

# Public Document Pack



Notice of Meeting:

## Cabinet

**Meeting Location:**

The Atrium, Perceval House,  
14-16 Uxbridge Road, Ealing, W5 2HL

**Date and Time:**

Thursday 12 October 2023 at 5.00 pm

**Contact for Enquiries:**

**Email:** [democraticservices@ealing.gov.uk](mailto:democraticservices@ealing.gov.uk)

**Telephone:** 020 8825 6302

**Chief Executive:**

Tony Clements

### Members:

### Portfolio

J Anand	Cabinet Member for Tackling Inequality
J Blacker	Cabinet Member for Healthy Lives
L Brett	Cabinet Member for Decent Living Incomes
D Costigan	Deputy Leader and Cabinet Member for Climate Action
S Donnelly	Cabinet Member for Inclusive Economy
P Knewstub	Cabinet Member for Thriving Communities
B Mahfouz	Cabinet Member for Safe and Genuinely Affordable Homes
S Manro	Cabinet Member for Good Growth and New Homes
P Mason (Chair)	Leader of the Council
K K Nagpal	Cabinet Member for A Fairer Start

# AGENDA

This meeting will be broadcast live on YouTube

Please click the following link to view the meeting:

(1) [Ealing Council - YouTube](#)

- 1 **Apologies for Absence**
- 2 **Urgent Matters**
- 3 **Matters to be Considered in Private**
- 4 **Declarations of Interest**
- 5 **Minutes** **(Pages 3 - 32)**
- 6 **Appointments to Sub Committees and Outside Bodies**
- 7 **Agency worker contract** **(Pages 33 - 38)**
- 8 **Council plan performance report Q1 2023 - 24** **(Pages 39 - 50)**
- 9 **Ealing Air Quality Strategy and Action Plan** **(Pages 51 - 178)**
- 10 **Date of the next meeting**

The next meeting is scheduled for Wednesday 8 November 2023.

*Exclusion of the Public and Press*

**Published:** Wednesday, 4 October 2023

## **Minutes of the meeting of the Cabinet**

**Date:** Wednesday, 13 September 2023

**Venue:** The Atrium, Perceval House, 14-16 Uxbridge Road, Ealing, W5 2HL

### **Attendees (in person): Councillors**

P Mason (Chair) J Anand, J Blacker, L Brett, D Costigan, S Donnelly, P Knewstub, S Manro and K K Nagpal

### **Attendees (virtual): Councillors**

B Mahfouz

### **Also present:**

G Busuttil, D Crawford, J Gallant

### **Also present (virtual):**

V Alexander

## **1 Apologies for Absence**

Apologies had been received from Cllr Shaw.

In accordance with paragraph 2.6(a) of the Council's Constitution, the following speakers addressed the Cabinet with regard to the following items:

Creation of a Regional Park:

- Cllr Busuttil (nominated by Cllr Malcolm)
- Cllr Gallant

2023/24 Quarter 1 Budget Monitoring Update:

- Cllr Busuttil (nominated by Cllr Malcolm)

New Lido Facility in the Borough:

- Cllr Busuttil (nominated by Cllr Malcolm)
- Cllr Gallant

The meeting was held in a hybrid format with members and officers able to join the meeting remotely. However, regulations did not allow for members attending virtually to be counted as present in the attendance section of the minutes, and their attendance would not count as attendance in relation to section 85(1) of the Local Government Act 1972. Members attending virtually would be able to speak but would not be able to vote. Cllr Mahfouz attended the meeting virtually.

## **2 Urgent Matters**

There were none.

## **3 Matters to be Considered in Private**

The 2023/24 Quarter 1 Budget Monitoring Update Report had a confidential appendix which was exempt by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972, however, this was not taken in private as it was not necessary to discuss the confidential information provided.

## **4 Declarations of Interest**

There were none.

## **5 Minutes**

### **RESOLVED:**

That the minutes of the cabinet meeting held on Wednesday 12 July 2023 were agreed and signed as a true and correct record.

## **6 Appointments to Sub Committees and Outside Bodies**

There were none.

## **7 Creation of a Regional Park**

### **RESOLVED:**

That Cabinet:

- I. Agreed the Statement of Ambition and Vision Statement for a new regional park included at paragraph 4.7.
- II. Authorised the Strategic Director of Economy & Sustainability to commission consultants to develop the ambition, vision, objectives and business case for the creation of a regional park in Ealing to include a review of the of the future provision of the borough's golf courses to understand the options for their future relationship with the regional park.
- III. Authorised revenue expenditure of up to £0.200m over the financial years 2023/24 and 2024/25, with a view to review of costs and capitalisation as part of approved capital programme budgets as the business case for the Regional Park is approved and proceeds, for the commissioning of consultants to deliver the brief set out in the above recommendation as highlighted in paragraph 6 of this report.
- IV. Authorised revenue expenditure of up to £0.160m over the financial

- years 2023/24 and 2024/25 for the cost of project support to include the appointment of an interim project director to support existing and future projects under the umbrella of the regional park including but not exclusively related to a new Lido facility (noting the Lido update report is on this same Cabinet Meeting agenda), a new cultural venue and the Gurnell Leisure Centre redevelopment. Revenue expenditure will be reviewed and capitalised as part of approved capital programme budgets when the business case for the Regional Park and other projects are approved and proceed.
- V. Agreed to the principle of a regional park in Ealing and further agrees that the vision and intention should be formally captured in a spatial policy within Regulation 19 of the Local Plan.
  - VI. Agreed that a full consultation exercise be carried out, informed by a consultation plan, to establish detailed proposals for the future management of the park and ensure that they are co-created with key stakeholders
  - VII. Agreed in principle to the closure of Perivale Park Golf Course in financial year 2023/24 subject to the outcome of the proposed consultation.
  - VIII. Delegates authority to the Strategic Director of Economy & Sustainability following consultation with the Portfolio Holders for Climate Action and Thriving Communities to make any final decision to close Perivale Park Golf Course following consideration of the representations received as part of the consultation.
  - IX. Authorised the expenditure of £0.075m over the financial years 2023/24 and 2024/25 to support a closure of Perivale Golf Course and for the rewilding and transformation of the golf course to park land, to be funded from the existing parks capital programme budgets, S106 and grant contributions.
  - X. Authorised the Strategic Director of Economy & Sustainability to consult with the community on proposals for an amphitheatre style outdoor cultural venue, and where community support can be demonstrated, commence a process to appoint a partner to design, build and operate the outdoor cultural venue within the Regional Park.
  - XI. Noted that in the Summer 2024 a further detailed report including a fully worked up financial business case (including any meanwhile and long-term proposals for Perivale Park Golf Course) will be presented to Cabinet on the outcome of the commission set out in paragraph 2.2 above.
  - XII. Noted that the proposed final layout of the regional park will be brought back to Cabinet for decision following a collaborative process of community engagement alongside technical considerations.
  - XIII. Noted that soft market testing with cultural operators on the inclusion of an indoor cultural facility will be reported back via the next Cabinet Report

## **REASONS FOR DECISION AND OPTIONS CONSIDERED:**

1. Cabinet recalled that Ealing Council declared a climate emergency in April 2019, and that it committed to treat the climate and ecological emergency as a crisis requiring immediate and vital action. Cabinet's aim was for Ealing to become carbon neutral, as a borough and an organisation by 2030.
2. Climate change was driving nature's decline, and the loss of wild places left Ealing ill-equipped to reduce carbon emissions and adapt to change. Cabinet considered that responding to the climate crisis was not possible without creating more space for nature.
3. Ealing Council's council plan sets the vision and strategy for the next four years and the Council's 'promises' to focus on the priorities of residents, businesses, and other stakeholders. The plan was the Council's high-level strategic response to the opportunities and challenges facing Ealing now and in the future.
4. Climate Action was one of the three cross cutting strategic objectives over the next four years to realise the vision for the borough by greening and keeping Ealing clean, achieving net zero carbon, and ensuring parks, open spaces and nature were protected and enhanced.
5. The Council Plan committed to create 10 new parks and open spaces, give back to nature 800,000 m<sup>2</sup> (the same as 130 football pitches) through re-wilding and re-introducing wildlife, and pioneering 10 new community growing spaces. Furthermore, it pledged to make streets and open spaces beautiful and resilient through planting another 50,000 trees, work towards increasing the proportion of the borough covered by tree canopies to 25% by doubling the number of trees planted each year, and ensuring every town had access to wild fruit.
6. Cabinet considered that the creation of a Regional Park offered the perfect opportunity to develop a wider, more connected Ealing that was equipped to tackle the Climate Emergency. Alongside the climate action agenda, there was also a growing recognition of the need to begin to restore natural habitats, increase biodiversity and provide space for nature to re-establish itself. With these issues in mind, putting nature at the heart of a green 'post-covid' recovery, could help drive locally led economic regeneration in a way that was good for nature, climate and people.
7. The creation of a Regional Park was going to be a major transformation of the landscape of Ealing to deliver a wide range of significant benefits including:
  - Making Ealing a more vibrant, green, and attractive place to live and visit.
  - Supporting nature recovery in Ealing by providing more space for nature-rich habitats and potential new species reintroductions.

- Increasing the carbon storage and sequestering capacity and contributing to the Council’s carbon reduction targets.
  - Providing more opportunities for Ealing’s residents to connect with nature.
  - Providing much needed flood resilience
8. A key concept that had emerged in recent years is that of ‘rewilding’. Re-wilding Britain, a UK Charity, defined re-wilding as: “the large-scale restoration of ecosystems to the point where nature can take care of itself. Rewilding seeks to reinstate natural processes and, where appropriate, missing species – allowing them to shape the landscape and the habitats within. Rewilding encourages a balance between people and the rest of nature so that we thrive together. It can provide opportunities for communities to diversify and create nature-based economies; for living systems to provide the ecological functions on which we all depend; and for people to reconnect with wild nature.” – It was recognised that rewilding differed from traditional conservation as it was more focused on the action of 'returning' a place back to its natural state rather than preserving a place in its natural state. Thus, rewilding focused on actions to move a place from an impacted state to a natural state. As such, there are significant opportunities for rewilding with three broad options that can be further examined:
- Passive or Abandonment Rewilding: the simplest option; implies the abandonment of green space to turn into woodland in its own time, with woodland developing within 25 years. This would lead to the loss of open grasslands. Only minor infrastructure would be required.
  - Community Rewilding: similar to the above but with higher levels of intervention, which in turn is more likely to secure external funding. Woodland would develop within similar timescales to the above option but would also involve keeping more of the site open. The option would also include resources for proactively seeking funding for visitor infrastructure that may be required and on some commercial activities to generate income subject to consultation and sustainable business planning. This would also enable planting new trees as part of the plan to plant 50,000 trees for woodland creation.
  - Active Rewilding: Infrastructure may involve a wellbeing hub and café; in addition, there could be exemplary cycle infrastructure, with an accessible pathway, suitable for cycles and other wheeled users through trees.
9. The borough population was projected to grow by over 38,000 from 360,000 to 398,000 in the ten years from 2021 to 2031 with an expected increase in demand for different less formal outdoor spaces for people to be active. Regional Parks developed a network of parks and trails that provided connectivity for people, wildlife, and

ecosystems. It was widely understood that people visited regional parks to participate in activities such as hiking, walking, riding, cycling, camping, swimming, boating, nature study, and organised group activities. These activities can be enjoyed year-round, and they contributed to a healthy lifestyle. Regional Parks provided for the health, inspiration and education of residents and visitors through a wide range of indoor and outdoor experiences and activities that fostered enjoyment of and appreciation and respect for the region's natural environments.

#### Vision, Ambition, and Governing Themes

10. Cabinet considered the successful legacy that the proposed regional park was expected to achieve through a clear articulation of the Council's ambition, vision and three thematic priorities for the regional park.
11. The design, development, and curation of the park was going to be governed by the following three themes:
  - Sustainability and Accessibility
  - Health and Wellbeing
  - Economy and Culture
12. Cabinet considered the further detail of the potential of the Regional Park to deliver against the key themes which was provided in Appendix 1.
13. Cabinet understood that in the evolution and development of the three themes it had been identified that inequalities, diversity and inclusivity also needed to be an overarching theme given that the creation of a Regional Park could have a significant positive impact on these issues affecting the borough's residents and communities.

#### Sustainability and Accessibility

14. Cabinet recalled that Ealing Council declared a climate emergency in April 2019, committing to treat the climate and ecological emergency as a crisis requiring immediate and vital action. The aim was to become carbon neutral, as a borough and an organisation by 2030.
15. The Council's approach to Climate and Ecological Emergency Strategy had been to focus on five themes, where the organisation had the most control and direct influence, based on policies, procurement, projects and relationships. Each of the five themes within this strategy identified unique objectives, targets and actions that were going to either reduce or capture carbon emissions in Ealing and beyond.
16. Cabinet understood that all carbon emission sources were going to need to be cut to zero eventually, this strategy was the first step toward



reducing emissions significantly by 2030.

17. The creation of a Regional Park was going to significantly support the ability for the Council to meet the Climate and Ecological Emergency strategic objectives. It was recognised that the pandemic of 2020 had identified the importance of our greenspaces for mental health and well-being and that they were places which should be treasured and protected. The trees, hedgerows, parks, rivers, ponds, fields and gardens in Ealing all had a vital role to play in storing carbon and combatting climate change. It was of equal importance for the borough to retain a diversity of habitats which were connected to each other. The Strategy sought to increase the amount of greenery in the borough through further development of carbon sequestration habitats including the number of trees and area of meadows. The objectives set out in the Strategy were going to work alongside the borough's Biodiversity Action Plan (BAP) which was the borough's strategic framework and road map for improving its biodiversity including all plant and animal life.
18. The vision for nature in the Strategy stated that the Council was continuing to reshape and modernise the approach to the management and maintenance of the Borough's green space network to maximise carbon capture, enhance the wildlife value, provide flood resilience and ensure these spaces were equipped to sustainably meet the needs and aspirations of communities recognising the following as a set of benefits.
  - Increased mental health and wellbeing of residents
  - Improved air quality
  - Urban cooling and adapting to extreme heat events
  - Education and access to nature
  - Increase biodiversity and connections for wildlife
  - Increased community engagement amongst residents, reducing loneliness
  - Reduction in noise pollution
  - Reduce risk of flooding
19. The scope for habitat creation with such a large area is extremely valuable as large areas with connected habitats offered the best opportunities to encourage wildlife and provide ecological resilience. The borough currently had limited capacity for tree planting due to the demands on our existing green space and such an area would enable several hundred thousand trees to be planted, providing new woodlands. A mosaic of connected habitats could be created encompassing the river, meadows, woodland, wetland, ponds and lakes in line with the Council's Biodiversity Strategy. The park project would allow the creation of a new generation of wildlife grassland.
20. Three of the best ways to capture carbon were tree planting, ponds,

wetlands and meadows. The scope for increasing the borough's ability to move to net zero by 2030 would be greatly enhanced with the opportunities the new park would offer. Such large areas of new planting and areas managed for biodiversity would increase the Council's ability to filter pollutants and improve water quality.

21. The new park was going to offer many new opportunities for walking and cycling. Having more of the river available would enable better public access of this key asset with new crossing points, paths and seating.
22. Alongside the nature of the offer of the open space, the accessibility to the open space was of particular importance if the open space was to adequately cater for a regional user catchment. The London Plan supports maximum distances for residential properties within London to a Regional Park of 8.0km.
23. While the open space definitions identify that car parking should be accommodated within Regional Parks, accessibility by public transport was an essential characteristic of strategic open space. Long distance accessibility is primarily dependent on the rail system, both London Underground and Overland Network. High quality routes to and from stations to the strategic open spaces network are vital and developing those routes should be considered as an integral element of the management of the strategic open space aspirations.
24. As part of the Local Plan Evidence Base and community led regeneration frameworks, the Council had followed a 20-minute neighbourhood approach to its seven towns. The 20-minute neighbourhood is the idea that people should be able to access their local shops and services including access to public transport, health, education, employment, community, retail, culture, leisure and green spaces within a 20 minute walk or cycle of their home.
25. A regional park at the heart of Ealing with new east-west and north-south active travel routes would be within 20 minutes reach of Greenford, Hanwell, Ealing, Perivale towns and parts of Southall whilst improving accessibility for residents across the Borough. It was going to enable travel by modes other than private car between multiple centres and improve interaction, sociability and access to a wider range of amenities than available currently.
26. Access to open space from a closer catchment could be achieved by both the bus network and pedestrian/cycle networks. Such local access could often be significantly enhanced through relatively small scale interventions that over come existing barriers to access. This could include works such as opening up existing boundary fences, providing new road crossings, pedestrian and cycle bridges over rivers or rail, or establishment of new links and routes between separate land ownerships.

## Health and Wellbeing

27. Ealing was a diverse and vibrant borough, but it also faced significant health inequalities. This was because people had unequal life experiences, with different access to opportunities and privileges. As well as differences in health outcomes for example diabetes, obesity etc, these differences are visible in the 'building blocks of health and wellbeing' - the wider life conditions which ultimately impact how well, and long people live. The best evidence for sustainable impact on health inequalities supported work on these building blocks of health and wellbeing, away from a focus on individual behaviour change or the provision of health services alone. Access to functional and good quality green space like that proposed for Ealing's regional park, was a good example of an essential building block of health and wellbeing since there were many health and wellbeing, and healthy equity opportunities and impacts that could arise from its creation.
  
28. Ealing's Health and Wellbeing Board (a partnership between the Council, Local NHS organisations (Ealing ICB, hospital and community health trusts), VCFS and HealthWatch) have developed 'Together in Ealing' the new Joint Health and Wellbeing Strategy for 2023-2028 focused on tackling inequality through work on the building blocks of health. Theme 3 in the strategy, '*Connecting the building blocks of health and wellbeing*', included commitments to work on these building blocks, including the equitable provision of good quality green space, through the lens of health equity.
  
29. Cabinet considered the following as a high-level perspective of some of the health and wellbeing opportunities arising from the creation of a regional park.
  
30. During the COVID-19 related lockdowns, "going to the park" became a central topic of national conversation. In England, people were permitted to go to parks and sit down, and to meet another individual. For some, this was a pleasant novelty. For others, who have had little access to green outside spaces during lockdown, it was a welcome change in their quality of life. COVID-19 refocused attention on the role that parks play in society. There were over 27,000 urban green spaces in the UK, with more than half the UK population regularly making use of them. Parks today continue to serve their primary historical purpose – to provide urban residents, particularly those with little private green space, a shared site for recreation in a natural environment. It was concern about health inequalities and poor housing conditions in booming industrial towns which led to the creation of parks in the late-Nineteenth Century.

31. Lockdown reignited some of this historical sentiment and the debate over the public/private green space divide. Commentators had argued that confinement without access to a park during lockdown would have had a devastating impact on the mental and physical health of those living in high-density urban areas without a garden. Recent ONS data showed that one in eight households in the UK did not have access to a garden, and that Black people in England were nearly four times as likely as White people to not have their own outdoor space. One in five young people had no access to a garden. Those in semi-skilled and unskilled manual occupations, as well as the unemployed, were over three times as likely to not have a garden as those in. Londoners in general were least likely to have a garden, with 21% of homes having no shared or private green space.
32. There was growing evidence of the physical and mental health benefits of green spaces such as the proposed regional park in Ealing. Research showed that access to green space was associated with better health outcomes, and income-related health inequality was less pronounced where people had access to green space. Research in the Netherlands showed that every 10 per cent increase in exposure to green space translated into a reduction of five years in age, in terms of expected health problems, with similar benefits cited in Canada and Japan.
33. More specifically access to good quality and large open connected green space was associated with positive health outcomes, including:
- improvements in mental health and wellbeing, such as depression, stress, dementia
  - increased longevity in older people
  - lower body mass index (BMI) scores, overweight and obesity levels and higher levels of physical activity
  - better self-rated health for all ages and socio-economic groups.
  - reductions in a number of long-term conditions such as heart disease, cancer, and musculoskeletal conditions
34. Green space such as the regional park could improve the environmental quality of an area with consequential health benefits. Some of the environmental benefits of green spaces included improved air and water quality, noise absorption and reduced 'urban heat island' effects. Additionally, green spaces could improve absorption of excessive rainwater and reduced surface water run-off reducing the likelihood of floods and sewage overflow, while protecting biodiversity and enhancing ecosystems.
35. Parks could provide alternative routes for circulation including green

routes for pedestrians and cyclists; therefore, promoting more active and healthy travel. Parks also provided a place to take exercise; through either formal provision such as tennis courts and football pitches, outdoor swimming pools, running, cycling, yoga or meditation, to take the dog for a walk or gentle stroll. The links between access to green space and levels of physical activity were well-established in research, which showed higher levels of physical activity in areas with more green space. Estimates suggested that an inactive person was likely to spend 37% more time in hospital and visit the doctor 5.5% more often than an active person. In 2007, physical inactivity was estimated to cost the NHS between £1 billion andm £1.8 billion. This highlighted some of the indirect and long term cost benefits that could be realised through the regional park.

36. In terms of the potential for the regional park to impact positively on health equity, research showed that living in areas with green spaces was associated with significantly less income-related health inequality, weakening the effect of deprivation on health
37. Access to nature had shown to reduce blood pressure, reduce stress and improve mental well-being. A change of scene and impact on the visual sense were beneficial aspects of urban green space.
38. Child development in terms of both mental learning and physical development had shown to improve through play in a variety of stimulating environments, including woodlands, parks and wetland areas. Play was crucial for many aspects of children's development. Play could promote the acquisition of social skills, experimentation, confrontation and resolution of emotional crises, to moral understanding, cognitive skills such as language and comprehension. Play could also promote physical well-being. Hard spaces offered little opportunity for play and green spaces were preferable offering a diverse range of activities.
39. Play brought diverse people together and improved the social and natural environment. Playful places enabled safe and stimulating interactions between friends, families, communities, strangers and with the built and natural environment. For both children and adults, the social aspects of play were fundamental for relationship building with people and the environment. Research suggested that children's and adults' interactions during play could be essential for creating the kind of supportive social environments that fostered a healthy development.
40. Nature-based play helped to create a greater sense of empathy and respect for nature and could contribute to climate resilience. Investments to 'de-grey' (paving, roads, concrete etc.) public spaces, to make room for increased rainfall, and to allow for more greenery and shade were an ideal opportunity to embed play elements into the design of these nature based solutions. Such investments could create climate resilient environments, educate about the importance of

biodiversity and climate action, and open new places for diverse play opportunities.

41. Child and play-friendly spaces could also boost the economic value and long-term viability of the built environment. Public spaces where families with young children chose to visit signal better than any marketing material that an area is clean, safe, and fun. Retail, leisure, and businesses increasingly recognised that play is good for business!
42. Cabinet was seeing a worrying trend of increasing levels of obesity in children. This was because people had unequal life experiences, with different access to opportunities and privileges. These differences were visible in the building blocks of health and wellbeing. These were the health, social and economic inequalities acting as root causes of health and wellbeing and they ultimately impacted how well, and long people live.
43. Addressing these challenges required a collaborative and strategic approach, which was why members of the Ealing Health and Wellbeing Board had worked closely with partners across the NHS, Ealing council and resident and community groups, to develop 'Together in Ealing' the Health and Wellbeing Strategy for 2023-2028 with the Vision: We will see Ealing's communities thriving, with good health and wellbeing, and with fairness and justice in the building blocks of health and wellbeing. Cabinet considered the following points which provided a high-level perspective of some of the health and wellbeing opportunities arising from the creation of a regional park.

#### Indoor and Outdoor Sports Facility Strategy 2022-2031

44. There was a significant opportunity for the Regional Park to support the delivery of the above strategy which had been developed to support the Council's corporate priorities and the administration's manifesto pledges, in shaping the future of Ealing. Together the strategy and Regional Park presented opportunities to contribute to the achievement of outcomes relating to improved health and increased physical activity levels of Ealing residents, establishing how to best meet their current and future health and wellbeing needs and encourage and support the continued independence of Ealing residents, contributing to the priority of making Ealing a better place to live and work.
45. The strategy had developed an accurate and robust evidence base to provide the leisure and sport content for the new draft Local Plan and to help inform planning policy decisions regarding the protection, enhancement and provision of existing and future indoor and outdoor sports facilities providing an understanding of the best location(s) for any new facilities.
46. In order to achieve the vision and 3 key objectives of the 10-year

strategy, the Council was exploring opportunities to:

- Enable and promote a network of accessible sports facilities across the borough maintaining and enhancing the borough's built and green infrastructure.
- Work with commercial and community partners and national governing bodies to enable and secure the development and long-term management as well as financial viability of indoor and outdoor sport facilities across the borough.
- Seek to maximise opportunities which may arise to develop sports facilities as part of wider regeneration, education or place-based projects.
- Identify and bid for external funding to support the development and delivery of new sports facilities across Ealing.
- Help clubs and organisations to promote the benefits of sport to bring communities together to make them stronger reducing inequality and celebrating diversity.
- Promote sport and active recreation as a key enabler to healthy and active lifestyles.
- Be innovative and creative when investigating possible solutions to facility supply needs in light of the general reduction in funding available to improve and or build new sports facilities.

## Economy and Culture

47. The Council had recently launched its Cultural Manifesto *367,100 Creatives - Ealing's cultural manifesto for creative change* to create direction, focus and purpose for culture in Ealing to achieve a change in the growth, resilience and sustainability of our creative economy and skills sectors.
48. The manifesto was about enhancing connections and enhancing capabilities. Cabinet considered that culture should influence all its services and be embedded in everything the Council does. This included culture-led regeneration; culture to be key in economic recovery and bringing people and pride back to our high streets; requirements for culture embedded in council planning and policies.
49. The creation of a regional park provided an opportunity to further an ambition for the borough to potentially host a new outdoor cultural venue and frame that within the context of the ambition to be the foremost borough of culture in west London. The report recommended the Council consult the community on proposals for an amphitheatre style outdoor cultural venue, and where community support can be demonstrated, commence marketing of Regional Park land to appoint a partner to design, build and operate the outdoor cultural venue.
50. Turbocharging Ealing's creative capabilities by building connections

between creative employers and the education sector; local communities and the creative sector working together with the Council; the creative sector collaborating better with each other; and all connecting with and influencing national agencies and organisations. The Council would work with the developer community to provide affordable creative workspaces, contribute to cultural capacity-building, create Culture Hubs and realise the state-of-the-art arts centre that Ealing deserves.

51. The majority category (36%) of survey respondents engaged in the development of the cultural manifesto were 'somewhat satisfied' with arts and culture in Ealing, highlighting that the top things currently missing from the creative and leisure offer in Ealing: More venues, creative/performance space/hub for artists, more opportunities to participate, more opportunities for children and young people and to appeal to a more diverse audience.
52. Ealing's local commercial centres experienced a resurgence during the pandemic as lockdown restrictions and an increase in working from home reduced the need to travel, meaning that residents were spending more time in their local area for discretionary activities as well as for employment. The Council was adopting a sustainable polycentric form of development across the borough that was going to reinforce the unique functions and roles of the centres within the local and wider West London economy.
53. A regional park could act as a hub for economic activity, provide hundreds of local jobs and create conditions for economic development across communities. A long-term investment in parks can bring a range of economic activities, creating both direct and indirect jobs and provide people with skills to find employment. The jobs created in parks are meaningful and create a sense of purpose. Even revenue-generating activities in park tend to focus on things that communities value, such as cafes, food provision, community events and physical activities.
54. At a regional park scale, a resilient model of both commercial operations and developing an enterprise to meet the needs of people and planet through social enterprise and cooperatives could be feasible. The key assets carrying higher risks within a regional park portfolio were going to need to be run on a commercial basis alongside a social enterprises model, that was going to reinvest the money they made back into the community, for example. A sustainable revenue generation model, supply chain, skills opportunities and capturing the wider economic benefits was going to need to be considered as part of the business case development.
55. A regional park that connected most of the boroughs town centres had clear benefits to invigorating local business, increasing property/land values, enabling development opportunities and job creation. Local residents were also going to benefit from quality of life improvements though better access to recreation and the potential for healthier mode



of travel. Land that had previously been built upon within the park would potentially be released for new income generating developments that supported the investment and upkeep and reduced financial pressure on local services in doing so.

56. Creating a large linear park through and close to some of the more deprived areas of the borough had obvious benefits to encourage and enable recreation and would allow a rethink of the recreation facilities in the borough for all ages, where new ideas and connections could be developed to complement the existing popular facilities like the Gruffalo trail, Hanwell Zoo and Horsenden Farm.
57. In addition to diverse residential neighbourhoods, a regional park was in close proximity of many of Ealing's strategic and local industrial areas in Southall, Hanwell, Greenford and Perivale. With a regional park on their doorstep, improved access and investment, the proposal was going to provide much needed local amenity for employees, attract businesses and improve productivity.
58. The Council had launched 'Good for Ealing' inward investment programme and a new regional park in London was going to further reinforce its credentials as a fantastic place to live and work. A regional park provided an opportunity to work proactively with private sector, business, developers, social enterprise and local voluntary sector to form partnerships and create a shared ambition.
59. Ealing was currently ranked 15th greenest out of the 33 London boroughs. This park represented a huge potential investment in the boroughs and London's natural capital. As the GLA stated in an urban context, these assets were our parks, rivers, trees, and features such as green roofs that collectively form an essential green infrastructure. Designed and managed as green infrastructure, natural capital could:
  - Promote healthier living
  - Lessen the impacts of climate change Improve air quality and water quality Encourage walking and cycling
  - Store carbon
  - Improve biodiversity and ecological resilience
60. It was rare in London to have the opportunity to realise all this in one space which would impact the lives of almost every resident of the borough and beyond as it would be of London wide significance.
61. The importance of open space provision to area regeneration was highlighted in Government guidance and evidenced in London and elsewhere in the UK. Open space assisted in establishing the setting and quality of new developments and in promoting area regeneration. A regional park was going to contribute to the achievement of regeneration benefits by providing an attractive setting for development

and promoting social inclusion and community benefits.

