen' at the inception of the Climate Action Strategy. Mitigatory actions are being taken and we have been successful at securing funding grants that supplement the £68 million, such as the Public Sector Decarbonisation Scheme.	No change made to the Strategy document.
177		Under 3.6, "Proposal for New Regulatory Powers", the need for a new Bill is essential.	Parliament was dissolved on 30 th May 2024, so the Bill fell. The text has been updated to reflect this in section 3.6. The action remains the same.	Strategy text amended.
178		Under "Designated Air Quality Partners", the need for the correction should be obvious. "LAQM" has been abbreviated previously.	A thorough review of the draft Strategy has been completed to ensure consistency with terminology.	Strategy text amended.
179		Under 4.2, "Additional Partnerships", the need for the correction should be obvious.	Comment noted.	No change made to the Strategy document.
180		Under 5.1.1, "Idling Vehicles' Engines", the various questions require answers.	The organisation completes the range of actions detailed in the Strategy. Funding from the Mayor's Air Quality Fund has been secured for a 4 th round of London wide work to tackle unnecessary engine idling. We are part of this project and will be implementing actions in 2025	No change made to the Strategy document.
181		Under 5.2, "Non-Transport Emissions" "has" should replace "had".	Text has been amended as stated.	Strategy text amended.
182		Under 5.1.4, "Transport Redevelopment Schemes", the successful but aborted Beech Street Zero Emissions Scheme warrants mention, for its success, at least.	The number of schemes mentioned was deemed sufficient for the overarching nature of the Strategy. Further detail is available in the Transport Strategy.	No change made to the Strategy document.
183		Under 5.2.2, "Construction and Demolition", "deconstruction" should replace "demolition". If the ninth edition of the CoP is the latest, a new one is required.	A revised Code of Practice will be published in the next 12 months.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
184		Under 5.2.3, “Non-Road Mobile Machinery”, not only is there a need for zero emission NRMM, but there is also no excuse for not having a universal requirement for Stage V now.	<p>The NRMM Low Emission Zone was developed by the Greater London Authority, with London Boroughs and the City of London delivering it on the ground.</p> <p>The current GLA timeline is presented in Table 5.2. The Square Mile is within the Central Activity Zone therefore the current requirement is for at least Stage IV. Stage V is set to be implemented on 1 January 2030.</p>	No change made to the Strategy document.
185		Under “5.2.4, Commercial Heat and Power”, the “CHP” abbreviation is missing. The “periodical” use of the generators by Linklaters in Silk Street is completely unacceptable, even if powered by HVO as its reduction in pollutants over pure diesel may be insignificant and sustainability questionable. Hydrogen is a suitable – and available – alternative, as is battery storage.	<p>Error in design document (but not base document). Thorough review to be completed prior to publishing the final version.</p> <p>Backup generators for new developments are assessed through planning. Developers are required to explain why alternatives to a diesel generator have not been utilised. Backup generators will be a key focus of the revised Supplementary Planning Document.</p> <p>The events at One Silk Street in 2024 have been reviewed and new processes discussed for similar cases in the future.</p>	No change made to the Strategy document.
186		Under 5.2.5, “Commercial Cooking”, evidence of the actual source of the particulates should be provided as not all catering establishments are likely to emit PM2.5.	Reference is made to the London Atmospheric Emissions Inventory under Section 1.1, where charts of all sources are available.	No change made to the Strategy document.
187		Under 5.2.7, “Environmental Permitting Regulations, “St Bartholomew’s Hospital” seems more professional.	Text updated.	Strategy text amended.

No	From	Comment Received	Response	Action taken
188		Under 5.2.8, "Smoke Control", an answer to the questions would be appreciated.	Officers inspect potential suppliers of solid fuel to log any locations, and to confirm any fuel solid conforms to solid fuel regulations. Manufactured Solid Fuels (MSF) must meet the following emission limits in order to be certified for use in domestic premises in England: - contain less than 2% sulphur (by dry ash weight with a 95% confidence limit) - have an average smoke emission rate of less than 5 g/hr	No change made to the Strategy document.
189		Under 6, "Public Health and Raising Awareness", how can high levels of air pollution be avoided in order to reduce impact on health?	The overarching actions presented have been chosen to raise awareness and reduce exposure to air pollution.	No change made to the Strategy document.
190		Under 6.5, "Indoor Air Quality", the answer to my question will be informative as regards safeguarding.	Monitoring of air pollution is completed externally at schools and nurseries in the Square Mile. Action Plans and periodic reports are completed that include monitoring results and relevant information. Pollution alerts are sent to all schools and health care sites and annual reports including monitoring data given to all schools and nurseries	No change made to the Strategy document.
191		Under Appendix 1, "Actions to deliver the Air Quality Strategy", the fourth "Detail" in "Action 24" requires amendment, as does the "Detail" under "Action 28".	Comment noted	No change made to the Strategy document.
192		Under Appendix 2, "Air Quality Standards and Guidelines several abbreviations etc are required.	A thorough review of the Strategy has been completed to ensure consistency with terminology.	Strategy text amended.
193		Under Appendix 3, "London Atmospheric Emissions Inventory", hopefully, my amendments are self-explanatory. Although Bishopsgate is mentioned as a busyroad, there is no evidence of any automatic air quality monitoring there.	Comments noted. We currently monitor NO ₂ using passive diffusion tubes at two locations on the A10. All monitoring locations are reviewed annually.	No change made to the Strategy document.

No	From	Comment Received	Response	Action taken
194		<p>Under Appendix 5, Air Quality Partner Commitments”, several abbreviations are required. The need for my other amendments should be obvious. My changes under “PLA” hopefully make sense. Presumably “our” in the following paragraph refers to City Corporation. A reply to my question re SO₂ would be appreciated. Also, hopefully my changes under “The GLA and TfL” also make sense.</p>	<p>A thorough review of the Strategy has been completed to ensure consistency with terminology.</p> <p>Table A5.1 summarises the responses received from our Air Quality Partners. We contacted them for information on how they can support our efforts to improve air quality locally. The text has been written by the AQPs therefore are contextualised from their point of view.</p> <p>SO₂ was monitored at Senator House from 2001 to 2013. During this time there were no exceedances of the three SO₂ LAQM objectives, or of the 2021 WHO AQG. This is in line with national reporting on SO₂ where compliance has been reported since 2008 with the Air Quality Standards Regulations (2010).</p>	<p>Strategy text amended.</p>