

Slough Borough Council

Report To: Council

Date: 28th November 2024

Subject: Recommendations of the Licensing Committee: A. Air Quality Action Plan (2024-2028)

Chief Officer: Pat Hayes - Executive Director - Property & Housing

Contact Officer: Jason Newman - Group Manager - Carbon & Sustainability

Ward(s): ALL

Exempt: NO

**Appendices:
(see Appendix
Pack)** Appendix A – Full Air Quality Action Plan
Appendix B – Consultation Results
Appendix C – Equalities Impact Assessment
Appendix D – Air Quality Action Plan Financial Summary

1. Summary and Recommendations

- 1.1 This report sets out the recommendations from the Licensing Committee from the meeting held on 30th October 2024. It requests approval of the Air Quality Action Plan (AQAP) (2024-2028). The production of the AQAP is a statutory requirement of local authorities which have Air Quality Management Areas (AQMAs) within their borough, under Part IV of the Environment Act 1995 (amended 2021). The AQAP sets out the actions which the local authority is going to take to improve air quality in the borough.

Recommendation to Council:

That the Air Quality Action Plan (2024-2028) as set out in Appendix A be approved.

Reason:

Agreement with the above recommendation will allow the council to meet its statutory obligation to provide an AQAP to address poor air quality within Slough Borough Council's AQMAs.

Commissioner Review

Commissioners have reviewed the report and made no comment.

2. Report

Introductory paragraph

- 2.1 The Council's Corporate Plan 2023 – 2027 includes priorities which are supported by the AQAP:
- **A cleaner, healthier and more prosperous Slough** – a focus of this priority is improving air quality, promoting active travel and sustainable forms of transport, and taking action to prevent or minimise the impact of climate change. The AQAP

directly supports these ambitions, as the measures outlined within it are specific to managing and reducing emissions, improving sustainable travel uptake, and improving the air quality knowledge base across the borough. Successful implementation of the AQAP will result in reduced health impacts associated with poor air quality exposure and will therefore contribute to meeting this priority.

Options considered

2.2 Option 1 – **Recommended:** Approve and implement AQAP (2024-2028).

The AQAP directly supports the priorities of the Corporate Plan 2023 – 2027 and will contribute towards improving the health of people who work and live in Slough. The AQAP has been produced in collaboration with officers across council departments and consolidates measures which contribute towards improvements in air quality. The measures within the plan represent actions that are currently being undertaken or planned to commence within the plan's lifetime (2024-2028) and prioritises those which have funding available to implement, either via grant or Section 106 funding.

Previous AQAPs to address exceedances within the borough were developed in 2005 and 2012. The council received a written warning from Defra requiring a new AQAP to be developed as the existing plans were out of date, with a deadline of 28 February 2024 to produce a draft AQAP. This deadline was met and the draft AQAP was subsequently approved by Defra on 5 April 2024. To fulfil Defra's requirements, the final AQAP must be approved and adopted no later than 5th December 2024.

2.3 Option 2 – **Not recommended:** Reject the AQAP (2024-2028).

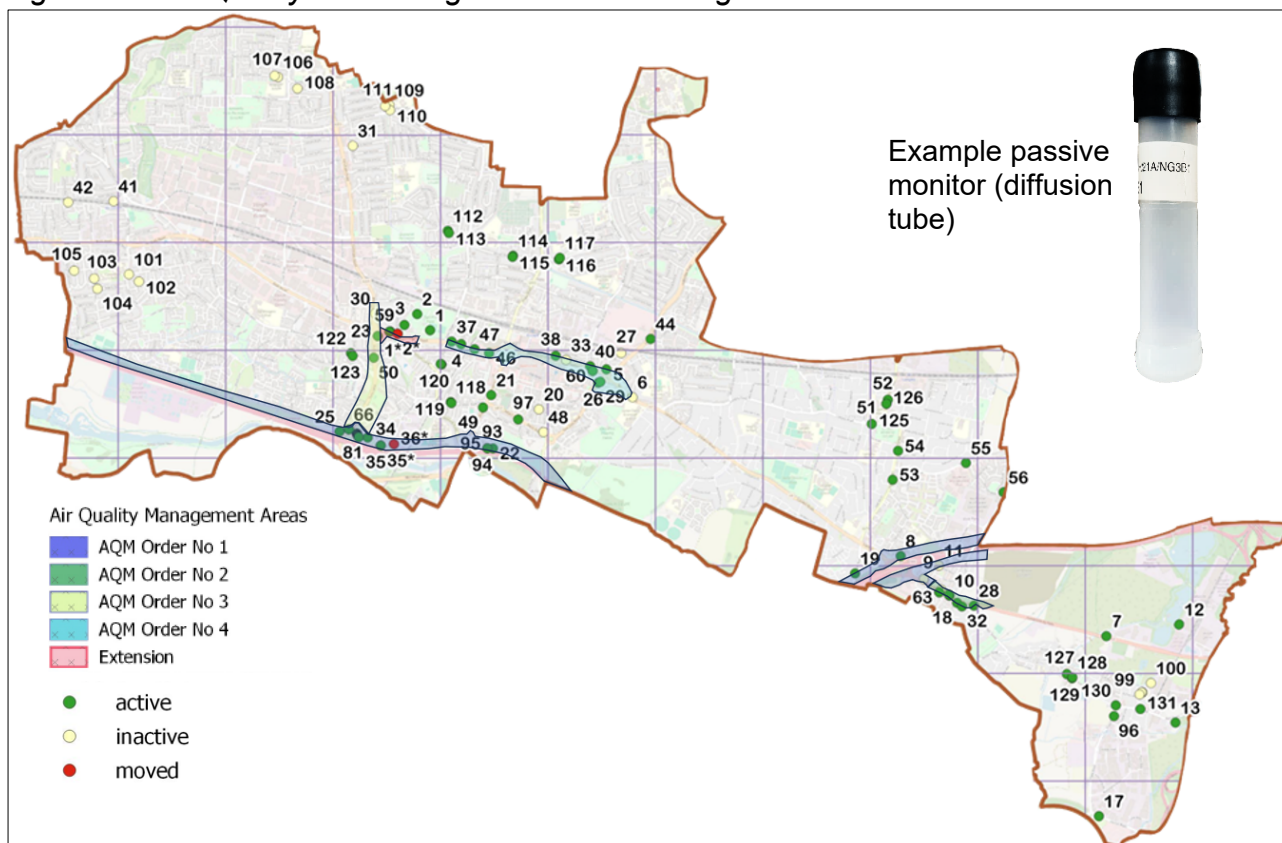
All local authorities are required to monitor, review and assess air quality within their administrative areas, as required by Part IV of the Environment Act 1995 (amended 2021), to identify locations where national Air Quality Objectives (AQOs) will not be achieved. Where this is likely to occur, this area must be declared as an AQMA. Exceedances of the NO₂ AQO has resulted in five AQMAs being declared within the borough. Once an AQMA has been declared, local authorities are responsible for setting out plans in the form of an AQAP, that details how compliance with the AQOs will be achieved and the actions that will be undertaken. Failure to produce an AQAP within the timescales specified by Defra will result in the council being in breach of the Environment Act 1995 and action will be taken by the Secretary of State under Section 85 of the Act. Production of the AQAP is a statutory duty and non-compliance with the Act may result in the council being liable for financial penalties.

