

AIR QUALITY ACTION PLAN - 2025 - 2030: PRE-CONSULTATION

Cabinet Member & Portfolio	Cllr Eddie Lavery Cabinet Member for Community and Environment
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Papers with report	Air Quality Action Plan – Pre consultation version

HEADLINES

Summary	<p>This report seeks the approval of Cabinet for officers to carry out a pre-consultation review of the new air quality action plan with the GLA. The intention is then to make any necessary changes and undertake a full public consultation on the action plan.</p> <p>Once adopted the action plan will be in effect from 2025 to 2030.</p> <p>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.</p>
Putting our Residents First Delivering on the Council Strategy 2022-2026	<p>This report supports our ambition for residents / the Council of: Live active and healthy lives</p> <p>This report supports our commitments to residents of: Thriving, Healthy Households</p> <p>This also supports the Strategic Climate Action Plan</p>
Financial Cost	<p>Where relevant, actions will be taken forward via existing Council workstreams and existing enforcement regimes.</p> <p>Transport related air quality projects will be tailored to overlap with Local Implementation Plan projects with funding allocated by TfL and via s106 contributions secured for air quality improvements.</p> <p>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</p>
Select Committee	Residents' Services Select Committee
Ward(s)	All

RECOMMENDATIONS

That Cabinet agree:

- 1) That the air quality action plan: pre-consultation version be sent to the Greater London Authority (GLA) for initial review, in accordance with requirements.**
- 2) That any changes from the Council's liaison with the GLA on the plan be delegated to the Director of Planning & Sustainable Growth to make, in consultation with the Cabinet Member for the Community and Environment**
- 3) Subject to the above, the publication of the final draft version, upon sign-off by the Cabinet Member for Community & Environment, for public consultation lasting a minimum of 6 weeks and furthermore, agree to receive a report back to duly consider the consultation and ultimately the plan's adoption.**

Reasons for recommendations

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 existing air quality action plan had a 5-year framework and needs to be reviewed in accordance with the statutory requirements of the Legislation.

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 policies, 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 to enable the most effective measures to help improve air quality.

The council must first undertake pre-consultation engagement with the GLA prior to public consultation. This is to ensure initial compliance with the guidance and policies of the GLA. The GLA will authorise the council moving to the public consultation once content with the pre-consultation version.

Some changes may be requested by the GLA. These will be reviewed by officers, and it is then recommended that any further changes to the Action Plan are via agreement with the Cabinet Member for the Environment prior to undertaking the public consultation.

Alternative options considered / risk management

A do-nothing option would not be meet the legislative requirements. It would also potentially result in a failure to manage air quality exposing communities to risk from air pollution impacts.

It is possible that the Mayor of London could direct the council to developing an updated air quality action plan if it was considered that a) the existing approach was out of date and b) there was not sufficient evidence of tackling the threat of air pollution.

The action plan has been updated to reflect more recent data and evidence thus ensuring the optimum approach to protecting human health.

Democratic compliance / previous authority

Cabinet may authorise such strategic plans for consultation and approve them.

Select Committee comments

The previous select committee, the Residents Environmental Services Policy Overview Committee (RESPOC) undertook a full review of air quality action prior to adoption of the existing plan. This took the form of a four-month inquiry. The findings from this committee were integral to the existing plan and have been reflected and strengthened in this review. The findings remain relevant:

- 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.*

The Residents' Services Select Committee will be engaged through the annual reviews of the action plan and the associated statutory air quality monitoring.

SUPPORTING INFORMATION

1. Air pollution remains one of the biggest public health threats in the country. It is acknowledged that it results in a reduced life expectancy for thousands of people across the UK annually. A 2019 research paper from Imperial College London found that 'toxic air' contributed to the premature deaths of around 4,000 Londoners.
2. In addition, in December 2020, Coroner Phillip Barlow ruled that a 9-year-old girl from Lewisham, South London died in 2013 as a direct result of air pollution, stating air pollution made a "material contribution to her death". This was landmark case in understanding the impacts of air pollution and has driven more stringent approaches to managing air quality

3. The Government has reinforced the importance of this matter stating:

Air quality has improved in England over recent decades. However, it continues to be the biggest environmental risk to public health, with children, the elderly and the already vulnerable most affected. Poor air quality also has consequences for crop yields and, particularly in the case of ammonia and oxides of nitrogen (NOx), significant impacts for the natural environment and biodiversity.

