

HILLINGDON AIR QUALITY ACTION PLAN 2019-2024

Cabinet Member(s)	Councillor Philip Corthorne Councillor Keith Burrows
Cabinet Portfolio(s)	Social Services, Housing, Health and Wellbeing; Planning, Transportation and Recycling
Officer Contact(s)	Val Beale, Residents Services
Papers with report	Appendix 1 - Consultation Responses Air Quality Action Plan 2019-2024

HEADLINES

Summary	This report seeks adoption by Cabinet of the Hillingdon Air Quality Action Plan for the timescale 2019-2024. The Plan fulfils the Council's statutory requirement to update the current Air Quality Action Plan, in accordance with guidance from the Mayor of London, and put in place actions to improve air quality.
Putting our Residents First	This report supports the following Council objectives of: <i>Our People; Our Natural Environment; Our Built Environment</i> It also contributes to the Hillingdon Health and Wellbeing Strategy, the Hillingdon Local Implementation Strategy for delivery of the Mayor's Transport Strategy and the Hillingdon Local Plan.
Financial Cost	Where relevant, actions will be taken forward via existing Council workstreams and existing enforcement regimes. Where additional funding is required for implementation, allocations have been identified within the LIP3 funding allocation from TfL (Cabinet Report LIP3, 27 th September 2018) and via s106 contributions secured for air quality improvements. Additional funding sources will be explored throughout the timescale of the Action Plan including the Mayors Air Quality Fund, Liveable Neighbourhoods Fund etc where applicable to do so. It is anticipated that where the activities of external stakeholders contribute to the pollution in the Borough they will fund and implement the actions necessary to reduce emissions from their own operations.
Relevant Policy Overview Committee	Residents, Education & Environmental Services
Relevant Ward(s)	All wards

RECOMMENDATIONS

That Cabinet:

- 1) **Considers the responses to the consultation received in Appendix 1; and**
- 2) **Approves the Hillingdon Air Quality Action Plan 2019-2024 for adoption by the Council.**

Reasons for recommendation

Under Part 1V of the Environment Act 1995 the framework for local air quality management (LAQM) was introduced. Every local authority has a statutory duty to review and assess the local air quality within their boundary and, where appropriate, declare an Air Quality Management Area along with the provision of an Air Quality Action Plan (AQAP) to improve air quality. The Council has a current Air Quality Action Plan which was adopted by Cabinet in 2004, its progress has been monitored via the submission of annual reports to DEFRA for approval.

In 2016, supervision of the LAQM system in the Greater London Authority (GLA) area was devolved to the Mayor of London. In accordance with the London-specific guidance, updated pollution information and action plan measures published by the GLA, local authorities across London have been required to undertake a review of their current Air Quality Action Plans. This ensures future actions on air quality are taken forward using the most up to date information on predicted pollution levels and on the measures best placed to help improve air quality.

This report outlines the processes undergone by the Council to review its Action Plan in line with the new guidance. This process has incorporated recommendations from the Residents' Environmental Services Policy Overview Committee (RESPOC) and been informed by a public consultation. The revised Air Quality Action Plan will stand from 2019-2024 when it will be required to be reviewed again. Progress will be monitored via the submission of annual reports to the GLA for approval.

Alternative options considered / risk management

If the Cabinet chose not to review the Air Quality Action Plan using the updated information;

- the Council would not be using the most accurate information on which to identify the areas of poor air quality and to ensure appropriate actions were taken in the relevant places in regards to actions to improve air quality for its residents;
- the Council may be directed to do so by the Mayor of London using the reserve powers under the Environment Act which allow for statutory intervention in cases such as a refusal to revise the AQAP appropriately.

Democratic compliance / previous authority

The original Air Quality Action Plan was adopted by Cabinet in 2004. The Mayor of London requires Air Quality Action Plans to be signed by the Heads of Public Health and Transport. In light of this, the Leader of the Council has approved that the Plan is additionally endorsed by the Cabinet Members responsible for Public Health and for Transport, along with the whole Cabinet.