Background

Air Quality Management in Slough

All local authorities are required to monitor, review and assess air quality within their administrative areas, as required by Part IV of the Environment Act 1995 (amended 2021). Slough Borough Council currently operate an air quality monitoring network, consisting of both continuous (automatic) and passive (non-automatic) monitoring stations. Specifically, Slough Borough Council monitors concentrations of nitrogen dioxide (NO₂) and particulate matter (PM₁₀ and PM_{2.5}) to assess compliance against the national air quality objectives (AQOs) as set out in The Air Quality Standards Regulations 2010. These monitoring stations are widely distributed across the borough, focusing on areas where exceedances of AQOs are anticipated, for example major roads and congestion hotspots (see Figure 1).

Figure 1 – Air Quality Monitoring Locations in Slough



The council's air quality monitoring network has been in place for many years. Historic monitoring data indicated that locations alongside major roads were in breach of the national AQOs. When this occurs, the area in which the AQOs are breached is declared as an air quality management area (AQMA), in accordance with the Environment Act 1995. An AQMA can only be revoked when there is sufficient evidence to indicate that pollution levels are below legal limits across the AQMA, usually for a period of five years.

The 2021 amendment to the Environment Act 1995 introduced new timeframes for AQMA declaration and subsequent AQAP development, as published in the Local Air Quality Management (LAQM) Statutory Policy Guidance 2022 by Defra. The Guidance states that following the declaration of an AQMA, a final AQAP should be produced within 18 months and then reviewed every five years as a minimum, to ensure air quality improvement measures remain effective, proportionate and feasible.

In August 2022, Defra introduced a new warning process for overdue AQAPs which came into effect on 30 June 2023. The Environmental Improvement Plan 2023 supports Defra's commitment to increase transparency by requiring timely and accurate publication of AQAPs by local authorities. Slough Borough Council received a warning letter from Defra requiring the submission of a draft AQAP by 28 February 2024. This deadline was met, and the draft AQAP was subsequently approved by Defra on 5 April 2024.

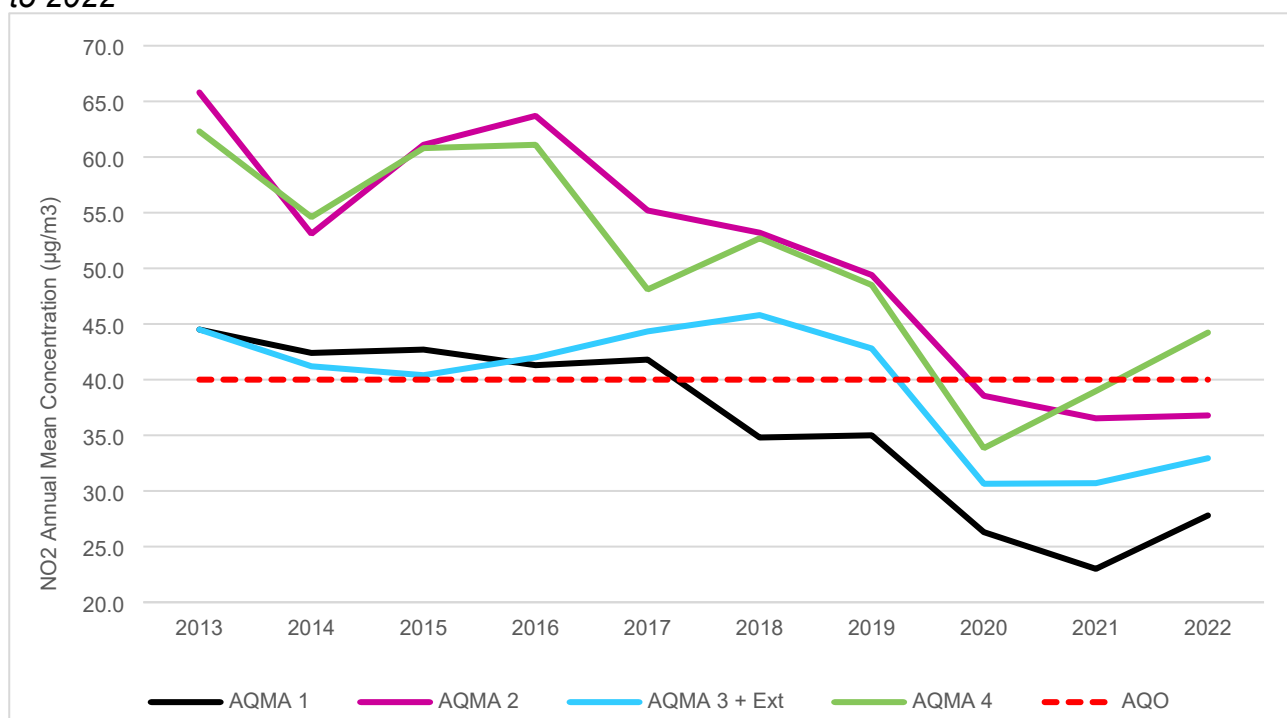
Air Quality Trends and Sources in Slough