4. Government has also recognised that local authorities are at the forefront of tackling air pollution with statutory duties imposed through the 1995 Environment Act and reinforced in the 2021 Environment Act.

Local government has an essential role to play in delivering cleaner air for communities and nature right across England. They have many of the powers and local insight to tackle issues that cause pollution locally. Local authorities (the lower tier in two-tier areas, and unitary authorities) already have a duty to address air quality exceedances in their area. This includes declaring Air Quality Management Areas and publishing Air Quality Action Plans setting out the measures they will take to come back into compliance. We also expect local authorities to take preventative action, through a local Air Quality Strategy, rather than waiting for a legal limit to be breached.

5. In addition to the national statutory requirements, in 2016, the Mayor of London implemented the London-specific local air quality management (LAQM) system for the Greater London Authority area. While the statutory framework established by national air quality regulations and Part IV of the environment act remains in place, the LAQM policy and technical guidance for London have been tailored to address the unique challenges and opportunities faced by local authorities in the city. All boroughs are now required to adhere to this updated guidance. Regarding action plans, there is a mandate to review and update them regularly, at least every five years.
6. Moreover, air pollution disproportionately impacts vulnerable communities, including those with lower incomes and individuals from Black, Asian, and Minority Ethnic backgrounds. Therefore, our efforts to improve air quality also support the council's broader goal of fostering a more equal and fairer borough for all residents.

Types of Pollutants

7. There are many types of air pollution from various sources however, it is important to understand what is relevant to the council in terms of the action plan. There are two main pollutants that the council needs to consider.

Nitrogen Oxides

8. Nitrogen oxides are a group of gases that are mainly created from burning fossil fuels. When the gas reacts with others in the air, it can create nitrogen dioxide (NO₂).

9. Short-term exposure to higher concentrations of NO₂ can cause inflammation of the airways and may increase susceptibility to respiratory infections. NO₂ can exacerbate the symptoms of those already suffering from lung or heart conditions.
10. In addition, NO₂ is a 'precursor pollutant', as it is involved in the formation of ozone. Ozone is a gas which is also damaging to human health and can trigger inflammation of the respiratory tract, eyes, nose and throat as well as asthma attacks. Moreover, ozone can have adverse effects on the environment through oxidative damage to vegetation including crops.

Particulate matter

11. Particulate matter is everything in the air that isn't gas. This includes natural sources like pollen, sea spray and desert dust. It also includes human made sources like smoke and dust from exhausts, brakes and tyres.
12. PM can travel large distances with up to 33% of PM_{2.5} (fine particles) originating from non-UK sources and around 15% from natural sources. PM is classified according to size. PM_{2.5} is less than 2.5µm (micrometers) across and is the main type of PM which is regulated. PM₁₀
13. PM can get into the lungs and blood and be transported around the body, lodging in the heart, brain and other organs.
14. There are also increasing scientific concerns related to ultrafine PM (UFPs). These particles (PM_{0.1}) are smaller in size and can be retained in the lungs longer. A recent study in relation to UFPs and aviation found concerning degrees of air pollution:
<https://www.transportenvironment.org/articles/ultrafine-particles-from-planes-put-52-million-europeans-at-risk-of-serious-health-conditions>
15. UFPs are not yet embedded into the regulatory framework but nonetheless pose a concern for the council. The action plan commits to monitoring UFPs, particularly around Heathrow Airport with the data informing future actions.

Sources of Pollution

16. Sources of NO₂ are predominantly transport based with aviation posing a particular problem. Much of these emissions are outside the control of the council, for example on the strategic road network. There is an influencing role for the council for the strategic network operators, TFL and National Highways and other major contributors such as Heathrow Airport Limited. However, at local specific hotspots, the Council does have more scope for interventions, particular around schools or where there are heavy degrees of local centre traffic.
17. Sources of PM largely come from industrial and commercial construction and operation. There is limited regulatory role for the council in managing improvements to the extent of securing clean air, but there is an influencing role meaning that collaboration with partners and industry operators is important.