62. High quality parks and public spaces created economic, social and environmental value. They were also highly valued by local people. Research suggested that the quality of public space and the built environment had a direct impact on lives and the way people felt. In terms of economic benefits there was evidence that high quality green spaces had a positive impact upon perceptions of places, were good for business, and being close to public space adds economic value. Safe, clean spaces encouraged people to walk more and therefore offered significant health benefits. Parks and green spaces offered places for sport, recreation and relaxation, benefiting physical health and mental wellbeing – this was particularly well understood during the COVID Pandemic.
63. There was evidence that access to good quality local spaces could help people live longer and green spaces could provide solutions to redress worsening public health. Green spaces could also bring significant community benefits as places to play, encouraging neighbourliness and social inclusion and as a venue for events that brought people together. Networks of linked open spaces and green corridors could encourage cycling and reduce dependency on the car, reducing levels of traffic. Ealing was particularly well served by Green Corridors with the canal network and River Brent Park providing important routes for people and wildlife.
64. Ealing Council's park service had an excellent track record in the delivery of large scale park improvements and a history of achieving quality accolades. For the ninth year (2022) in a row Ealing had won gold in the London in Bloom Borough of the Year Awards. It had continuously been given the honour in the Large City category for the overall impact of its horticulture and environmental management and for community participation. Historically, the borough had been awarded almost perfect marks for elements such as promoting sustainability, developing local heritage including natural heritage, its achievements in conservation and biodiversity and increasing community involvement. Furthermore, Ealing Council and local groups had recently been awarded prestigious Green Flags for 26 parks and open spaces, further enhancing the borough's reputation as one of the greenest and most beautiful in the capital. A Green Flag flying was a sign that that a park kept the highest standards, was beautifully maintained and had excellent facilities.
65. The Council had also delivered pioneering and creative solutions to park improvements; not least on the award winning park projects to create Northala Fields; to restore Walpole Park and Gunnersbury Park and to create the Greenford to Gurnell Greenway.
66. Additionally, good progress had been achieved to deliver the Council Plan target of creating ten new parks. The Central Plaza in the Acton

Gardens development in South Acton was planned to be opened in September 2023. Works were well underway to deliver an area of newly accessible park land at Glade Lane, Norwood Green, Southall; with work extending into surrounding areas, providing wider improvements to the park and the Grand Union Canal. Planning permission had been granted for the newly publically accessible South Lawn at Twyford Abbey and the next phase of the Central Gardens in the Green Quarter, Southall, was expected to be completed by August 2024.

67. The economic benefits were well understood, open spaces improve air quality, provide sustainable urban drainage solutions and could help mitigate against climate change, whilst trees cool air and provide shade. Open spaces were also important areas for wildlife and biodiversity and provided opportunities for local people to experience nature first hand.
68. The London Plan was the overall strategic plan for London, and it set out a fully integrated economic, environmental, transport and social framework for the development of the capital to 2031. It formed part of the development plan for Greater London and it was necessary for the London boroughs' local plans to be in general conformity with the London Plan. The London Plan recognised the valuable contribution that green spaces play in providing a good quality environment. In order to fully understand the provision of open space and the demands and needs placed on them. Policy 7.18C of the London Plan stated that when Councils were assessing open space needs they should include appropriate designations and policies to protect open space and identify areas of open space deficiency.
69. National and regional policy guidance required local authorities to set their own local standards for the provision of open space and apply this through local planning policy and the Local Development Framework. Using 2011 population data it had been determined that the current average provision of public open space across the borough is 1.97 hectares per 1,000 head of population. Over the next 15 years, as a result of project population growth this was expected to decrease to 1.82 ha / 1000 head population.
70. This equated to just 18.2 m<sup>2</sup> per person (less than the London average 18.96m<sup>2</sup>) where the World Health Organization recommended the availability of a minimum of 9m<sup>2</sup> of green space per individual with an ideal value of 50 m<sup>2</sup> per capita. One of the primary aims of the creation of a regional park was going to be to increase this availability towards more ideal levels.
71. Whilst the average level of provision was currently 1.97 hectares per 1,000 population the distribution of public open space and the resident population was not uniform. The ward data also showed that the amount of Public Open Space availability over time was going to decline based on

projected increases in population. At a ward level Ealing Broadway had just 0.15 hectares per 1,000 population and North Greenford 6.58 ha per 1,000 population, a variation in provision by a factor of over 40 times.

72. All Public Open Space in Ealing had been classified against the GLA hierarchy set out in Table 1 below. In a built up borough such as Ealing large areas of open green space were at a premium. Larger spaces, in particular District Parks over 20 hectares, offered a wider range of opportunities for recreation and for wildlife. Within the borough there were areas of green space which lay adjacent to, or very close to others, and collectively could provide an opportunity to create one larger parcel of land.

73. Ealing Council had used the GLA hierarchy to analyse accessibility to local parks (within 400 m of people’s front doors, about 5 minutes’ walk) and to district parks (within 1.2 km, about 15 minutes’ walk). This provided a consistent approach across London for identifying broad areas of deficiency in provision. In addition, as required by the GLA guidance, the study area was extended for 1.2 km beyond the borough’s boundaries to identify district and local parks larger than 0.3 hectares with catchments that carry across into Ealing. Audits of the condition and quality of those sites were not carried out.

Table 1: London’s Public Open Space Hierarchy

Type	Area (ha)	Distances from home to open space	Number of sites Ealing
Regional	Over 400 ha.	8 km	0
Metropolitan	60-400 ha.	3.2 km	2
District parks	20-60 ha.	1.2 km	6
Local parks	2-20	400 m	46
Small local parks	0.4-2 ha.	400 m	41
Pocket parks	Under 0.4ha.	400 m	41

#### Consolidated sites

74. In a built up borough such as Ealing large areas of open green space were at a premium. In general, larger spaces, in particular District Parks over 20ha offer a wider range of opportunities for recreation and for wildlife. There were several places in the borough where areas of green space lay adjacent or very close by to others and collectively could act as a larger parcel of land. There were two spaces in the borough where this created metropolitan parks ( greater than 60ha) – Horsenden Hill, and Northolt and Greenford Countryside Park and there were six other sites where combinations of land parcels created District Parks (greater than 20ha); but nothing as significant as a Regional Park (greater than 400ha). It would be reasonable as part of

any feasibility study to consider how the amalgamation of existing spaces in the borough including Brent River Park and Horsenden Hill could support the creation of a Regional Park to achieve the considerable benefits of a Regional Park outlined in this report.

75. It was necessary to consider Regional Parks within the context of current strategic policy guidance. The importance of open space was recognised in a range of government policy and policy guidance. Particular importance was placed on the range of benefits that could be attributed to open spaces within the vision for climate action and thriving communities, particularly in creating improved living environments through the promotion of healthy living, improved accessibility and economic sustainability.
76. Within the GLA Hierarchy a Regional Park was defined as large areas, corridors or networks of open space, the majority of which were going to be publicly accessible and provide a range of facilities and features offering recreational, ecological, landscape, cultural or green infrastructure benefits. They offered a combination of facilities and features that are unique within London, are readily accessible by public transport and are managed to meet best practice quality standards.

## **8 2023/24 Quarter 1 Budget Monitoring Update**

### **RESOLVED:**

That Cabinet:

- I. Noted the estimated General Fund revenue budget outturn position of net £8.214m (2.87%) overspend for 2023/24 (section 4), and an overspend of £0.732m position on the Housing Revenue Account for 2023/24 (section 7).
- II. Noted the in-year Dedicated Schools Grant (DSG) deficit forecast of £3.049m to be charged to the DSG account (section 6).
- III. Noted the progress on delivering the 2023/24 savings programme (section 5).
- IV. Noted the 2023/24 capital programme forecast (paragraph 8.3).
- V. Approved the re-profiling of 2023/24 capital programme net slippage of over £1m of £204.280m (Appendix 2) into future years.
- VI. Approved the decommissioning of £148.252m of capital schemes, most significantly the reversal of budgets for the previous Perceval House redevelopment scheme, as outlined in section 8.5.
- VII. Approved an additional capital programme budget of £3.030m for the purchase of temporary accommodation, as outlined in section 8.8, to be funded by Local Authority Housing Fund (LAHF) Round 2 grant of £2.4m, and £0.630m of Homeless Prevention Grant balances.
- VIII. Approved an additional capital programme budget of £0.906m to the capital programme in relation to Gunnersbury Sports Hub, to be

funded by £0.453m capital contribution from London Borough of Hounslow and £0.453 borrowing, as outlined at para 8.9.

- IX. Approved an increase to the HRA capital budget totalling £4.815m as outlined at section 8.10; £3.788m in relation to the Lexden Road housing scheme, and £1.027m in relation to the Northolt Grange housing scheme, and changes to the financing of these schemes.
- X. Delegated authority to the Strategic Director of Economy & Sustainability to award the Design and Build JCT contract for the construction of 92 new affordable homes at Northolt Grange approved by Cabinet in February 2023 for a revised total cost set out in Confidential Appendix 3.

#### **REASONS FOR DECISION AND OPTIONS CONSIDERED:**

To forecast the financial position for 2023/24 based on available information at the end of 30 June 2023. Cabinet reviewed the Council's forecast position on revenue, capital, income, and expenditure to the end of Quarter 1.

### **9 New Lido Facility in the Borough**

#### **RESOLVED:**

That Cabinet:

- I. Reaffirmed the commitment to provide a new Lido facility within the borough in line with the Council Plan 2022-2026 commitment and agreed to the vision statement for the facility as shown at paragraph 3.1 of the report.
- II. Noted and agreed the longlist of sites which have been identified for the possible location of a Lido facility as summarised in Appendix 1 of the report.
- III. Authorised the Strategic Director of Economy and Sustainability following consultation with the Cabinet member for Thriving Communities to further explore the proposed long list of potential sites identified in Appendix 1 of the report (Lido Site Longlist) and to commission further, more detailed feasibility study work, including surveys, searches, procurement options and viability, to identify a preferred location.
- IV. Delegated authority to the Strategic Director of Economy and Sustainability following consultation with the Cabinet member for Thriving Communities to decide upon a shortlisted site.
- V. Approved a revenue budget of up to £0.250m for the purposes of commissioning the activity outlined at paragraphs III and IV.
- VI. Noted that a Sounding Board was to be established, with membership consisting of key stakeholders to support and assist in steering the future direction of the project.

#### **REASONS FOR DECISION AND OPTIONS CONSIDERED**

1. Provision of a new Lido facility in the borough was an objective set out in the Council Plan 2022 – 2026. Cabinet considered the report which set out a recommended vision for the project in the context of the strategic objectives as set out in the Council Plan and sought a basis on which to take the project forward for further feasibility work and analysis. The proposed vision for the facility would be to create a new outdoor swimming facility in Ealing which was inclusive, family orientated, promoted health and wellbeing and had sustainability at the heart.
2. The Ealing Indoor and Outdoor Sports Facility Strategy and Action Plan 2022 – 31, produced in line with Sport England’s latest guidance provided an accurate and robust evidence base to inform Planning policy decisions regarding the protection, enhancement and provision of existing and future indoor and outdoor sports facilities providing an understanding of the best location(s) for any new facilities. By following Sport England’s assessment process, this strategic document identified that the existing indoor and outdoor sports facility supply in Ealing fell below the needs of the existing population as evidenced by the projects identified across the borough.
  - a. As with other sports facilities, swimming pool provision was reviewed and an assessment made of the existing and potential future supply and demand of indoor swimming facilities; current and future trends in participation were also considered as well as the views of National Governing Bodies of Sport and local sports clubs. The assessment showed that Ealing had a current and future need for more indoor water space, the level of which supported the need for new and enhanced swimming pool facilities at both Gurnell and Dormers Wells Leisure Centres; even with these two facilities Ealing may still have demand for more water space.
  - b. Although not included in the formal Sport England facility strategy swimming pool assessment process, a new outdoor swimming facility in the borough would, to some extent, help meet Ealing’s need for more swimming space.
  - c. Swim England’s top eight benefits of swimming were: full body workout, great for general wellbeing, de-stresses and relaxes, burns calories, lowers the risk of diseases, water supports the body, increases your energy levels and allows you to exercise without sweating. There were extra health benefits unique to open and cold water swimming, both disciplines were slightly more extreme forms of outdoor swimming than swimming in a heated outdoor pool, but still relevant to a certain extent; these four additional benefits were better sleep, increased happiness, boosted immune system and preventing and managing long term health conditions.
  - d. Whilst there was abundant evidence for the physical and mental health benefits of swimming, social connection was arguably as beneficial as the physical exercise for participants’ health, particularly their mental health. Designing environments that

enable people to connect with others and live well was vital to improving the health and wellbeing of local people and achieving the ambitions set out in the manifesto. It was therefore vital that the Lido was inclusive, actively working to break down social, cultural and financial barriers to bring people together. In addition, a new Lido facility was going to support the Council's plans for Good Growth by creating employment and enhancing green spaces.

3. Work to date had focussed on reviewing sites across the borough to identify those which would suit the accommodation of a new Lido facility. Various sites had been considered and assessed to arrive at a longlist based upon the following criteria:
  - Deliverability
  - Sustainability, energy, transport links, active travel
  - Accessibility for all of borough residents
  - Financial attractiveness to operators, proximity to existing leisure facilities.
4. The potential sites were included at Appendix 1 to the report and constituted the longlist of options. To move the proposals forward, it was necessary to carry out further analysis to determine from this longlist:
  - optimal location
  - projected current and future demand
  - commercial viability and financial return including capital and revenue projections
  - scope of facility and design brief.
5. By coming to this decision, Cabinet established a budget for further feasibility work to be completed on the longlist of sites and determined a recommended site through an officer delegation.

## **10 Final Report Scrutiny Panel 1 2022-23 - Tackling the Cost of Living Crisis**

### **RESOLVED:**

That Cabinet:

- I. Noted the final report of the scrutiny panel 1 2022/23 – Tackling the cost of living crisis
- II. Accepted the scrutiny panel's recommendations in section 13 of the final report
- III. Identified whether further information or advice was required from council officers on any of the recommendations before cabinet could take a decision about accepting or rejecting these
- IV. Directed council officers to produce/or finalise an action plan within



an agreed timescale on those recommendations that are agreed by cabinet.

**REASONS FOR DECISION AND OPTIONS CONSIDERED:**

1. Scrutiny panels had a role in improving decision-making and service delivery through effective scrutiny. It was important that recommendations from scrutiny panels were taken forward in a timely manner and in accordance with the Council's Constitution if the scrutiny function was to be effective. The scrutiny and executive protocol identified the timescale for cabinet to respond to scrutiny panel recommendations. This decision meant that the response was made in a timely manner and that services can implement the accepted recommendations.

**11 Final Report of the Health and Adult Social Services Scrutiny Panel 2022-23**

**RESOLVED:**

That Cabinet:

- I. Noted the final report of the health and adult social services standing scrutiny panel 2022-23
- II. Accepted the scrutiny panel's recommendations in section 7 of the final report
- III. Identified whether further information or advice was required from council officers on any of the recommendations before cabinet could take a decision about accepting or rejecting these
- IV. Directed council officers to produce/or finalise an action plan within an agreed timescale on those recommendations that are agreed by cabinet.
- V. Thanked Cllr D Crawford for his service as Chair to the Health and Adult Social Services Standing Scrutiny Panel for the past seven years.

**REASONS FOR DECISION AND OPTIONS CONSIDERED:**

1. Scrutiny panels had a role in improving decision-making and service delivery through effective scrutiny. It was important that recommendations from scrutiny panels were taken forward in a timely manner and in accordance with the Council's Constitution if the scrutiny function was to be effective. The scrutiny and executive protocol identified the timescale for cabinet to respond to scrutiny panel recommendations. This decision meant that the response was made in a timely manner and that services can implement the accepted recommendations.

**12 Report by the Local Government and Social Care Ombudsman -  
Complaint Reference 22 002 098**

**RESOLVED:**

That Cabinet:

- I. Noted the findings of the Local Government and Social Care Ombudsman (LGO), attached as Appendix 1 to this report;
- II. Noted that the Council accepted the recommendations and has issued an apology to the complainants and paid £3,400 as suggested by the LGO as a remedy;
- III. Noted that the other recommendations the LGO had made had either been completed or were underway.

**REASONS FOR DECISION AND OPTIONS CONSIDERED**

The LGO completed its investigation into a complaint made against the Council in June 2023. Cabinet considered the full details of the complaint and the LGO's findings as they were found in appendix 1 of the report.

In summary, the household had approached the Council for assistance with housing. The Council accepted it had a housing duty to the household under the relevant homelessness legislation. The household was provided with temporary accommodation in 2016, which was a 10th floor flat. The household reported disrepair to the Council in May 2021 and despite subsequent repairs undertaken by the Council, the primary matter of leaks from the communal roof did not stop and the household were placed on the Temporary Accommodation (TA) Transfer List to move to alternative accommodation. A suitability review was completed by the Housing Demand Department in January 2022 which confirmed the property was unsuitable due to disrepair.

The LGO found fault in that the Council delayed moving the household who lived in unsuitable TA for longer than necessary which the household considered was detrimental to their health. The management of TA transfer cases was in accordance with the TA Placement Policy, which set out the priority principles for each case to be considered based on their current housing circumstances, similar to the Housing Allocation Policy and how social housing was allocated. In this case, the priority level was assessed as Band 3 of the TA Placement Policy, based on a scale of Band A (highest priority) to Band E (lowest priority). The household were awarded Band C on the grounds their current accommodation was not suitable. In similar cases, the repair works could sometimes be undertaken with the household in situ, once completed, the household do not need to move and would be removed from the transfer list as considered suitably housed, but in this case the household needed to move to allow the roof works to be undertaken.

As new TA units became available, the TA Allocations Team considered transfer cases on their housing needs and the available property and offered

to the highest priority transfer case (who had been waiting the longest within that band). This household were moved to alternative TA in October 2022, with the delay being because of the shortage of available 3-bedroom properties to offer and the duty to move other households with higher housing needs before this household.

The current housing crisis in London and across England was well documented, with a substantial decrease in private properties becoming available to let, alongside the substantial increases in rent levels resulting in the Council not being as able to acquire new properties as in previous years, with a recent London Councils report stating that about 3% of available private rented properties available at Local Housing Allowance levels or below and supply levels not returning to pre-covid levels with supply levels in larger properties being in particular short supply both in the private rented sector but also in the social housing sector.

The Council has accepted the LGO's findings and recommendations and has actioned, or in the process of actioning all the recommendations.

The complainant had received a formal apology and had been paid the £3,400 remedy.

The Council had implemented a daily recording sheet for Acquisitions Officers who are responsible for sourcing properties and was looking at best practice of other London councils to improve its recording. The Council had reviewed all the cases on the TA Transfer list to ensure accuracy and correct prioritisation and was currently in the process of reviewing the TA Placement and Acquisitions Policies to meet the second recommendation.

The LGO asked the Council to report its findings to an appropriate body of Council as it found that the complainant had suffered injustice as a result of maladministration. The Council was required to comply with this request by Section 31 (2) of the Local Government Act 1974.

The Council was also required to place two public notices in local newspapers or local newspaper websites notifying the public of the existence of a report of injustice as a result of maladministration made by the LGO. This requirement had also been completed.

## **13 WLA Procurements and Contract Changes**

### **RESOLVED:**

That cabinet:

- I. Noted that Ealing Council, as accountable body on behalf of the West London Alliance (WLA), was going to lead on the sponsorship, procurement and commissioning of the devolved Universal Support Programme in West London.

- II. Authorised the Director of WLA, following consultation with the Strategic Director of Resources and the Director of Legal and Democratic Services, to take all necessary steps with DWP, Treasury, GLA, DLUHC and other boroughs and bodies to enter into necessary agreements on behalf of the London Borough of Ealing to enable the continuation of the current devolution to London for employment support programmes, including, the Universal Support Programme.
- III. Authorised the Director of WLA, following consultation with the Strategic Director of Resources and the Director of Legal and Democratic Services, to enter into a funding agreement for £35m - £50m, with DWP, Treasury, or DLUHC to fund the provision of the Universal Support Programme across the 7 WLA boroughs.
- IV. Authorised the Director of WLA to invite and evaluate tenders on behalf of the London Borough of Ealing for a contract for the provision of job search services for unemployed, sick and disabled people across the WLA who met the criteria of the Universal Support Programme, with the procurement being carried out using either a competitive dialogue process or a competitive procedure with negotiation and in compliance with Ealing Council's Contract Procedure Rules.
- V. Authorised the Director of WLA, following consultation with the Strategic Director of Resources and the Director of Legal and Democratic Services to submit bids for grants and funding; and enter into such agreements on behalf of the London Borough of Ealing as necessary with Treasury, DWP, JCP, GLA, DLUHC; other councils of the WLA or London Councils in relation to other funding that could be available to support the programme.
- VI. Delegated authority to the Director of WLA to award a contract to the bidder with the most advantageous tender received pursuant to the procurement exercise referred to in decision IV.
- VII. Authorised Ealing to act as lead authority on behalf of WLA participating boroughs to jointly develop and procure a Dynamic Purchasing System (DPS) under the light touch regime flexibilities permitted by the Public Contracts Regulations 2015 (as amended) (to include inviting and evaluating tenders from providers applying to join the DPS or framework) for the additional LDMH care home provision lot. LDMH services was going to be procured as an additional 'lot' on the supported living tender which was approved on 19 April 2023 Cabinet Meeting. The arrangement was going to be for an initial contract term of 4 years with option to extend for a further 4 years with an initial value of up to £628 million for the first 4-year period and £1.3 billion for 8 years (spend figures for the entire contract include both lots). London Borough of Ealing's estimated annual spend was c £25m annually; £100m over the first 4 years and £200m for 8 years on LDMH care homes through this contract.
- VIII. Delegated authority to the Director of WLA, upon completion of the tender process, to appoint bidders to the DPS or flexible framework

- for LDMH care home provision, if suitable tenders were received, in accordance with the tender evaluation criteria and enter into suitable contracts with the appointed bidders.
- IX. Authorised the Director of WLA to enter into Access Agreements with Brent, Harrow, Hillingdon, Hounslow, Harrow, Hammersmith & Fulham, Kensington & Chelsea and the City of Westminster, with other authorities joining if appropriate (following consultation with the Director of Legal & Democratic Services).
  - X. Delegated authority to the Strategic Director of Adults Social Services and Public Health to award contracts from the DPS/flexible framework for LDMH care home provision in accordance with its call off rules.
  - XI. Noted that a decision on how to best apply the Real Living Wage (London) in the shared procurement following the impact evaluation and consultation with key stakeholders was going to be taken by considering the sub-region's position in tandem with Ealing's requirements. The approach was detailed in section 3.1.5 – 3.1.6 of the report.
  - XII. Noted that a decision on how best to include social value within a shared contract was going to be taken by considering the sub-region's position in tandem with Ealing's requirements.

## **REASONS FOR DECISION AND OPTIONS CONSIDERED**

1. In 2016, the running of employment support programmes for people furthest from the labour market was devolved to London. This was delivered at a Sub regional level ever since. In the March budget this year the Chancellor announced that the Work and Health Programme (WHP) was going to be replaced by the Universal Support Programme from October 2024.
2. Cabinet noted that at the time of the report, all recommendations were contingent on the existing devolution deal remaining in place and the funding which was provided by DWP.
3. Cabinet understood that the reason for coming to this decision before final resolution of the devolution deal and the funding by the DWP was that the service required a large and complex procurement to be delivered by Summer 2024 for the provision of the Universal Support Programme, and delaying the decision would place this goal at considerable risk.
4. Cabinet noted that the Governments policy direction was for increased devolution; so the opinion was that revoking existing devolution arrangements was going to be unlikely.
5. As part of the devolution deal for London, it was anticipated that the commissioning of the Universal Support Programme was going to be devolved to the London sub regions. WLA was one of 4 sub regions in London.
6. The aim was to help those furthest from the Labour Market with typical participants having health issues.
7. Universal Support was going to be a Place and Train model of employment support. With elements modelled on Individual Placement

and Support (IPS). WLA had been successfully pioneering IPS with a variety of cohorts since 2015.

8. Cabinet anticipated that the contract was going to be for an initial period of 5 years commencing from 1st October 2024 with options to extend. Based on the funding for WHP, it was estimated the contract value, including extensions, was going to be in the region of £35m to £50m.
9. Cabinet anticipated that the continuation of the devolution deal was possibly going to require variations to the existing devolution agreements between DWP and Ealing Council, as opposed to replacement or new agreements being required. This assumption was based on the fact that the existing agreements had largely been fit for purpose since they were put in place between the parties in 2017.
10. Given the complex nature of the services that were going to be procured, a Competitive Dialogue procurement route was going to be followed in accordance with the Public Contracts Regulations 2015 (as amended).
11. The Commissioning Alliance was the WLA workstream that supported vulnerable residents across Children's Social Care, Adults Social Care and Temporary Accommodation. A key element of the service was the creation of collaborative procurements that partner local authorities (including Ealing) were going to be able to access. Procurements provided local authorities with a compliant route to market that was open and transparent. A regional approach was demonstrated to deliver value for money as it enabled local authorities to leverage their collective purchasing power and market management. It also facilitates adherence to shared quality standards and contractual terms which helped to raise standards of provision, deliver operational efficiencies, and creates the foundations upon which local authorities could develop shared commissioning strategies.
12. The contract in place for LDMH care homes from the private and voluntary sectors was due to expire on 31st August 2024.
13. It was proposed that when the existing contract ended it was going to be replaced by a LDMH contract including supported living (already approved by Cabinet on 19th April 2023) and LDMH care homes; as well as an additional separate residential and nursing contract (also approved by Cabinet on 19th April 2023). The procurement was going to fall under the light touch regime of the Public Contracts Regulations 2015 (as amended), and the current preferred option was to use an open procedure to set up the DPSs/flexible frameworks.
14. The procurements were going to be designed in such a way that it did not prevent any member Local Authority from investing in their own 'in-house' provision or having an 'in-house first' policy. The procurements were going to have functionality that enabled Local Authorities to subsequently call-off block contracts should they so wish.
15. The procurements were going to be open to any West London local authority and other authorities where appropriate. The creation and subsequent ongoing management of the procurements were going to be funded through Local Authority subscription payments to the WLA for the adults commissioning programme. This model (which had been

used successfully since 2017) ensured that Ealing did not incur costs for formally hosting the procurements. Each Local Authority was going to be required to go through their own governance in order to join the procurement.

16. The purchasing for LDMH care homes was going to form part of previously approved contract for supported living services. This was based on the review of the existing arrangements and was designed to allow a varied approach to quality and price which was felt was going to bring greater control over cost, quality and market shaping than was achieved in the current arrangements.
17. The total value of spend for LDMH care home services was anticipated to be in the region of £53m per annum based on Brent, Ealing and Harrow's commissioning data. The contract was initially going to be for a period of four years, with a potential to extend by a further four years. The maximum contract value for the LDMH procurement over the 8 years was going to be £1.3 billion (based on combined supported living and LDMH care home spend).

**14 Section 75 Framework Agreement relating to the Commissioning of Health and Wellbeing and Social Care and Education Services for Adults and Children**

**RESOLVED:**

That Cabinet:

- I. Approved London Borough of Ealing entering a new Partnership Agreement with NHS North West London Integrated Care Board (NHS NWL ICB) under Section 75 of the National Health Service Act 2006, for the delivery of pooled budgets relating to the commissioning of health and wellbeing, social care, and education services for the population of Ealing, commencing 1st April 2023 for a period of 12 months, plus an option to extend for another term of 12 months. The value of the Agreement was approximately £143 million per annum.
- II. Delegated authority to the Strategic Director Adults and Public Health, Strategic Director Children's Services, following consultation with the Strategic Director of Resources and Director of Legal Services and Democratic Services to finalise and complete the Partnership Agreement and other associated documents with NHS NWL ICB.
- III. Delegated authority to the Strategic Director Adults and Public Health, Strategic Director Children's Services, following consultation with the Strategic Director of Resources and Director of Legal Services and Democratic Services to extend the Partnership Agreement, to agree amendments and variations to the associated Service Schedules; subject to consultation with the Lead Member for Health Lives and Lead Member for Fairer Start.
- IV. Noted that Part 2 of the Partnership Agreement was going to contain Service Schedules the contents of which were listed in

section 3 and that some Schedules provided for the exercise of ICB functions by the Council.