Residents' & Environmental Services Policy Overview Committee comments

The previous Residents' & Environmental Services Policy Overview Committee (RESPOC) during 2017/18 undertook a full inquiry in regard to the review of the Air Quality Action Plan.¹ The four-month inquiry involved witness sessions from Council officers from planning, transportation, property services, fleet management, public health and external air quality experts. The Committee focused on actions that the Council itself could implement whilst recognising that the final Action plan would also seek actions from external organisations whose operations impact on air quality in the Borough. The following recommendations from the Committee were put forward to Cabinet:

1. The Action Plan should maintain a strong focus on Hillingdon school travel plans. It should prioritise work with schools most affected by air pollution, particularly to explore measures to tackle idling emissions from cars and coaches;
2. Further promotion of the Air Text service providing pollution alerts for Borough residents should be considered;
3. The Council should explore ways to work with businesses to help them and their employees improve air quality in the Borough;
4. The air quality monitoring networks across the Borough should be reviewed to ensure that there is appropriate coverage, particularly in Air Quality Focus Areas;
5. The Council will explore further ways to make businesses and residents aware of their responsibilities recognising that the whole Borough is designated a Smoke Control Area;
6. Existing work by the Council to promote healthier and greener alternatives to driving, such as cycling and walking, and other practical ways to reduce pollution, should be integrated into the Action Plan along with ways to evaluate their impact in helping to reduce emissions.

These recommendations were warmly welcomed by the Cabinet, which agreed that they should go forward as part of the Council's Air Quality Action Plan. The Cabinet recognised the work that had already been undertaken on air quality, but also that the Committee had identified areas that could be focussed on further to help manage key air quality issues affecting residents. Cabinet highlighted the impact on children of poor air quality and also the Council's recently announced legal challenge in respect of the Borough's main contributor of pollution, Heathrow Airport.

¹ <https://www.hillingdon.gov.uk/media/40320/Review-into-Air-Quality/pdf/MajorReviewAirQuality1.pdf>

SUPPORTING INFORMATION

1 Introduction

1.1 Air pollution is recognised as having a substantial impact on health, leading to a shortening of life expectancy for thousands of people across the UK every year. A recent report commissioned by the Greater London Authority (GLA) found that there are approximately 9,400 premature deaths from exposure to particulate matter (PM) and nitrogen dioxide (NO₂) in London. As noted in the Mayor of London's Environment Strategy, these health impacts fall disproportionately on the most disadvantaged communities affecting the poorest, the youngest, the oldest, those with pre-existing health conditions and those from minority ethnic groups the most.

1.2 The Hillingdon Health and Wellbeing Strategy identifies respiratory disease as the third highest cause of death in the Borough. It contributes to at least 15% of hospital admissions with a cost of approximately £10m to the health service in Hillingdon annually, with additional costs of an estimated £5.7m in working days lost. Poor air quality is thought to contribute to a sizable proportion of acute exacerbations of asthma and Chronic Obstructive Pulmonary Disease (COPD). Respiratory disease disproportionately affects people of lower socio-economic status due to lifestyle and environmental factors. The number of residents with COPD is expected to increase to 10,799 by 2030.

1.3 Taken together, this information demonstrates that there is a pressing need to improve air quality in Hillingdon so that public exposure to harmful concentrations of pollution can be avoided and the health of people protected.

2 Legislative Background

2.1 In 2003, in accordance with the duties for local air quality management (LAQM) as defined in the Environment Act Part IV, the Council declared an Air Quality Management Area (AQMA) over the bottom two thirds of the Borough, for nitrogen dioxide (NO₂). This covered all the areas that were above the legislative limits set for health.

2.2 This was followed in 2004 by the development of the Hillingdon Air Quality Action Plan (AQAP). This set out the local measures to be implemented in working towards achievement of the relevant air quality objectives. Annual Air Quality Action Plan reports, including details of all the monitoring results throughout the Borough, are available on the Council's website.

2.3 The implementation of the Plan since 2004 has set in place a significant number of measures to improve air quality. For example, all schools in Hillingdon now have travel plans; there are more dedicated cycle and walking paths to help encourage active travel; there are an increasing number of electric vehicle charging points across the Borough; proposed developments are required to produce air quality assessments and include mitigation to reduce their impact on pollution levels; residents and people working in the Borough are able to sign up to a free pollution episode alert service; pilot projects have been undertaken in regards to the

use of green infrastructure to protect vulnerable receptors from pollution, and there is now Borough-wide enforcement against idling vehicles.