The AQAP addresses air pollution in the borough, focusing on Slough's five AQMAs. The plan has been designed to also address air pollution outside of these areas, as many measures proposed will help to reduce pollution borough wide. The 2021 amendment to the Environment Act 1995 also introduced the requirement for the government to set targets for particulate matter (PM_{2.5}) which are set through the Environmental Targets

(Fine Particulate Matter) (England) Regulations 2023, therefore some measures proposed assist in meeting this target.

Air quality in Slough has been gradually improving over the years. Figure 2 below shows the highest monitored annual mean NO₂ concentration within AQMAs from 2013 to 2022. Progress with air quality improvements is not always linear and there are many contributing factors which influence concentrations, primarily meteorological impacts including temperature, rainfall and wind direction. In 2020, the Covid-19 pandemic brought widespread reductions in traffic as the population were instructed to stay at home, which resulted in a significant drop in NO₂ concentrations into 2021. The first full year of data without Covid-19 impact is 2022 as defined by Defra, however the monitoring data indicates that the pandemic may have had prolonged positive impacts on air quality beyond this.

Figure 2 – Highest Monitored Annual Mean NO₂ Concentrations within AQMAs, from 2013 to 2022



Defra have clarified that due to the effects of Covid-19 on traffic levels and therefore local pollutant concentrations, monitoring data from 2020 and 2021 should be excluded when a local authority is considering compliant years for AQMA revocation. However, it is advised that 2020 and 2021 datasets can be considered as compliant years with respect to AQMA revocation if compliance was achieved in 2019 or earlier.

As such, AQMA 1 (the M4) can be considered for revocation, as compliance has been maintained since 2017. AQMA 2, AQMA 3 and AQMA 3 Extension achieved compliance as a result of the pandemic, therefore revocation can be considered in 2025 at the earliest. AQMA 4 has one site that exceeded the AQO in 2022, therefore if the following years show compliance with the AQO, the earliest that the area can be considered for revocation is 2026.

In contrast to the NO₂ results, reductions in particulate matter (PM₁₀ and PM_{2.5}) have been less pronounced. Figure 3 and Figure 4 show concentrations in PM₁₀ and PM_{2.5} from 2013 - 2022. Although compliance with AQOs has been achieved for both pollutants during this time series, mounting evidence indicates that the health impacts of particulate matter exposure is evident at concentrations below this level.

Human exposure to air pollution, particularly PM_{2.5}, has significant health consequences, for example exposure during pregnancy can contribute to low birth weight babies and slower lung function development, which can develop into asthma and atherosclerosis during childhood. Adults can further develop coronary heart disease, lung cancer, chronic obstructive pulmonary disease and diabetes. In the elderly, heart failure and dementia risk is increased. As such, air quality must be improved for the benefit of Slough's residents.