- V. Noted Health and Wellbeing Areas were required under the national conditions of the Better Care Fund (BCF) to establish a Section 75 Agreement for pooled budgets no later than 31st October 2023.

**REASONS FOR DECISION AND OPTION CONSIDERED:**

1. The London Borough of Ealing and NHS NWL ICB (formerly known as Ealing Clinical Commissioning Group or CCG) had long established integrated commissioning arrangements. Cabinet first approved the Partnership Agreement in November 2015, this was extended in 2021 for a term of two financial years (1st April 2021 to 31st March 2023) due to the impact of COVID-19 and uncertainty with the structural reorganisation within the NHS.
2. As part of BCF Planning Framework 2023 - 2025, local areas were mandated to have in place agreed and signed Section 75 Agreements no later than 31st October 2023.
3. There was no alternative option to the Partnership Agreement, as it would impact the availability of approximately £40 million NHS funds to support the local health and social care system in Ealing. This was also going to impact the £3,724,468 Disabled Facilities Grant (DFG), £1,777,649 Adult Social Care Discharge Fund and £12,679,522 improved BCF (iBCF). The receipt of these grants was reliant upon a BCF plan that met national conditions, of which an established Section 75 Partnership Agreement was one.

**15 Date of the next meeting**

The next meeting was scheduled for Thursday 12 October 2023.

Meeting commenced: 5.00pm

Meeting finished: 6.10pm

Signed:

Dated: Thursday, 12 October 2023

P Mason (Chair)





**Report for:**  
**ACTION**

**Item Number:**

<b>Contains Confidential or Exempt Information</b>	<b>NO</b>
<b>Title</b>	Agency Worker Contract
<b>Responsible Officer(s)</b>	Amanda Askham, Strategic Director, Strategy and Change, <a href="mailto:AskhamA@ealing.gov.uk">AskhamA@ealing.gov.uk</a> 020 8825 9697
<b>Author(s)</b>	Andrew Scully, HR Business Partner and Head of HR Operational Services, <a href="mailto:ScullyA@ealing.gov.uk">ScullyA@ealing.gov.uk</a> 020 8825 6930
<b>Portfolio(s)</b>	Councillor Steve Donnelly, Inclusive Economy
<b>For Consideration By</b>	Cabinet
<b>Date to be Considered</b>	Thursday 12 <sup>th</sup> October 2023
<b>Implementation Date if Not Called In</b>	Tuesday 24 <sup>th</sup> October 2023
<b>Affected Wards</b>	All
<b>Keywords/Index</b>	Agency workers, Commercial, Eastern Shires Purchasing Organisation (ESPO), Framework Agreement for Managed Services for Temporary Agency Resources, MSTAR2, MSTAR3, London Council's Collaboration, Pan London, Procurement.

**Purpose of Report:**

The purpose of this report is to seek approval from Cabinet, to extend the current contract with Adecco UK Limited from 9<sup>th</sup> January 2024 to 8<sup>th</sup> January 2025.

**1. Recommendations for DECISION**

1.1. It is recommended that Cabinet:

Grants approval to extend the current contract between the council and with Adecco UK Limited dated 11 March 2022 for agency services ("the Contract") for a period of one year from 9<sup>th</sup> January 2024 to 8<sup>th</sup> January 2025 at an approximate cost of £25m.

**2. Recommendations for NOTING**

2.1. None.

**3. Reason for Decision and Options Considered**

3.1. Cabinet on 10<sup>th</sup> November 2021 resolved:

“That Cabinet:

- (i) Agrees to award a direct call off contract to Adecco UK Limited from the Eastern Shires Purchasing Organisation (ESPO) Framework Agreement for Managed Services for Temporary Agency Resources (MSTAR3) under Lot 1 (b) (Master Vendor), the ‘Framework Agreement’, for the provision of agency workers. The start date of the contract is 9 January 2022, and the contract would be for two years with the option to extend for a further 2 periods of 12 months each (2 + 1 + 1) with a value of £25,136,198 per annum (£100,544,702 for a four-year cost of the contract).”

3.2. This report seeks approval from Cabinet to extend the current contract with Adecco UK Limited from 9 January 2024 to 8 January 2025 as provided for in the contract and as per paragraph 2.1. above. Options have been considered including:

- I. Entering new contractual arrangements effective from 9 January 2024.
- II. Extending the current contractual for one year from 9 January 2024 to 8<sup>th</sup> January 2025 will allow time for the new leadership team to explore different delivery models for the council and determine the workforce needs for the future. The extension will be the most effective and financially advantageous decision to be made on behalf of council to ensure this happens.

3.3. The second option (ii) above is the preferred option which is being recommended to Cabinet for approval.

3.4. Current performance of the contract and value for money considerations have been taken into account when making this recommendation.

#### **4. Key Implications**

4.1. The key implications are:

- The council’s current contract with Adecco UK Limited will be extended for the period 9 January 2024 to 8 January 2025.
- During the period from now to 8 January 2025 the council will consider the most cost effective and financially advantageous options for going forward from 9 January 2025 based on the workforce requirements.
- A further report will be presented to Cabinet in Summer/Autumn 2024 with the options and recommendations for the best way forward effective from 9 January 2025.

#### **5. Financial**

5.1. There are no new financial implications on the budget, agency use should be managed within departments as part of their overall staffing budgets.

5.2. Under the current contract, ways of achieving financial savings to the council have been and continue to be explored both in-house and with Adecco UK Limited. Meetings with Adecco UK Limited have been taking place and will

continue to take place to seek to achieve financial savings. All requests for interim and temporary workers must first be placed through this contract to ensure that any mark-up is beneficial for the council before engaging with any other supply chain.

- 5.3. During the period from now to 8 January 2025 as part of the consideration of options and recommendations for the arrangements that need to be in place from 9 January 2025 every option to achieve financial savings will be assessed and, wherever reasonably practicable, will be put in place for any new future contract.

## **6. Legal**

- 6.1. The Contract permits extension on 3 months' written notice before the expiry of the existing term as set out in the definition of Term.

## **7. Value For Money**

- 7.1. Robust contract management arrangements are in place. The contract is managed by the Workforce & OD department with support from the Commercial Hub. Quarterly meetings are held with the supplier to ensure the contract is achieving KPIs. The contract is currently meeting the key performance indicators.
- 7.2. Directorates review the usage of agency workers to ensure that this is the most effective and appropriate approach to meet staffing requirements. Agency worker metrics now form part of the quarterly metric report to SLT.
- 7.3. The supplier regularly shares data and case studies on the latest market insights across the labour market and neighbouring public sector organisations. This is important as the council is able to benchmark itself and spend.

## **8. Social Value**

- 8.1. Adecco is committed to:
- delivering employability and skills workshops for young people and over 24-year-olds
  - providing young adults that are Not in Education, Employment or Training access to the Adecco Community Mentoring Programme
  - continuing to grow the Local Jobs for Local People initiative with the aim of increasing residents employed in the borough by 10%
    - Offering guaranteed interviews for those that participate in an employment programme ran by Adecco, including workshops and mentoring programmes.
    - Prioritising applications with an Ealing postcode

- Adding a statement to the top of the CV of those who are local residents to say:
    - *“This candidate resides in the London Borough of Ealing and is keen to work for their local authority making a difference to the community that they live in, contributing to the Local Jobs for Local People initiative.”*
  - Creating a partnership with Ealing Job Centre and Shaw Trust with a ‘self-referral’ form to register with Adecco. Referrals will then be contacted by an Adecco recruiter who directly works on the MSTAR contract
    - attending one job fair per annum
    - offering work experience to local residents every quarter with support of the council
    - one day of volunteering per annum to a cause which directly impacts the community improvements in Ealing.
- 8.2. The commitments will be monitored during contract meetings to check progress during the contract meeting.

## **9. Sustainability Impact Appraisal**

Not applicable.

## **10. Risk Management**

- 10.1. Agency workers are a key part of the council’s workforce and provide flexibility and resilience to meet the needs of the council. If the contract was not extended this would have an impact on service deliverables. The council would need to find another way for providing temporary agency staffing resources.

## **11. Community Safety**

None.

## **12. Links to the 3 Key Priorities for the Borough**

- 12.1. The efficient provision of temporary agency worker resources supports the delivery of the council priorities of fighting inequalities and creating good jobs. Agency worker assignments are paid no less than the Real Living Wage (RLW). Agency workers are paid in line with the council’s evaluated role profiles.

## **13. Equalities, Human Rights and Community Cohesion**

- 13.1. The council aspires to have a workforce, which reflects the diversity of the borough’s population. Agency workers are part of the council’s workforce. The management information provided by the supplier includes information on the ethnicity, age and gender of the council’s temporary workforce which will assist in wider planning activities and ensure it supports the council’s ambition in relation to equalities.

**14. Staffing/Workforce and Accommodation implications:**

14.1. Provisions are in place for the relationship manager to be on- site. Due to hybrid working drop-in sessions are available using Teams and face to face as appropriate.

**15. Property and Assets**

No implications.

**16. Any other implications**

None.

**17. Consultation**

17.1. The options were discussed at Joint Contracts Board, including representatives from all departments, on 22 August 2023.

**18. Timetable for Implementation**

18.1. With effect from the implementation date to 8 January 2025.

**19. Appendices**

None.

**20. Background Information**

Cabinet – 10 December 2019

Cabinet – 10 November 2020

Cabinet – 20 April 2021

Cabinet – 10 November 2021

## Consultation

Name of consultee	Post held	Date sent to consultee	Date response received	Comments appear in paragraph:
<b>Internal</b>				
Kim Brown	Director of Workforce and OD			
Chuhr Nijjar	Senior Contracts Lawyer			
Amanda Askham	Strategic Director, Strategy and Change	14 <sup>th</sup> September 2023	14 <sup>th</sup> September 2023	Throughout
Emily Hill	Strategic Director, Resources	15 September 2023	20 September 2023	
Baljinder Sangha	Finance Manager – Planning and Monitoring			
Zamil Ahmed	Assistant Director – Commercial Hub			
Andrew Shorter	Category Lead, Commercial Hub			
Shadi Brazell	Head of Cabinet Office			

## Report History

<b>Decision type:</b>	<b>Urgency item?</b>
Key decision	No
Report no.:	Report author and contact for queries:
	Andrew Scully, HR Business Partner and Head of HR Operational Services, 020 8825 6930, <a href="mailto:ScullyA@ealing.gov.uk">ScullyA@ealing.gov.uk</a>

# Agenda Item 8



<b>Report for:</b> <b>INFORMATION</b>
<b>Item Number:</b>

<b>Contains Confidential or Exempt Information</b>	<b>NO</b>
<b>Title</b>	<b>Council Plan Performance Report Quarter 1 2023/24</b>
<b>Responsible Officer(s)</b>	<b>Amanda Askham</b> Strategic Director of Strategy & Change 020 8825 5005 Email: <a href="mailto:AskhamA@ealing.gov.uk">AskhamA@ealing.gov.uk</a>
<b>Author(s)</b>	<b>Maria Gull</b> Research and Performance Officer 0208 825 6430 Email: <a href="mailto:GullMa@ealing.gov.uk">GullMa@ealing.gov.uk</a>  <b>Rajiv Ahlawat</b> Strategic Intelligence & Corporate Performance Manager 0208 825 6380 Email: <a href="mailto:AhlawatR@ealing.gov.uk">AhlawatR@ealing.gov.uk</a>
<b>Portfolio(s)</b>	Cllr. Mason, Leader of the Council
<b>For Consideration By</b>	Cabinet
<b>Date to be Considered</b>	12 October 2023
<b>Implementation Date if Not Called In</b>	N/A – Information only
<b>Affected Wards</b>	All
<b>Keywords/Index</b>	Corporate Health Check, Key Performance Indicators, Council Plan Priorities, Corporate Performance, Council Plan, Delivery Plan
<b>Purpose of Report:</b> This report presents progress on delivery of the Council Plan 2022-26, with specific reference to the Corporate Health Check key performance indicators at Quarter 1 2023/24. These Key Performance Indicators (KPIs) track the operational effectiveness of the council.	

## 1. Recommendations for DECISION

None

## 2. Recommendations for NOTING

That Cabinet notes progress against the Corporate Health Check KPIs at Q1 2023/24.

## 3. Reason for Decision and Options Considered

Performance management is an essential part of a high performing organisation and therefore not providing a performance report was discounted as an option. This report presents progress on the delivery of the Council Plan 2022-26, with specific reference to performance on the Corporate Health Check KPIs as at the end of Q1 2023/24.

## 4. Council Plan Performance Framework

The Council Plan 2022-26 was agreed in July 2022. Annual delivery plans show the actions to be taken to work towards the Council Plan commitments. The 2023/24 Council Plan Delivery Plan was agreed in September 2023. Progress on Council Plan delivery is reported in the following three ways:

- a) Performance against target on the key performance indicators that enable a 'corporate health check' of the organisation in terms of its operational effectiveness.
- b) Narrative updates on key achievements against the 2023/24 Council Plan Delivery Plan.
- c) Progress against numeric, quantifiable, targets under the '4-year commitments' contained within the Council Plan 2022-26.

This report presents the progress on the Corporate Health Check KPIs only (part a above), as at the end of Q1 2023/24. Narrative updates against the 2023/24 Council Plan Delivery Plan and the progress against 4-year numeric targets will be presented in Q2 2023/24 (parts b and c above).

### 4.1 Summary of Q1 2023/24 performance on Corporate Health Check KPIs

This section presents performance against the 72 indicators in the Corporate Health Check KPI set. Out of the 72, 26 indicators are not reportable at Q1 as they are annual, and 1 KPI is not available yet due to a lag in reporting times (see section 4.4). Another 3 indicators are contextual and therefore do not have specific targets (see section 4.5).

Therefore, performance against target (RAG status) is presented only for 42 KPIs in the table below. Nearly 4 out of 5 indicators (33 or 78%) either met their target or were within tolerance at the end of the first quarter, while 9 (21%) did not meet their target.

Table 1: Performance of Corporate Health Check KPIs at Q1 2023/24

RAG status	No. of KPIs reportable at Q1	% of reportable KPIs at Q1
Green	30	71%
Amber	3	7%
Red	9	21%
<b>Total</b>	<b>42</b>	



## 4.2 Indicators that met target or were within tolerance

This section presents the performance indicators that have met or remained within tolerance of the set targets for Q1 2023/24. These are shown in the table below.

Table 2: The 33 indicators that met target or were within tolerance at Q1 2023/24

Council Plan Priority	Performance Indicator	Polarity	Target 2023/24	Target Q1 2023/24	Performance Q1 2023/24	RAG
Tackling Inequality and Crime	Police-recorded offences of Personal Robbery and Violence With Injury (rate per 1,000 residents)	Smaller is better	10.25	2.65	2.64	Green
Tackling Inequality and Crime	First time entrants to the Youth Justice System aged 10-17 (Rate per 100,000 10-17 population)	Smaller is better	150.0	37.5	20.6	Green
Tackling Inequality and Crime	Percentage of care leavers who were in EET (19-21)	Bigger is better	60%	65%	65%	Green
Tackling Inequality and Crime	Percentage of care leavers who were in EET (17-18)	Bigger is better	71%	75%	75.3%	Green
Climate Action	Fly tips cleared within target time	Bigger is better	95%	95%	97%	Green
Climate Action	Levels of cleanliness (Percentage streets free of litter)	Bigger is better	94%	94%	94%	Green
Climate Action	Levels of cleanliness (Percentage streets free of detritus)	Bigger is better	94%	94%	98%	Green
Climate Action	Levels of cleanliness (Percentage streets free of graffiti)	Bigger is better	92%	90%	97%	Green
Climate Action	Levels of cleanliness (Percentage streets free of fly posting)	Bigger is better	94%	92%	94%	Green
Healthy Lives	Admissions into permanent residential and nursing care (Rate per 100,000 population aged 65+)	Smaller is better	399.1	99.8	98.3	Green

Council Plan Priority	Performance Indicator	Polarity	Target 2023/24	Target Q1 2023/24	Performance Q1 2023/24	RAG
Healthy Lives	Proportion of older people (65+) not in permanent residential care 91 days after discharge from hospital into reablement	Bigger is better	95.0%	95.0%	95.0%	Green
Healthy Lives	Percentage of reablement services at home that reduce the level of ongoing support needed	Bigger is better	80.0%	80.0%	88.9%	Green
Healthy Lives	Percentage of CQC regulated care agencies rated Good or Outstanding	Bigger is better	75.0%	72.0%	72.1%	Green
Healthy Lives	Percentage of delayed reviews	Smaller is better	40.0%	40.0%	40.1%	Amber
A Fairer Start	Percentage of children looked after with more than 3 placements within a year	Smaller is better	12.5%	3.0%	0.0%	Green
A Fairer Start	Percentage of child and family assessments following a referral to social care completed within 45 days	Bigger is better	85%	82%	85%	Green
A Fairer Start	Percentage of re-referrals in the last 12 months	Smaller is better	17.0%	18.5%	15.1%	Green
A Fairer Start	Percentage of EHC plans issued within 20 weeks (exc. exceptions)	Bigger is better	45.0%	45.0%	55.4%	Green
A Fairer Start	Percentage of 16-17 year olds not in education, employment or training	Smaller is better	1.4%	1.4%	1.1%	Green
Decent Living Incomes	Number of people completing employability and professional courses	Bigger is better	1,353	325	341	Green
Inclusive Economy	Sickness absence (Number of days lost per FTE)	Smaller is better	8.0	8.0	8.2	Amber
Inclusive Economy	Percentage of business rates collected in year	Bigger is better	97.2%	28.5%	28.2%	Amber

Council Plan Priority	Performance Indicator	Polarity	Target 2023/24	Target Q1 2023/24	Performance Q1 2023/24	RAG
Inclusive economy	Calls resolved at first point of contact	Bigger is better	80%	80%	82%	Green
Inclusive economy	Percentage of total council spend within the borough	Bigger is better	25%	25%	28%	Green
Safe and Genuinely Affordable Homes	Households with children in B&B over 6 weeks	Smaller is better	125	125	124	Green
Safe and Genuinely Affordable Homes	Number of families in B&B	Smaller is better	175	175	162	Green
Safe and Genuinely Affordable Homes	Percentage of homelessness applications prevented through early intervention as a percentage of total cases where duty was owed	Bigger is better	55%	55%	57%	Green
Good Growth and New Housing	Percentage of 'Major' planning applications determined within target time	Bigger is better	96.0%	96.0%	100.0%	Green
Good Growth and New Housing	Percentage of 'Minor' planning applications determined within target time	Bigger is better	93.0%	93.0%	99.5%	Green
Good Growth and New Housing	Percentage of 'Other' planning applications determined within target time	Bigger is better	94.0%	94.0%	98.6%	Green
Thriving Communities	Number of physical visits to libraries	Bigger is better	598,528	140,379	148,544	Green
Thriving Communities	Number of electronic/virtual visits to libraries	Bigger is better	261,319	61,298	63,294	Green
Thriving Communities	Number of visits to leisure centres	Bigger is better	1,975,100	498,800	559,093	Green

### 4.3 Indicators that did not meet target

This section presents the performance indicators that did not meet their Q1 2023/24 targets. These are shown in the table below, and are discussed in more detail later with a narrative commentary.

Table 3: The 9 indicators that did not meet target in Q1 2023/24

Council Plan Priority	Performance Indicator	Polarity	Target 2023/24	Target Q1 2023/24	Performance Q1 23/24	RAG
Tackling Inequality and Crime	Percentage of young offenders engaged in suitable education, training or employment	Bigger is better	87.0%	87.0%	62.5%	Red
Climate Action	Percentage of household waste sent for reuse, recycling and composting	Bigger is better	52.0%	52.0%	47.3%	Red
Healthy Lives	Admissions into permanent residential and nursing care (Rate per 100,000 population aged 18-64)	Smaller is better	12.0	3.0	4.1	Red
Healthy Lives	Average Waiting Times for Contacts (days)	Smaller is better	25	25	28	Red
Decent Living Incomes	Average days taken to process new benefit claims	Smaller is better	24	24	26	Red
Inclusive Economy	Percentage of telephone calls answered within 5 minutes	Bigger is better	80%	80%	74%	Red
Inclusive Economy	Percentage of council tax collected in year	Bigger is better	97.2%	31.1%	29.5%	Red
Inclusive Economy	FOIs responded to within 20 days	Bigger is better	100.0%	100.0%	88.6%	Red
Inclusive economy	Customers satisfied with their contact	Bigger is better	80%	80%	75%	Red

These performance outturns are discussed below:

**a) Young offenders engaged in suitable education, training or employment (EET)**

10 out of 16 (62.5%) young offenders were engaged in EET at the first quarter of 2023/24, against the set target of 87.0%. The Youth Service is focussed on improving performance and increasing supply of EET opportunities.

**b) Household waste sent for reuse, recycling and composting**

Ealing has seen a large increase in the contamination<sup>1</sup> levels of recycling which contributed heavily to the waste service not reaching the target for Q1 (47.3% against the target of 52.0%). Focussed communication activity is taking place to reduce contaminated recycling and it is expected that performance will improve in Q2.

**c) Admissions into permanent residential and nursing care (Rate per 100,000 population aged 18-64)**

By the end of the first quarter, 10 younger adults aged 18-64 were admitted into permanent residential and nursing care, a rate of 4.1 per 100,000 population. While the target of 3.0 has not been reached, the number of admissions remains very low, in line with our Better Lives demand management strategy.

**d) Average Waiting Times for Contacts (days)**

In Q1, it took 28 days on average for the Advice and Referral Centre (ARC) to respond to contact referrals, more than the targeted 25 days. ARC have been addressing a backlog of older contacts and some of these have required ongoing action, resulting in an increase in the average. The vast majority of triaged referrals result in no further action, and we expect to improve the outcome by the next quarter.

**e) Average days taken to process new benefit claims**

It took an average of 26 days to process new benefit claims in Q1, against the target of 24 days. This measure's performance is impacted by supported exempt accommodation<sup>2</sup> cases where it is challenging to obtain information for new benefit claims. Due to the vulnerability of the claimants, we allow more time for both the landlords and the tenants to submit evidence required to process claims. We are obliged to ensure that supported housing claims are genuine and not set up to defraud the council. This is a national issue as the supported housing scheme has been used by rogue landlords to receive inflated rents whilst at the same time providing sub-standard accommodation. In June 2023, the Parliament passed a bill to regulate these types of tenancies. The council is awaiting further guidance on oversight and enforcement powers relating to supported exempt accommodation, which, once in place, should improve the new benefit processing times.

**f) Percentage of telephone calls answered within 5 minutes**

74% of telephone calls were answered within 5 minutes, less than the 80% targeted. Customer services are closely monitoring the telephone answering performance with a

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<sup>1</sup> Recycling contamination occurs when non-recyclables are placed in recycling.

<sup>2</sup> Supported Exempt Accommodation refers to housing with support for people with specific needs, such as older people, people with disabilities, and people with complex needs. Therefore this type of accommodation is exempt from locally set caps on housing benefit and the rents are generally much higher than for standard private accommodation.

view to improve response times while maintaining the quality of service provided. Technical issues impacting the contact centre call waiting times are being addressed as a matter of priority with our third-party suppliers.

**g) Percentage of council tax collected in year**

Council tax collection rate at the end of June 2023 was 29.5%. This is 1.65 percentage points below target, however still 0.29 points above last year's outturn. We are continually focussed on recovery action and expect collection rates to improve by the next quarter although the impact of the cost-of-living crisis may lead to increased levels of unpaid council tax.

**h) Freedom of Information (FOI) requests responded to within 20 days**

88.6% of FOI requests were responded to within 20 days at the end of the first quarter. Although the target of 100% has not been met, there has been a consistent improvement quarter on quarter, indicating a commitment to prioritise FOI responses across the organisation. Overdue FOIs are escalated to Strategic Directors to improve compliance.

**i) Customers satisfied with their contact**

75% of customers surveyed were satisfied with their contact, against the expected 80%. Customer satisfaction was above 80% for the majority of services, and we are carrying out targeted interventions in areas where outcomes were lower, which should improve the overall satisfaction in the next quarters of the year.

**4.4 Indicators with no available performance**

This section presents the 27 indicators with no available performance currently but where an update is expected later in the year. These are shown in the table below.

Table 4: The 27 indicators where Q1 2023/24 performance is not available yet

Council Plan Priority	Performance Indicator	Frequency	Status
Tackling Inequality and Crime	Percentage of the top paid 5% of local authority staff who are from an ethnic minority (excluding those in maintained schools)	Annual	Outcomes for these indicators are not reportable until later in the year
Tackling Inequality and Crime	Percentage of the top paid 5% of local authority staff who have a disability (excluding those in maintained schools)	Annual	
Tackling Inequality and Crime	Percentage of the top paid 5% of local authority staff who are female (excluding those in maintained schools)	Annual	
Tackling Inequality and Crime	Mean disability pay gap within the Council	Annual	
Tackling Inequality and Crime	Mean ethnicity pay gap within the Council	Annual	
Tackling Inequality and Crime	Mean gender pay gap for council employees	Annual	
Climate Action	% residents stating walking and cycling as main mode of transport within 1 mile	Annual	

Council Plan Priority	Performance Indicator	Frequency	Status
Healthy Lives	Percentage of people who use services who are satisfied with their care and support	Annual	
A Fairer Start	Percentage of Ealing primary schools rated good or outstanding	Annual	
A Fairer Start	Percentage of Ealing secondary schools rated good or outstanding	Annual	
A Fairer Start	Percentage of pupils achieving the expected standard in Reading, Writing and Maths at Key Stage 2	Annual	
A Fairer Start	Percentage of pupils achieving Levels 5 and above in English and Maths at Key Stage 4	Annual	
A Fairer Start	Percentage of disadvantaged pupils achieving the expected standard in Reading, Writing and Maths at Key Stage 2	Annual	
A Fairer Start	Percentage of disadvantaged pupils achieving Levels 5 and above in English and Maths at Key Stage 4	Annual	
A Fairer Start	Percentage of Black Caribbean pupils achieving the expected standard in Reading, Writing and Maths at Key Stage 2	Annual	
A Fairer Start	Percentage of Black Caribbean pupils achieving Levels 5 and above in English and Maths at Key Stage 4	Annual	
A Fairer Start	Primary school attendance rate – most recent academic year	Annual	
A Fairer Start	Secondary school attendance rate – most recent academic year	Annual	
Inclusive economy	% residents satisfied with the way the council runs things	Annual	
Inclusive economy	% residents agreeing the council is easy to contact	Annual	
Inclusive economy	% residents visiting the council's website in the last 12 months	Annual	
Inclusive economy	% residents using MyAccount, the council's customer portal	Annual	
Safe and Genuinely Affordable Homes	Number of households in Temporary Accommodation	Quarterly	Data for this indicator is not yet available due to a reporting time lag
Safe and Genuinely Affordable Homes	Percentage of homes meeting Decent Homes Standard	Annual	Outcomes for these indicators are not reportable until later in the year
Safe and Genuinely Affordable Homes	Number of eligible rough sleepers on Ealing's streets without an offer of accommodation	Annual	
Good Growth and New Housing	Percentage of S78 Planning Appeals allowed	Annual	
Thriving Communities	Number of participants attracted to take part in the borough's cultural offer annually	Annual	

## 4.5 Monitored only indicators

This section presents the 3 indicators which are contextual and therefore do not have specific targets. Their performance is monitored and reported on a quarterly basis to ensure we regularly check progress. These are shown in the table below.

Table 5: 'Monitoring only' Corporate Health Check KPIs

Council Plan Priority	Performance Indicator	Polarity	Target 2023/24	Target Q1 2023/24	Performance Q1 2023/24	RAG rating Q1 2023/24
Tackling inequality and crime	% of ethnic minority residents among those supported into employment through Council and partner schemes	Bigger is better	Monitoring only	Monitoring only	62.0%	Monitoring only
Healthy Lives	Number of contacts to adults social care front door	Smaller is better	Monitoring only	Monitoring only	11,730	Monitoring only
	Number of referrals from the social care contact centre	Smaller is better	Monitoring only	Monitoring only	669	Monitoring only

## 5. Financial

There are no direct financial implications as part of this report, except for the collection rates for business rates and council tax, which will affect the year-end Collection Fund balance and future years' budget funding.

## 6. Legal

There are no direct legal implications as part of this report.

## 7. Value for Money

Having clear objectives and measurable targets assists the Council to ensure that all activity is focused on delivery, makes officers accountable for that delivery and increases effectiveness.

## 8. Sustainability Impact Appraisal

There are no direct sustainability impact appraisal implications for this report.

## 9. Risk Management

There is a clear link between managing performance and risk management. Performance indicators are used to regularly monitor the performance of services – this information is used to highlight trends in performance and enable the early identification of any potential issues. Through this regular monitoring of information by both members and senior officers, informed decisions can be made regarding any mitigating actions that need to be taken.

## 10. Community Safety

There are no direct community safety implications as part of this report.



## 11. Links to the 3 Key Priorities for the Borough

Performance measures in the framework contribute to all three key priorities for the borough. The council's administration has three key priorities for Ealing. They are:

- creating good jobs
- tackling the climate crisis
- fighting inequality

## 12. Equalities, Human Rights and Community Cohesion

There are no direct equalities implications of the report. Both Council Plan commitments and organisational health check indicators include a focus on narrowing inequalities in line with the council's strategic priority on tackling inequalities. Effective performance management is therefore a key part of achieving the council's objectives.

