

APPENDIX 3

Air Quality Action Plan 2025-30: post-consultation change tracker

Summary

This document summarises the key changes that have been made to the draft version of the council's Air Quality Action Plan 2025-30 following the public consultation and steer from senior officers and Cabinet Members.

This is split into three:

1. A summary of the changes made to the document as a whole following public consultation
2. A granular tracker showing changes made to the action plan matrix (the second half of the AQAP)
3. A summary of the changes made to the post-consultation document following steer from Cabinet Members.

This document will be included or appended to the cover report for the AQAP, and a public facing version will also be included in the consultation response document (in a 'you said, we did' style) that will be published alongside the final AQAP.

1. Key changes to the AQAP as a whole following public consultation:

- Included new one page primer at the very start of the document, to increase the AQAP's accessibility
- Included a new executive summary
- Included a new section setting out the structure of the AQAP
- Included new section on synergies between our work on air quality and our work on climate change and ecology
- Changed the ordering of the AQAP into two parts: 1. The context of air pollution in Hammersmith & Fulham; 2. The Action Plan itself
- Updates to the section on pollution sources in the borough for clarity and readability
- Introduced a new section of a checklist of actions that can be immediately taken by residents / community groups, businesses and schools to help join our coalition for clean air

2. Change tracker for the Action Plan matrix of the AQAP:

Action ID	Action relates to	Summary of key changes	Justification
1	Planning: Air Quality Assessments	Added requirement for AQAs to have regard for WHO guidelines	H&F and GLA have set targets to meet WHO guidelines for AQ; this change aligns the action with our wider targets. National objectives are no longer considered to be adequate to minimise and mitigate adverse impacts of development on

			health.
2	Planning: Non Road Mobile Machinery (NRMM) enforcement	Added requirement that all NRMM used on development sites will be Stage V	Stage V is the most advanced and least polluting emissions class of NRMM. This aligns H&F with the Central Activity Zone in Central London and shows our ambition in reducing emissions from construction and development sites.
3	Planning: reducing emissions from buildings	<p>Added expectation of zero emissions to air from new developments – essentially ensuring that gas boilers are no longer a default option.</p> <p>Added requirement that use of diesel back up generators should only be by exception and that a valid strong justification for their use (over battery sources and secondary main sourced) is required.</p> <p>A number of additional elements added to build out the expectation around zero emissions to air and moving away from combustion plant e.g Gas boilers , CHP, Diesel Generators</p>	<p>This is a logical strengthening of this action given H&F's ambitions for net zero and WHO Air Quality guidelines for AQ.</p> <p>While the H&F local plan (and SPDs) will be updated in the lifetime of the AQAP, the National Planning Policy Framework 2023 (para 192) gives us the authority to include these requirements in our AQAP and for this to be a material consideration for planning decisions.</p>
6	Planning: green space and infrastructure	Included additional requirements for use of 'AQ positive' species and planting	Slight tightening of previous wording
7	Planning: Smoke Control Area	Added that default position that applications for any developments with wood burning / solid fuel burning will be refused	Strengthening previous wording: justification is that AQ Neutral GLA guidance suggests that use of wood burning / solid fuel burning is an immediate fail of the AQ Neutral requirements
8	Buildings: Retrofitting existing buildings	Expanded action to include quantifying AQ benefits as well as carbon benefits of major retrofitting schemes	This addition highlights the synergies between AQ and carbon benefits of retrofitting, and will help embed AQ as a KPI in retrofitting projects
9	Buildings: tree planting	Included GLA guidance on tree types of canyons	Ensuring most up to date guidance is available within the Plan
10	Buildings: support for residents	Future proofed action by referencing not just Winter Ready Homes but any	Future proofing action for lifetime of the AQAP

		subsequent projects	
12	Public Health: working with public health function	Included sub-action to include Public Health involvement earlier in AQ project initiation. Included details of the Better Air Better Health partnership	Earlier involvement and engagement with PH colleagues will allow H&F to take a more health outcomes focused approach to project development and delivery.
13	Indoor AQ	Strengthening this action to include the various actions we may take in this area. Included a commitment to finding alternative funding for the LHAMP project (initially funded by Defra before all funding was withdrawn) Adding a new sub-action around ensuring indoor air quality emissions are minimised in the new Civic Campus.	Indoor air quality is a priority for the council, and this action now reflects the variety of actions and policies we may take forward.
14	Businesses and AQ	Included new actions around reporting on businesses undertaking air pollution footprinting, and exploring opportunities to support businesses with commercial kitchens to reduce associated emissions.	Wording strengthened to be more ambitious
15	AirTEXT	Strengthened the wording to include a commitment to working with healthcare partners to increase the uptake of airTEXT subscriptions	Strengthened to reflect the closer working ties we are seeking to make with healthcare organisations and partners across the borough.
16	New action: School Streets	New action to reflect this council priority	New action to reflect this council priority
18	Schools AQ work	Strengthened wording to include delivery of Mayor's Air Quality Fund money and wider School Streets Plus work. Included new commitment to joining GLA's school filtration programme.	New details reflecting the funding we have received in this area
24	Fuel poverty	Tightened wording to reflect new projects	Updated to reflect new projects

25	Collaborating with public health and academic partners	Updated to reflect Better Air Better Health partnership	Updated to reflect Better Air Better Health partnership
26	Procurement policies	Included wording on working around circular economy and opportunities for co-working and co-benefits	Circular economy is another lever which the council has to influence council and contractor behaviour that could have a positive impact on air quality
28	Emissions from borough fleet	Included new reporting requirement on the use of car/vehicle sharing and use of cargo bikes, e-bikes etc by council services	This additional reporting requirement strengthens this action, requiring the council to report on the use of innovative technologies and policies to reduce emissions from the borough's fleet
31	Clean Air Neighbourhoods	Strengthened wording following success of CLEAN trials	Updated to reflect changes since the consultation version of the AQAP
32	Transport and AQ policies	Wording tightened to reflect forthcoming council Transport Strategy	Updated to reflect forthcoming work
35	Parking policies	Reporting indicators changed to reflect new policies	Updated to reflect forthcoming work
38	Working with GLA / TfL	Inclusion of GLA's school filtration programme as a reporting requirement	Updated to reflect forthcoming projects
39	Monitoring AQ	Strengthened to include new requirement for completing and reporting on our air quality footprint emissions.	Updated to reflect more ambitious forthcoming work

3. A summary of the changes made to the post-consultation document following steer from Cabinet Members

- Amendment to the title of the AQAP from the consultation version (2024-29) to a new version (2025-30) to reflect the adoption date of the Plan.
- Amendments to the main body of the text related to:
 - Further highlighting the links between air quality and health
 - Adding in narrative around achievements made in priority areas such as parking and school streets
- A strengthening of wording in actions related to a number of policy priority areas:
 - School streets (Action 16 and 18)
 - Parking policy (Action 35)
 - Bonfires and wood burning (Action 7)
- An updating of wording in actions related to policy areas that have moved forward since the public consultation
 - Added in details related to the Council's 2024 adopted Net Zero Parking Strategy

- Added in details related to the Council's forthcoming new Local Plan

ENDS