

# LONDON BOROUGH OF HILLINGDON

# ENVIRONMENT OVERVIEW AND SCRUTINY COMMITTEE 2003/04 Report

# 'THE DEVELOPMENT OF THE ACTION PLAN FOR AIR QUALITY'

# **Members of the Committee**

Cllr Michael Cox (Chairman)
Cllr Dalip Chand
Cllr Bruce Baker
Cllr Janet Duncan
Cllr Henry Higgins
Cllr David Horne
Cllr David Routledge















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# **CHAIRMAN'S FOREWORD**

The right to good air quality is not only a necessity for a decent quality of life for all the Borough's residents it is now a legal requirement under European legislation.

Hillingdon's air quality varies considerably, given its outer London location, proximity to the national motorway network, and the world's busiest international airport. These factors have a fundemental influence in determining the location of air quality hotspots.

These hotspots not only effect the most vulnerable in society, the young and the very old, but also those with underlying medical considerations such as lung disease and asthma.

The Council's first Air Quality Action Plan is to be strongly welcomed and will hopefully ensure that air quality for borough residents improves steadily in the future.

The preparation of the draft Air Quality Action Plan has involved the expertise and commitment of a number of people and stakeholders both within the Council and from external organisations.

I and other members of the Overview and Scrutiny Committee would formally like to thank those responsible for their hard work, which has contributed to the development of the draft Action Plan.

Finally, although the review of the preparation of the Air Quality Action Plan is not scheduled to be completed until June 2004, and the implementation process has yet to be ratified, I am confident that the work already undertaken and the review by this Committee will ensure that the strategy will become a keystone document for the Borough.

#### **EXECUTIVE SUMMARY**

The Environment Overview and Scrutiny Committee selected the 'Development of the Action Plan for Air Quality' as a review topic on the 25<sup>th</sup> June 2003. The following report examines the process the Committee followed which led to the development of the Air Quality Action Plan.

In addition to the development of the Action Plan, the report also examines the key legislation and status of air quality in Hillindgon that affected the scope and direction of the plan.

# <u>The terms of reference</u> for the Committee were:

- 1. To review the measures and initiatives for the Action Plan for Air Quality following consultation with Statutory Consultees and Stakeholders
- 2 To review the public consultation programme to ensure effective public participation
- To weigh up the issues and agree on a final draft Action Plan for Air Quality before ratification by Cabinet in June

# <u>The recommendations</u> arising from the review were:

- 1. To commend the work of Officers
- 2. To endorse the strong link and common themes shared by the Air Quality Action Plan and the Borough Transport Strategy.
- 3. To lead on transport issues i.e. Green Travel Plans and parking schemes.
- 4. To implement practical solutions to the problems caused by school-run car journeys and examine whether successful initiatives elsewhere can be implemented in Hillingdon
- 5. The Committee remains strongly opposed to the decision on the third runway but recognises that the Council has a statutory duty to produce an Air Quality Action Plan.
- 6. To support the packages of measures being proposed in the Air Quality Action Plan.
- 7. To endorse proposed amendments put forward by the peer review technical workshop on the 5<sup>th</sup> March 2004
  - a) To reduce the number of packages from 10 to 7
  - b) To rename Package 1 to avoid the use of 'modal shift' and include the wording 'extend the Underground to Heathrow Terminal 5'

- 8. That the final Air Quality Action Plan cabinet report should include a chapter on the financial implications of the strategy, so that costs could be determined and incorporated into section 106 negotiations so that developers paid appropriate costs
- 9. To endorse the use of section 106 agreements for air quality improvement initiatives
- 10. To endorse the commitment to improve Eco-efficiency of current and future developments including properties owned and run by the Council
- 11. To recommend that stricter limits be proposed for Hillingdons Air Quality Action Supplementary Planning Guidance than the Association of London Government's assessment for planning applications / technical guidance notes

#### **BACKGROUND**

#### Introduction

#.1 The executive summary of the Air Quality Strategy for England, Scotland, Wales and Northern Ireland states:

'Clear air is an essential ingredient of a good life. People have a right to expect that the air they breathe will not harm them'

#.2 Hillingdon is one of the worst air quality hotspots in the whole of the United Kingdom. Therefore, poor air quality affects both the quality of life and health of all Hillingdons residents. As a result of poor air quality an Air Quality Management Area was declared and the Council was obliged to follow government guidance and develop an Action Plan for Air Quality to implement a variety of measures to improve air quality.