Figure 3 – Particulate Matter (PM₁₀) Annual Mean Concentration from 2013 - 2022

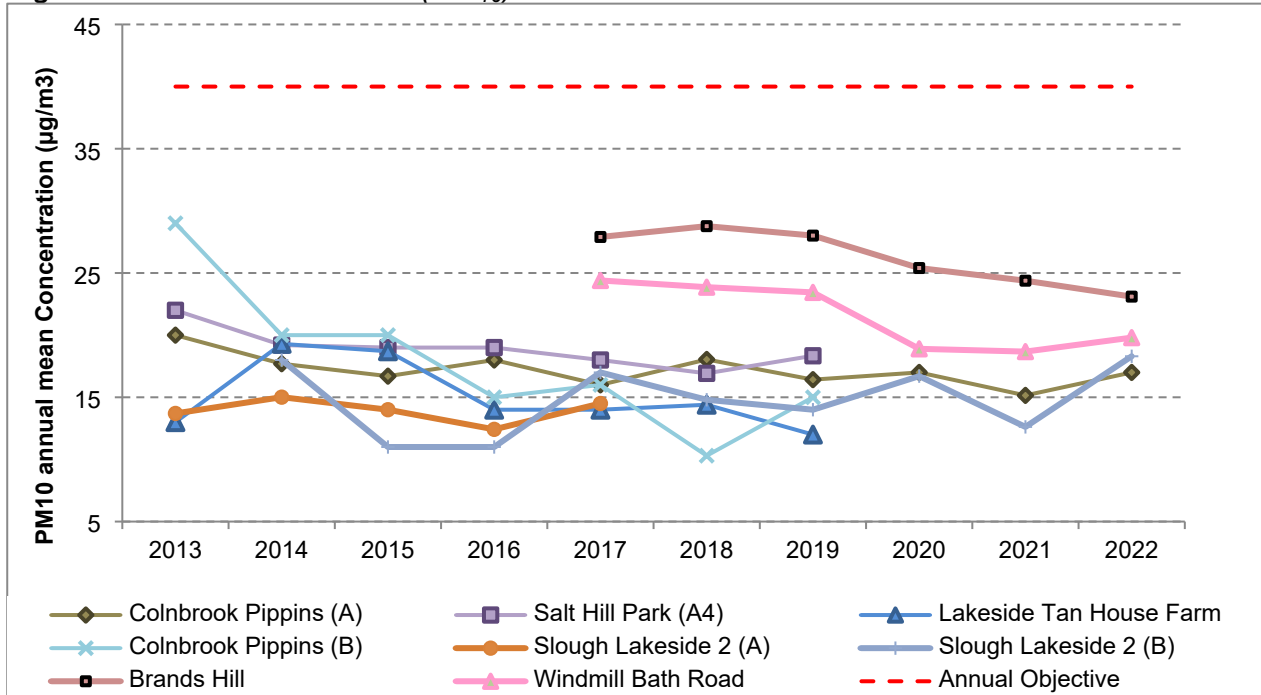
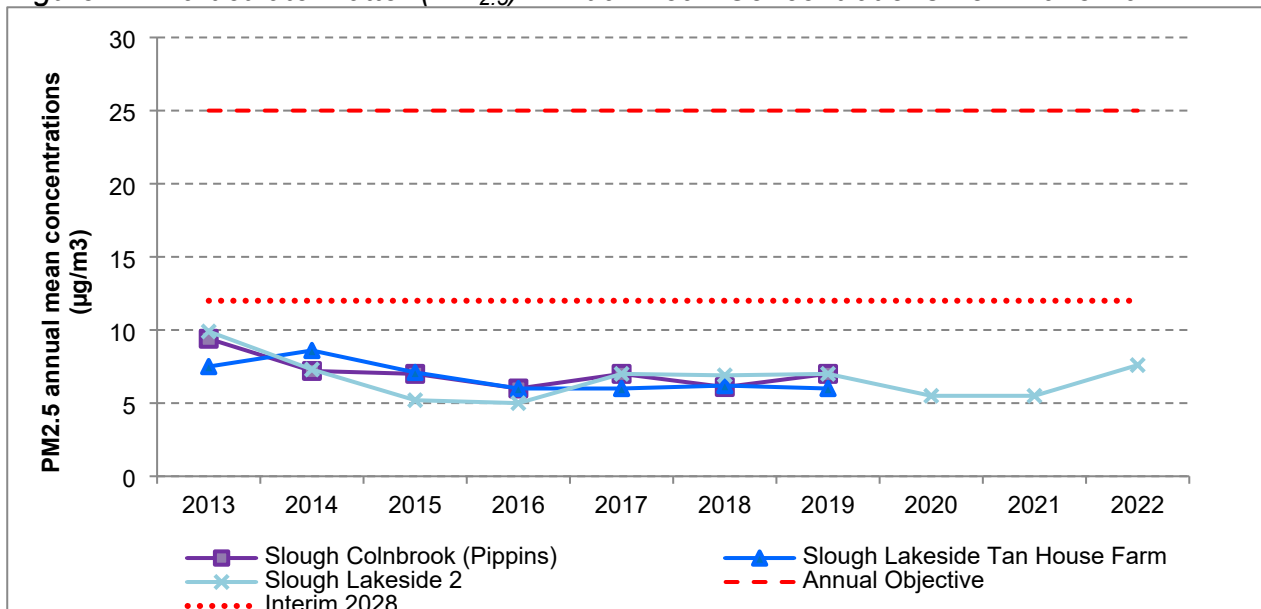


Figure 4 – Particulate Matter (PM_{2.5}) Annual Mean Concentrations from 2013-2022

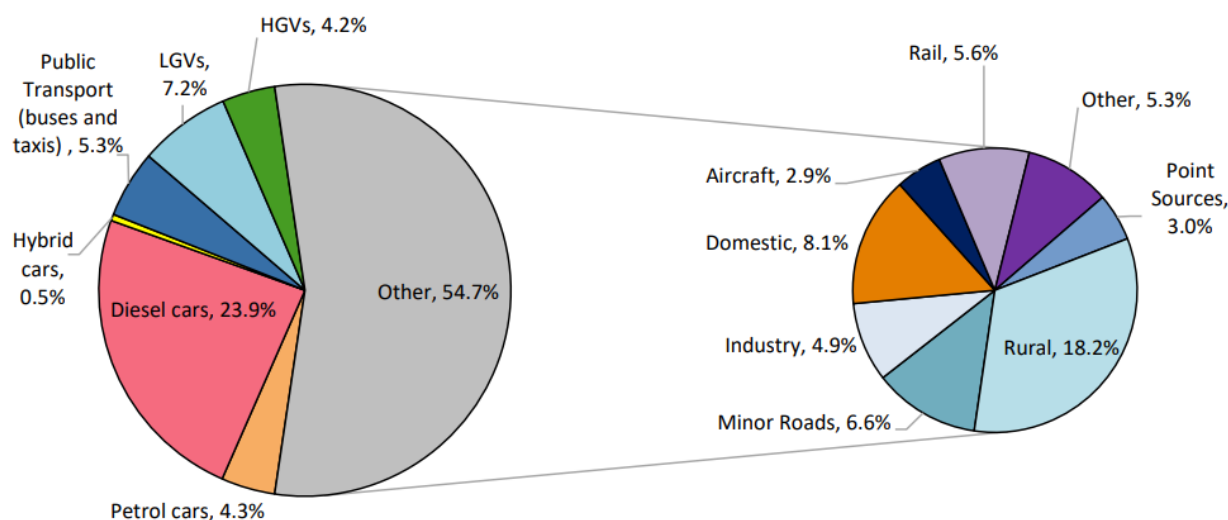


As part of the AQAP development, source apportionment modelling was undertaken to understand the sources of air pollution in Slough.