## 13. Staffing/Workforce and Accommodation implications:

There are a number of workforce indicators as part of the organisational healthcheck suite.

## 14. Property and Assets

None.

## 15. Any other implications:

None.

## 16. Consultation

None. This report is for information only.

## 17. Timetable for Implementation

Implementation is dependent on specific action plans for improving performance in key areas.

## 18. Appendices

None.

## 19. Background Information

- Ealing Council Plan 2022-26

### Consultation

Name of consultee	Post held	Date sent to consultee	Date response received	Comments appear in paragraph:
<b>Internal</b>				
Cabinet members	Various	21/09/2023	26/09/2023	
Strategic Leadership Team	Various	19/09/2023	20/09/2023	

Una McCarthy	Interim Head of Strategy, Performance and Intelligence	06/09/2023	11/09/2023	
Amanda Askham	Strategic Director of Strategy & Change	06/09/2023	14/09/2023	
Baljinder Sangha	Finance Manager – Planning & Monitoring, Corporate Resources	12/09/2023	19/09/2023	
Helen Harris	Director of Legal and Democratic Services	19/09/2023	19/09/2023	
Emily Hill	Strategic Director - Resources	19/09/2023	20/09/2023	

### **Report History**

Decision type:	Urgency item?
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For information

No

Report no.:

Report authors and contact for queries:

Rajiv Ahlawat – extn 6380

Maria Gull – extn 6430



**Report for: ACTION**

**Item Number:**

<b>Contains Confidential or Exempt Information</b>	<b>NO</b>
<b>Title</b>	Ealing's Air Quality Strategy and Air Quality Action Plan
<b>Responsible Officer(s)</b>	Nicky Fiedler, Strategic Director, Housing and Environment
<b>Author(s)</b>	Surinderpal Suri, Environmental Protection Manager Joe Blanchard, Head of Environmental Health and Trading Standards
<b>Portfolio(s)</b>	Cllr. Deirdre Costigan - Deputy Leader of Ealing Council and Cabinet Member for Climate Change
<b>For Consideration By</b>	Cabinet
<b>Date to be Considered</b>	12 October 2023
<b>Implementation Date if Not Called In</b>	24 October 2023
<b>Affected Wards</b>	ALL
<b>Keywords/Index</b>	Air quality, air pollution

**Purpose of Report:**

This report asks the Cabinet to approve adoption of the Air Quality Strategy 2022-2030 and Air Quality Action Plan 2022-2027. Final versions of both documents are appended to the report.

The Air Quality Strategy fills the need expressed by our residents to have an easily accessible source of information about air quality in the borough and which details the actions the Council is taking, and plans to take, to improve air quality.

Having declared the whole borough an Air Quality Management Area the Council is obliged to produce a written Air Quality Action Plan which details the actions the Council will take, with national and regional agencies, to achieve air quality standards and improve air quality.

## **1. Recommendations**

It is recommend that Cabinet:

- 1.1 Approves the Air Quality Strategy and Air Quality Action Plan at Appendices 1 and 2.

## **2. Reason for Decision and Options Considered**

The need for the Council to adopt an Air Quality Strategy (AQS) was borne out of feedback from residents that air quality information was not easy to understand or interpret and that formal legal documents, such as the Air Quality Action Plan (AQAP), were not accessible and did not improve awareness of the impacts of air quality nor the actions taken by the Council to improve air quality in the borough.

Having declared the whole of the borough an “Air Quality Management Area”, the Council is obliged, under the Environment Act 1995 (the Act), to publish a written action plan describing how it will use its powers to achieve air quality standards and should renew such a plan every five years. The last Air Quality Action Plan (AQAP) was published in 2017. Failure to produce an action plan is a failure to comply with the Act.

## **3. Key Implications**

Both the AQS and AQAP were subject to comprehensive consultation exercises which are detailed in Section 14.

**3.1** The AQS, while not a statutory document, works in conjunction with the AQAP and details the actions the Council is taking and plans to take with regards to the five main priorities for improving air quality in the borough:

- Reduce road traffic emissions
- Improve indoor air quality and reduce emissions from wood burning
- Reduce emissions from construction of new developments
- Invest in green infrastructure
- Raise awareness of air quality

The AQS also represents the Council’s undertakings to resist any attempts by national government to reduce the level of power held by local authorities to decide on matters relating to planning so that local decision making processes can ensure that development is sustainable and reduces impacts on air quality. It also outlines the administration’s ambition to campaign for greater powers so the Council has the necessary legislative tools to regulate polluting industries locally and tackle poor air quality and the emissions of smells and pollutants.

The AQS includes commitments from services across the Council such as highways, transport, planning and public health as well as external partners and focusses on activities in specific localities within the borough demonstrating with real examples what those actions are achieving.

For example the AQS is aligned with the Council's Health and Wellbeing Strategy 2023-28 regarding engagement with businesses, the voluntary sector and schools to raise awareness of air quality issues (page 55).

In summary the actions detailed within the AQS include:

1. Reducing road traffic emissions
  - a. increase the use of and access to sustainable travel options and Active Travel and alignment with the Council's Transport Strategy
  - b. Encouraging the uptake of low-emission vehicles
  - c. School Streets
  - d. Reducing vehicle idling
  - e. Reducing emissions from the Council fleet
  - f. Improving use of and access to public transport
2. Improving indoor air quality and tackling wood burning
  - a. Smoke Control Area enforcement
  - b. Grants and support to improve the energy efficiency of housing
  - c. The Healthy Homes Ealing Helpline
  - d. Ecodesign requirements on new wood burning stoves
  - e. The Council's pledge to improve 750 homes in the borough and support 20 new community-led projects through a retrofitting scheme that will make the properties more energy efficient
3. Reducing the impact of new developments on air quality
  - a. The Council's Sustainable Design and Construction Supplementary Planning Guidance ensuring the developments are air quality neutral for buildings and transport
  - b. Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance implemented to reduce emissions of dust, PM10, and PM2.5 from construction and demolition activities
  - c. The new Local Plan will describe the safeguards to be adopted to ensure new development does not inhibit the Council's air quality objectives and ensure developments are sustainable, accessible, and equitable, to help reduce emissions
  - d. The Council's pledge to implement a "retrofit first" principle for Council buildings and deliver zero-carbon development as standard whilst ensuring any carbon offset payments that do occur are invested locally to make our borough greener
  - e. The Council's pledge to resist any attempts by national government to reduce the level of power held by local authorities to decide on matters relating to planning
  - f. The Council's pledge to campaign for greater powers to regulate polluting industries, and for a Clean Air Act that gives us the tools we need to tackle poor air quality, smells and pollutants from industry and new development
4. Investing in green infrastructure
  - a. Ealing's Greenspaces Strategy - improving green infrastructure
  - b. Tree planting, greening, River Brent restoration project with Thames21

- c. Sustainable Drainage Schemes (SuDS) and street tree planting
  - d. The Council's pledge to achieve a 25% increase in tree canopy; further 50,000 trees by 2026; 10 new parks and open spaces; 10 new community growing spaces in our housing estates and new developments
5. Raising awareness of air quality
- a. Procured both the GLA's air pollution alerts and the airTEXT tool to provide the public with daily air pollution forecasts and information on reducing personal exposure to poor air quality
  - b. Awareness raising through work with Integrated Care Partnership (ICP) partners and via the Health and Wellbeing Strategy
  - c. Local Plan and Shaping Ealing
  - d. 'Let's Go Southall' programme aims to encourage and support residents to be more physically active including when travelling

The AQS is provided in Appendix 1.

**3.2** The AQAP is a statutory document and as such its contents and format, as well as the processes for consultation, are largely prescribed by the Act and relevant regulations made under that Act as well as the requirements of the London Local Air Quality Management process.

The AQAP provides detailed pollution assessments and profiles of the borough and outlines the monitoring arrangements and actions that the Council is taking to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and others in the borough.

The AQAP is reviewed every five years and progress on measures within it will be reported annually within Ealing's Air Quality Annual Status Report.

The AQAP focuses on those objectives for which the Air Quality Management Area (AQMA) was declared namely nitrogen dioxide (NO<sub>2</sub>; annual mean objective) and Particulate Matter (PM<sub>10</sub>; 24-hour mean objective) as well as reductions of PM<sub>2.5</sub>, which is a fraction of PM<sub>10</sub>, which the Council also has formal responsibility to work towards although the objective for that pollutant is a national rather than local requirement.

The AQAP also considers monitoring and actions around the eight Air Quality Focus Areas in the borough formally identified by the Greater London Authority:

- Acton Central: Acton A40 North Acton Station/Gypsy Corner/Savoy Circus;
- Hanger Hill: Hanger Lane/Twyford Abbey Road;
- Perivale: A40 Western Avenue Teignmouth Gardens to Alperton Lane;
- Hanwell: Hanwell Broadway, Ealing Broadway and Walpole;
- South Acton: Acton High Street/Gunnersbury Lane junction to rail in Acton High Street;
- Southall: King Street/The Green/Western Road/South Road;
- East Acton: Victoria Road/Portal Way/ Wales Farm Road; and

- Central Greenford: Greenford Road (junction with Rockware Avenue) to Greenford Road (junction with Whitton Avenue West).

The AQAP is provided in Appendix 2.

#### **4. Financial**

There are no financial implications arising from adoption of the AQAP or AQS. Actions required will be managed within approved service budgets.

#### **5. Legal**

Having declared on 14 December 2000 the whole of the borough an “Air Quality Management Area”, under Section 83 of the Environment Act 1995, the Council is obliged to prepare an action plan, pursuant to Section 83A of that Act, which sets out how the local authority will exercise its functions in order to secure air quality standards and objectives.

#### **6. Value For Money**

There are no potential VfM impacts arising from adoption of the AQS and AQAP

#### **7. Sustainability Impact Appraisal**

The impacts which adoption of the AQS and AQAP will have on the Council’s sustainability objectives are detailed within the documents and include actions to ensure development is sustainable and that sustainable and effective transport systems and infrastructure are delivered.

#### **8. Risk Management**

There are no potential risks associated with adoption of the AQS and AQAP.

#### **9. Community Safety**

The AQS and AQAP aim to improve air quality across the borough and by doing so will improve the health, safety and wellbeing of our communities.

#### **10. Links to the 3 Key Priorities for the Borough**

While the primary purpose of both the AQS and AQAP are to improve air quality and health outcomes by reducing airborne pollutants, many of those pollutants can result in changes to the climate. Therefore adoption of the AQS and AQAP will have significant and positive contributions to the Council’s priority of *tackling the climate crisis*.

Air pollution disproportionately affects children, older people and those with underlying health conditions and there is a correlation between poor quality air and those places in our borough with the highest levels of economic and social

deprivation therefore the aims of the AQS and AQAP to improve air quality across the borough will help to *fight inequality*.

## **11. Equalities, Human Rights and Community Cohesion**

An Equality Analysis Assessment (EAA) was not required.

The AQS and AQAP are relevant to everyone and their goal is to have a positive impact on everyone's health.

It is identified within the AQS that there is a correlation between poor quality air and those places in our borough with the highest levels of economic and social deprivation therefore the aims of the AQS and AQAP to improve air quality across the borough will help to fight inequality.

In addition the AQS and AQAP were widely consulted upon.

## **12. Staffing/Workforce and Accommodation implications:**

There are no staffing, workforce or accommodation implications arising from adoption of the AQS and AQAP.

## **13. Property and Assets**

There are no property implications arising from adoption of the AQS and AQAP.

## **14. Consultation**

Consultation was sought on both the AQS and AQAP simultaneously. Detailed analysis of the consultations are provided within Appendix 4 of the AQAP.

**14.1** The Council's "Shaping Ealing" survey and engagement exercise was carried out between November 2021 and May 2022 and asked residents, businesses and others to describe their priorities for the Council to act upon.

This included an air quality focussed survey where residents were invited to inform the Council of their priorities specifically in relation to tackling air quality and that survey ran from February to March 2022.

Air quality featured significantly in the top three issues which people were concerned about universally across Ealing's seven towns and overall 42% of respondents disagreed with the statement "the air I breathe is clean" (only 25% agreed while 32% responded neither/nor).

**14.2** The substantive public consultation was carried out between 5 December 2022 and 30 January 2023.

The main route for response was provided by an online questionnaire, accessed through the Council's consultation website. Bespoke responses could also be



provided by email to the dedicated consultation inbox as well as requests for alternative formats. Interest groups were also invited to provide responses.

To achieve further awareness of the consultation and to encourage a diverse range of responses additional activities were carried out to support the public consultation:

- A series of social media posts by the Council throughout the consultation period
- Distribution of paper leaflets promoting the consultation to Ealing residents at the beginning of the consultation period
- 9 December 2022 and 12 December 2022 in-person events attended by Environmental Protection Officers to raise public awareness of the consultation, explain its scope, and offer the opportunity for questions
- 9 January 2023 and 12 January 2023 webinars hosted by the Environmental Protection team outlining the AQAP and AQS

**14.3** 204 responses were received.

The majority of responses were received through the online questionnaire.

73% of respondents said that air quality is important to them.

35% of respondents felt air quality is a serious problem in Ealing while 20% of respondents believed air quality is not at all a serious issue.

With regards to areas which respondents believed should be focussed upon, 65% of respondents believed that air quality improvement actions in Ealing as most important while the policy context for air quality improvement in Ealing was seen as least important.

There was majority support among respondents for a number of actions to tackle air quality including:

- 63% of respondents supported action/measures for implementing green infrastructure
- 57% of respondents supported measures/action to reduce the impact (emissions) of new/existing developments
- 56% of respondents supported measures to reduce emissions from road traffic

However some actions received less support such as:

- 48% supported public health awareness raising
- 37% supported measures aimed at improving indoor air quality.

**14.4** As well as public consultation the Council was obliged, as part of AQAP process, to engage and consult with statutory consultees, namely the Greater London Authority and the Environment Agency and their responses are also detailed in Appendix 4 of the AQAP.

## **15. Timetable for Implementation**

The AQS and AQAP will come in to effect upon approval by Cabinet for adoption by the Council.

## **16. Appendices**

Appendix 1 – Air Quality Strategy 2022-2030

Appendix 2 – Air Quality Action Plan 2022-2027

## **17. Background Information**

Mayor of London, London Local Air Quality Management (LLAQM) Policy Guidance 2019 (LLAQM.PG (19)) Pursuant to Part IV of the Environment Act 1995

[https://www.london.gov.uk/sites/default/files/llaqm\\_policy\\_guidance\\_2019.pdf](https://www.london.gov.uk/sites/default/files/llaqm_policy_guidance_2019.pdf)

## Consultation

<b>Name of consultee</b>	<b>Post held</b>	<b>Date sent to consultee</b>	<b>Date response received</b>	<b>Comments appear in paragraph:</b>
<b>Internal</b>				
Councillor Deirdre Costigan	Cabinet Member for Climate Action	continuous		
Nicky Fiedler	Strategic Director, Housing and Environment			
Justin Morley	Head of Legal Services	15/09/2023	18/09/2023	Minor wording changes to 1 & 5
Russell Dyer	Assistant Director, Accountancy	15/09/2023		Minor wording changes throughout
<b>External</b>				

## Report History

<b>Decision type:</b>	<b>Urgency item?</b>
Key decision	No
Report no.:	Surinderpal Suri, Environmental Protection Manager, SuriS@ealing.gov.uk

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2022-2030

# Ealing Council Air quality strategy

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# Executive Summary

This Air Quality Strategy (AQS) pulls together key information about local air quality topics, setting out a vision for improving and safeguarding the health of those who live and work in Ealing.

This strategy aims to explain why we need to improve air quality, describe the air pollution challenges we currently face in Ealing, outline the actions the council will take to improve air quality and offer advice for how you can reduce your exposure to air pollution.

## The case for improving air quality

Air pollution in the UK and in Ealing in particular has reduced in recent decades. However, levels of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>2.5</sub>) are still high in Ealing and across London. Recent studies have estimated that between 147 and 165 premature deaths each year in Ealing are related to long-term exposure to these pollutants.<sup>1</sup> There is increasing evidence of links between exposure to air pollution and a wider range of health effects, such as intra-uterine impacts, adverse birth outcomes, poor early life organ development, diabetes, reduced cognitive performance, and increased dementia risk.

Air pollution affects everyone who lives and works in Ealing throughout their lives. The most vulnerable groups include children, pregnant women, and the elderly. The most vulnerable in our society are often those whose health is most at risk.

## Air pollution challenges in Ealing

Ealing Council carries out a range of air quality monitoring to track pollution in the borough. The council has declared an Air Quality Management Area (AQMA) covering the council due to high concentrations of NO<sub>2</sub> and historically high concentrations of particulate matter. This means that we need to take action to reduce concentrations to safe levels.

Road transport and heating are the most important sources of both NO<sub>2</sub> and particulate matter emissions in Ealing. Particulate matter concentrations are also strongly affected by sources from London, the rest of the UK, and mainland Europe.

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<sup>1</sup> Environmental Research Group – Imperial College London, 2020, [https://www.london.gov.uk/sites/default/files/london\\_health\\_burden\\_of\\_current\\_air\\_pollution\\_and\\_future\\_health\\_benefits\\_of\\_mayoral\\_air\\_quality\\_policies\\_january2020.pdf](https://www.london.gov.uk/sites/default/files/london_health_burden_of_current_air_pollution_and_future_health_benefits_of_mayoral_air_quality_policies_january2020.pdf)

## How we will improve air quality in Ealing

Our vision for improving air quality in Ealing is set out in a number of key themes. **Reducing traffic emissions** is a priority, with actions ranging from making walking and cycling more accessible to improving emissions from the vehicle fleet. Wood burning and **improving indoor air quality** are also considered, as there is growing evidence that they affect our health. The changing landscape of Ealing is considered through **reducing the impact of new and existing developments**, such as controlling emissions of odour and dust and developing **green infrastructure**, linking to Ealing's Greenspaces Strategy.

**Raising awareness of air quality** is highlighted through actions including provision of clear and accurate air pollution information, and engaging with local businesses and community groups. Finally, there is a description of the **monitoring and review** process to track the performance of these actions set out in the AQS.

### Spotlights

Neighbourhoods which exemplify specific air quality challenges in Ealing are given a 'spotlight', presenting the main local issues and potential solutions:

- **Acton:** a retail and commerce hub with high levels of traffic congestion, and the location of Acton Goods Yard.
- **Southall:** the location of a large area of redevelopment at the former Southall Gasworks site, known as The Green Quarter.
- **Greenford:** a residential neighbourhood with limited public transport that connects north and south of the borough exhibits regular periods of traffic congestion, therefore making it more vulnerable to elevated air pollution level.

### Types of resources provided

In each chapter of the Air Quality Strategy we have provided links to more information. This includes material provided by the Council, TfL and Government-led programmes which support reduction of emissions, as well as useful apps, energy saving websites, relevant charities and local conservation groups.

This Air Quality Strategy is supported by other publications by Ealing Council, including the Air Quality Action Plan 2022-2027, which focusses on short-term measures to improve NO<sub>2</sub> concentrations in Ealing, and our Annual Status Reports, which provide yearly updates on concentrations in the borough.





# 1

# An Air Quality Strategy for Ealing

## In this section

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1.1 Our Vision

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1.2 How we will deliver the strategy

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1.3 How we will deliver the strategy

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1.4 How does the AQS align with other key policies?

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# 1 An Air Quality Strategy for Ealing

This Air Quality Strategy sets out Ealing Council's vision for improving air quality and safeguarding the health of everybody who lives and works here.

## This strategy aims to

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Set out the case for improving air quality

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Describe the air quality challenges we currently face in Ealing

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Outline the actions the council will take to improve air quality

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Offer advice for how you can reduce your air pollution footprint, and where to find more information about air quality

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# 1.1 Our Vision

Our vision is for clean air for all Ealing residents and continuous improvements in the quality of our environment through development of sustainable transport and green spaces.

Our key goals for the strategy are presented below. We have developed a series of action areas to address air pollution in Ealing and and achieve these goals.

## Strategy Goals



### Improve air quality

Protect the health and wellbeing of Ealing residents from the harmful effects of nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM) air pollution. Support national, regional and local initiatives to meet EU thresholds for key pollutants as soon as possible.



### Tackling the climate crisis

We will work to keep Ealing clean and green and take leadership in ensuring the borough we build is sustainable. We will take leadership on tackling the ramifications of the climate crisis, by aiming for the highest environmental standards as we grow new jobs and homes.



### Fighting inequality

We want to create a borough where we work hard to address inequalities in all their forms, to ensure that no-one is left behind in achieving their potential.



### Protect biodiversity

Ensuring our parks, open spaces and nature are protected and enhanced. Reduce emissions of pollutants to safeguard local ecological sites and enhance biodiversity, and support ongoing greening efforts across the borough, to create healthy spaces and adapt to the impacts of climate change.



### Protect health and wellbeing

Protecting and enhancing the physical and mental health of all, supporting our older residents to enable them to remain independent and resilient. Improve air quality and support access to healthier travel choices.



### Raise public awareness

Promoting awareness of the causes and impacts of air quality issues, as well as the available local solutions. Bring people together to build strong neighbourhoods and communities empowering volunteers, encouraging community activism, and engaging civic and faith leaders.



## Promote sustainable infrastructure

Making sure the growth that takes place in Ealing enhances its character, conserves its future and makes great places where people want to live. Ensure local transport and development planning supports investment in sustainable infrastructure, that limits impact on air quality, enabling a shift to low-emission transport and energy options.



## Creating good jobs

We want growth in Ealing to be inclusive, where people can both contribute to and benefit from growth and economic development. We want to create good quality jobs in our borough and deliver an ambitious programme of building more genuinely affordable homes.



## Support the transition to clean energy

Supporting the uptake of low-emission energy technologies and improvements in efficiencies, and reducing reliance on the consumption of fossil and solid fuels.

# 1.2 How this strategy has been developed

To achieve this vision, we have identified a number of action areas aimed at key polluters and raising public awareness. Air pollution in Ealing comes from a wide range of sources, so we have included a large variety of action areas to ensure that we deliver as much improvement as possible.. This includes both the council's activities and other emissions. Our action areas are:

- Reducing road traffic emissions (4)
- Improving indoor air quality and tackling wood burning (5)
- Reducing the impact of new developments on air quality (6)
- Investing in green infrastructure (7)
- Raising awareness of air quality (8)

It is important that we ensure that any actions don't cause new air quality problems elsewhere in Ealing, or harm quality of life for our residents. In particular, we are committed to making sure that our plans are inclusive of people who might not be able to change their lifestyle to reduce their air pollution footprint.

Not all air pollution in Ealing comes from inside the borough, and there are some sources of emissions which are outside the council's control. For these areas, we will work with regional and national government to bring down emissions on a wider scale.

Ealing Council has developed this strategy through **collaboration** with stakeholders across Ealing. We have sought views from local residents, businesses, and Council representatives to ensure that the strategy is **inclusive** and **equitable**, and represents the priorities and perspectives of the local community.

## 1.3 How we will deliver the strategy

This Air Quality Strategy has been developed alongside the updated Air Quality Action Plan (AQAP) for Ealing<sup>2</sup>, which describes specific air pollution reduction measures in further detail.

Ealing Council will monitor, review, and regulate the measures discussed in this Strategy and the related Air Quality Action Plan to ensure they can respond to the air quality challenges in the borough in the most effective way. This strategy will be reviewed every 5 years to assess progress and adjust the air quality improvement goals for Ealing as necessary. The detailed actions in the Air Quality Action Plan will also be reviewed and updated every 5 years. Yearly updates on our progress are provided in our Annual Status Reports, which can be found on the EalingAir website<sup>3</sup>. More information on monitoring and review can be found in Chapter 9.

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2 Air Quality Action Plan (AQAP),  
<https://ealingair.org.uk/AirQuality/Reports.aspx>  
3 <https://ealingair.org.uk>



# 1.4 How does this AQS align with other key policies?

This Strategy is aligned with national, regional, and local policies, plans, and strategies, that either directly or indirectly relate to improving air quality. By setting goals and targets at a national and local level, air pollution can be tackled from various perspectives and at a range of scales. The layers of local, regional, and national policy and initiatives relevant to the Air Quality Strategy are presented in **Figure 1.1**.

**Figure 1.1: Local, regional and national policy, guidance and initiatives linked to the Air Quality Strategy**



## 2

# Why do we need to improve air quality?

## In this section

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2.1 Health and air quality

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2.2 Who is most vulnerable to air pollution?

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2.3 How is air quality protected?

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2.4 Social equity and health inequalities

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## 2 Why do we need to improve air quality?

Air pollution in the UK has seen significant improvements in recent decades due to the introduction of policies and measures designed to reduce emissions from transport, industry, and homes. However, although ambient air quality in the UK is generally considered good, elevated pollution levels still occur in many towns and cities across the country.

### 2.1 Health and air quality

It is estimated that air pollution in the UK **reduces the life expectancy of every person by an average of 7-8 months, with an associated cost of up to £20 billion each year**<sup>4</sup>. Episodes of higher air pollution increase respiratory and cardiovascular hospital admissions and mortality, with harmful short-term effects including exacerbating symptoms for those with pre-existing heart and lung conditions, such as asthma. There is also growing evidence that air pollution is associated with other long-term ailments which are related to reduced life expectancy such as stroke, lung cancer, respiratory conditions and cardiovascular disease, dementia, diabetes, and adverse pregnancy outcomes<sup>5,6</sup>. Recent studies have estimated that between 137 and 167 deaths are related to long-term exposure to man-made air pollution annually in Ealing<sup>7</sup>.

The two most important pollutants in London are:

- **Nitrogen dioxide** (NO<sub>2</sub>);
- **Particulate matter** (PM<sub>10</sub> and PM<sub>2.5</sub>).

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4 Department for Environment, Food and Rural Affairs, The Air Quality Strategy for England, Scotland, Wales and Northern Ireland, Volume 1. Accessed at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69336/pb12654-air-quality-strategy-vol1-070712.pdf)


5 Public Health England (2014), PHE-CRCE-010: Estimating local mortality burdens associated with particulate air pollution. [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/332854/PHE\\_CRCE\\_010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf)

6 WHO, Ambient (outdoor) air pollution, [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

7 King's College London Understanding the Health Impacts of Air Pollution in London [https://www.london.gov.uk/sites/default/files/hia\\_in\\_london\\_kingsreport\\_14072015\\_final.pdf](https://www.london.gov.uk/sites/default/files/hia_in_london_kingsreport_14072015_final.pdf)



### What is nitrogen dioxide?




Has the chemical formula  $\text{NO}_2$ , meaning that it has two oxygen atoms and one nitrogen atom

One of a group of gases called nitrogen oxides ( $\text{NO}_x$ )

Red-brown in colour, but colourless in our air as it is very diluted

Released by burning fossil fuels

### What is particulate matter?



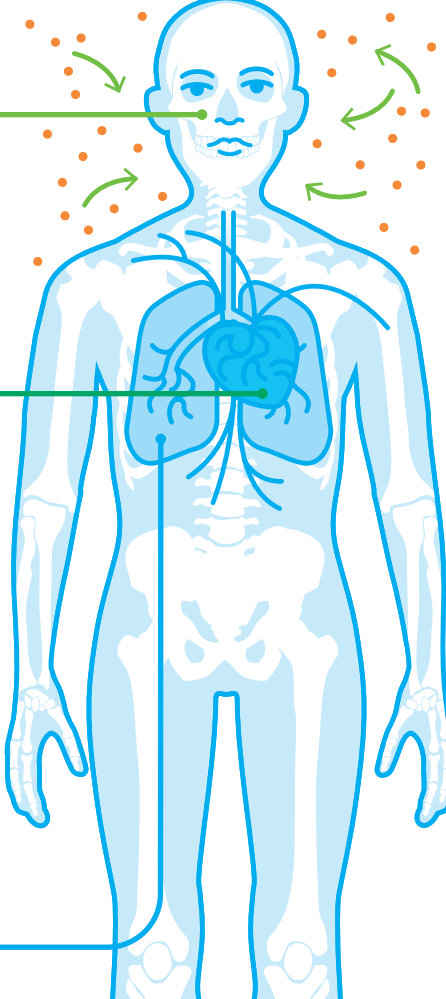
Solid dust particles and liquid droplets

$\text{PM}_{10}$  is all dust up to  $10\ \mu\text{m}$  wide,  $\text{PM}_{2.5}$  is dust up to  $2.5\ \mu\text{m}$  wide

Contains a mixture of different chemicals, some of which are harmful to human health

Mostly comes from regional sources

## What are the potential health impacts of the different pollutants?



### Particulate matter ( $\text{PM}_{10}$ )

- Coarse particles can irritate the eyes, nose, and throat, cause increases in respiratory illness, and deterioration in cases of cardio-respiratory disease.

### Fine particulate matter ( $\text{PM}_{2.5}$ )

- Fine particles which can enter deep into the lungs and even the bloodstream.
- Short term exposure (a few hours to weeks) can increase risk of cardiovascular disease.
- Longer-term exposure (e.g. a few years) increases the risk for cardiovascular mortality to an even greater extent and reduces life expectancy.