# The Objectives of the Air Quality Action Plan

#.3 By following the DEFRA guidance and consulting a number of stakeholders from local communities, businesses and regulators the following objectives were developed:

- To improve the quality of life and health of the residents in Hillingdon
- To act in a cost effective manner, through the careful selection of options
- To integrate the work of Hillingdon Council with other Council strategies and the activities of Council Departments, regional bodied, outside Agencies and other interested parties
- To take account of the needs and views of local people
- To act, where possible, to stimulate local employment and the local economy

# The Development of the Air Quality Action Plan

#.4 The Council appointed consultants (AEA Technology/EMRC) to lead the development of the air quality Action plan. In total more than 200 options for the plan have been considered so far. For convenience, these measures have been grouped into 10 specific packages (example in Appendix 1). As the plan has developed, an ongoing process of prioritisation is being applied which, has sought to take to take an integrated approach to the relative merits of each package according to:

- Cost
- Effectiveness in reducing Nox emissions
- Effectiveness relative to NO2 levels in the Hillingdon AQMA
- Potential to implement the option before 2005, and the 2010
- Additional (non-NO2) benefits of the measure
- Disbenefits linked to the measure
- Complementarity of measure with local and regional development objectives

#.5 Furthermore, the positive and negative factors associated with the air quality measures identified within each packages are being assessed in accordance with:

- Other (non-Nox) air pollutants
- Noise
- Congestion
- Attractiveness of Public Transport
- Social inclusion
- Economic vitality of local businesses
- Other (to pick up impacts that may be very specific to certain options)

#.6 In addition to the list of measures that form the basis of the Air Quality Action Plan, the final plan will contain guidance on implementation and monitoring. However these criteria can only be applied when the consultation period has closed.

#### **LEGISLATION**

#.7 From the outset of the review, the Committee was aware of the Government and EU legislation which would shape the development of the Air Quality Action Plan. The Committee considered the following key legislation:

# The Environment Act 1995

- A new system of local Air Quality Management introduced
- New legal duties imposed on Local Authorities
- Requirements: Periodic reviews and assessment current and future air quality
- Air Quality Management Area declared in areas where targets are not met
- Duty to develop an Air Quality Action Plan to meet national air quality objectives

# The National Air Quality Strategy

- Launched in May 1997
- Aim: Ensure ambient air quality posed no significant health risk without imposing unacceptable social / economic costs
- Objectives to be achieved by 2005
- Standards / objectives set for 8 key pollutants
- 7 pollutants subject to Local Authority control under the process of Local Air Quality Management

# Review of National Air Quality Standards

- January 2000, Air Quality Strategy was republished
- New objectives for the 7 pollutants in the AIR Quality Management Area set
- Further review in September 2001
- Consultation document tightens regulations on fine particle matter (PM10), benzene, carbon monoxide and polycyclic aromatic hydrocarbons
- August 2002, new objectives were confirmed

# **European Legislation and International Agreements**

- 27<sup>th</sup> September 1996 (Directive 96/62/EC) the Air Quality Framework Directive was established
- Framework under which all EU targets for specified pollutants will be set
- 12 pollutants identified targets set in daughter directives
- 1998 First Daughter Directive agreed sets limits for sulphur dioxide, nitrogen dioxide, particles and lead
- Eventually, Limits for all 12 pollutants were set.

#### **AIR QUALITY IN HILLINGDON**

#.8 Following national guidance, Hillingdon Council carried out a series of intensive studies to identify current and future air pollution levels. The initial review and assessment was carried out in three defined stages. The Committee reviewed this process:

# Stage 1

- Completed by March 1999
- Initial screening process to identify all the potential sources of the 7 pollutants within the Borough
- More detailed analysis of carbon monoxide, sulphur dioxide, particulates (PM10) and nitrogen dioxide was required
- Conclusion: Objectives for 1-3 butadiene, benzene and lead in all areas would be met