Figure 5 below shows the percentage breakdown of road emissions (the chart on the left) and background concentrations (the chart on the right) of NO₂ average across the borough. The majority of emissions originate from background sources, such as rural (for

example agriculture) and point sources (single emission points such as emission stacks). The council have a greater control over road sources rather than background sources, however some measures can help to reduce background concentrations, for example policies on wood burning can reduce background domestic sources. The information in the Table indicates that out of the sources within the local authority's control, diesel cars overall are the largest contributor towards NO₂ in the borough. As such, many of the measures within the action plan are tailored towards reducing emissions from road traffic.

Figure 5 – NO₂ source apportionment (road emissions on the left and background sources on the right) on average across the borough of Slough



Air Quality Challenges in Slough

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{4,5}. The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion⁶.

Slough has a number of specific challenges which exacerbate and sustain air quality issues in the borough:

- Slough is the third most densely populated local authority in the South East (following Portsmouth and Southampton) with 4,871 usual residents per square kilometre (48.7 per hectare compared to 45.8 in 2011, South East: 4.87, England: 4.34), therefore ten-fold higher than the South East average.
- Slough has a high proportion of households with one or more vehicles relative to its population density (79.7%) when compared with other high density areas including Reading (71.6%), Portsmouth (69.7%) and Southampton (72.6%). Likewise Slough has a lower proportion of households without access to a car or van (20.3%), compared to Reading (28.4%), Portsmouth (30.3%) and Southampton (27.4%) (ONS, 2021).
- Residents support having a high quantity of private vehicles in Slough and public transport schemes have received little public support (Slough 2040 Vision Engagement Survey, 2020). The A4 cycle lane scheme consultation results indicate that 87% of respondents use private vehicles to travel on the A4 compared to 14.7% by bus (A4 Cycle Scheme Consultation, 2023).

- Of residents who travel to work, the majority (71%) travel in a car or van, and often travel using this mode for short journeys under 10km (68%) (ONS, 2021).
- For school travel from 2018/19 to 2022/23, car sharing was the second most popular usual mode choice until 2021/22, when this was overtaken by the single child car mode. Single child car mode remains the second most popular usual mode choice, peaking at 38% in 2022/23 (Hands Up Surveys, 2018-2023).
- Slough falls within the top 25% of most deprived local authorities in England and a number of these areas of deprivation are located in poor air quality areas.
- In 2021/22, the percentage of physically active adults in Slough was 51.6%, which is the lowest out of all England authorities (the next lowest after Slough is Blackburn with Darwen at 53.7%) and lower than the average for the South East (70.5%).
- High inactivity results in further health issues in Slough, including high mortality rates attributed to cardiovascular diseases, with 108.9 deaths per 100,000 under 75 years old, a high prevalence of obesity in Year 6 children (over 28.4%) and adulthood, with 62% of adults in Slough overweight or obese in 2020/21⁷ (approx. 71,112 people).
- The healthy life expectancy for a male and female is 58.1 and 60.3 years old, much lower than neighbouring boroughs and lower than the South East average (7.4 years and 5.6 years higher for males and females, respectively).
- Slough's location in proximity to London and Heathrow, in addition to direct links to the Strategic Road Network, results in high commuter traffic and favours travel via private vehicles.

However, despite these challenges, engagement with people in Slough has indicated that:

- Improving children's health is an important value for schools in Slough (School Engagement Survey, 2024) and children are motivated to travel sustainably (Hands Up Surveys, 2018-2022).
- When asked about contributors to poor air quality, the majority of respondents (52%) voted that vehicle traffic contributes towards poor air quality, which suggests that Slough residents have a good understanding of the dominant pollutant sources in the borough (Thinks report, 2023).
- Slough residents have concerns about their weight (67.3%) and activity levels (65.8%), with a willingness to get active (77.8%), suggesting that there is appetite for active travel related schemes and projects (Healthy Behaviours Survey, 2022).
- Residents voted that cheaper sustainable travel (e.g. discounted public transport), wider public transport links and better public transport infrastructure (70% in total) would encourage them to travel more sustainably (Thinks Report, 2023).
- The community would like to be more involved in community engagement activities, with 72% agreeing, and raised useful engagement suggestions including community meetings, newsletters and surveys, showing an interest in involvement (Thinks report, 2023).

Development of the Air Quality Action Plan

The development of the AQAP has followed a rigorous process, as outlined by Defra within their Technical Guidance (TG.22). The process was supported by a steering group of council representatives which was initiated in July 2023, including members from the following areas:

- Carbon & Sustainability
- Sustainable Transport
- Highways Development
- Transport Planning
- Parking
- Taxi Licensing
- Public Health
- Development Management
- Planning Policy
- Housing
- Strategy & Policy
- Lead Member for Environment

The steps taken in the development of the AQAP are outlined below:

1. Review of all existing plans, policies and strategies to identify measures which may have an influence on air quality, for inclusion in a long list of potential measures (see Appendix E.1 of the AQAP for the full review).
2. Focused one to one meetings with steering group members from different departments to ascertain which of those measures were outdated, or no longer valid or relevant (as some strategies and plans are old and have not been replaced) and to raise any existing measures not currently represented within existing strategies and plans.
3. Review of the Air Quality Hub resources, to include measures for consideration that other local authorities are delivering but have not previously been considered by Slough Borough Council.
4. Application of a rating system to the measures list in collaboration with steering group members, based on the parameters of potential for reduction in pollution, technical feasibility of delivery, implementation timeframe, cost and funding (see Table 5.1 of the full AQAP report). This resulted in a 'viability score' which determined how viable it would be to deliver the measures (see Table C.2 – C.4 of the full AQAP report).
5. Initial measure scoping, to prioritise measures which had the highest rated positive impact on air quality (rated 1). Measures which focused on schools (HEA1) were consolidated, as collectively they have a more significant air quality impact than if delivered individually.
6. Final measure scoping, based on the final viability score, to form the 'core' AQAP measures list consisting of 26 measures. Scores which exceeded 16 were considered unviable (presented in Table B.1 of the full AQAP report). These measures will be promoted to the core AQAP measures list (Table 5.3 of the full AQAP report) should the viability of the measure change. This will be assessed annually and will be presented within the ASR. For measures that have a lesser impact on air quality which score well for viability, the council will endeavour to deliver these actions during the lifetime of the plan.

All measures included in the AQAP fall under the following objectives:

Environment Objective 1 (EO-1)	Undertake statutory duties to monitor, review and manage air quality
Environment Objective 2 (EO-2)	Ensure that air quality is a key consideration in all planning applications and support the Council's clean air ambitions at new developments
Environment Objective 3 (EO-3)	Reduce vehicle and building emissions associated with Council operations
Environment Objective 4 (EO-4)	Reduce emissions from staff e.g. vehicles associated with Council staff 'grey' fleet to improve air quality and meet carbon targets

Environment Objective 5 (EO-5)	Reduce emissions from public transport by implementing emission standards via partnerships and promoting ultra-low emission vehicle use with operators
Environment Objective 6 (EO-6)	Work in partnership with stakeholder groups to reduce emissions from vehicles and buildings
Environment Objective 7 (EO-7)	Work in collaboration with council officers to deliver the Air Quality Action Plan & LES Programme and promote the air quality agenda
Transport Objective 1 (TO-1)	Implement major infrastructural change, focusing on active travel, public transport and traffic management.
Transport Objective 2 (TO-2)	Increase uptake on public transport
Transport Objective 3 (TO-3)	Manage vehicle parking in Slough to achieve balance between accommodating growth and managing congestion
Transport Objective 4 (TO-4)	Implement traffic management measures to improve traffic flow and manage congestion
Transport Objective 5 (TO-5)	Improve the uptake of walking and cycling by making active travel an attractive travel option
Health Education & Awareness Objective 1 (HEAO-1)	Work in partnership with communities, businesses, schools and healthcare establishments to improve air quality
Health Education & Awareness Objective 2 (HEAO-2)	Improve information dissemination to the public regarding air quality
Health Education & Awareness Objective 3 (HEAO-3)	Improve education and awareness of air quality to promote healthy choices in relation to physical activity, transport, energy efficiency, smoke control and indoor air quality.

Scenario Impact Assessment

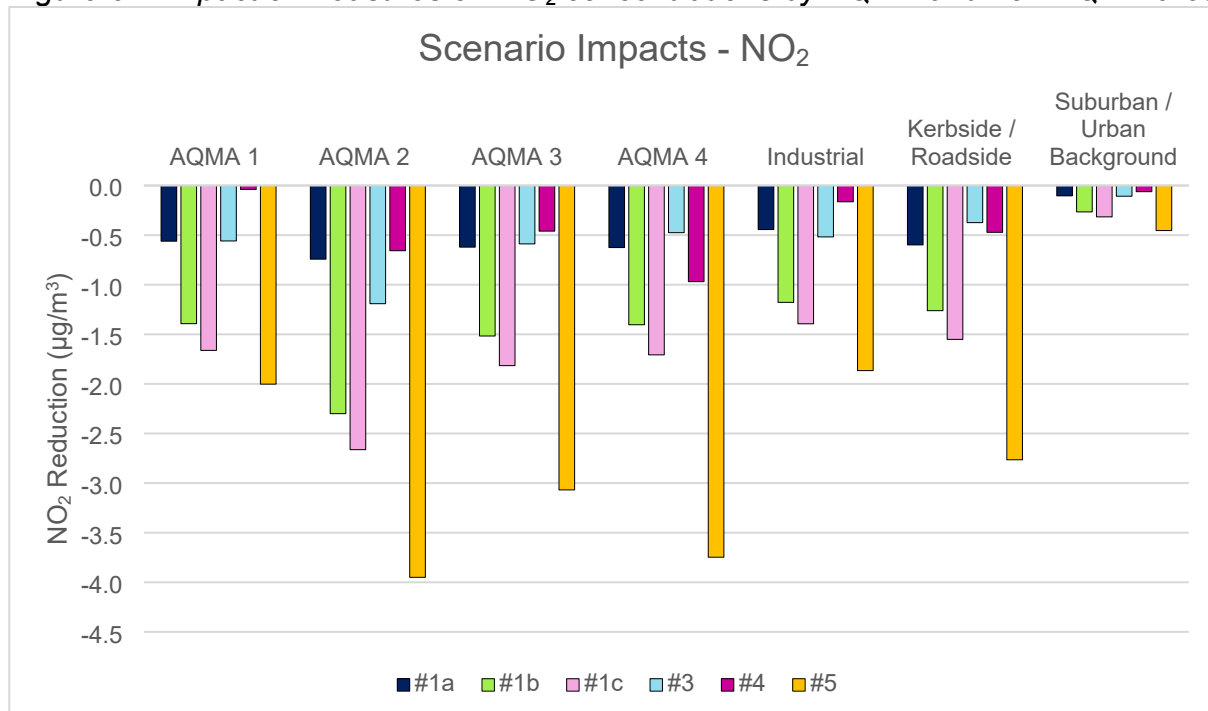
Defra's LAQM.TG22 requires that the impact of measures is quantified in the AQAP. As such, the refined measures list was grouped into five measure bundles, which included the following:

- Scenario 1 (1a-1c): progressive increase in active travel and electric vehicles.
- Scenario 2: Yew Tree Road junction improvements
- Scenario 3: setting a minimum emission standard (Euro VI) standard for HGVs and LGVs
- Scenario 4: 100% zero emission vehicle buses
- Scenario 5: combination of quantified AQAP borough-wide measures and 100% zero emission vehicle taxis

The graph below shows the average NO₂ reductions that result from the implementation of these measures (excluding measure 2 that impacts Yew Tree Road only), within and outside of AQMAs.

It is evident in the modelling that the single measure that has the greatest impact on NO₂ concentrations both within and outside of AQMAs is measure 1c (increasing active travel and uptake of electric vehicles). Measure 5 that combines the above measures results in the largest impact, therefore the combined implementation of these measures will have the best outcome in terms of NO₂ reduction.

Figure 6 – Impact of measures on NO₂ concentrations by AQMA and non AQMA areas



The two measures that had the greatest impact on NO₂ (#1c and #5) were taken forward to model the impact of these measures on particulate matter (PM_{2.5} and PM₁₀). Although the impact of the modelled measures on particulate matter are smaller than that of NO₂, the results indicate that both measure bundles have a positive influence on particulate matter concentrations.

It was also tested whether these measures had a positive influence on carbon emissions. For light vehicles including cars, taxis and LGVs, measure 1c reduces CO₂ emissions by 101 kt/year (18% reduction relative to the baseline), and measure 5 reduces CO₂ emissions by 122 kt/year (22.5% reduction relative to the baseline). For HGVs however, measure 1c does not have any impact. This is expected as the measures focus on modal shift and increase in electric vehicle uptake, intended to address emissions associated with light vehicles. Measure 5 has a small impact on HGVs and buses, reducing CO₂ emissions by 21 kt/year (9.4% reduction relative to the baseline). This evidence demonstrates the positive impact that the measures have on tackling emissions from light vehicles. Similarly to the particulate matter results, despite the impact on HGVs being small, this demonstrates that the measures do not have negative unintended consequences in relation to carbon emissions.

Full details of these measures on PM and CO₂ emissions are presented in Appendix A.

Public consultation

The public consultation on the draft AQAP was launched via Citizen Space on 15th March 2024 and closed on 27th April 2024 (open for six weeks in total). This consultation was shared directly with key stakeholder groups including statutory consultees, and received 100 responses to the online survey, three responses via email and feedback from Defra via the Local Air Quality Management (LAQM) online portal.

Heathrow Airport, SEGRO and Defra responses are provided as background papers, whereas comments raised internally (i.e. by Transport Planning) included minor wording

amendments only. A detailed consultation report is appended at Appendix B which considers online survey responses only.

The key conclusions from the online consultation are as follows:

- The majority of respondents (68%) agreed that air quality is important to them, however fewer (44%) agreed that air quality was a problem in Slough, and fewer agreed that air quality significantly affects them (37%). In contrast however, 87% agreed that they have a good understanding of air pollution and its health impacts. This highlights the knowledge gap in understanding air quality issues specific to Slough and will be a focus area in the AQAP, which will support the aims of the Slough Wellbeing Strategy 2020-2025.
- Respondents put value on their health, with 77% of respondents voting that they live a healthy lifestyle, 68% considering themselves physically active, and 69% interested in improving their health. This suggests that people in Slough may be receptive to taking actions to improve emissions and exposure to air pollution, for example by travelling more actively, and the positive impact this can have on their health.
- Almost all (99%) of respondents own a vehicle, 88% of which is either a diesel or petrol vehicle, and most (58%) have more than one vehicle per household. When asked what vehicle they would change to if given the opportunity, 52% would opt for a petrol or diesel vehicle, however 36% would opt for a hybrid or electric vehicle. This indicates that there is appetite for over a third of respondents to switch to a cleaner vehicle and assisting these respondents to make this transition is likely to have a positive influence on air quality, by tackling the largest pollutant source (private petrol and diesel vehicles).
- Despite 33% of respondents owning a bicycle (6% electric, 27% manual), only one respondent selected bicycle as their first ranked mode choice. This suggests that bicycle ownership may not be the main barrier to cycling uptake in Slough and a focus should be on encouraging people to choose to use their bicycle over private vehicle use, particularly for short journeys, and therefore highlights the importance of this measure in the action plan.
- When looking specifically at respondents who chose petrol or diesel vehicle as their top ranked mode choice, the top selected reasons for their choice included convenience (44%), reliability (42%), accessibility (41%) and ease of use (41%). Of the 73 respondents, 35 (48%) use their car between 0-5 hours per week, suggesting that their vehicle is mainly used for short journeys. Their geographic distribution suggests that alternative modes such as public transport and active travel are available to many of the respondents, but may need support in accessing them. In regards to reasons for travel, the most selected option was 'travelling to and from shops', followed by 'visiting friends and family' and 'commuting to and from work'. When asked if there were any other mode options they would like to start using or use more often, 39 (54%) respondents had selected alternative travel modes (i.e. excluding 'petrol / diesel' car and 'none of the above'). Almost half of these were short journeys, and the most popular alternative was public bus, therefore indicating that there is appetite amongst respondents to reduce use of their private car if an alternative was available.
- When looking specifically at public transport barriers, the top voted options included convenience (49%), reliability (46%) and journey time (44%). Respondents also specified in the 'other' option that cost, frequency and safety were further barriers. It is

recommended that a review of current bus service provision is undertaken to identify solutions to these barriers.