### Nitrogen dioxide ( $\text{NO}_2$ )

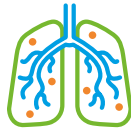
- Adverse effects of the respiratory system. Irritation of the lungs and lower resistance to respiratory infections.
- Frequent exposure to concentrations that are typically much higher than those normally found in the ambient air may cause increased incidence of acute respiratory illness in children.

## 2.2 Who is most vulnerable to air pollution?

Air pollution affects everyone who lives and works in Ealing. The most vulnerable groups include:



**Elderly**



**Those with lung disease**



**Children**



**Pregnant Women**

Children exposed to PM<sub>2.5</sub> are more likely to have reduced lung function and develop asthma as they grow up.

Approximately 21% of Ealing's population is 15 and under, while 13% of the population is over the age of 65<sup>8</sup>. Around 14% of the local population find that their day-to-day activities are limited in some way, or have a long-term health problem or disability.<sup>9</sup>



<sup>8</sup> ONS, Local authority ageing statistics, based on annual mid-year population estimates (2019), <https://www.ons.gov.uk/datasets/ageing-population-estimates/editions/time-series/versions/1>

<sup>9</sup> Equality in Ealing Summary Needs Assessment (August 2020), [https://www.ealing.gov.uk/download/downloads/id/7840/equalities\\_needs\\_assessment\\_-\\_april\\_2017.pdf](https://www.ealing.gov.uk/download/downloads/id/7840/equalities_needs_assessment_-_april_2017.pdf)

## 2.3 How is air quality protected?

The UK sets out Air Quality Standards and Targets based on the latest health evidence. These establish acceptable levels of air pollution that will not cause harm to human health. These Air Quality Standards are periodically reviewed to ensure that they are in line with the latest evidence. The World Health Organization (WHO) has recently completed its review of evidence and has proposed new guideline limit values<sup>10</sup> for air pollutants which are lower than the current limits set in the UK. The Committee on the Medical Effects of Air Pollutants (COMEAP) supports the tighter restrictions to reduce health risks associated with air quality<sup>11</sup>.

In the London Environment Strategy<sup>12</sup>, the Mayor has set out the ambition that all of London will have concentrations of PM<sub>2.5</sub> within the WHO guideline limit by 2030.

Air quality measurements are typically presented as a daily or annual mean concentration in micrograms per cubic meter (µg/m<sup>3</sup>).

**Table 2-1: Annual mean concentration limits for pollutants (µg/m<sup>3</sup>), as defined in the EU directives, UK objectives and WHO guideline limit values**

Pollutant	EU obligation (2020) <sup>13</sup>	UK objective (2020) <sup>14</sup>	WHO guideline limit values (2021) <sup>15</sup>
NO <sub>2</sub>	40	40	10
PM <sub>10</sub>	40	40	15
PM <sub>2.5</sub>	20	20	5

10 More information on the limit values can be found at <https://www.who.int/news-room/questions-and-answers/item/who-global-air-quality-guidelines>

11 COMEAP, Summary of COMEAP recommendations for the quantification of health effects associated with air pollutants, <https://www.gov.uk/government/publications/air-pollutants-quantification-of-associated-health-effects>

12 Mayor of London, London Environment Strategy, <https://www.london.gov.uk/what-we-do/environment/london-environment-strategy>

13 European Commission, Air Quality Standards, <https://ec.europa.eu/environment/air/quality/standards.htm>

14 UK AIR, UK Air Quality Limits, <https://uk-air.defra.gov.uk/air-pollution/uk-eu-limits>

15 WHO, Ambient (outdoor) air pollution, [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)

## 2.4 Social equity and health inequalities

### **The most vulnerable in our society are often those whose health is most at risk**

London has the widest health inequalities in England, defined by the Healthy London Partnership as “systematic, avoidable and unfair differences in mental or physical health between groups of people”<sup>16</sup>. Ealing as a borough experiences inequality in a number of ways, including disparities in income, housing, and health indicators, such as life expectancy.

Recent air quality exposure studies have found that there are clear social inequalities in traffic-related air pollution exposure in London<sup>17</sup>. Communities which have higher levels of deprivation, or a higher proportion of people from a non-white ethnic background, are more likely to be exposed to higher levels of air pollution. Black, Asian and Minority Ethnic (BAME) Londoners are also more likely to be affected by the impacts of the climate crisis<sup>18</sup>. In general, less affluent areas emit the least NO<sub>x</sub> and PM, while more affluent areas emit the highest levels of pollution<sup>19</sup>. Around half of Ealing’s population are BAME, so this is an important consideration for us<sup>20</sup>.

Recent policies to improve air pollution are reducing the extent of this inequality, particularly for NO<sub>2</sub> exposure. However, in 2019, annual average NO<sub>2</sub> concentrations were still between 16% and 27% higher in areas where non-white people were most likely to live, compared to areas where they were least likely to live.

All Londoners benefit from an environment and economy that promote good mental and physical health, including tackling issues such as fuel poverty, schools in areas of poor air quality, and ensuring all Londoners have access to good quality green and other public spaces.

Measures to improve air quality can improve the quality of life for those who are most vulnerable. For example, improving access to public transport can benefit those who may not be able to regularly walk or cycle such as young children, those with a disability or long-term health condition.

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16 Healthy London Partnership <https://www.healthy london.org/>

17 Logika (2019), Air pollution and inequalities in London: 2019 update, [https://www.london.gov.uk/sites/default/files/air\\_pollution\\_and\\_inequalities\\_in\\_london\\_2019\\_update\\_0.pdf](https://www.london.gov.uk/sites/default/files/air_pollution_and_inequalities_in_london_2019_update_0.pdf)

18 Mayor of London, BAME Londoners more likely to be affected by climate emergency, <https://www.london.gov.uk/press-releases/mayoral/bame-londoners-bear-brunt-of-climate-emergency>

19 Barnes and Longhurst (2019), Emissions vs exposure: Increasing injustice from road traffic-related air pollution in the United Kingdom, <https://www.sciencedirect.com/science/article/pii/S1361920919300392#!>

20 [https://data.ealing.gov.uk/population/#/view-report/40d8fa6651d042f8870d1b26e949be38/\\_\\_\\_iaFirstFeature](https://data.ealing.gov.uk/population/#/view-report/40d8fa6651d042f8870d1b26e949be38/___iaFirstFeature)

# 3

# Air quality in Ealing

## In this section

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3.1 How do we monitor local air quality?

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3.2 Where does air pollution in Ealing come from?

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3.3 Air quality levels in Ealing

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3.4 Clean air and climate change

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## 3 Air quality in Ealing

Ealing Council undertakes a range of monitoring and assessments to track air quality across the borough in order to compare levels of air pollution with thresholds for the protection of human health and the environment.

As part of its statutory duties, Ealing Council has declared an Air Quality Management Area (AQMA) covering the entire borough, due to high concentrations of NO<sub>2</sub> and historically high concentrations of PM<sub>10</sub>. This means that we need to take action to reduce concentrations of these pollutants to safe levels.

The Greater London Authority has identified 8 Air Quality Focus Areas in Ealing. These are areas where people are exposed to high levels of pollution. The Air Quality Focus Areas are:

- **Acton Central:** Acton A40 North Acton Station/Gypsy Corner/Savoy Circus;
- **Hanger Hill:** Hanger Lane/Twyford Abbey Road;
- **Perivale:** A40 Western Avenue Teignmouth Gardens to Alperton Lane;
- **Elthorne:** Uxbridge Road/Ealing Broadway and Haven Green;
- **South Acton:** Acton High Street/Gunnersbury Lane junction to rail in Acton High Street;
- **Southall:** King Street/The Green/Western Road/South Road;
- **East Acton:** Victoria Road/Portal Way/ Wales Farm Road; and
- **Central Greenford:** Greenford Road (junction with Rockware Avenue) to Greenford Road (junction with Whitton Avenue West)

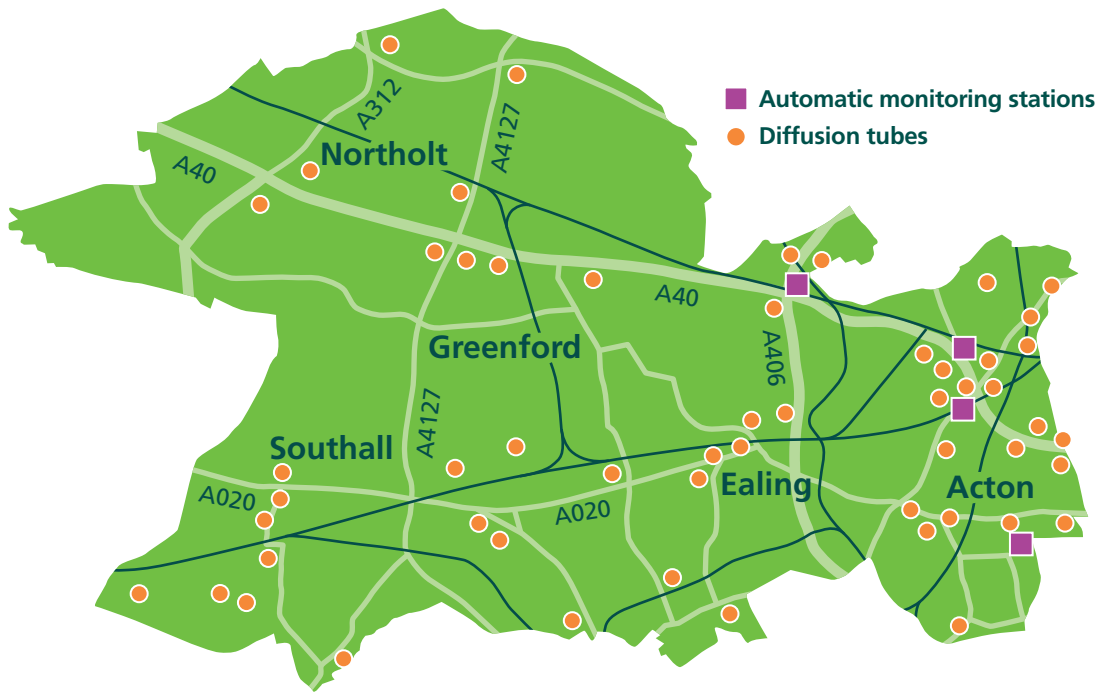
## 3.1 How do we monitor local air quality?

Monitoring air quality helps us understand the current levels of air pollution across Ealing, making sure that we identify where action is needed. We measure air quality using 67 monitoring stations across Ealing. All of them monitor NO<sub>2</sub>, with four of them also monitoring PM<sub>10</sub>. We publish our latest monitoring data each year in our Air Quality Annual Status Report (ASR).

We also add temporary air quality monitoring sites in some cases where residents express concerns. For example, in 2019, two new temporary sites located at St Mark's Primary School were added due to concerns expressed by parents about the exposure of their children to pollution from traffic on Lower Boston Road. We are also currently monitoring air quality around the Green Quarter site, following concerns from local residents regarding potential odour and air pollution issues related to the redevelopment of the site.



**Air quality monitoring stations in Ealing**



**Automatic monitoring stations**

- Hourly measurements of multiple pollutants
- Larger boxes, often on pavements or in parks
- Continuously collecting data on NO<sub>2</sub>, particulates and other substances

**Diffusion tubes**

- Collected monthly, and measure average NO<sub>2</sub> concentrations
- You can find them attached to lampposts and buildings
- Provide long-term estimations of concentrations of NO<sub>2</sub>



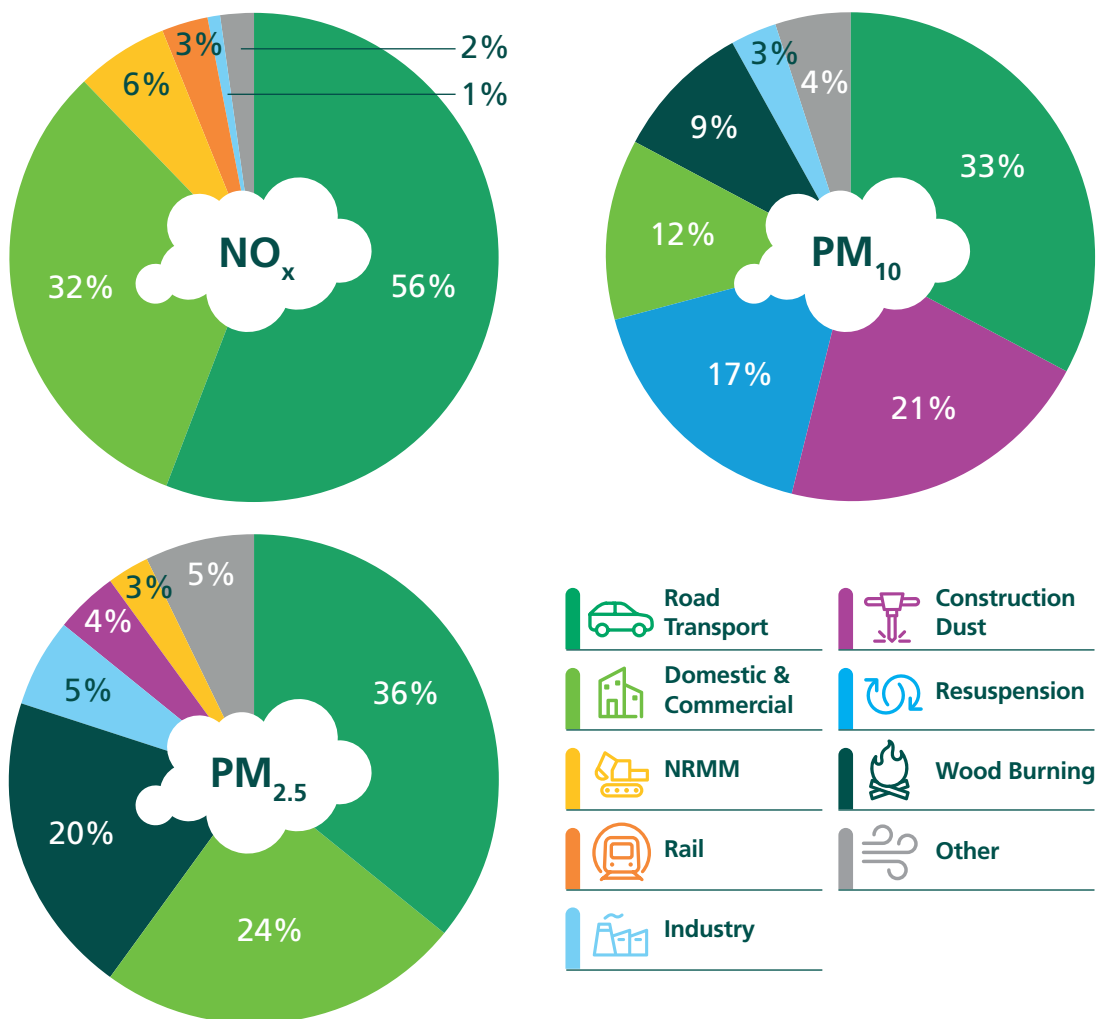


## 3.2 Where does air pollution in Ealing come from?

There are a range of air pollutants present in London, and each will impact human health and the environment in different ways. The key pollutants in Ealing are  $\text{NO}_x$  (which forms  $\text{NO}_2$ ),  $\text{PM}_{10}$ , and  $\text{PM}_{2.5}$ .  $\text{NO}_2$  is a pollutant that is short-lived, so local sources are very important.  $\text{PM}_{10}$  and  $\text{PM}_{2.5}$  stay in the atmosphere longer and are therefore affected more strongly by emissions from the rest of the UK and mainland Europe.

For each of these pollutants, road transport is the dominant source of emissions in Ealing.  $\text{NO}_x$  and  $\text{PM}_{2.5}$  are also emitted by domestic and commercial combustion emissions from gas, coal, and oil. For  $\text{PM}_{10}$ , construction dust and resuspension are large contributors, while wood burning is another important source of  $\text{PM}_{2.5}$  emissions. Non-road mobile machinery (NRMM), which are vehicles used for domestic, industrial, and commercial construction, also contribute to all three pollutants.

**Figure 3.1: Primary emission sources of  $\text{NO}_x$ ,  $\text{PM}_{2.5}$  and  $\text{PM}_{10}$  in Ealing (based on LAEI 2019 data)<sup>21</sup>**

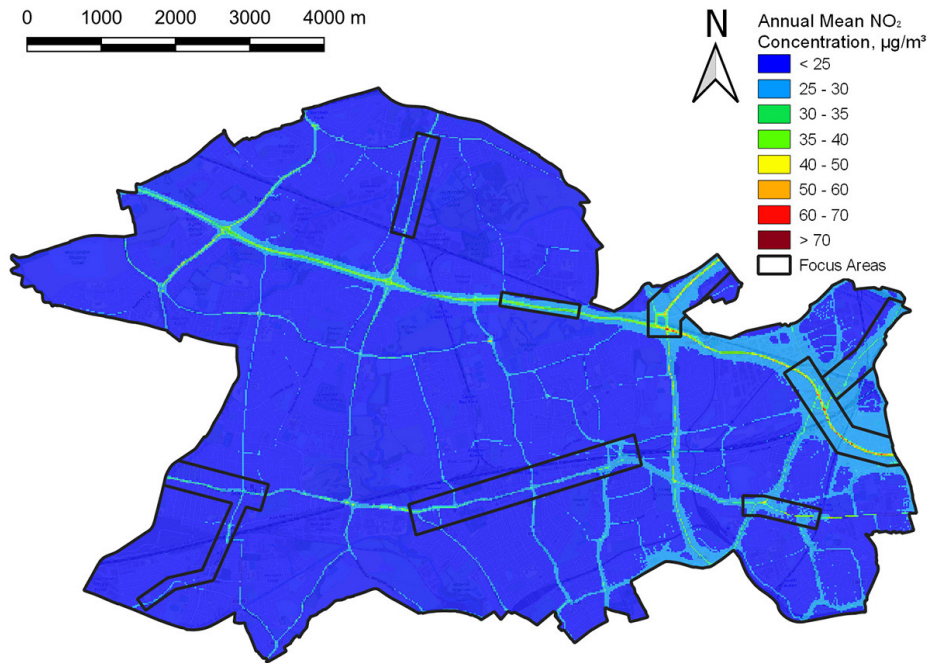


<sup>21</sup> London Atmospheric Emissions Inventory (LAEI) 2019, <https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory--laei--2019>

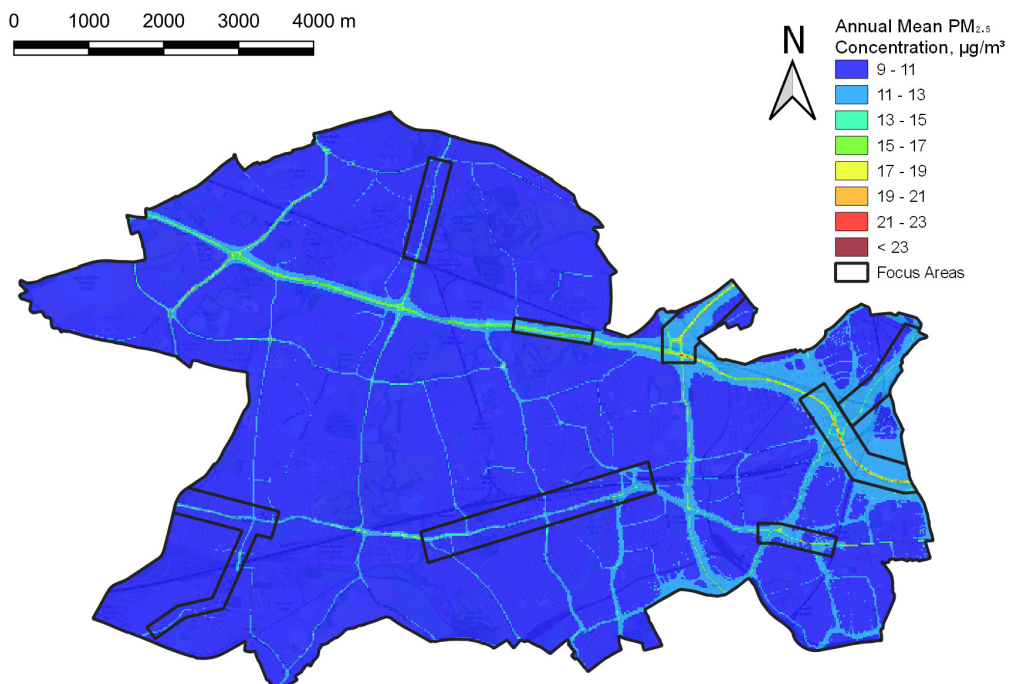
### 3.3 Air quality levels in Ealing

Some areas of Ealing experience higher concentrations of pollutants than others, due to the local activities taking place. For example, measured concentrations of PM<sub>10</sub> and NO<sub>2</sub> are often highest along roadsides due to road traffic. The maps shown in Figure 3.2 and Figure 3.3 provide illustration as to how concentrations of NO<sub>2</sub> change across Ealing Borough, and Greater London, respectively.

**Figure 3.2 Annual mean concentrations of NO<sub>2</sub> across Ealing, 2019**



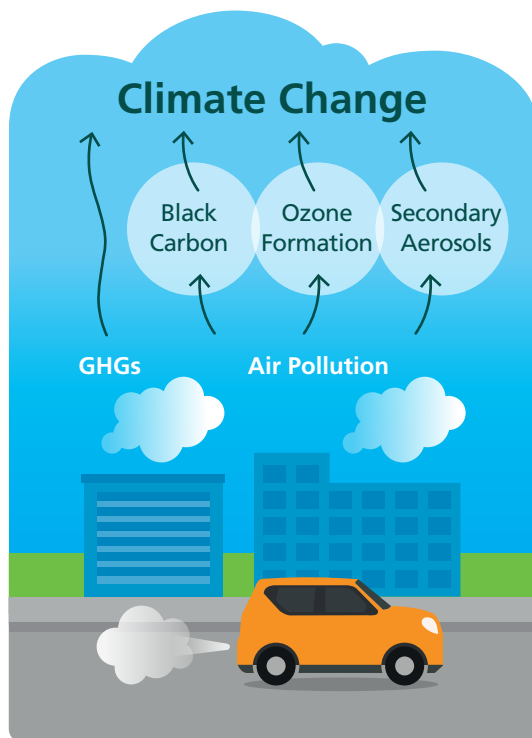
**Figure 3.3 Annual mean concentrations of PM<sub>2.5</sub> across Ealing, 2019**



## 3.4 Clean air and climate change

Air quality and climate change can sometimes be viewed as two separate issues, particularly as air quality is typically assessed on a local scale, whilst the impacts of climate change have a global reach. Combustion of fossil fuels is a major source of both air pollutants like NO<sub>x</sub> and PM and greenhouse gas emissions like carbon dioxide (CO<sub>2</sub>) and volatile organic compounds (VOCs). This means that improving air quality by reducing emissions can also help to address climate change.

### Examples of links between air pollutants and climate change



**Ozone, which is formed by pollutants including NO<sub>x</sub>**, is a powerful greenhouse gas. It contributes directly to climate change, as well as reducing carbon uptake by vegetation. Therefore, taking action to reduce emissions of NO<sub>x</sub> will help to limit ozone creation, and thereby minimise these climate impacts.

**Black carbon** forms part of the **particulate matter** emitted by diesel engines due to incomplete combustion, and also absorbs heat, contributing to climate change.

Air pollutants like nitrogen oxides, sulphur dioxide, ammonia and volatile organic compounds can all lead to the formation of **secondary aerosols**, which reflect light.

Limiting emissions of these pollutants by making behavioural changes such as shifting away from private vehicle use, and making homes, workplaces and vehicles more energy efficient, contributes to local efforts to limit our contribution to climate change.

Climate change also has an impact on air quality. Longer, hotter summers have been forecast to occur in London as a result of climate change, which in turn can increase the frequency and severity of smog. On the other hand, more periods of rainfall during winter may reduce ambient pollutant concentrations<sup>22</sup>.

Ealing's Climate and Ecological Emergency Strategy 2021-2030<sup>23</sup> describes our climate commitments and the actions that we are taking to reduce emissions and become carbon neutral by 2030. Improved air quality is considered to be a key co-benefit of the strategy.

<sup>22</sup> Air quality expert group, Air Quality and Climate Change: A UK Perspective, <https://uk-air.defra.gov.uk/library/assets/documents/reports/aqeg/fullreport.pdf>

<sup>23</sup> Ealing Council Climate and Ecological Emergency Strategy 2021-2030 [https://www.ealing.gov.uk/downloads/file/15879/climate\\_and\\_ecological\\_emergency\\_strategy\\_2021-2030](https://www.ealing.gov.uk/downloads/file/15879/climate_and_ecological_emergency_strategy_2021-2030)

# 4

# Reducing road traffic emissions

## In this section

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4.1 Making walking and cycling more accessible

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4.2 Public transport

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4.3 School Streets

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4.4 Reducing vehicle idling

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4.5 Encouraging the uptake of low-emission vehicles

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4.6 Improving emissions from the council fleet

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4.7 Ealing Spotlight: Acton

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## 4 Reducing road traffic emissions

Pollution from road traffic is the most important cause of air quality issues in Ealing. Car journeys currently account for 40% of trips in Ealing and two thirds of trips across London. Diesel cars have the biggest impact on air quality (35% of NO<sub>x</sub> emissions), while petrol cars only contribute 8% of total emissions.

Ealing Council have published local borough-wide transport strategies and plans to increase the use of and access to sustainable travel options. Ealing Council's Transport Strategy (2019-2022)<sup>24</sup> explains the transport priorities for Ealing Council. These are:

**Modal shift** – reducing the dependency on the motorised vehicle by moving trips, particularly the shorter ones, to active travel using more sustainable modes (walking, cycling and public transport) through behaviour change.

**Improve road safety** – making the borough roads as safe as possible, particularly for those modes of transport perceived to be more vulnerable, i.e. walking and cycling.

**Lower transport's environmental footprint** – we know that not everybody has the option to switch to active travel, so we also need to encourage cleaner driving behaviours, and provide the infrastructure to allow residents to switch to low-emission vehicles.

Driving should be discouraged as much as possible for those who can use other methods/ active transport. This will reduce congestion and incentivise walking and cycling, particularly for smaller journeys and school runs.

The details of the measures we are taking to help achieve these goals are given below.

<sup>24</sup> Ealing Council Transport Strategy 2019-2022 [https://www.ealing.gov.uk/downloads/download/5408/transport\\_strategy](https://www.ealing.gov.uk/downloads/download/5408/transport_strategy)

The safer that streets are,  
the more people will use them  
for active travel.

Ealing does not stand alone in working to improve air quality in London; our work to improve local air quality in Ealing contributes to wider benefits seen across London. Equally, we support pan-London air quality action, as Ealing will see the benefits over time.

## 4.1 Encouraging the uptake of low-emission vehicles

Ealing Council is committed to tackling climate change and improving local air quality. While one way to do this is to reduce the total amount of travelling done by car, we know that not all car journeys can be replaced with other modes of transport. This means that finding ways to reduce emissions from car journeys is as important as encouraging those who can to shift to alternative modes of transport when possible.

Electric vehicles (EVs) have lower running costs, are currently exempt from the Congestion Charge and Ultra Low Emission Zone schemes, pay no road tax (Vehicle Exercise Duty) and benefit from parking permit discounts in Ealing, as well as reduced company car tax.

Ealing Council recognises that although EVs contribute towards reducing emissions, they still emit pollutants into the air from tyre and brake wear. Nevertheless, EVs are less polluting overall than their conventional counterparts.

### 4.1.1 What are we doing now?

Over the past five years, Ealing Council and partners Source London and Siemens/ Ubitricity have successfully installed 215 EV charging points across the borough. There are also around 85 additional charging points on private land open to the public.

The implementation of 100% emissions-based permit parking for long-term parking is complete. Low emission vehicles are offered a discount in pay & display and car parking spaces. There is a scale categorising each vehicle into one of four carbon dioxide (CO<sub>2</sub>) bands, with an additional surcharge added to diesel vehicles which are not Euro 6 standard.

## 4.1.2 What are we doing next?

Building on this success by increasing the availability of charging points is a priority for the council going forward. We are currently prioritising neighbourhoods that are more than 10 minutes' walk from existing EV charging points, and we hope to reduce the waiting time to an EV charging point to 5 minutes across Ealing.

We are committed to increasing the number of EV charging points to 2,000 by 2026.