# Stage 2

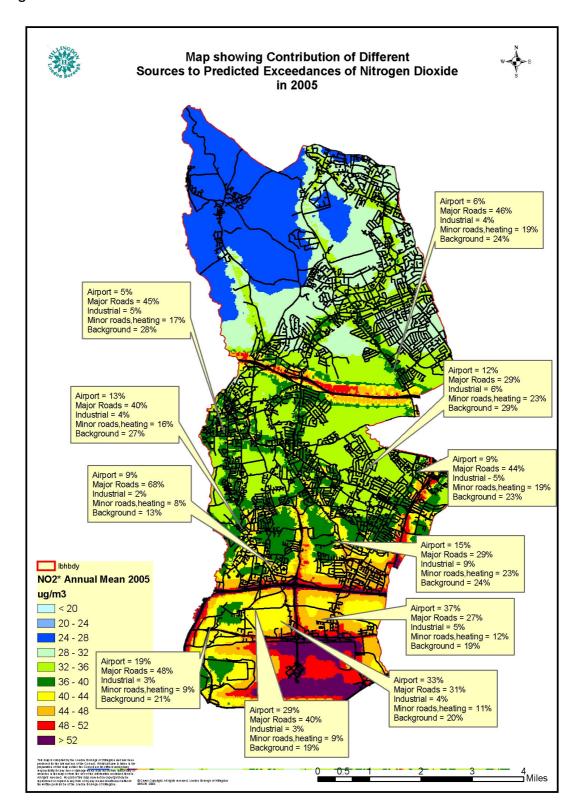
- Completed by September 1999
- Detailed study of the 4, aforementioned pollutants
- Simple air modelling was used
- Carbon monoxide was raised as a matter of concern
- Conclusion: Objectives for nitrogen dioxide, PM10 and sulphur dioxide would not be met and additional modelling was required for these pollutants

#### Stage 3

- Hillingdon commissioned Cambridge Environmental Research Consultants Ltd (CERC) to provide a detailed modelling of the four pollutants identified in stage 2
- A 'new generation' computer dispersion modelling was used
- New model considered emissions from: traffic, aircraft, industry and domestic use
- Monitoring sites around the Borough created to validate the modelling
- Conclusion: Government targets for nitrogen dioxide and PM10 would not be met

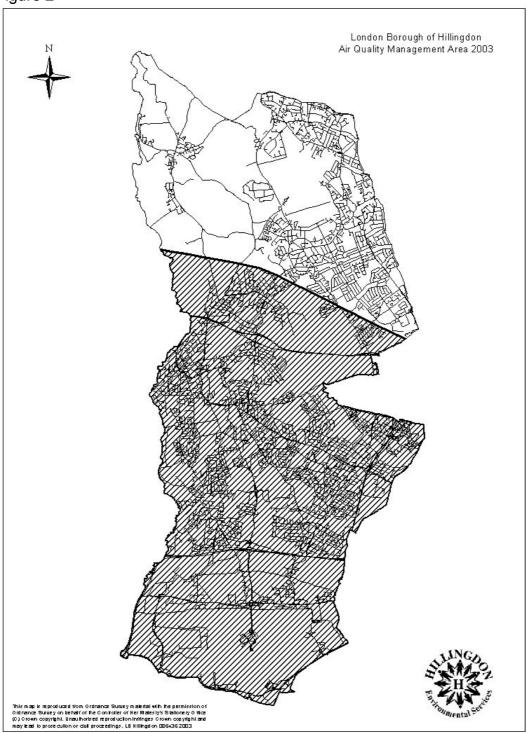
#.9 The conclusion of the final detailed stage of research (Stage 4) was that the annual average nitrogen dioxide objective for 2005 (40ug/m), set for the protection of human health would not be met. Sophisticated air modelling identified the southern third of the Borough, particularly in and around Heathrow Airport and along several road corridors including the Uxbridge Road, A40 and Hayes Bypass as a hotspot. See Figure 1.

Figure 1



#.10 As a result of this problem the Council declared an Air Quality Management Area in May 2001 based on these forecasts. Further modelling extended the AQMA in September 2003. Today, the AQMA covers all parts of the Borough south of the Chiltern-Marylebone railway. See figure 2.

Figure 2



#.11 As part of the Boroughs continued commitment to monitoring air quality in Hillingdon, the Committee noted that, there are currently two continuous monitoring stations in Hillingdon, one in West Drayton close to the M4 and in South Ruislip close to Northolt Aerodrome and the A40. A third monitoring station is about to be commissioned in Hillingdon, close to Hillingdon hospital.