Air Quality in the London Borough of Hillingdon

18. Despite improvements in air quality over the last five years in the borough, air pollution continues to impact health and economy and impact inequalities. Poor air quality is still observed at sensitive locations within Hillingdon.
19. The general trends in the three key pollutants, NO₂, PM_{2.5} and PM₁₀ are all positive and generally below the legal limit values. However, the UK limit values are an upper legal threshold, and it does not mean that air pollution is safe below these levels. The World Health Organisation recommendations for 'safe' air quality levels are much lower than the UK standards.
20. As stated previously, compliance with legal limits is not determinant of good air quality. People respond differently to various degrees of air pollution meaning impacts can be observed at levels much lower than the thresholds set by government. In addition, much of the thresholds are linked to averages. This means there could be spikes in air pollution which people are exposed to, for example during the 'school run', but modelled data over a period of time shows air pollution to be quite low.
21. The Borough, like all others in London are largely above the WHO 'safe levels' for the three key pollutants. In addition, over the course of the previous plan, more stringent air pollution levels have been adopted by the government with a particular focus on PM_{2.5} and PM₁₀. There are now statutory targets to be met in relation to these with monitoring required as a consequence.
22. This is why action to improve air quality continues as a priority for the council. There is no 'safe level' of air pollution. A reduction in air pollution and exposure to it will continue to be embedded within government and GLA air quality policy.

The 2025-2030 Air Quality Action Plan

23. The 2025-2030 air quality action plan responds to the Council Strategy aspirations for 'Thriving healthy households' and 'A green and sustainable borough'. At the heart of the plan are 6 key outcomes that build on the good work of its predecessor:
 - i. To reduce pollutant emissions within our borough to the maximum possible extent, with all emissions being mitigated
 - ii. To reduce pollution concentrations, striving to achieve the world health organization (WHO) guidelines in the shortest time possible
 - iii. Remove inequalities in exposure to poor air quality and protect the vulnerable
 - iv. Continue to use the planning system to ensure:
 - a. new development does not contribute additional air pollution and
 - b. new development in our focus areas actively contribute towards improvements in air quality
 - v. Raise awareness on the health impacts and preventive measures to be taken to safeguard health
 - vi. Influence change and lead by example
 24. These overarching aims are reflected in a series of actions across 5 themes:
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Monitoring and Reporting

25. The actions in this theme reflect our statutory obligations to monitor air pollution which in turn informs actions. We have over 50 monitoring points across the borough, but we recognise the need to expand this to have more sites capturing data on PM as well as ultrafines around Heathrow Airport.
26. The data collected is invaluable to identify changing priorities as well as to influence work with other statutory partners and interested parties, i.e. TFL in relation to improving public transportation or National Highways regarding pollution from strategic transport corridors.

Improving the Urban Environment

27. The actions in this theme relate to protecting and improving the places we live in. It sets the requirement to deliver specific area action plans with priority given to the most at risk areas. It also identifies Heathrow Airport as a specific area of concern and therefore requiring a bespoke council led action plan to compliment and challenge Heathrow Airport Limited's own approaches.
28. It also sets out plans for reducing exposure to harmful emissions either through increased planting or the development of better connectivity to and from the places most used.
29. Finally, the management of new development is also reflected in this theme. All new development introduces likely additional sources of pollution, whether direct or indirect. It is not possible to refuse all these developments on air pollution grounds as this is just one material planning matter. However, it is possible to secure development that is either air quality neutral (i.e. no net increase in pollution) or ideally air quality positive (i.e. a net improvement). That latter position is not straightforward and can place a high degree of constraint on development but will be pursued in our air quality focus areas.

Cleaner Transport

30. The actions in this theme relate to removing or reducing pollutants from a key source of harmful air quality. It is recognised that the borough has relatively poor transport connections, particularly north/south which means that car ownership is still relatively high. Nonetheless, more can be done within the borough to increase the alternative options to private vehicle usage. This provides healthier choices to communities without enforcing change that may have consequences in other faces of life.
31. The action plan therefore provides the framework for working with and challenging TFL to increase public transport opportunities as well as for the council to deliver more cycling and pedestrian routes as well as improving electric vehicles charging infrastructure.

Protecting the Vulnerable

32. A flagship project for this action plan is to raise awareness and education for GPs in identifying air pollution impacts for patients. This in turn will help promote the benefits of a healthier lifestyle and importantly provide information on how to achieve it in the borough.
33. This project will also ensure that schools are fully engaged on the subject of air pollution with innovative approaches to tracking air pollution and identifying cleaner routes for school children as well as making parents aware of their own contribution.