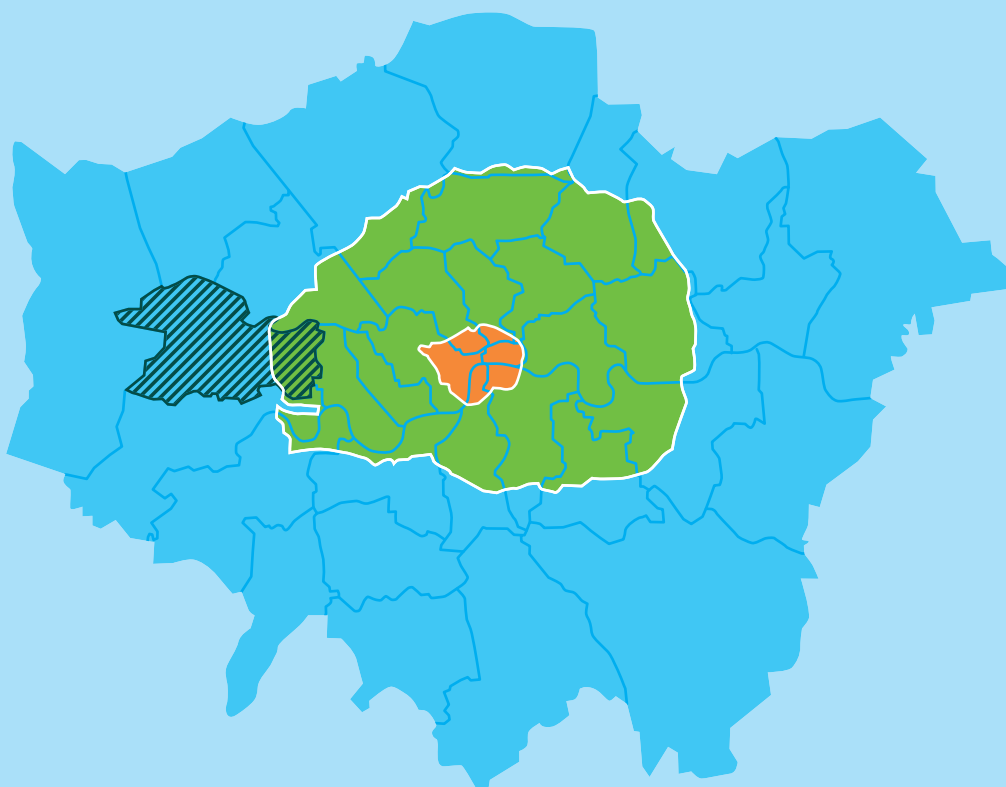
<span style="border: 1px solid white; border-radius: 50%; padding: 2px 6px;">i</span> Where to find more information		
Tool / Resource	Description	Link
<b>Council Website</b>	Finding or installing electric vehicle charging points.	<a href="https://www.ealing.gov.uk/info/201173/transport_and_parking/1316/electric_vehicles_and_charging_points">https://www.ealing.gov.uk/info/201173/transport_and_parking/1316/electric_vehicles_and_charging_points</a>



## The London Ultra Low Emission Zone

The Central London Ultra Low Emission Zone (ULEZ) is designed to encourage a shift towards the use of vehicles that have less of an impact on local air quality. From 25 October 2021, the ULEZ expanded to create a single, larger zone up to the North Circular Road (A406) and South Circular Road (A205). On the 29<sup>th</sup> of August 2023, the ULEZ will expand again to cover all of London.<sup>25</sup>

In the ULEZ, a £12.50 daily charge is issued to vehicles that do not meet the Euro 4 emission standard for petrol cars and the Euro 6 emission standard for diesel cars. The requirements for diesel vehicles are stricter because these vehicles have a greater impact on air quality.



- Central London ULEZ and Congestion Charge Zone
- Expanded ULEZ Zone (From 25 October 2021)
- / / / / London Borough of Ealing
- Expanded ULEZ Zone (from 29 August 2023)

Further information on the ULEZ can be found here:  
<https://tfl.gov.uk/modes/driving/ultra-low-emission-zone>

<sup>25</sup> <https://tfl.gov.uk/modes/driving/ultra-low-emission-zone/proposed-ulez-expansion-for-2023>



## 4.2 Making walking and cycling more accessible

Cycling and pedestrian infrastructure is critical because accelerating the reduction in road space for cars and increasing the space for walking and cycling will improve air quality.

Walking and cycling can have significant benefits for Ealing and Ealing residents. Higher rates of walking and cycling can reduce congestion and emissions, increase public transport capacity, and have substantial health and wellbeing impacts. Most car trips in the borough are very short and in many cases could be cycled or walked. 31% of car trips originating in Ealing are under 2km in length.

To encourage more people who can to consider active travel when taking journeys, we are committed to making walking and cycling safer, more accessible, and more of an attractive option by putting walking and cycling first in the design of our streets.

### 4.2.1 What are we doing now?

We have carried out a number of policies designed to make walking and cycling more attractive in Ealing. We have implemented a 20 mph speed limit across all roads in Ealing, with the aim of improving road safety and making walking and cycling more accessible.

We are implementing the *Uxbridge Road walking and cycling corridor project*, which will separate cyclists from other road traffic along this key route. We are also working to improve the pedestrian and cycling experience in town centres, in order to make cycling and walking to and around these areas more attractive.

We have implemented a successful *School Streets* programme<sup>26</sup> which temporarily closes streets surrounding schools during peak arrival and departure time periods. This is described in detail in Section 4.3.

The *Let's Go Southall* programme aims to encourage and support residents to be more physically active. Southall is one of 12 areas across the country that has been selected for a Sport England programme to help people to choose more active lifestyles. Our *Get Southall Moving* active travel project will make this even easier.



<sup>26</sup> More information on the school street programme can be found [https://www.ealing.gov.uk/info/201146/neighbourhood\\_and\\_streets/2610/ealing\\_school\\_streets](https://www.ealing.gov.uk/info/201146/neighbourhood_and_streets/2610/ealing_school_streets)


## 4.2.2 What are we doing next?

The council will continue to seek to create new routes across roads, railways, and canals, where these features block the easiest routes for pedestrians to get to important amenities.

We have pledged to invest £10 million to develop the Travel in Ealing Charter and active travel programme. The Travel in Ealing Charter is a document that sets out our commitment and approaches for engaging with people on future transport projects.

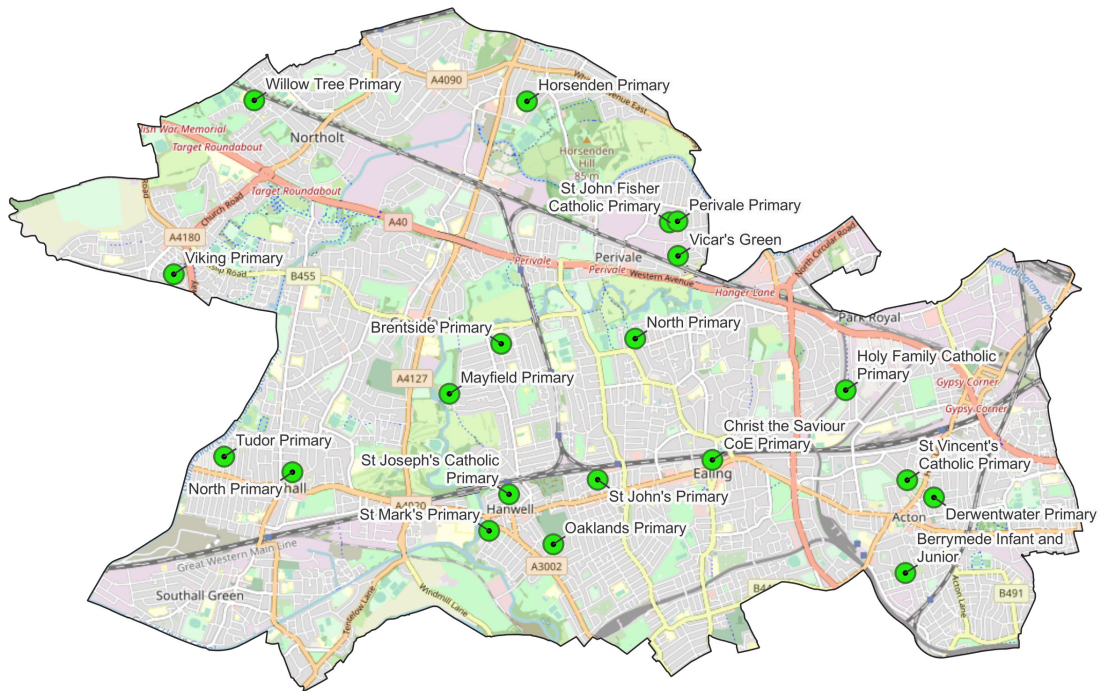
We will also provide £35 million funding for road and pavement infrastructure maintenance and improvements, including expanding the number of bike hangars to 150. and reclaiming road space for urban greening, sustainable drainage (SUDs) and other public realm improvements.

We will continue to assess our transport network to make sure we are reducing inequalities and removing barriers which may reduce the quality of life for a resident with impaired mobility.

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Ealing Council Cycle Plan 2019-2022</b>	Our Cycle Plan sets out a policy framework for encouraging cycling. The overall aim is for the borough to be an exemplar for cycling.	<a href="https://www.ealing.gov.uk/downloads/download/5404/cycling_plan">https://www.ealing.gov.uk/downloads/download/5404/cycling_plan</a>
<b>The National Cycle Network</b>	Assists in finding a cycle route, bike path or walking route near you through maps of the area. Traffic-free route guides are available throughout the UK.	<a href="https://www.sustrans.org.uk/national-cycle-network">https://www.sustrans.org.uk/national-cycle-network</a> <a href="https://www.sustrans.org.uk/get-your-traffic-free-route-guides/">https://www.sustrans.org.uk/get-your-traffic-free-route-guides/</a>



## 4.3 School Streets



The *School Streets* programme aims to improve children’s health by reducing their exposure to air pollution, and through the encouragement of active travel which can help reduce the health effects caused by obesity.

One quarter of London’s morning peak hour traffic is made up of families on the school run. In Ealing, 84% of primary school-aged children live within one mile of their school. This distance takes approximately 20 minutes to walk, or five minutes to cycle. The health benefits of active travel are well documented. Our *School Streets* initiative is designed to help make active travel easier, safer, and with better quality air for communities across the borough.

### 4.3.1 What is a School Street?

*School Streets* is a scheme where the streets near a school are closed to most traffic around school opening and closing times. Closing the streets to school and through traffic provides a low traffic area, making it easier for pedestrians and cyclists to use the road space and enable social distancing. *School Streets* help to achieve a safer, more pleasant environment for everyone using the streets, whilst maintaining access for residents and businesses within the designated zone.

Safer crossings and pedestrian infrastructure would make people feel more confident about letting their children walk.

## 4.3.2 How will School Streets increase active travel?

The schools that are taking part in *School Streets* are committed to encouraging walking, scooting, and cycling for the school journey. They want to reduce car use, congestion, and air pollution around their school to improve safety and health. The schools will support families that can use active modes of transport to increase their physical activity and improve health.

Ealing's first *School Street* was launched at Perivale Primary and St John Fisher Catholic schools in September 2020. This scheme was developed in consultation with the school and local community, over a period of 18 months. Almost 80% of those consulted agreed, or strongly agreed, that the *School Street* was a good idea.

We have pledged to build on this success to deliver 50 *School Streets* in Ealing by 2026.

## 4.4 Reducing vehicle idling


Leaving vehicle engines running while stationary is an unnecessary source of air pollution. The pollution caused by idling is highly localised and concentrated around areas with high footfall, such as schools. Younger people are more vulnerable to air pollution as they take twice as many breaths per minute compared to adults, and breathe closer to vehicle exhausts, so it is particularly important that we tackle idling emissions at these locations.

### 4.4.1 What are we doing now?

Our approach combines public awareness and education, anti-idling signage, and enforcement to target idling hotspots such as schools and taxi ranks. Anti-idling signage is in place at a number of locations across Ealing.

We are part of the Mayor of London's Idling Action London campaign, which delivers idling action events, school workshops, and business engagement.

Free driver training and resource toolkits are available for businesses to educate their staff on how to best to reduce air pollution and protect their health.




Switching off our engines when idling is an easy win for improving air quality.

### 4.4.2 What are we doing next?

We are identifying pollution hotspots for additional anti-idling measures and continuing our public awareness and education campaigns. By focusing our efforts on the areas where the most vulnerable people are affected, we hope to reduce the impacts of idling vehicles as much as possible.

We are also planning to introduce further anti-idling signage at pollution hotspots across Ealing for 2023 and beyond, and are investigating ways to make these signs more impactful by introducing enforcement via a borough-wide traffic management order (TMO) under section 6 of the Road Traffic Regulation Act 1984, based on the exemplar TMO provided by Idling Action London, that has also been implemented in the London Borough of Camden. A borough-wide TMO would provide consistency and parity across the borough and enable more equitable enforcement to take place across the whole borough.

Ealing Council will also campaign to win the powers we need from the Government to ramp up fines for idling vehicles to the maximum.

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Idling Action</b>	Ealing Council is now part of a pan-London group of councils who are working together to find a viable and workable solution to address vehicle idling. The group has delivered school workshops, engaged with businesses and offered vehicle fleet training. You can also volunteer for local anti-idling initiatives.	<a href="https://idlingaction.london/">https://idlingaction.london/</a>
<b>Engine Off Every Stop</b>	Ealing Council is supporting a London-wide campaign, "Engine Off Every Stop". This aims to reduce avoidable air pollution, particularly NO <sub>2</sub> , from idling vehicles.	<a href="https://www.aroundealing.com/news/engines-off/">https://www.aroundealing.com/news/engines-off/</a>

## 4.5 Improving emissions from the council fleet

Freight vehicles, including HGVs and LGVs, make significant contributions to NO<sub>2</sub> concentrations in Ealing. Our Air Quality Action Plan includes several actions which aim to reduce pollution from freight vehicles, including those owned by the council and operated privately.



WestTrans, which operates our fleet, has secured Champion status through the Fleet Operator Recognition Scheme (FORS)<sup>27</sup> in recognition of our updated procurement practices, which include FORS accreditation requirements for any procured freight or fleet functions. As a result, 100% of the fleets operated on behalf of the council are now FORS-compliant.

Ealing Council are also in the process of reorganising freight to consolidate deliveries by participating in new logistics facilities. This will reduce congestion and vehicle emissions, and improve road safety.

The reorganisation is already being implemented at Ealing Broadway, and will be implemented in the Park Royal/East Acton area where air quality is adversely affected by the A40 and A406 road corridors.

Additionally, in Ealing Broadway, several schemes have successfully reduced annual vehicle trips. Examples of measures implemented to achieve this include the promotion of a centralised recycling and pest control service to businesses, and a food waste recycling scheme. These schemes will be replicated elsewhere in Ealing, using the Mayor's Air Quality Fund.

Car clubs can reduce congestion, reduce parking pressure, and cut pollution. Being a car club member in Ealing means you have access to a fleet of cars and vans across the borough. Cars can be booked for as little as an hour and there are discounted rates, whole day hire, or long term hire available.

A Zipcar Flex floating car club with EVs was introduced in Acton/Ealing in July 2021. As these car club vehicles are less polluting than the average car, using a car club can save money and reduce your air pollution footprint for essential journeys.

### Where to find more information

Tool / Resource	Description	Link
<b>Local Car Clubs</b>	Local car clubs including ZipCar, Enterprise Car Club, HertzOnDemand now contribute over 100 vehicles in the borough.	<a href="http://www.zipcar.co.uk/">http://www.zipcar.co.uk/</a> <a href="https://www.enterprise-carclub.co.uk/gb/en/home.html">https://www.enterprise-carclub.co.uk/gb/en/home.html</a> <a href="https://www.hertz247.co.uk/uk/en-gb/Home">https://www.hertz247.co.uk/uk/en-gb/Home</a>

<sup>27</sup> Fleet Operator Recognition Scheme <https://www.fors-online.org.uk/cms/>

## 4.6 Public transport

Encouraging people in Ealing to use public transport where possible is vital if we want to encourage people to take fewer journeys by car.

### What are we doing now?

Ealing is already well-served by public transport: 91% of Ealing residents are within five minutes' walk of a bus service, and 99% are within seven minutes' walk (at average walking speed).

However, these routes don't always provide simple routes for journeys in the Borough. Public transport in Ealing needs to be easier, more convenient and safer for all, especially children, older adults, disabled people and other vulnerable users of our roads.

The Elizabeth Line, opened in 2021, provides more connectivity between Ealing, Reading and Central London. In addition to the extra routes, improvements have been made to several stations in Ealing to make stations more accessible. The West Ealing, Ealing Broadway, Acton Main Line and Southall stations now have step-free access from street to platform. Improvements have also been made to existing platforms, including new signage, waiting rooms, and customer information screens. Southall Station has been rebuilt with a ticket hall and ticket gates. Toilets and waiting rooms in the station have been refurbished, and three new lifts and a footbridge provide step-free access to platforms.

The council supports school children, the elderly, and those with a mobility impairment in accessing public transport, currently spending around £19 million every year on concessionary fares for school children.


### What are we doing next?

In the long term, Transport for London is considering the West London Orbital railway scheme. This is an extension to the London Overground that would improve rail connectivity across West and North-West London, making it easier to travel around Ealing and to neighbouring boroughs directly without travelling towards Central London.

Reducing emissions from public transport is a key step to making transport in Ealing more sustainable. Buses can make significant contributions to local concentrations of air pollutants, particularly where older diesel models are used. TfL have set a target of operating a zero-emission fleet by 2030, which will have direct benefits for air quality and climate change.

The key air quality impacts associated with the rail networks include emissions from older diesel trains, and emissions associated with construction and development. Many of the rail networks have already transitioned to electric, and construction and demolition impacts are managed through the planning process (see Section 6).

There are a number of tools available to help you plan your journeys in a way that reduces your air pollution footprint and limit your exposure:

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Council Website</b>	<p>Travel options such as public transport and parking.</p> <p>Clean air route finder.</p> <p>If you live in London and do not have access to off-street parking, you can contact your borough and suggest that an on-street electric vehicle charge point is delivered near your home.</p>	<p><a href="https://www.ealing.gov.uk/info/201173/transport_and_parking">https://www.ealing.gov.uk/info/201173/transport_and_parking</a></p> <p><a href="https://ealingair.org.uk/AirQuality/Default.aspx">https://ealingair.org.uk/AirQuality/Default.aspx</a></p> <p><a href="https://www.londoncouncils.gov.uk/our-key-themes/transport/electric-vehicle-charging/suggest-location-ev-charge-point">https://www.londoncouncils.gov.uk/our-key-themes/transport/electric-vehicle-charging/suggest-location-ev-charge-point</a></p>
<b>Transport for London (TfL)</b>	<p>The TfL STARS programme helps schools to commit to more active, safe and sustainable travel.</p> <p>A variety of Ealing-specific sustainable travel advice and information sources can be found through the TfL website<sup>28</sup>.</p>	<p><a href="https://stars.tfl.gov.uk/">https://stars.tfl.gov.uk/</a></p> <p><a href="https://tfl.gov.uk/info-for/boroughs-and-communities/ealing">https://tfl.gov.uk/info-for/boroughs-and-communities/ealing</a></p>
<b>School Run Travel Apps</b>	<p>There are several school-run travel apps which help to find healthier, active and sustainable travel routes to school, for example, by facilitating carpooling, finding routes with less traffic, tracking kids' journeys, or coordinating walking and cycling groups; e.g. SchoolRun or HomeRun.</p>	<p><a href="https://schoolrunsafe.com/">https://schoolrunsafe.com/</a></p> <p><a href="https://www.homerun-app.com/">https://www.homerun-app.com/</a></p>

28 Ealing TfL, <https://tfl.gov.uk/info-for/boroughs-and-communities/ealing>



 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Let's Go Southall</b>	The <i>Let's Go Southall</i> programme aims to encourage and support residents to be more physically active. Southall is one of 12 areas across the country that has been selected for a Sport England programme to help people to choose more active lifestyles.	<a href="https://letsgosouthall.org.uk/">https://letsgosouthall.org.uk/</a>

## 4.7 Ealing Spotlight: Acton

### The Area

Once an ancient village, Acton, meaning “oak farm”, is now a retail and commerce hub. It is located on the eastern side of the Borough of Ealing, and is the closest district to Central London. Acton is a large residential suburb, home to several schools and the South Acton estate. Acton has exceptional public transport connectivity with seven stations: one National Rail, two London Overground, and four London Underground.

The population of Acton – inclusive of East Acton, North Acton, South Acton, and Acton Green – is approximately 67,000. The top three ethnic groups from the 2011 census are White (61%), Asian/Asian British (14%), and Black (12%).

### Key Emission Sources

As the closest district to Central London, levels of air pollution tend to be higher in Acton than the rest of Ealing. The **A40 dual carriageway** that cuts through Acton allows traffic through to central London and is subject to periods of congestion.

There is also a retail and commerce hub along Uxbridge Road, which contributes to congestion and elevated air pollution.



The Acton Goods Yard on Horn Lane has historically released high levels of dust, leading to annual average PM<sub>10</sub> concentrations on Horn Lane exceeding the UK National Air Quality Objective.

## Local Actions to Improve Air Quality

### Transport emissions:

As of the 25<sup>th</sup> of October 2021, the area east of the A406 ring road, including all of Acton, is within the London ULEZ. This means that vehicles within Acton need to meet specific emission standards or pay a daily charge to drive. The ULEZ is designed to encourage a shift to alternative forms of travel, including active travel, public transport, and the use of cleaner vehicles. On the 29<sup>th</sup> of August 2023, the ULEZ will be expanded to cover all of Ealing.



### Industrial emissions:

In addition to the ULEZ, a Low Emissions Strategy<sup>29</sup> was developed for Acton Goods Yard to reduce particulate matter concentrations around Horn Lane. The aim of the strategy is to encourage the site operators to employ best practices, in order to reduce emissions and improve air quality.

### Public awareness:

During London Climate Action Week in July 2021 the London Transport Museum in Acton held public events to show how modern transport technology is transforming sustainable travel around Central London. The events were held as part of the wider 18-month Climate Crossroads<sup>30</sup> programme to engage the community and raise public awareness of sustainable cities, travel, transport, and greener skills for the future.



29 Low Emissions Strategy, Acton Goods Yard, Horn Lane, Acton. 2015. [https://www.londonair.org.uk/london/reports/LB\\_Ealing\\_Low\\_Emissions\\_Strategy\\_Acton\\_Goods\\_Yard\\_Horn\\_Lane\\_Acton.pdf](https://www.londonair.org.uk/london/reports/LB_Ealing_Low_Emissions_Strategy_Acton_Goods_Yard_Horn_Lane_Acton.pdf)

30 Climate Crossroads, London Transport Museum <https://www.ltmuseum.co.uk/about/climate-crossroads>

# 5

# Wood burning and improving indoor air quality

## In this section

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5.1 Ealing's Smoke Control Area

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5.2 What can I do?

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5.3 What are we doing next?

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## 5 Wood burning and improving indoor air quality

People in urban areas spend up to 90% of their time indoors<sup>31</sup>. The quality of air we breathe indoors is affected by many factors, including both outdoor air pollution and activities inside the home, including burning solid fuels, tobacco smoke and cooking.

Solid fuels are by far the most polluting method of domestic heating, causing both indoor and outdoor air pollution. The main pollutant emitted by burning solid fuels like wood is ultra-fine particulate matter, PM<sub>2.5</sub>. PM<sub>2.5</sub> is widely acknowledged as being the air pollutant with the greatest impact on human health.

Emissions of PM<sub>2.5</sub> from domestic wood burning in London have increased by 35% between 2010 and 2020, and as a result domestic wood burning is one of the most important sources of PM<sub>2.5</sub> pollution in Ealing, accounting for 20% of all emissions. A 2016 government survey found that 7.5% of London's homes burned wood.

### 5.1 Ealing's Smoke Control Area

The whole of Ealing is a Smoke Control Area. This means that:

- Burning coal, wood or other non-authorized fuels on open fires is banned;
- There's a limit on how much smoke you can release from a chimney;
- Burning smokeless fuels is allowed.

Ealing Council has a responsibility to investigate any complaints about smoke that might constitute a "statutory nuisance". Offenders can be fined £5,000 (or up to £20,000 for industrial, trade or business premises).

31 <https://www.ncbi.nlm.nih.gov/pubmed/11477521>



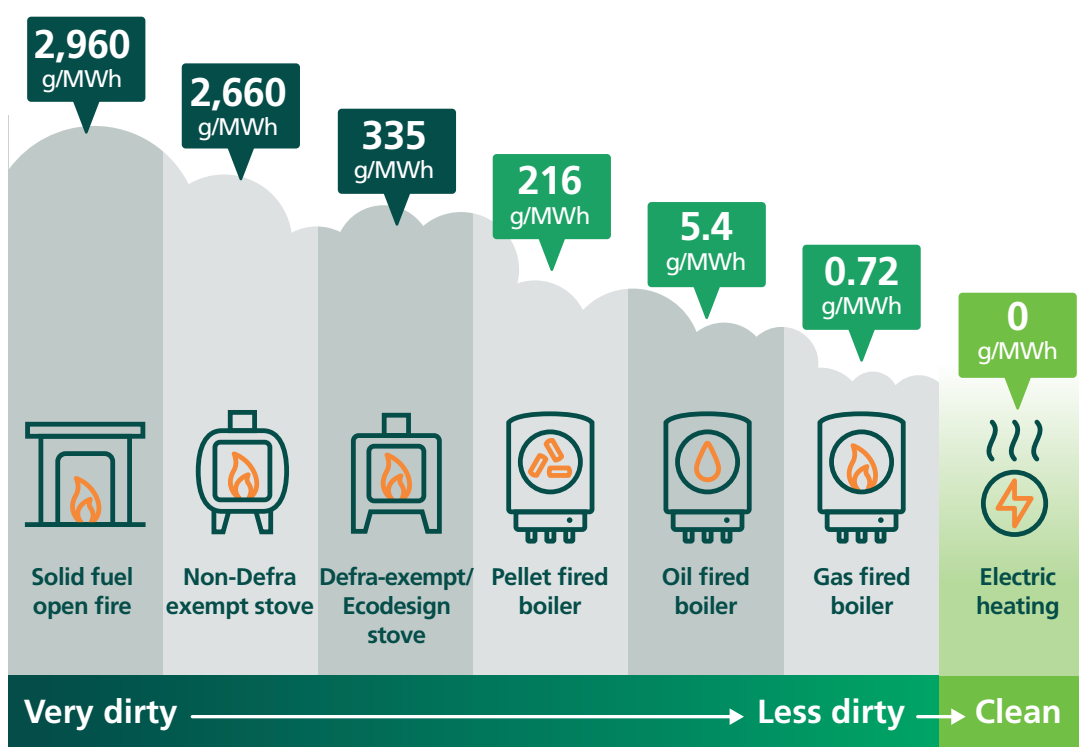
## 5.2 What can I do?

The best way to reduce your exposure is to stop burning or reduce the amount you burn.

If you are going to burn, what you burn and how you burn it can make a big difference to the pollution it creates. Emissions from fireplaces can be reduced **but not eliminated** by:

- Burning dry fuel rather than wet wood, as this emits less pollution. The Ready-to-Burn scheme certifies less-polluting wood;
- Burning in an Ecodesign stove rather than on an open fire (which is banned in Ealing);
- Not burning construction wood or painted wood, which can contain harmful metals;
- Ensuring that your stove is well-maintained.

The relative PM<sub>2.5</sub> emissions from domestic heating methods<sup>32</sup>




<sup>32</sup> Chief Medical Officer's annual 2022 report: Air Pollution [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1124738/chief-medical-officers-annual-report-air-pollution-dec-2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1124738/chief-medical-officers-annual-report-air-pollution-dec-2022.pdf)

## 5.3 What are we doing next?

Wood burning stoves pose a particular challenge for local authorities across the country, as they can make significant contributions to background levels of air pollution, but can be difficult to regulate. Our target is to ensure that 100% of smoke complaints are investigated within 48 hours.

2022 saw the introduction of the Ecodesign Regulations, which require all new solid fuel burning room heater appliances to have been independently tested to show that they meet minimum seasonal efficiency standards and maximum emission limits for a range of pollutants. This is expected to have widescale benefits for background air quality levels.

Ealing Council have set plans for action to improve the energy efficiency of housing in the area, which also improves indoor air quality. As housing is Ealing's largest source of carbon emissions, improving energy efficiency is a key priority for the borough.

 <b>Where to find more information</b>		
<b>Tool / Resource</b>	<b>Description</b>	<b>Link</b>
<b>Smoke control areas rules</b>	Rules for smoke control areas, including information on penalties	<a href="https://www.gov.uk/smoke-control-area-rules">https://www.gov.uk/smoke-control-area-rules</a>

# 6

# Reducing the impact of new and existing developments

## In this section

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6.1 What are we doing now?

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6.2 What are we doing next?

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6.3 Ealing Spotlight: Southall

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## 6 Reducing the impact of new and existing developments

Ealing has delivered one of the most ambitious house-building programmes in London and we will have built 2,700 genuinely affordable homes for people across the borough by 2022. The council plans to continue this ambitious programme going forward.

However, new developments can introduce new emission sources and put additional pressure on areas that are already experiencing heightened air pollution levels. Demolition and construction activities, if not managed appropriately, can also result in emissions of particulates and dust, and involve the use of plant machinery. However, if planning is tackled correctly, it can improve air quality, create sustainable urban locations, improve health, and provide a better living environment. Local planning or placemaking can be used to improve and maintain good air quality.