#### **CURRENT ACTIONS TO IMPROVE AIR QUALITY**

#.12 Currently a considerable amount has already been done to control emissions from vehicles, industry and other stationary sources. To complement the national and European legislation, a variety of local and regional plans were considered by Members during the course of Committee meetings. The most prominent of these are:

- The Mayor of London's Air Quality Strategy
- West London Air Quality and Transport Plan
- BAA Action Plan for Heathrow
- The Unitary Development Plan (UDP)
- Supplementary Planning Guidance on Air Quality
- Local Agenda 21 (LA21)
- The Health Improvement and Modernisation Plan (HIMP) and the Hillingdon Local Delivery Plan that as followed it
- The Interim Local Development Plan (ILIP) 2002/03
- The Borough Transport Strategy
- The Hillingdon Community Plan
- The Environmental Services Plan

# **Limitations**

#.13 Whilst the people that live and work in the Borough have an important role in improving the air quality in Hillingdon, the Committee recognised that there were limits on what Council led action could achieve. In particular, the Committee noted that:

- Heathrow Airport is run by BAA plc
- Final decisions on developments at Heathrow, including the Third Runway, will be taken by central government
- Major road links were the responsibility of the Highways Agency and Transport for London
- Large-scale industry was regulated by the Environment Agency, although smaller sites were subject to Council control.
- Sources of pollution, external to Hillingdon were outside the Council's remit

#### **CONSULTATION PROCESS**

#.14 The Committee met on numerous occasions throughout 2003 / 2004 and invited a variety of guest speakers to present evidence. The work of the Committee was divided into 3 distinct phases. Phase 1 identified the scope of the problem and developed an initial set of remedial measures to improve air quality. Phase 2 concentrated on acquiring feedback on the initial measures and sought ways to improve these. Finally, phase 3 focused on redrafting the remedial measures.

# Phase 1 – Background and Initial Measures

# **Background**

#.15 In July 2003, the Committee met with officers from the Council's Environmental Protection Unit and received an updated presentation on the development of the Air Quality Action Plan. The Committee was informed that the Council had a statutory duty to produce an Air Quality Action Plan to meet EU emission targets by 2005 and that an essential element to this process was to ensure that as many options were identified as possible. In addition, it was noted that the Air Quality Management Area, declared in May 2001 would need to be increased in size. Officers explained what the different types of airborne pollutants were, the effects these had on human health and where the sources of pollution were located by using an air quality modelling map.

#.16 In response to this information the Committee requested data on the present level of pollutants in the Borough, and identified the requirement for a cost benefit analysis to be mandatory on any future package of remedial measures. In addition, Members also highlighted the advantages of avoiding duplication by setting up cross-functional teams with officers working on the Borough Transport Strategy. Finally, the value of educating the residents of Hillingdon about the issue of air quality before the Council requested behavioural change, was emphasised.

#### **Initial Measures**

#.17 Dr Mike Holland from AEA consultants, chosen to lead the development of the Air Quality Action Plan, was invited by the Committee to give a briefing note on the 10<sup>th</sup> September 2003. Dr Holland highlighted the sources of local pollutants and explained that a list of measures had been drawn up as a series of packages to improve air quality. An example of one of these 10 packages is listed in Appendix 1. He suggested that the packages would be most effective if they were broad rather than narrowly focused. Dr Holland also showed the Committee a management tracking system that could be used to monitor the performance of the packages. It was noted that if these packages were not successfully implemented and did not meet their statutory targets at a local level, then the Secretary of State would have to intervene.

#.18 Following this update, the Committee requested a copy of the air quality mapping over the West London area. By noting the link between the high concentrations of pollutants and specific road links, Members highlighted the

problems created by land based freight operators, requested information on lorry bans and were keen to see how these issues could be integrated into the Action Plan. Finally, Members agreed to review the 10 packages presented to the Committee and provide feedback to Council officers.

# Phase 2 – Consultation Feedback and Means to Enhance Consultation

# Consultation Feedback

#.19 In late September, the Committee received a further update from Council officers. The Committee was informed that work had begun on several projects. These included Green travel plans where no public opposition was anticipated. A questionnaire on the Council website (also included in the Hillingdon People magazine) was designed to record feedback on air quality, and that a dedicated website on air quality was under construction. The Committee was also informed of proposals to consult residents living close to Heathrow Airport.