- Overall, respondents support the objectives of the AQAP, with every objective under environment, transport and health education & awareness having greater support than opposition (on average across all measures, 50% support, 26% oppose, and 24% neither support nor oppose).
- In regards to specific measures, on average environment measures are supported (47% support, 27% oppose) whereas transport measures are generally opposed (35% support, 43% oppose). Specific schemes that lack support include the cycle and scooter hire scheme, the A4 cycle lane scheme and Destination Farnham Road. These schemes have been through their own consultation process and as such, are discussed separately in respective reports. Other measures that are not supported include emissions based parking charges and traffic calming measures in AQMAs. This feedback will be considered when assessing suitability for implementation. Measures associated with Health Education & Awareness are generally supported (50% support, 21% oppose), with the greatest support being for the road safety education and training programme (62%) and the greatest opposition being towards the delivery of a roadside emissions campaign (27%).
- Comments from respondents indicate that cost to residents is the most significant factor in their response, therefore measures that impose further costs to residents are unlikely to be publicly supported. This will be taken into consideration when assessing the viability of measures, however measures are likely to be implemented where the benefits are evident.

The consultation feedback will be used to inform the Implementation Plan. This will ensure that the main priorities and key areas of concern raised by the respondents are at the heart of the plan. The action plan will be delivered collaboratively across council departments and overseen by a newly formed public health led working group.

3. Implications of the Recommendation

3.1 Financial implications

3.1.1 There are 26 environmental measures underpinning the AQAP resulting in additional total costs to the council of £24.774m over the period of the plan (2024 - 2028). Of the 26 measures proposed, 15 require officer time / resource to implement. These will be delivered collectively using existing officer resource within existing council service budgets and will be overseen by the public health led working group. The additional costs will be funded from available specific government revenue & capital grants and s106 funding for the AQAP (see Appendix D). Existing resources are already provided for within the current approved budgets for the relevant service areas. It is not anticipated that there will be any additional impact on council resources beyond the existing provisions within the relevant service budgets. However, additional funding for these measures will continue to increase, for example additional S106 obligations throughout the lifetime of the action plan, to support implementation.

3.2 Legal implications

3.2.1 The Environment Act 2021 created a legally binding duty on the Government to set a target on fine particulate matter. Local authorities have a role to play in delivering

reductions in fine particulate matter. Section 82 of the Environment Act 1995 provides that every local authority shall review the air quality within its area and requires it to designate an Air Quality Management Area where air quality objectives are not being achieved. When these areas are in place, the local authority must develop an Air Quality Action Plan detailing remedial measures to tackle the problem with the area.

- 3.2.2 Defra has published the Local Air Quality Management Policy Guidance (PG22) as guidance for local authorities in England (excluding London). The guidance is statutory and all local authorities must have regard to it. Chapter 5 of the guidance deals with Air Quality Action Plans. The Council is expected to work with its air quality partners, which may include neighbouring authorities and the Environment Agency. The Council is also expected to work on a cross partner basis, engaging with public health bodies and public transport providers as well as working on a cross departmental basis.
- 3.2.3 Consultation and community engagement are seen as key to increasing public awareness of the health issues associated with poor air quality. This followed the Coroner's Prevention of Future Deaths Report following the death of Ella Roberta Addo-Kissi-Debrah in 2021. The guidance recommends communicating advice to the public via a broad range of bodies and methods and involving local communities in local air quality, including forming a network to engage harder to reach groups.
- 3.2.4 The council is required to have an up to date Air Quality Management Plan. Failure to have a plan in place puts the council in breach of the Environment Act 1995 and risks intervention by the Secretary of State. The council should use its knowledge of its local community and work on a cross partnership basis to ensure the plan fits the needs of the local area.

3.3 *Risk management implications*

- 3.3.1 There are no risks associated with the proposed decision (AQAP approval). There are risks however with not approving the AQAP, as its development and implementation is a statutory responsibility of the council and therefore non-approval may result in intervention by the Secretary of State (Defra).

3.4 *Environmental implications*

- 3.4.1 The AQAP has demonstrated that the actions proposed will have a positive influence on nitrogen dioxide concentrations, but also has benefits in respect to particulate matter and carbon. As such, approval of the action plan will contribute to improvement of the environment and result in positive health implications.

3.5 *Equality implications*

- 3.5.1 Poor air quality is widely reported as having disproportionate impacts on the young, the elderly, those with pre-existing health conditions and those who live in areas of deprivation, as these areas tend to be closer to major roads with high congestion. As such, it is likely that improvements in air quality are going to be the greatest benefit to these groups. It is possible that negative equality implications may arise as a result of the AQAP approval if measures which increase costs for residents are introduced, particularly those that increase costs for private vehicle users. Those who have lower income are more likely to be disproportionately impacted by these measures, and as

such further EIAs will be taken on any specific measures before any such measure is introduced.

3.6 *Corporate Parenting Implications*

3.6.1 N/A

3.7 *Procurement implications*

3.7.1 N/A

3.8 *Workforce implications*

3.8.1 N/A

3.9 *Property implications*

3.9.1 N/A

4. Background Papers

Background Paper 1 – Heathrow Airport Consultation Response

Background Paper 2 – SEGRO Consultation Response

Background Paper 3 – Defra Consultation Response (Ricardo AEA-Ltd Responses)