## 6.1 What are we doing now?

**Ensuring the impacts of new developments are appropriately assessed** – The council’s Sustainable Design and Construction Supplementary Planning Guidance<sup>33</sup> supports developers to achieve sustainable development, including through ensuring the developments are air quality neutral for buildings and transport. An air quality assessment would normally be expected for various types of development, for example proposals that will result in increased local vehicle trips or congestion, or those with a large number of parking spaces<sup>34</sup>.

**Controlling emissions of odours and dust** – To manage odours and dust from construction and commercial premises, the council follows the Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance<sup>35</sup>. This provides detailed guidance to reduce emissions of dust, PM<sub>10</sub>, and PM<sub>2.5</sub> from construction and demolition activities.

**Reducing emissions from plant machinery** – Non-road mobile machinery (NRMM) includes any mobile machine or vehicle that is not solely intended for carrying passengers or goods on the road. NRMM, particularly from the construction sector, is a significant contributor to London’s air pollution. Emissions standards for diesel powered machinery are gradually getting tighter for NRMM in London, and by January 2040 only zero-emission machinery will be allowed.

Development needs to be sustainable, accessible, and equitable, to help reduce emissions

## 6.2 What are we doing next?

Ealing is expected to see ongoing development in the coming years, both to ensure improvements for local communities and to support forecast growth in the number of residents. Ealing are currently developing a new Local Plan, which will set out the vision for the borough and describe the safeguards to be adopted to ensure new development does not inhibit the council’s air quality objectives.

33 Sustainable Design and Construction Supplementary Planning Guidance, [https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/Sustainable%20Design%20%26%20Construction%20SPG.pdf)


34 Air Quality and Pollution, [https://www.ealing.gov.uk/download/downloads/id/1135/air\\_quality\\_and\\_pollution\\_supplementary\\_planning\\_guidance.pdf](https://www.ealing.gov.uk/download/downloads/id/1135/air_quality_and_pollution_supplementary_planning_guidance.pdf)


35 Dust and odours from commercial premises, [https://www.ealing.gov.uk/info/201199/air\\_quality/2057/dust\\_and\\_odours\\_from\\_commercial\\_premises](https://www.ealing.gov.uk/info/201199/air_quality/2057/dust_and_odours_from_commercial_premises)

The council has also pledged within its manifesto to:

- Launch a new tax on developers, and work towards raising at least £12 million per year to fund new infrastructure, education, health and community facilities.
- Create a new Local Plan to give residents and businesses confidence that our borough can change for the better in the coming decade.
- Implement a “retrofit first” principle for council buildings and deliver zero-carbon development as standard whilst ensuring any carbon offset payments that do occur are invested locally to make our borough greener.
- Resist any attempts by national government to reduce the level of power held by local authorities to decide on matters relating to planning.

We will continue to campaign for greater powers to regulate polluting industries, and for a Clean Air Act that gives us the tools we need to tackle poor air quality, smells and pollutants from industry and new developments.

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>RE:NEW and RE:FIT programmes</b>	Government-led programmes to support energy efficiency at work and home.	<a href="https://www.london.gov.uk/what-we-do/environment/energy/renew-0">https://www.london.gov.uk/what-we-do/environment/energy/renew-0</a>  <a href="https://localpartnerships.org.uk/our-expertise/re-fit/">https://localpartnerships.org.uk/our-expertise/re-fit/</a>
<b>The Energy Saving Trust</b>	The Energy Saving Trust helps households, businesses, and organisations to save energy.	<a href="https://energysavingtrust.org.uk/">https://energysavingtrust.org.uk/</a>
<b>Green Deal</b>	The Green Deal is a government scheme, introduced in October 2012, designed to help homeowners and tenants to increase the energy efficiency of their homes.	<a href="https://www.gov.uk/guidance/getting-a-green-deal-information-for-householders-and-landlords">https://www.gov.uk/guidance/getting-a-green-deal-information-for-householders-and-landlords</a>

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Green Homes Together</b>	A Community Interest Company formed by a consortium of 15 local authorities, including the London Borough of Ealing, and the National Energy Foundation. Green Homes Together is your local Green Deal Provider, in partnership with Ealing Council, offering householders energy saving advice and support.	<a href="https://www.greenhomestogether.org.uk/">https://www.greenhomestogether.org.uk/</a>
<b>The Big London Energy Switch</b>	Ealing is part of the Big London Energy Switch (BLES). It brings people together to use collective buying power to secure better deals on their gas and electricity bills. Anyone who pays a bill can take part, including tenants and customers on pre-pay meters.	<a href="https://biglondonenergyswitch.co.uk/">https://biglondonenergyswitch.co.uk/</a>

## 6.3 Ealing Spotlight: Southall

### The Area

Southall is a vibrant region in the south-west of the Borough of Ealing. It is a mixed-use area with a large residential population, a bustling commercial area along Southall Broadway on Uxbridge Road, and an industrial zone.

There is also a large area of redevelopment at the former Southall Gasworks site, known as The Green Quarter. This is a major regeneration scheme to convert the site into a large mixed development for affordable housing, commerce, schools, public parkland, and a central park. Due to its historical use as a gasworks and chemical works site from the 19th century until the late 1960s, there was contamination of the soil which has since been treated in a soil hospital to make the land safe and suitable for its new uses, including housing.





Being a South Asian hub since the 1950s, Southall is often called Little Punjab or Little India. The Gurdwara Sri Guru Singh Sabha is one of the largest Sikh temples outside of India. The population of Southall – inclusive of Dormers Wells, Lady Margaret, Norwood Green, Southall Broadway, West Southall, and Southall Green – is approximately 54,000, and the average age is 35. The top three ethnic groups from the 2011 census are Asian/Asian British (64%), White (16%), and Black (12%). Two thirds of the Asian/Asian British population are Indian.

## Local Actions to Improve Air Quality

In recognition of the scale of the development and the potential impact of the scheme on future emissions of air pollutants and greenhouse gases, the council commissioned the preparation of a Low Emissions Strategy (LES) for The Green Quarter in 2019. The LES aims to set a course for the development to minimise pollutant emissions and achieve net zero-carbon emissions by 2050.

In response to concerns raised by local residents, the council have commissioned an **independent air quality monitoring survey** around the site and appointed a dedicated Environmental Health Officer to respond to issues raised by the local community. Near real-time data is available at [airqualityengland.co.uk](https://airqualityengland.co.uk). Further monitoring sites will be added in the coming months as part of Defra funded air quality monitoring project in and around schools. We have also commissioned **independent soil monitoring** on the site. The first results are now available.

The council encourages residents to report air quality concerns<sup>36</sup>. All reports are investigated through site visits from council officers based in Southall, and any necessary action is taken to mitigate the concerns, including stopping works during hot weather, and covering stockpiles.

Other local Southall development actions include the regeneration of the Havelock estate<sup>37</sup>. The £1 million project is refurbishing empty garages in the Willowbrook blocks to create new community facilities. The project was issued in response to resident complaints about the quality of life on the estate, namely poor environmental quality, anti-social behaviour, and a lack of facilities for young people. The redevelopment will increase access to local green space for healthy outdoor activities, and improve local air quality.

36 Southall Gasworks [https://www.ealing.gov.uk/info/201283/our\\_neighbourhoods/2613/southall\\_gasworks](https://www.ealing.gov.uk/info/201283/our_neighbourhoods/2613/southall_gasworks)

37 Ealing Council, 2022. New community facilities for Southall's Havelock estate [https://www.ealing.gov.uk/news/article/2163/new\\_community\\_facilities\\_for\\_southalls\\_havelock\\_estate](https://www.ealing.gov.uk/news/article/2163/new_community_facilities_for_southalls_havelock_estate)



# 7

# Green infrastructure

## In this section

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7.1 What are we doing now?

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7.2 What are we doing next?

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## Green infrastructure

Green infrastructure includes the creation of more natural spaces, better management of existing green spaces, and technology such as “green screens” where planted fences screen out airborne pollution. During the Covid-19 restrictions, we have all appreciated our local parks and green spaces more than ever.

Ealing’s Greenspaces Strategy<sup>38</sup> highlights the benefits of improving green infrastructure for local biodiversity, such as birds and pollinators, and local residents alike.

By providing space for recreation and being close to nature, green spaces have been shown to benefit physical and mental wellbeing. High quality green spaces have also been shown to have a positive impact upon property prices, and are good for business. Meanwhile, the level of protection green spaces provide by improving air quality and mitigating against the impacts of climate change also have economic value. Improved green spaces can encourage people to opt for active travel such as walking and cycling.

Planting street trees contributes to the council’s plans for Sustainable Drainage Systems (SuDS), which can be used to mimic natural drainage processes to reduce surface water run-off reaching traditional piped drainage, and can provide water quality improvement through settlement or biological breakdown of pollutants<sup>38</sup>.

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38 Ealing Greenspaces Strategy 2012-2017, [https://www.ealing.gov.uk/downloads/download/2459/ealing\\_greenspaces\\_strategy\\_2012-2017](https://www.ealing.gov.uk/downloads/download/2459/ealing_greenspaces_strategy_2012-2017)

39 Ealing’s transport strategy 2019-2022, [https://www.ealing.gov.uk/downloads/download/5418/ealings\\_transport\\_strategy\\_2019-2022](https://www.ealing.gov.uk/downloads/download/5418/ealings_transport_strategy_2019-2022)

## 7.1 What are we doing now?

We have planted 37,000 trees in Ealing in the 4 years from 2018 to 2022. An £830,000 River Brent restoration project with Thames21 has added flood resilience and improved habitats, to encourage greater biodiversity along the river corridor.

Ealing residents regularly volunteer their time to improve spaces where they live, including the greening of traffic islands and tree pits, and the creation of community gardens. In the Mill Hill Park conservation area of South Acton, a group of residents continue to sustain a small pocket park in Crown Street that in the past was underused as a result of anti-social behaviour. With the support of their ward councillors and assistance of council officers, the group designed the planting plan and encouraged additional assistance from the community<sup>40</sup>.

## 7.2 What are we doing next?

We want to build on the progress we have made in recent years by planting more trees, opening up more green space for people, and boosting our biodiversity. The council is prioritising the creation of new parks and open spaces, and has set an objective to achieve a 25% increase in tree canopy cover across Ealing by doubling the number of trees planted each year<sup>41</sup>. To achieve this objective, we have pledged to plant another 50,000 trees by 2026.

We will create 10 new parks and open spaces, give back to nature 800,000 m<sup>2</sup> (the same as 130 football pitches) through re-wilding and re-introducing wildlife, and pioneer 10 new community growing spaces in our housing estates and new developments.

The planning system includes a requirement for new developments to protect existing green spaces and identify and pursue new opportunities for green infrastructure. An example of this in action is the new Green Quarter development, which will provide 13 acres of new parkland and two new parks. The council will continue to use the planning system to ensure the provision of green spaces across the borough, and support local community greening projects.



<sup>40</sup> Local Strategic Partnership (LSP) borough plan (2018-2022), [https://www.ealing.gov.uk/downloads/download/5415/local\\_strategic\\_partnership\\_lsp\\_borough\\_plan](https://www.ealing.gov.uk/downloads/download/5415/local_strategic_partnership_lsp_borough_plan)

<sup>41</sup> Ealing Council Climate and Ecological Emergency Strategy 2021-2030 [https://www.ealing.gov.uk/downloads/file/15879/climate\\_and\\_ecological\\_emergency\\_strategy\\_2021-2030](https://www.ealing.gov.uk/downloads/file/15879/climate_and_ecological_emergency_strategy_2021-2030)

 <b>Where to find more information</b>		
<b>Tool / Resource</b>	<b>Description</b>	<b>Link</b>
<b>Ealing Council Website</b>	Information on Parks and open spaces is provided through the Council's parks service.	<a href="https://www.ealing.gov.uk/info/201132/parks_and_open_spaces">https://www.ealing.gov.uk/info/201132/parks_and_open_spaces</a>
<b>The Tree Council</b>	The Tree Council provides advice about planting new trees and hedges – of the right kind and in the right place.	<a href="https://treecouncil.org.uk/">https://treecouncil.org.uk/</a>
<b>Conservation Charities</b>	Conservation charities such as the Royal Society for the Protection of Birds (RSPB) and Bumblebee Conservation Trust provide resources for how to support the environment in your local area and in your garden.	<a href="https://www.rspb.org.uk/birds-and-wildlife/advice/gardening-for-wildlife/">https://www.rspb.org.uk/birds-and-wildlife/advice/gardening-for-wildlife/</a>  <a href="https://www.bumblebeeconservation.org/">https://www.bumblebeeconservation.org/</a>
<b>Local Conservation Groups</b>	<p>Local conservation groups and community gardens such as the Ealing Wildlife Group run local conservation projects and are often looking for volunteers.</p> <p>You can volunteer with local community conservation and wellbeing projects such as those organised through <i>do something good</i> or Ealing Volunteer Centre.</p>	<a href="https://ealingwildlifegroup.com/">https://ealingwildlifegroup.com/</a>  <a href="https://ehcvs.org.uk/volunteering/">https://ehcvs.org.uk/volunteering/</a>  <a href="https://www.dosomethinggood.org.uk/volunteering">https://www.dosomethinggood.org.uk/volunteering</a>



# 8

# Raising awareness of air quality

## In this section

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8.1 What are we doing now?

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8.2 What are we doing next?

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8.3 Ealing Spotlight: Greenford

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# 8 Raising awareness of air quality

Ealing residents have told us how important it is to have good quality, reliable information. This enables people to make informed decisions around how their own behaviour impacts air quality in Ealing, and how they can reduce the air pollution they or their family members are exposed to.



## 8.1 What are we doing now?

The council works with residents, schools, charities, community groups, the NHS, and decision makers in order to raise awareness about the sources and impacts of local air quality. Several initiatives have already been implemented in Ealing with the aim of increasing awareness around the issues of air quality and benefits of active travel. These include:

- Ealing Council has signed up to both the GLA's air pollution alerts and the airTEXT tool<sup>42</sup>. These provide the public with daily air pollution forecasts and information on reducing personal exposure to poor air quality.
- We are engaging with businesses, the voluntary sector and schools to raise awareness of air quality issues. Awareness raising is also being enabled through work with Integrated Care Partnership (ICP) partners and through development activity for the Health and Wellbeing Strategy 2023-28.
- The council is engaging with the community through the Shaping Ealing campaign, which allows residents, businesses, and others to contribute to the development of Ealing and the towns within it, by joining a dedicated conversation to put local priorities under the spotlight<sup>43</sup>.
- The 'Let's Go Southall' programme aims to encourage and support residents to be more physically active. Southall is one of 12 areas across the country that has been selected for a Sport England programme to help people to choose more active lifestyles. One of the main messages to residents is that the smallest thing can make a huge difference to one's health and being more active now could improve quality of life<sup>44</sup>.

Transparency into where the data is sourced from and the reasons behind government investment is essential for Ealing residents.

## 8.2 What are we doing next?

The council will continue to engage with local community groups on air quality issues, ensuring the council is listening to the views and concerns of local residents, and providing access to update and transparent information on current air quality and the steps being taken to improve it.

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42 airText, <https://www.airtext.info/about>

43 Shaping Ealing, [https://www.ealing.gov.uk/info/201282/shaping\\_ealing](https://www.ealing.gov.uk/info/201282/shaping_ealing)

44 Let's Go Southall, <https://letsgosouthall.org.uk/>

We are planning to incorporate high pollution alert service information into the Health Protection Forum and relevant severe weather response and planning forums. We are also working on awareness raising for airText and other air pollution alert services for primary care services. 42 schools in Ealing have achieved or are working towards TfL STARS accreditation.

## 8.3 Ealing Spotlight: Greenford

### The Area

Greenford is a residential area in the north of the Borough of Ealing. It has a small town centre, with a diverse community. Key attractions in the area include Horsenden Hill, the highest point in the borough, and Ravenor Park.

The population of Greenford – inclusive of North Greenford, Central Greenford, and Greenford Broadway – is approximately 46,000, and the average age is 35. The top three ethnic groups from the 2011 census are White (46%), Asian/Asian British (32%), and Black (13%). Just under half of the Asian/Asian British population are Indian.



### Key Emission Sources

Despite Greenford being a relatively residential neighbourhood, the area is transected by the A40 dual carriageway, which is a key traffic route between central London and Oxford. This road experiences regular periods of congestion and as a result, causes heightened concentrations of NO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> in the area.

Regular periods of congestion are not helped by the low accessibility of public transport connectivity in Greenford. This is primarily due to there being only one London Underground and National Rail station in Greenford, so the average distance to the station is lengthened. Bus services are also relatively infrequent. This can be challenging to improve, because these public transport services are operated by external organisations.



## Local Actions to Improve Air Quality

Ealing Council is focusing on raising awareness on the actions that local residents can take to personally improve air quality. This includes understanding the impacts of emissions from personal vehicles, and the benefits of sustainable active transport. Modal shift from personal vehicles to active and public transport through behavioural change will help to reduce the heavy congestion on the A40 dual carriageway that worsens air quality in Greenford.

In 2019, Ealing Council published The Ealing Transport Strategy,<sup>45</sup> which sets out several actions to encourage sustainable active travel. By 2041, Ealing Council aims for 80% of all journeys in the borough to be made by walking, cycling, and public transport.

Ealing Council is lobbying public transport operators to provide frequent, reliable, safe, affordable, and well-connected public transport to the community. This will reduce journey times and incentivise the switch from personal vehicles to public transport, thereby reducing vehicular emissions and improving air quality. The Greenford branch line is a significant project where Ealing Council is lobbying both the Department of Transport and the Mayor of London/TfL for frequency and service improvements on the Greenford branch line, including linking Greenford with the new Elizabeth Line.

Another way to incentivise public transport is to improve cycling infrastructure and safety, which is one of the key policy goals in the Ealing Transport Strategy. Cycling reduces the time spent travelling to stations. Policy actions include putting walking and cycling first in street design, as well as providing free cycling training in schools and to adults who live, work, or are educated in the borough.

<sup>45</sup> Ealing Transport Strategy 2019-2022 [https://www.ealing.gov.uk/downloads/download/5418/ealings\\_transport\\_strategy\\_2019-2022](https://www.ealing.gov.uk/downloads/download/5418/ealings_transport_strategy_2019-2022)

# 9

# Monitoring and review

## Monitoring and review

Monitoring and review is vital to track the performance of the actions set out in this Air Quality Strategy. The monitoring and review process will ensure we can respond to the air quality challenges in the borough in the most effective way possible.

Ealing Council will monitor, review, and regulate the measures discussed in this Strategy and the related Air Quality Action Plan to ensure the actions are achieving their aims and that Ealing is on track to achieve the National Air Quality Standards.

A combination of air quality monitoring data, and secondary data collected for each air quality action, will be used to monitor and evaluate the actions within the Air Quality Strategy. While monitoring air pollution concentrations provides an overview of air quality in Ealing, this does not provide information on how a particular action is performing or is contributing to any changes in air pollution. Therefore, indirect or secondary indicator data will also be used to track the progress of the Air Quality Strategy and actions within it. These types of indicators can also be more accessible when reporting to the public and other stakeholders.

The changes brought about by our actions can be compared with the original objectives, and a baseline where possible, to assess our performance. If actions are found to be underperforming, remedial measures can be implemented to get the actions back on track.

Monitoring and review is a continuous process of data gathering, assessment against objectives, and making changes to allow for improvement; therefore, the Air Quality Strategy will be reviewed and reported on at regular intervals, keeping stakeholders up to date with progress and any changes being made. This Air Quality Strategy will be subject to an in-depth review every five years to assess progress and adjust the air quality improvement goals for Ealing as necessary. The detailed actions in the Air Quality Action Plan will also be reviewed and updated every five years. Yearly updates on the Air Quality Strategy's progress will be provided in our Annual Status Reports, which can be found on the [EalingAir website](https://www.ealingair.org.uk)<sup>2</sup>.

# 10

# Other resources on air quality

## In this section

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10.1 Information on current air quality levels

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10.2 Health and wellbeing resources

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## 10 Other resources on air quality


A list of key resources is presented here. These are divided into resources which provide further information on air quality, and tools to help you take action, relating to transport, planning, green infrastructure and climate.


### 10.1 Information on current air quality levels

There are several useful points of information to check for updates about the status of local air quality. The following documents and websites provide information about NO<sub>2</sub> and particulate matter in Ealing, and across the UK.



## Resources providing further information on the status of air quality


 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Air Quality Action Plan</b>	The Air Quality Action Plan contains details of the measures the council will take to address exceedances of the UK National Air Quality Objectives for NO <sub>2</sub> and to reduce PM <sub>2.5</sub> emissions.	<a href="https://www.ealing.gov.uk/downloads/download/4240/air_quality_action_plan_aqap">https://www.ealing.gov.uk/downloads/download/4240/air_quality_action_plan_aqap</a>
<b>Annual Status Reports</b>	Ealing publishes its latest air quality monitoring data annually in Annual Status Reports, reporting on general air quality trends, and discussing areas which exceed National Air Quality Objectives.	<a href="https://www.ealing.gov.uk/info/201199/air_quality">https://www.ealing.gov.uk/info/201199/air_quality</a>
<b>Ealing Air</b>	The Ealing Air website includes general information about air quality in Ealing, and provides a clean air route planner to help you avoid pollution during your journeys.	<a href="https://ealingair.org.uk/">https://ealingair.org.uk/</a>
<b>AirTEXT</b>	airTEXT is a free tool providing air quality alerts 3-day forecasts of air quality, pollen, UV and temperature across Greater London. The forecasts are provided by Cambridge Environmental Research Consultants (CERC) with concentrations of four pollutants calculated. Schemes such as airTEXT have the potential to enable people within the borough to minimise their individual exposure to air pollutants.	<a href="https://www.airtext.info/">https://www.airtext.info/</a>

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>London Air Quality Network / LondonAir app.</b>	<p>Kings College London runs the London Air Quality Network on behalf of the London Boroughs, which provides a wealth of online air quality information and forecasting, including live data from the council's automatic air quality monitoring stations. Its website provides access to information about air pollution in every London Borough and some of the surrounding local authorities. Information about current air pollutant concentrations can also be accessed through the LondonAir app.</p>	<a href="https://www.londonair.org.uk">https://www.londonair.org.uk</a>
<b>CityAir app</b>	<p>The City of London Corporation has developed a free smartphone app which helps Londoners lower their impact on, and exposure to, air pollution.</p>	<a href="https://www.cityoflondon.gov.uk/services/environmental-health/air-quality/cityair-app">https://www.cityoflondon.gov.uk/services/environmental-health/air-quality/cityair-app</a>
<b>The Air Pollution Research in London (APRIL) network</b>	<p>The APRIL network does not provide data about air pollutants in Ealing, but aims to bring together scientists, policy makers and the wider community. The APRIL network identifies priority areas for research to improve air quality in London and other major cities, supports the development of new scientific research and communicates the latest research findings. APRIL holds regular meetings, generally hosted by the Greater London Authority (GLA) at City Hall.</p>	<a href="https://aprilresearchlondon.wordpress.com/">https://aprilresearchlondon.wordpress.com/</a>


## 10.2 Health and wellbeing resources

The following resources provide information about the impacts of air quality on health and wellbeing.

### Resources providing further information on health and wellbeing relating to air quality

 <b>Where to find more information</b>		
Tool / Resource	Description	Link
<b>Public Health England</b>	Provides information about the health impacts of air pollution.	<a href="https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution">https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution</a>
<b>London Councils</b>	Provide information about air pollution and the effects on our health.	<a href="https://www.londoncouncils.gov.uk/node/33227">https://www.londoncouncils.gov.uk/node/33227</a>
<b>Mayor of London</b>	The Mayor of London has provided a guide for public health professionals regarding air quality in Ealing.	<a href="https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_lb_ealing.pdf">https://www.london.gov.uk/sites/default/files/air_quality_for_public_health_professionals_lb_ealing.pdf</a>
<b>Ealing's Health and Wellbeing Strategy</b>	The Ealing Health and Wellbeing Strategy is a long-term way of meeting the needs of the local population. The 2023-28 strategy is being developed with a focus on addressing inequalities, to be launched in early 2023.	<a href="https://www.ealing.gov.uk/downloads/download/3755/health_and_wellbeing_strategy">https://www.ealing.gov.uk/downloads/download/3755/health_and_wellbeing_strategy</a>

## Resources providing further information on health and wellbeing relating to climate change

 <b>Where to find more information</b>		
<b>Tool / Resource</b>	<b>Description</b>	<b>Link</b>
<b>The Climate Risk Map</b>	The Climate Risk Map produced by the Mayor of London presents exposure and vulnerability to climate change across Greater London.	<a href="https://www.london.gov.uk/what-we-do/environment/climate-change/climate-adaptation/climate-risk-map">https://www.london.gov.uk/what-we-do/environment/climate-change/climate-adaptation/climate-risk-map</a>
<b>The Carbon Trust</b>	Organisations such as The Carbon Trust help business and the public sector cut carbon emissions.	<a href="https://www.carbontrust.com/">https://www.carbontrust.com/</a>
<b>Act for Ealing</b>	#ACTFOREALING is building a collaborative online space for organisations and individuals in Ealing to participate in a conversation about climate action in the borough. This space will share resources, events and information which cover the breadth of climate actions needed to reach the net zero target by 2030.	<a href="https://actforealing.org/">https://actforealing.org/</a>

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# LONDON BOROUGH OF EALING AIR QUALITY ACTION PLAN 2022-2027 - DRAFT

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## FOREWORD BY COUNCILLOR DEIRDRE COSTIGAN, DEPUTY LEADER OF EALING COUNCIL AND CABINET MEMBER FOR CLIMATE ACTION

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**Every Ealing resident deserves to breathe clean air and live a long and healthy life unaffected by air pollution.**

As a council, we have declared a climate emergency in order to recognise the urgency and scale of the negative impacts of climate change on our residents.

We now know that the cost to our health of breathing dirty air is higher than we imagined. It is shocking that in Ealing, every year 160 people die prematurely as a result of air pollution.

Air pollution disproportionately affects children, older people and those with underlying health conditions. But we also see a worrying correlation between poor quality air and those places in our borough with the highest levels of economic and social deprivation. So the climate emergency is a real and pressing issue not only for the future health of our planet, but also for the wellbeing of our residents.

It will come as no surprise then that improving the quality of the air in our borough is one of our key priorities. The creation of this new Air Quality Action Plan is essential in ensuring that we can deliver on this priority and it will play an absolutely vital role in achieving our climate action goals.

Contained in this Action Plan are the steps we will take to monitor and tackle air pollution and maintain good levels of clean air for all our residents to breathe.

I appreciate that bold policy action is not always universally popular, and that change may feel too quick for some, but we are making these changes with residents and everything in this Action Plan is based on consultation with and feedback from local people. As an open, transparent and inclusive council we will continue to work with and listen to residents about the changes they want to see for their towns and neighbourhoods.

This work is just part of our wider agenda on climate action, and we will implement it alongside improvements to our streets and pavements to encourage walking, cycling and scooting, the rollout of 50 school streets, and being one of the top three boroughs for recycling in London.





## Executive Summary

This Air Quality Action Plan (AQAP) has been produced as part of our duty to manage local air quality, in accordance with the guidance issued by the Mayor under London Local Air Quality Management. It outlines the actions we will take to improve air quality in the London Borough of Ealing between 2022 and 2027.

This Action Plan replaces the previous action plan which was published in 2017 outlining measures to be implemented in subsequent years. Highlights of successful projects delivered during the last Action Plan period include:

- Implementation of 220 Electric Vehicle charging points across the Borough;
- Successful implementation of a Borough-wide 20 mph speed limit in December 2021;
- Completion of the 100% emissions-based parking scheme: Low emission vehicles are offered a discount in pay & display and car parking spaces. There is a scale categorising each vehicle into one of 4 carbon dioxide (CO<sub>2</sub>) bands, with an additional surcharge added to diesel vehicles which are not Euro 6;
- Delivered 21 School Streets at March 2023, making it easier for pedestrians and cyclists to use the road space at school opening and closing times. School Streets help to achieve a safer, more pleasant environment for everyone using the streets whilst maintaining access for residents and businesses within the designated zone;
- Delivery of the Acton-Chiswick cycleway, Acton Town Centre and the Vale, Ealing Common, Hanwell Bridge and Greenford Road permanent cycle schemes under the London Streetspace Programme;
- Supporting the resident-led play streets initiative in setting up 25 streets in the borough.

Air pollution is associated with a number of adverse health impacts and 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<sup>1,2</sup>.

The annual health costs to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion<sup>3</sup>. Ealing Council is committed to reducing the exposure of people in Ealing to poor air quality in order to improve health.

Recent research has determined that in 2019 between 147 and 165 premature deaths in Ealing were attributable to the combined effects of NO<sub>2</sub> and PM<sub>10</sub><sup>4</sup>. According to Government's Clean Air Strategy 2019<sup>5</sup>,

<sup>1</sup> Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

<https://www.ncbi.nlm.nih.gov/pubmed/16234422>

<sup>2</sup> Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. [https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944\\_AQinequalitiesFNL\\_AEAT\\_0506.pdf](https://uk-air.defra.gov.uk/assets/documents/reports/cat09/0701110944_AQinequalitiesFNL_AEAT_0506.pdf)

<sup>3</sup> Defra. Air Pollution: Action in a Changing Climate, March 2010

<sup>4</sup> Environmental Research Group – Imperial College London, 2020, [London health burden of current pollution and future health benefits of mayoral air quality policies](#)

<sup>5</sup> Clean Air Strategy 2019, [Clean Air Strategy 2019 \(publishing.service.gov.uk\)](#)

evidence suggests that *“when all diseases are included, air pollution is expected to cause 2.4 million new cases of disease in England between now and 2035. PM<sub>2.5</sub> alone could be responsible for around 350,000 cases of coronary heart disease and 44,000 cases of lung cancer in England”*.