#.20 During the update, the Committee took ownership of the questionnaire by incorporating their views about the form and scope of the questionnaire and how best this information could be used. Members agreed that the Heathrow consultation was a valuable exercise and suggested that the process should include data on residents perceptions of low emission zones and congestion charging. In addition, Members suggested the lobbying of all local authorities affected by Heathrow, on 'green' aircraft fuels / landing duties and also highlighted the importance of starting a meaningful dialogue with BAA and BA about the implementation of their own independent Air Quality Action Plan. An essential task of the Committee was to ensure statutory stakeholders were included in the consultation process and Members noted that Brunel University and Groundwork Thames Valley were involved. Members were also keen to highlight the relationship between air quality and the health of residents and suggested more work had to be done to ensure that data on hospital admissions correlated with poor air quality events. Finally, feedback on the packages identified by Dr Holland influenced the questions posed by Council officers to the statutory stakeholder groups. The following questions were asked:

# **Questions for Consultees**

#.21 An integral part of the consultation process was to ascertain feedback on the following questions from key stakeholder groups:

- 1. Do you support the air quality plan covering a broad range of sources (traffic, Heathrow Airport, industry, domestic, commercial and public sectors), or do you think that it should be more focused?
- 2. Do you think that the emphasis placed on each of the sources listed in question 1 at the present time is correct?
- 3. Where relevant, do you agree with the level of your organisation's involvement in each package? Are you able to suggest the mechanism

- 4. If not appropriate, are you able to suggest alternative organisations/ that Hillingdon could approach through options cold be investigated and implemented?
- 5. With the information available are you able to indicate which measures you feel should be prioritised with regard to reducing emissions in Hillingdon?
- 6. Are there any other measures not listed that Hillingdon could investigate?
- 7. Do you support the process outlined on page 4 of this report for prioritising measures? What are its strengths and weaknesses?
- 8. What are your views on the management structure for the implementation process?

# Means to Enhance Consultation

#.22 On the 24<sup>th</sup> November 2003, the Committee attended the all Member Transport seminar. This seminar addressed the issue of air quality as a sub topic and stressed the importance of the cross-functional teams and information sharing. The key points related to air quality from the Transport seminar were, to consider air quality in evaluating traffic schemes, to promote the use of cleaner vehicles, public transport and walking and to aim to reduce traffic levels. The seminar not only enhanced the Committee's understanding of the complementary areas, but also allowed the Committee to review the list of consultees and ensure that transport managers of key Borough employers were included.

#.23 On the 2<sup>nd</sup> December 2003, the Committee invited Dr Hiliary Pickles, the Director of Public Health in Hillingdon to present information to the Committee. Dr Pickles' presentation used census data to illustrate the links between air quality, pollutants and poor health in Hillingdon. The presentation built upon many of the key themes from the Transport seminar. The most significant issue to arise from the presentation was that land based freight and not aircraft were the main sources of pollution in and around Heathrow Airport. The Committee noted this finding and encouraged officers to investigate freight movements and road usage patterns.

# Phase 3 – Redraft of Remedial Measures

#.24 On the 24<sup>th</sup> March 2004, the Committee invited Erica Sutton from the Environment Council to report on the developments that had arisen from the major stakeholders workshop from the 5<sup>th</sup> March. A joint presentation from officers and Ms Sutton informed the Committee that the packages of measures which had been developed by Dr Holland had been reviewed by stakeholders and noting the concerns of the Committee, Ms Sutton concluded that the 10 packages would need to be redrafted to include a cost / benefit analysis and an improvement scale (high, medium and low) to qualify the level of improvement offered by each package. In addition, each package would identify the source of funding for the package, an implementation timeframe and a state a series of targets so that performance could be monitored.

#.25 On the 20<sup>th</sup> April 2004, the Committee met with officers from the Environmental Protection Unit to consider the cabinet Air Quality Action Plan: Consultation Draft report. Officers explained the construction of the report and highlighted that Chapter 4, which addressed the packages of remedial measures, had undergone significant revisions to take account of the findings of the Environment Council and the work of the Committee. It was noted that the number of packages had been reduced from 10 to 7. Package A remodelled is listed in Appendix 2.