2.4 From a regional perspective within this timescale, there has been the introduction of the London-wide low emission zone (LEZ), the increased use of cleaner technologies for buses and taxis, and guidance for local authorities has been produced both for reducing emissions from construction sites and through planning guidance for new developments. Despite this, there are areas in the Borough where pollution levels remain above the legislative air quality limits set to protect human health, and so further action is needed.

2.5 Data from air quality monitoring stations across the UK, confirmed by those within Hillingdon, demonstrate that despite renewal of the road vehicle fleet, pollution levels have remained more or less static and show few signs of a substantial reduction. Evidence from the increased use of diesel vehicles and non-compliance of a proportion of these with vehicle emission standards is now accepted as being a major cause for the lack of sufficient improvement in air pollution in urban areas.

2.6 In 2016 the Mayor of London introduced the London-specific LAQM system for the Greater London Authority area. Although the statutory framework outlined by National Air Quality regulations and Part IV of the Environment Act remains, the London specific local air quality management policy and technical guidance has been refined to reflect the unique challenges, and opportunities, faced by local authorities in London. All Boroughs are now required to work in accordance with this new guidance. In regard to Action Plans there is the requirement to review them and update them regularly, every 5 years as a minimum.

2.7 Although nitrogen dioxide is the main pollutant of concern in terms of exceeding legislative limits, recognising the importance of the inhalation of fine particulate matter on health, the latest GLA policy requirements have introduced a specific duty for London Boroughs to work towards reducing emissions and concentrations of particulate matter PM_{2.5} where this is possible. This is reflected in the Air Quality Action Plan 2019-2024 ("the Plan").

2.8 The Plan replaces the current AQAP and outlines the actions that the Council proposes to deliver, between 2019 and 2024, to help reduce pollution emissions and protect against public exposure to pollution. Effective implementation will impact positively on the health and quality of life of residents and visitors to the Borough.

3 Updated Information and guidance

3.1 The Plan has been based upon the GLA guidance which includes information on predicted pollution levels in each London Borough, priority areas for action and measures to be included in Air Quality Action Plans. The updated pollution maps indicate the extent of the problem within Hillingdon with the areas of highest pollution most notable in the south of the Borough around Heathrow Airport and around the strategic road network including the M4, the A4, the A312 and the A40. Congested traffic conditions contribute significantly in the more urbanised areas in the Borough, such as along busy major roads and in the town centres plus areas where local roads intersect with busy through routes such as the A40.

3.2 The GLA has identified specific Air Quality Focus Areas (AQFAs) throughout London, the Focus Areas are described as areas where the risk of exceeding pollution limits is high, there is relevant public exposure and where local authorities are expected to prioritise improvement actions. In Hillingdon there are eleven such areas, with an additional Focus Area for the M4 where the responsibility for improvement action is identified as being with Highways England.

3.3 The GLA guidance requires local authorities to take account of a series of twenty five actions under seven identified themes around which the Action Plan should be based. These are:

- Air quality monitoring and other statutory duties;
- Emissions from developments and buildings;
- Emissions associated with deliveries, servicing and freight;
- Awareness raising to drive behavioural change;
- Emissions from council fleets;
- Localised solutions for neighbourhoods;
- Use of cleaner transport technologies and increased cycling and walking.

Of the twenty five actions there are nine described as selected measures which the GLA require each local authority to consider as a priority. All of the above information is referenced within the Plan.

4 Hillingdon specific information

4.1 There are several different sources which impact upon pollution levels within the Borough boundary, the major contributors are emissions associated with the operation of Heathrow Airport plus emissions from vehicles on the roads within the Borough. These arise from trips made by residents, by businesses (including airport-related traffic), by public transport such as buses and coaches plus a significant proportion of trips made on the strategic road network which simply pass through the Borough such as on the M4, the A40, the A312 and the A4.

4.2 Slow-moving congested traffic contributes to the pollution levels in the more urbanised areas and town centres, there is the potential for more localised impacts arising from point sources such as industry within specific locations and there is also transboundary pollution brought in from other parts of the UK and, in some cases, internationally. This is especially the case for particulate matter which can travel large distances. Within the five year timescale of the Action Plan there will also be emissions associated with the construction of HS2.