34. Area Action Plans for the focus areas will all have sections dedicated to the understanding of the impacts on vulnerable people and specific actions necessary to reduce pollutants and/or exposure to them.

Education and Awareness

35. This action focuses on using technology and toolkits to raise awareness of air pollution and provide education on improving lifestyles. There are invariably overlaps between the suite of actions with this theme largely overlapping with the others, but it is important to ensure that the action plan contains targeted action related to communication and education.

Process

36. There is a requirement to undertake a pre-consultation review with the GLA as the regulatory body overseeing action. This pre-consultation version of the plan will be sent to the GLA for comment with any changes to be made and agreed with the Cabinet Member for the environment. The air quality action plan will then be subject to a minimum 6-week consultation period.

Review

37. The Council is statutorily required to produce an Annual Status Review. This contains an update on progress against each of the actions. These are produced in September/October every year following collation of air quality data, laboratory analysis and GLA ratification.

Financial Implications

38. Where possible, actions will be integrated into existing Council workstreams, including planning development, town centre improvements, Council property upgrades, and fleet replacement. These efforts will be supported by enforcement regimes under the Clean Air Act, and Public Spaces Protection Order for no idling vehicles, and the regulation of industrial processes, alongside partnership work with businesses and health organisations.
39. For transport-related actions aimed at improving air quality, officers will collaborate on TFL allocated funded projects to maximise the overlaps between improving transport and reducing air pollution.
40. Additional funds for air quality improvements have been secured and ring-fenced from S106 agreements from planning approvals, subject to Council approval procedures.
41. Currently the Council holds £3,800k unallocated air quality S106 contributions that can be used towards the future air quality action plan delivery.
42. Throughout the plan's timescale, further funding opportunities will be pursued, such as the mayor's air quality fund, liveable neighbourhood's bids, and other applicable sources.

RESIDENT BENEFIT & CONSULTATION

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

43. Air pollution is known to have a significant detrimental impact on communities. The action plan is driven by data to prioritise action to reduce pollution and the exposure to it.
44. The benefits of the plan are therefore health led. However, by working in partnership with others, additional benefits can be realised. For example, urban planting can have many wider benefits related to wildlife, climate change and improving the amenity in an area.

Consultation & Engagement carried out (or required)

The plan has been developed with collaboration of internal officers. The next stage is to secure a pre-consultation review by the GLA as the regulator as required by policy.

Once this step has been completed; the plan and any changes will be subject to further internal review by officers in collaboration with the Cabinet Member for the Community and Environment.

The Air quality action plan will be finalised and published for a minimum of 6 weeks consultation.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concurs with the financial implications set out above, noting the recommendation to approve the Air Quality Action Plan 2025-2030: Pre-consultation version.

Furthermore, it is noted the delivery of the air quality action plan will be funded from air quality S106 contributions, which currently amount to £3,800k as of month 10. To enable the delivery of the plan up to 2030, officers will pursue further funding opportunities through external funding from Transport for London and additional S106 agreements, to ensure there will be no pressure on General Fund resources, which will be monitored as part of the regular monthly monitoring process.

Legal

Section 82 of the Environment Act 1995 (“the Act”) places a duty on the Council to review the quality of air in its area, to assess whether the air quality standards and objectives set out in The Air Quality (England) Regulations 2000 (as amended) are being achieved or are likely to be achieved.

Section 83 of the act requires the Council to designate air quality management areas (AQMA) where, as a result of an air quality review, it appears that air quality standards or objectives are not being achieved or are unlikely to be achieved within a relevant period.

Section 83A of the Act requires the Council to prepare an air quality action plan (AQAP) detailing the remedial measures that will be delivered to work towards meeting the air quality objectives for the designated area(s).

Since the Council's existing AQAP had a 5-year framework and it now needs to be reviewed and pursuant to section 83A (6), of the act, the Council may revise its AQAP any time.

Part IV of the Environment Act 1995 Local Air Quality Management Policy Guidance (PG09) requires the Council to undertake statutory consultation when revising its AQAP and the London Local Air Quality Management Policy Guidance requires the Council to submit its draft AQAP to the GLA both prior to and post public consultation.

Planning comments

Section 106 has been a fundamental factor in delivering actions within the previous plan. The plan sets out the processes and context by which Section 106 funding is secured from new development to implement the actions in the plan. All Section 106 spend is subject to a separate allocation process.

BACKGROUND PAPERS

NIL