Following this information the Committee suggested that the title of Package A was amended to avoid the phrase 'Modal Shift' and include the wording 'to extend the Underground to Heathrow Terminal 5', to highlight the need for improved transport links to the airport. Members also considered that a chapter on the Financial Management of the Strategy should be incorporated, to ensue that budgets were monitored and section 106 monies were integrated into future plans to improve air quality. In addition, Members endorsed the commitment to improve the Eco-efficiency of current and future housing developments, as outlined in Chapter 6. Furthermore, the Committee recommended that the lower limits (higher standards) for Hillingdon's Air Quality Action Supplementary Planning Guidance be proposed to replace the limits imposed by the Association of London Government's Assessment for Planning Applications.

# **CONCLUSIONS**

#.26 In conclusion, the Committee recognised that the development of an Air Quality Action Plan was an extremely time consuming process and one which involved the implementation of several options over the short, medium and long term. The scrutiny process clearly revealed how successful Hillingdon had been in consulting a wide variety of statutory stakeholders, businesses and local residents. During the scrutiny process, the Committee identified several key themes to incorporate into the Action Plan. These included Green Travel Plans, low emission zones, vehicle testing, eco-efficiency and the importance of sustainable development and the need for a more proactive approach to short car journeys, especially the school run. The Committee also highlighted the importance of including a section on the financial management and implications of the strategy in the final Cabinet report to ensure that action was taken. In addition, the Committee had played an important role in shaping questions to stakeholders and noted that the evaluation work in the preparation of the Air Quality Action Plan was ongoing.

#### **RECOMMENDATIONS**

- 1. To commend the work of Officers
- 2. To endorse the strong link and common themes shared by the Air Quality Action Plan and the Borough Transport Strategy.
- 3. To lead on transport issues such as Green Travel Plans and parking schemes.
- 4. To implement practical solutions to the problems caused by school-run car journeys and examine whether successful initiatives elsewhere can be implemented in Hillingdon
- 5. The Committee remains strongly opposed to the decision on the third runway but recognises that the Council has a statutory duty to produce an Air Quality Action Plan.
- 6. To support the packages of measures being proposed in the Air Quality Action Plan.
- 7. To endorse proposed amendments put forward by the peer review technical workshop on the 5<sup>th</sup> March 2004
  - c) To reduce the number of packages from 10 to 7
  - d) To rename Package 1 to avoid the use of 'modal shift' and include the wording 'extend the Underground to Heathrow Terminal 5'
- 8. That the final Air Quality Action Plan cabinet report should include a chapter on the financial implications of the strategy, so that costs could be determined and incorporated into section 106 negotiations so that developers paid appropriate costs
- 9. To endorse the use of section 106 agreements for air quality improvement initiatives
- 10. To endorse the commitment to improve Eco-efficiency of current and future developments including properties owned and run by the Council as outlined in Package 6.
- 11. To recommend that stricter limits be proposed for Hillingdons Air Quality Action Supplementary Planning Guidance than the Association of London Government's assessment for planning applications / technical guidance notes

# **BACKGROUND DOCUMENTS**

Hillingdon's Air Quality Action Plan: Summary for Consultation – January 2004

The London Borough of Hillingdon Air Quality Action Plan: Consultation Draft – April 2004

The London Borough of Hillingdon Air Quality Action Plan: Consultation Draft – Appendices - April 2004

Impact of the proposed Third Runway at Heathrow – September 2002

London Borough of Hillingdon online – Summary of Air Quality Management in Hillingdon

Minutes of the Environment Overview and Scrutiny Committee 19/9/02, 18/10/02, 21/1/03, 26/6/03, 30/7/03, 10/9/03, 30/0/03, 24/2/04, 24/3/04, 20/4/04

The Environment Act - 1995

National Air Quality Strategy - 1997

Air Quality Framework Directive - 1996

Air Quality Strategy for England, Scotland, Wales and Northern Ireland - 2000

# Appendix 1

# Package A: Increase Use of Existing Public Transport Services

# Potential Lead Organisations/Fora:

Hillingdon Transportation Team, TfL, West London Alliance, Heathrow Area Transport Forum (HATF), Local Bus Operators, Hillingdon Education Department

# Measures under consideration: Very strongly recommended

- 1. Improve access to, and quality of, public transport travel information;
- 2. Seek to ensure improvements in overall public transport service (facilities, cleanliness, safety, frequency, reliability) across the Borough, but particularly in the AQMA, to a level where significant modal shift takes place. This will include measures to ensure the enforcement of public transport priority schemes;