4.3 In order for there to be effective reductions in pollution the Council will need to work collaboratively across departments within the Council and also include measures to address the sources that impact on the Borough over which the Council has no direct control.

5 Development of the Air Quality Action Plan 2019-2024

5.1 The new Air Quality Action Plan has taken account of the GLA guidance and has been further developed to ensure it reflects the specific issues within the Borough, for example, additional actions have been added to ensure the stakeholders with responsibility for contributing significantly to the pollution sources which impact within the Borough are appropriately engaged. Its development has been influenced by the following:

- Residents' & Environmental Services Policy and Overview Committee (RESPOC)

5.2 The recommendations within the RESPOC report, as detailed previously, have all been incorporated into the Council priorities within the Air Quality Action Plan with appropriate implementation measures incorporated into the action plan delivery table.

- Air Quality Action Plan Steering Group

5.3 The Residents Services Senior Management Team (SMT) includes senior officers responsible for, amongst other aspects, council operations in regards to buildings and vehicle fleet, enforcement of statutory duties under the Environment Act and Clean Air Act, schools, planning decisions, transportation and public health. This group, acting as the AQAP Steering Group, has helped define Hillingdon's objectives and a series of Hillingdon-specific priorities for the Air Quality Action Plan. The SMT will continue in this capacity throughout the AQAP's five-year timescale and will sign off each annual statutory report to the Mayor.

- Air Quality Action Plan Officer Group

5.4 The officer group includes representatives from planning policy, development management, transportation and re-generation. Its objective was to further define the GLA AQFAs Areas into Hillingdon-specific Air Quality Focus Areas. There are seventeen of these and they encompass the GLA Focus Areas and include additional areas where further work is required to ensure all areas at potential risk of high pollution levels have been investigated.

6 Overview of the Air Quality Action Plan 2019-2024

Air Quality Action Plan objective

6.1 To focus actions to:

- improve the areas of poorer air quality as soon as possible;*
- to continue to improve air quality across the Borough and reduce public exposure to air pollution, especially for vulnerable groups within our communities such as the young, the old and those already suffering with associated respiratory illnesses.*

Council priorities

6.2 The Council will prioritise the following actions that will be taken in the timescale from 2019 to 2024 at which point the Plan will be reviewed again. The priorities have been cross referenced to show how they incorporate the RESPOC recommendations (R) and the GLA selected measures. The priorities are defined as:

- *Lead by example*

6.3 The Council will undertake a review of its own fleet and develop a programme for reducing emissions from this source over the five years of this Plan. This approach will also be adopted in regard to reducing emissions from Council buildings and the Council will both promote the use of, and seek funding to ensure the supply of, the infrastructure necessary for the increased use of low/zero emission technologies throughout the Borough. (GLA selected measure, GLA 8 and 17)

- *Prioritise reducing public exposure and improving air quality around schools*

6.4 The Council will work with schools to help them implement measures to reduce exposure both at school and on the journey to school. This will focus initially on those in the areas of poorer air quality and where schools are close to busy roads. (RESPOC R1, GLA selected measure 14)

- *Prioritise the implementation of improvement strategies in the Air Quality Focus Areas*

6.5 The Council will investigate the development of an air quality improvement strategy for each Air Quality Focus Area on a rolling programme across the five years of the Plan. (RESPOC R4, R6, GLA selected measure 25 and others)

- *Ensure the integration of the Healthy Streets approach in relevant council work programmes*

6.6 The Council will ensure its transport management projects and town centre improvements programmes incorporate delivery outcomes which include reducing pollution emissions and protecting public exposure. (RESPOC R3, R6)

- *Ensure the planning system supports the achievement of air quality improvements in relation to new developments*

6.7 The Council will use its planning policies to ensure new developments incorporate air quality positive design measures from the outset. Suitable mitigation measures will be sought to reduce pollution increases associated with new development, especially in areas where the air quality is already poor. (RESPOC R6, GLA selected measure 3)

- *Raise awareness via targeted campaigns*

6.8 The Council will develop a rolling programme of awareness and enforcement campaigns focused on the protection of public health such as; promotion of the free pollution alert system,

AirText, to vulnerable groups in the Borough; a renewed focus on the issues of health impacts from particulate matter arising from sources such as from the burning of wood, coal and other substances especially in domestic fireplaces, enforcement on pollution issues arising from construction site activities and the enforcement of no idling throughout the Borough (RESPOC R1, R2, R3, R5, GLA selected measures 3, 7 and 12).