# Measures under consideration: Strongly recommended

3. Work in partnership with TfL and the HATF for the provision of low emission buses in the Hillingdon exceedance areas;

#### Measures under consideration: Recommended

- 4. Investigate the provision of low or zero emission buses for schools within the high exceedance areas;
- 5. Work in partnership with TfL to trial new low/zero emissions technology in the Hillingdon exceedance areas;
- 6. Investigate the feasibility of working with relevant stakeholders to subsidise bus, train and underground fares in order to achieve significant modal shift:

# **Examples of measures already rejected**

Public transport currently generates 8% of emissions in the Borough. The plan cannot therefore support expansion of public transport systems using old technologies that are significantly more polluting than their modern equivalents. The objective of this package is thus to increase patronage of buses, trains, etc., whilst reducing emissions from the vehicle stock

# Comments

A number of additional public transport measures are included in Package 2, dealing with the further development of transport infrastructure.

Hillingdon's Air Quality Action Plan Summary for Consultation
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# Appendix 2

<u>Package A- Remodelled</u> - (Moving to Less Polluting Modes of Transport)
Potential Partners: Hillingdon Transportation, Hillingdon Education, TfL, West London Alliance, Heathrow Area Transport Forum, Local Bus Operators, Coach Operators, Train Operators, Health?

Action/Measure	Responsibility and Implementation mechanism	Overall cost	Is funding identified?	Timescale	Target?
HILLINGDON			•	•	
1.1 Establish a Green Travel Plan for Hillingdon	Borough Transport Strategy?			To be defined via workshop on 17 <sup>th</sup> May	To be defined via workshop on 17 <sup>th</sup> May
1.2 Improve access to, and quality of, public transport travel information	Borough Transport Strategy? Hillingdon Transportation team in partnership with Tfl, West London authorities, BAA Heathrow			To be defined via workshop on 17 <sup>th</sup> May	To be defined via workshop on 17 <sup>th</sup> May
1.3 Encourage the development of more cycle priority lanes and signalling	Borough Transport Strategy			To be defined via workshop on 17 <sup>th</sup> May	To be defined via workshop on 17 <sup>th</sup> May
1.4 Extend provision of parking for motorcycles, mopeds and bicycles at public and medium and large business sites.	Borough Transport Strategy Planning team for new developments			To be defined via workshop on 17 <sup>th</sup> May	To be defined via workshop on 17 <sup>th</sup> May
1.5 Improve provision for pedestrians	Borough Transport Strategy			To be defined via workshop on 17 <sup>th</sup> May	To be defined via workshop on 17 <sup>th</sup> May
1.6 Introduce Safe Routes to School throughout the Borough with special regard to the schools within the highest exceedance areas	Borough Transport Strategy			To be defined via workshop on 17 <sup>th</sup> May	To be defined via workshop on 17 <sup>th</sup> May
1.7 Ensure Green Travel Plans are a requirement for all businesses (new and existing) employing more than a specified number of people in the Borough.	Planning department via SPG				
PARTNERSHIP WORKING					
1.8 Improve access to, and quality of, public transport travel information on regional basis	Borough Transport Strategy West London Air Quality and			Identified in workshop as eg	

	Transport Group in partnership with Tfl, BAA Heathrow	of a quick win
1.9 Seek to ensure improvements in overall public transport service (facilities, cleanliness, safety, frequency, reliability) across the Borough, but particularly in the AQMA	Borough Transport Strategy in partnership with Tfl, transport operators	
1.10 Improve the north-south public transport provision in the Borough	Borough Transport Strategy in partnership with Tfl, transport operators	Maybe long term but given high priority in workshop
1.11 Support multi modal travel by further development of public transport interchanges for rail/cycle/bus/walking both within Hillingdon and the West London area;	Borough Transport Strategy West London Joint Air Quality and Transport Working Group, Tfl	Study on identification of hubs and interchanges due to report summer 2004  Implementation medium/long
1.12 Encourage development of efficient and high quality bus corridors	Borough Transport Strategy West London Joint Air Quality and Transport Working Group, Tfl	
1.13 Investigate potential for more night buses	Hillingdon Transportation team and Tfl	
LOBBYING IN PARTNERSHIP	•	 •
1.14 Investigate the feasibility of working with relevant stakeholders to subsidise bus, train and underground fares in order to achieve significant modal shift;	Borough Transport Strategy in partnership with West London authorities, Tfl, and authorities and transport operators outside GLA border	Long term