- *Promote the use of greener walking and cycling routes to help the delivery of the Council's transport objective of an increased mode share for walking and cycling*

6.9 The Council will use available funding mechanisms to provide the necessary infrastructure and local improvements needed for increased cycling and walking facilities. Along with the use of enhanced green infrastructure to create greener walking and cycling routes away from the most polluted areas and roads, this will form an important integrated approach to reducing exposure to pollution and promoting healthier lifestyles as well as improving air quality by providing a zero-emission alternative to use of the car (RESPOC R6, GLA selected measures 24 and 25).

- *Work with external stakeholders*

6.10 The Council will ensure that external stakeholders, whose operations influence the pollution levels experienced within the Borough, are actively engaged to deliver focused actions to reduce emissions from their operations and play their part in improving the air quality in the local communities.

6.11 The Plan will be subject to an annual review and appraisal of progress reporting to the Senior Management Team. Progress each year will be reported in the Hillingdon Annual Status Report submitted to the GLA for approval on an annual basis.

7 Financial Implications

7.1 Where possible the actions will be taken forward through existing Council workstreams such as planning development, town centre improvements, Council property upgrades and fleet replacement, through enforcement regimes under the Clean Air Act, under the Parks and Public Spaces Protection Order for no idling vehicles and the regulation of industrial processes plus partnership working with businesses and health partners.

7.2 Where the actions required to secure air quality improvements are transport-related, funding has been identified via the LIP3 (2019-2022) allocation from Transport for London. The Hillingdon LIP3 report, which was approved by Cabinet on 27th September 2018, has been submitted to TfL and approval is anticipated imminently.

7.3 Additional funds have been secured and ring-fenced for air quality improvements (and will continue to be secured where relevant) from s106 agreements for planning approvals. Their use is subject to Council approval procedures.

7.4 Bidding opportunities to secure fund for further improvements will be sought throughout the timescale of the Plan, such as the Mayor's Air Quality Fund, Liveable Neighbourhoods bids and others where applicable.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

Air pollution is recognised as having a substantial impact on health, including shortening of life expectancy and contributing to exacerbations of asthma and other respiratory diseases such as Chronic Obstructive Pulmonary Disease (COPD). The Hillingdon Health and Wellbeing Strategy identifies respiratory disease as the third highest cause of death in the Borough. Improving air quality will bring health benefits for those most at risk from air pollution such as young people, older people and those already suffering from respiratory illnesses.

Consultation carried out or required

The draft Air Quality Action Plan has been the subject of a six week public consultation process. This has included the statutory consultees, as named in the local air quality management legislation including the Greater London Authority, Transport for London, neighbouring local authorities, Highways England, Environment Agency.

In addition the Council has undertaken a local consultation including the Hillingdon Health and Wellbeing Board, Heathrow Airport, all ward Councillors and an online public consultation involving residents, residents groups, local businesses and other local organisations. This has allowed residents to be able to give their views on the Plan and highlight any potential air quality issues in their own local areas. With the inclusion of the statutory consultees who have responded, the total number of responses has totalled 106.

Further detail on the consultation responses can be found in the Air Quality Action Plan summarised at para 4.4, and in detail in Appendix 1 of the Air Quality Action Plan Consultation Report.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed the report and notes the budgetary implications set out above. The funding for many of the recommended actions are already managed through the work of various council services, whilst specific transport related actions will be funded through bids made to the LIP3 (2019-2022) allocation from Transport for London. Where appropriate opportunities to access other national funding streams will be sought to support improvements to Air Quality recommended in this report.

Legal

The Borough Solicitor confirms that the Legal Implications are contained within the body of the report.

Comments from other relevant service areas

Internal consultation

The Air Quality Action Plan has been developed following recommendations from the RESPOC Report, as approved by Cabinet. The Residents Services Senior Management Team has acted as the Internal Steering Group for the review and carried out internal consultation with the relevant Council departments, all of which have informed the Air Quality Action Plan measures.

BACKGROUND PAPERS

- [Cabinet Report LIP3 Allocation, September 27th 2018](#)
- [Report from the Residents & Environmental Services Policy Overview Committee](#)