We have developed actions that can be considered under seven broad topics:

- **Monitoring and other core statutory duties:** maintaining monitoring networks is absolutely critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other very important statutory duties undertaken by boroughs, which form the basis of action to improve pollution;
- **Emissions from developments and buildings:** emissions from buildings account for about 15% of emissions of nitrogen oxides (NO<sub>x</sub>) across London<sup>6</sup> so are important in affecting NO<sub>2</sub> concentrations;
- **Public health and awareness raising:** increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
- **Delivery servicing and freight:** vehicles delivering goods and services are usually light and heavy duty diesel-fuelled vehicles with high primary NO<sub>2</sub> emissions;
- **Borough fleet actions:** our fleet includes light and heavy duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO<sub>2</sub> emissions. Tackling our own fleet means we will be leading by example;
- **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures; and
- **Cleaner transport:** road transport is the main source of air pollution in London, accounting for 62% of the emissions of NO<sub>x</sub> across London<sup>6</sup>. We need to incentivise a change to walking, cycling, public transport and ultra-low emission vehicles including electric vehicles as far as possible.

Our priorities are:

- Reduce road traffic emissions
- Improve indoor air quality and reduce emissions from wood burning
- Reduce emissions from construction of new developments
- Invest in green infrastructure
- Raise awareness of air quality
- We will also work with external partners such as the Greater London Authority (GLA) and the Environment Agency in order to implement measures at a wider scale and to continue implementing measures in relation to fugitive PM<sub>10</sub> emissions, in particular at Acton Goods Yard, Horn Lane.

You will see in this report that we have worked hard to engage with stakeholders and communities who can make a difference to air quality in the borough. We would like to thank all those who have worked with us in the past and we look forward to working with you again, as well with new partners, as we deliver this new action plan over the coming years.

In this AQAP we outline how we plan to effectively use local levers to tackle air quality issues within our control. However, we recognise that there are a large number of air quality policy areas that are outside of our influence

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<sup>6</sup> GLA and TfL air quality, [London Atmospheric Emissions Inventory 2019](#)

(such as Euro standards, national vehicle taxation policy, taxis and buses), and so we will continue to work with and lobby regional and central government on policies and issues beyond the London Borough of Ealing’s influence.

### Responsibilities and Commitment

This AQAP was prepared by Ealing Council’s Environmental Protection team, in association with Ricardo Energy and Environment, with the support and agreement of the following officers and departments;

Joe Blanchard – Head of Environmental Health & Trading Standards

Gina Cole - Head of Parking Services

Chris Cole - Head of Transport Planning Service

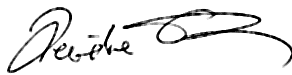
Russell Roberts – Principal Transport Planner,

Alex Jackson - Head of Planning

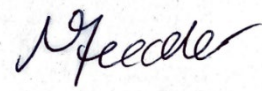
Joanne Mortensen - Climate Action Programme Manager

This Air Quality Action Plan has been approved by: e-signatures to be provided in final issue

Cllr. Deirdre Costigan - Deputy Leader of Ealing Council and Cabinet Member for Climate Change



.....



Nicky Fiedler – Strategic Director of Housing & Environment .....



Anna Bryden - Director of Public Health, .....

This AQAP will be subject to an annual review and appraisal of progress and reporting to the General Purposes Committee. Progress each year will be reported in the Annual Status Reports produced by the London Borough of Ealing as part of our statutory London Local Air Quality Management duties.

If you have any comments on this AQAP please send them to the Council’s Environmental Protection Team, Ealing Council, Perceval House, 14/16 Uxbridge Rd, London W5 2HL or Email: [Pollution-Technical@ealing.gov.uk](mailto:Pollution-Technical@ealing.gov.uk)

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## Abbreviations

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
ASR	Annual Status Report
CAB	Cleaner Air Borough
CHP	Combined Heat and Power
DPH	Director of Public Health
EV	Electric Vehicle
FORS	Fleet Operator Recognition Scheme
GLA	Greater London Authority
JSNA	Joint Strategic Needs Assessment
LAEI	London Atmospheric Emissions Inventory
LAQN	London Air Quality Network
LAQM	Local Air Quality Management
LB	London Borough
LIP	Local Implementation Plan
LLAQM	London Local Air Quality Management
MAQS	Mayor's Air Quality Strategy
MTS	Mayor's Transport Strategy
NRMM	Non-Road Mobile Machinery
OLEV	Office for Low Emission Vehicles
PM <sub>10</sub>	Particulate matter less than 10 micron in diameter
PM <sub>2.5</sub>	Particulate matter less than 2.5 micron in diameter
SPG	Supplementary Planning Guidance
STARS	Sustainable Travel: Active, Responsible, Safe
TfL	Transport for London
ULEZ	Ultra-Low Emission Zone
WLSRTP	West London Sub-Regional Transport Plan

## 1 INTRODUCTION

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- 1.1.1 This report outlines the actions that the London Borough of Ealing and others will deliver between 2022 and 2027 in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and those employed in or visiting the borough.
- 1.1.2 It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that Act and to meet the requirements of the London Local Air Quality Management statutory process.
- 1.1.3 This Plan will be reviewed every five years at the latest and progress on measures set out within this Plan will be reported on annually within Ealing's air quality Annual Status Report (ASR).

## 2 CURRENT AIR QUALITY IN EALING

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- 2.1.1 The UK Clean Air Strategy 2019 provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The national Air Quality Objectives take into account EU Directives that set limit values which member states are legally required to achieve by their target dates.
- 2.1.2 The London Borough of Ealing is meeting all of the national Air Quality Objectives other than those for nitrogen dioxide (NO<sub>2</sub>).
- 2.1.3 The London Borough of Ealing is meeting the current national AQS objectives for Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>).
- 2.1.4 However, for PM<sub>2.5</sub> the legal objective is significantly higher than the World Health Organisation (WHO) recommended guideline limit. As a result, the Mayor of London has committed to meeting the WHO health-based guideline limit of 10 µg / m<sup>3</sup> by 2030. PM<sub>2.5</sub> concentrations in the Borough currently exceed this WHO guideline limit.
- 2.1.5 There have also been concerns, and historical breaches of the air quality objectives, over a number of years regarding PM<sub>10</sub>, particularly at Acton Goods Yard, Horn Lane. Work has been undertaken putting in place a Low Emission Strategy for the site, as well as joint enforcement action by the Council and the Environment Agency.

### 2.1 AIR QUALITY MANAGEMENT AREAS AND FOCUS AREAS

- 2.1.6 In accordance with the LAQM process, Ealing Borough Council declared an Air Quality Management Area (AQMA) has been declared covering the whole borough in 2000.
- 2.1.7 The AQMA has been declared for nitrogen dioxide (NO<sub>2</sub>; annual mean objective) and Particulate Matter (PM<sub>10</sub>; 24-Hour mean objective), as both pollutants failed to meet the relevant air quality objectives. For PM<sub>10</sub>, air quality objectives are now being achieved, but there are still widespread exceedances of NO<sub>2</sub>, particularly along busy and congested roads. The London Borough of Ealing also has a formal responsibility to work towards reductions of PM<sub>2.5</sub>, which is a fraction of PM<sub>10</sub>, although the objective for this pollutant is a national rather than local requirement.

2.1.8 An Air Quality Focus Area is a location that has been identified by the GLA as having high levels of pollution and human exposure. There are currently 8 focus areas in the borough. These are:

- a. **Acton Central:** Acton A40 North Acton Station/Gypsy Corner/Savoy Circus;
- b. **Hanger Hill:** Hanger Lane/Twyford Abbey Road;
- c. **Perivale:** A40 Western Avenue Teignmouth Gardens to Alperton Lane;
- d. **Hanwell:** Hanwell Broadway, Ealing Broadway and Walpole;
- e. **South Acton:** Acton High Street/Gunnersbury Lane junction to rail in Acton High Street;
- f. **Southall:** King Street/The Green/Western Road/South Road;
- g. **East Acton:** Victoria Road/Portal Way/ Wales Farm Road; and
- h. **Central Greenford:** Greenford Road (junction with Rockware Avenue) to Greenford Road (junction with Whitton Avenue West)

2.1.9 The Air Quality Focus Areas are included on the maps of pollutant concentrations across Ealing borough (Figure 2-1 to Figure 2-3). The maps provide a context for concentrations of annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>. They are based on modelled concentrations from the London Atmospheric Emissions Inventory (LAEI) for 2019, the most recent available year.

## 2.2 MAPS OF POLLUTANT CONCENTRATIONS IN EALING

2.2.1 Figure 2-1 shows annual mean NO<sub>2</sub> concentrations across the London Borough of Ealing in 2019. It shows that the highest concentrations occur along main roads, reflecting that roads are the largest source of pollution within Ealing. There are large areas of the borough away from major roads where the annual mean NO<sub>2</sub> objective is being achieved.

2.2.2 Figure 2-1 shows the annual mean PM<sub>10</sub> concentrations, which again shows higher concentrations in the east of the borough (towards central London) and along major roads. A similar distribution is shown for PM<sub>2.5</sub> in Figure 2-3.

2.2.3 It should be noted that the objectives apply at locations where members of the public are likely to be regularly present and are likely to be exposed over the averaging period of the objective. The annual mean objectives for nitrogen dioxide and PM<sub>10</sub> are considered to apply at the façades of residential properties, schools, hospitals etc. The 24-hour objective for PM<sub>10</sub> is considered to apply at the same locations as the annual mean objective, as well as in gardens of residential properties and at hotels.

2.2.4 All maps also show the Air Quality Focus Areas within the borough.



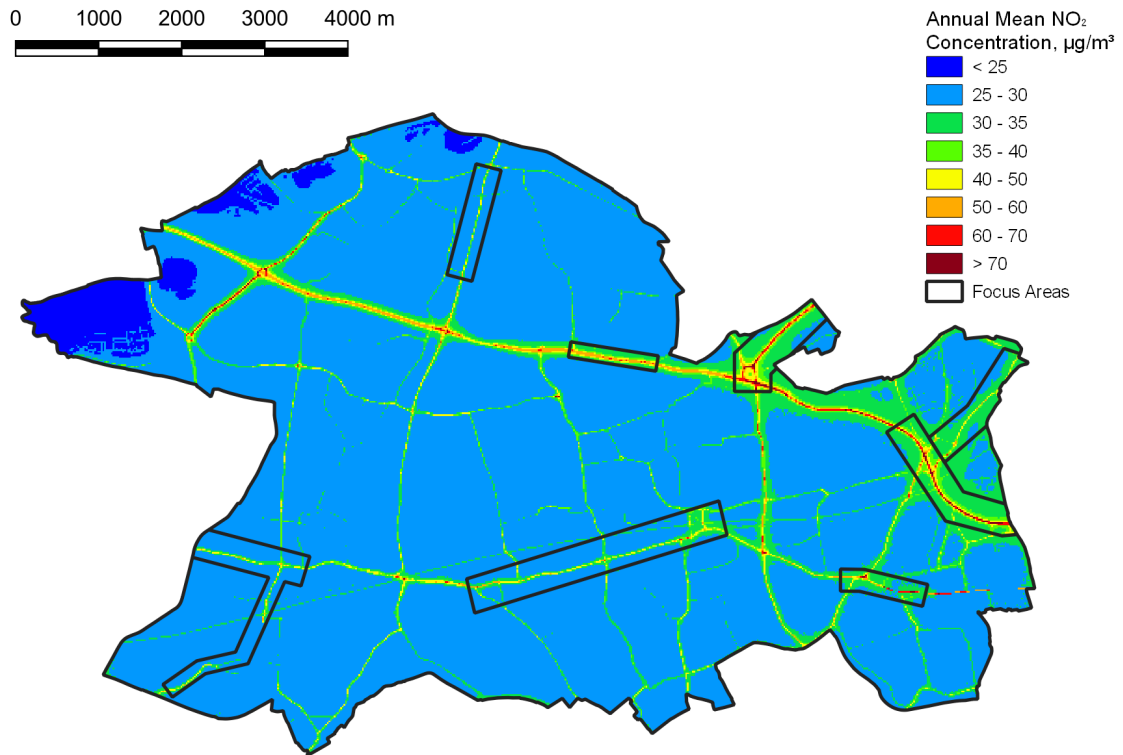


Figure 2-1: Modelled map of annual mean NO<sub>2</sub> concentrations including Air Quality Focus Areas (from the LAEI 2019)

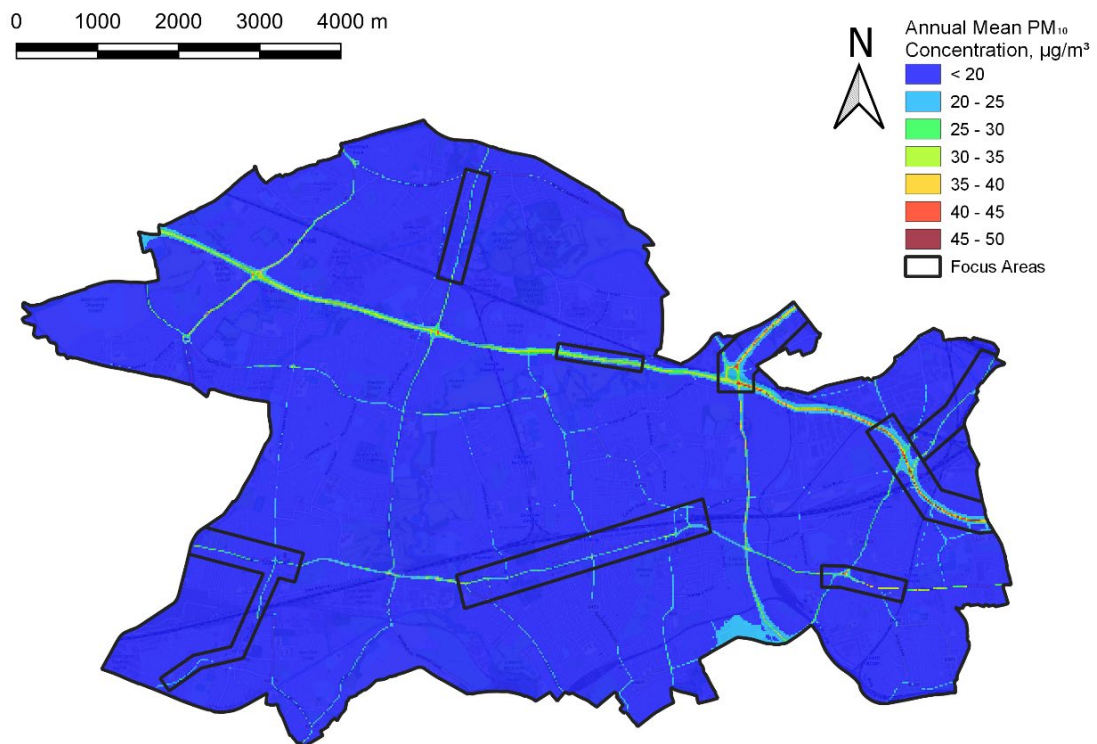


Figure 2-2: Modelled map of annual mean PM<sub>10</sub> concentrations including Air Quality Focus Areas (from the LAEI 2019)

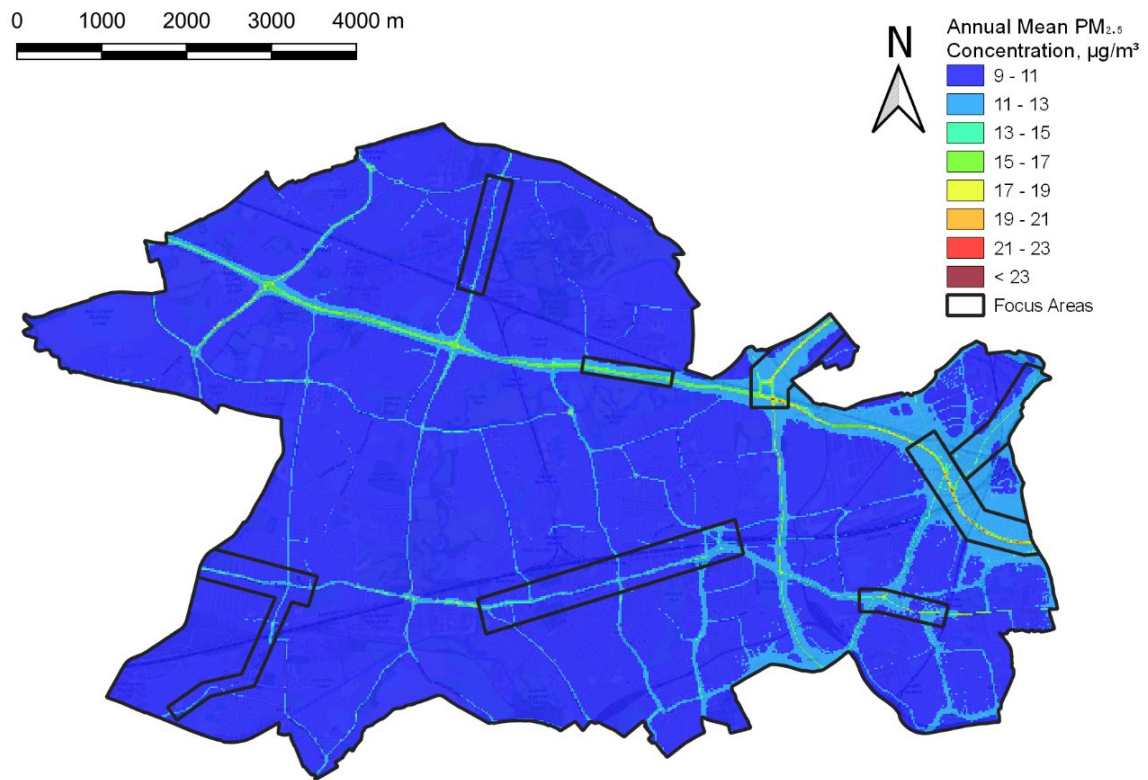


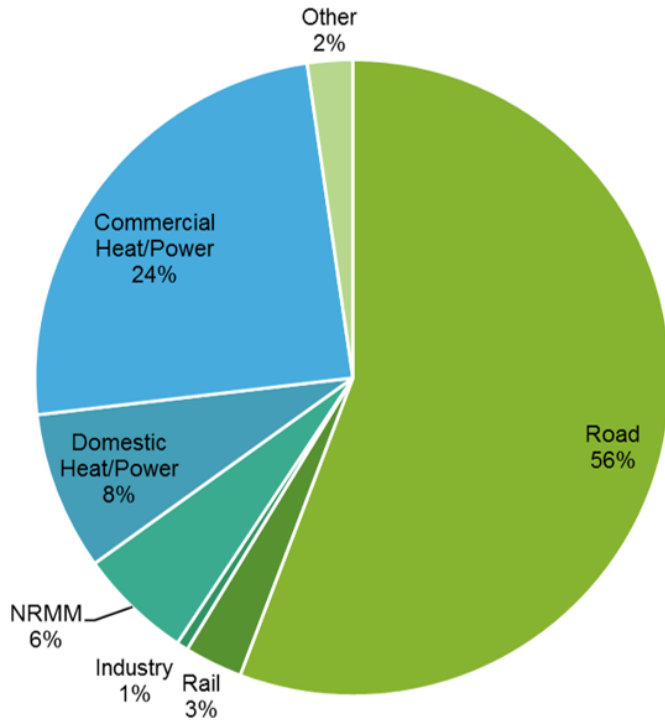
Figure 2-3: Modelled map of annual mean PM<sub>2.5</sub> concentrations (from the LAEI 2019)

## 2.3 SOURCES OF POLLUTION IN EALING

- 2.3.1 Pollution in Ealing comes from a variety of sources. This includes pollution from sources outside the borough, and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.
- 2.3.2 Figure 2-4 and Figure 2-5 present the total emissions of NO<sub>x</sub> originating in Ealing by emissions sector. The main sources of NO<sub>x</sub> emissions that originate in Ealing are road transport and domestic and commercial heating (i.e. boilers). Diesel vehicles dominate the road transport contribution to total NO<sub>x</sub> emissions, with the most important contributor being diesel cars (35%), followed by LGVs (26%).
- 2.3.3 Since the publication of the previous Air Quality Action Plan for 2017 –2021, where emissions for 2013 were presented, there have been significant reductions in emissions from a number of sectors, including road transport, rail, and industry. As a result, total NO<sub>x</sub> emissions in Ealing have reduced compared to 2013.
- 2.3.4 Figure 2-6 and Figure 2-7 present the total emissions of coarse particulate matter (PM<sub>10</sub>) in the borough divided by emissions sector and vehicle category, respectively. The most important emissions sectors are road transport, resuspension, and construction. Emissions from the road transport sector are dominated by the contributions from diesel cars (27%) and petrol cars (31%).
- 2.3.5 The main sources of fine particulate matter (PM<sub>2.5</sub>) in Ealing are road transport, domestic and commercial combustion, and wood burning, as shown in Figure 2-8. Emissions from construction are significantly reduced compared to PM<sub>10</sub> emissions. As for PM<sub>10</sub>, the majority of PM<sub>2.5</sub> emissions from road transport are caused by petrol and diesel cars.
- 2.3.6 Unlike other pollutants, such as NO<sub>2</sub>, a large proportion of PM<sub>2.5</sub> in London comes from outside London and even the UK<sup>7</sup>. In 2016 the estimated background concentration for PM<sub>2.5</sub> was 10.2 µg/m<sup>3</sup>, meaning that the external contribution to London's PM<sub>2.5</sub> levels alone were above the WHO guideline of 10 µg/m<sup>3</sup>.

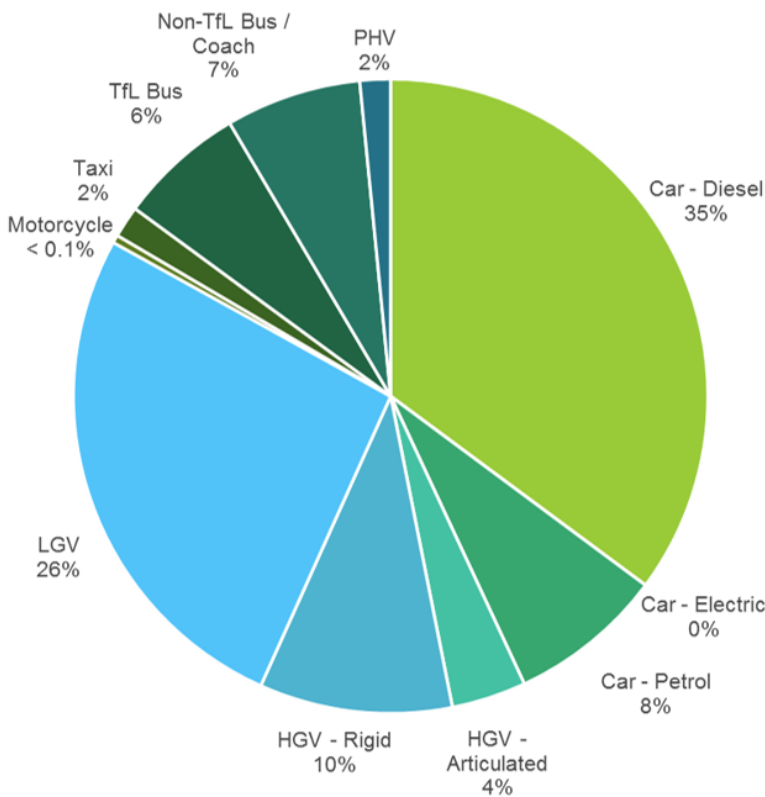
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<sup>7</sup> PM<sub>2.5</sub> in London, 2019. [https://www.london.gov.uk/sites/default/files/pm2.5\\_in\\_london\\_october19.pdf](https://www.london.gov.uk/sites/default/files/pm2.5_in_london_october19.pdf)



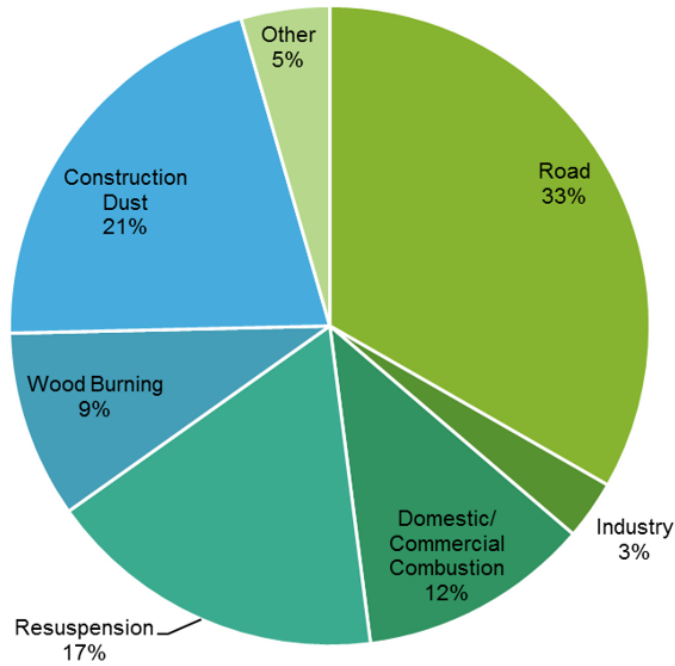
Sector	NOx Emissions in 2019 (tonnes)
Road	669
Rail	36
Industry	7
NRMM	69
Domestic Heat/Power	97
Commercial Heat/Power	295
Other	28

Figure 2-4: NOx emissions by source in Ealing in 2019 (from the LAEI 2019)



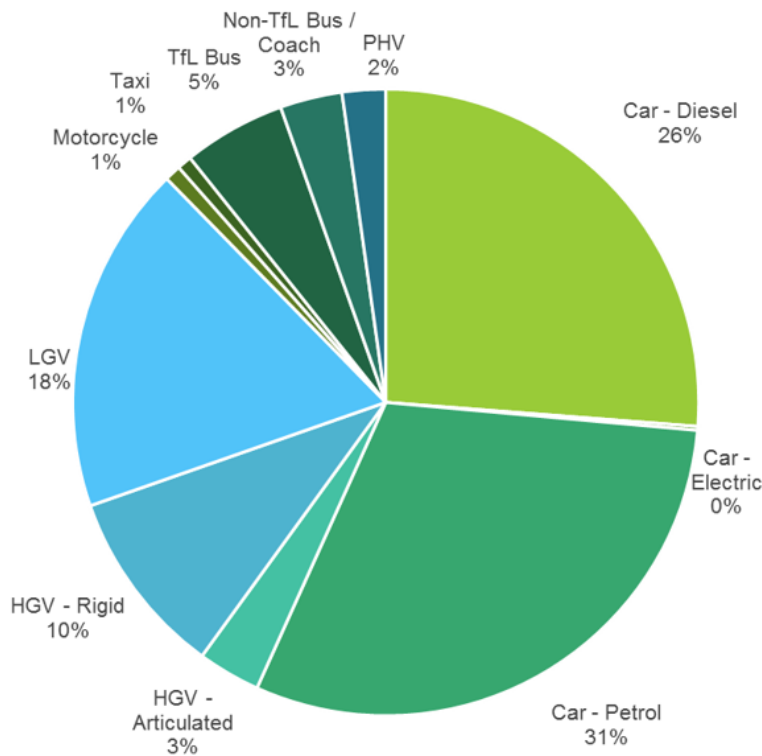
Sector	NOx Emissions in 2019 (tonnes)
Car - Diesel	235
Car - Electric	0
Car - Petrol	53
HGV - Articulated	25
HGV - Rigid	66
LGV	176
Motorcycle	3
Taxi	11
TfL Bus	43
Other Bus/Coach	46
PHV	10

Figure 2-5: NOx emissions by vehicle type in Ealing in 2019 (from the LAEI 2019)



Sector	PM <sub>10</sub> Emissions in 2019 (tonnes)
Road	90.4
Industry	8.1
Domestic/Commercial Combustion	31.8
Resuspension	46.8
Wood Burning	25.7
Construction Dust	56.8
Other	12.2

Figure 2-6: PM<sub>10</sub> Emissions by source (from the LAEI 2019). “Other” includes Non-Road Mobile Machinery.



Sector	PM <sub>10</sub> Emissions in 2019 (tonnes)
Car - Diesel	23.7
Car - Electric	0.2
Car - Petrol	27.4
HGV - Articulated	2.9
HGV - Rigid	8.7
LGV	16.3
Motorcycle	0.8
Taxi	0.7
TfL Bus	4.8
Other Bus/Coach	2.9
PHV	2.0

Figure 2-7: PM<sub>10</sub> Emissions by vehicle type (from the LAEI 2019)

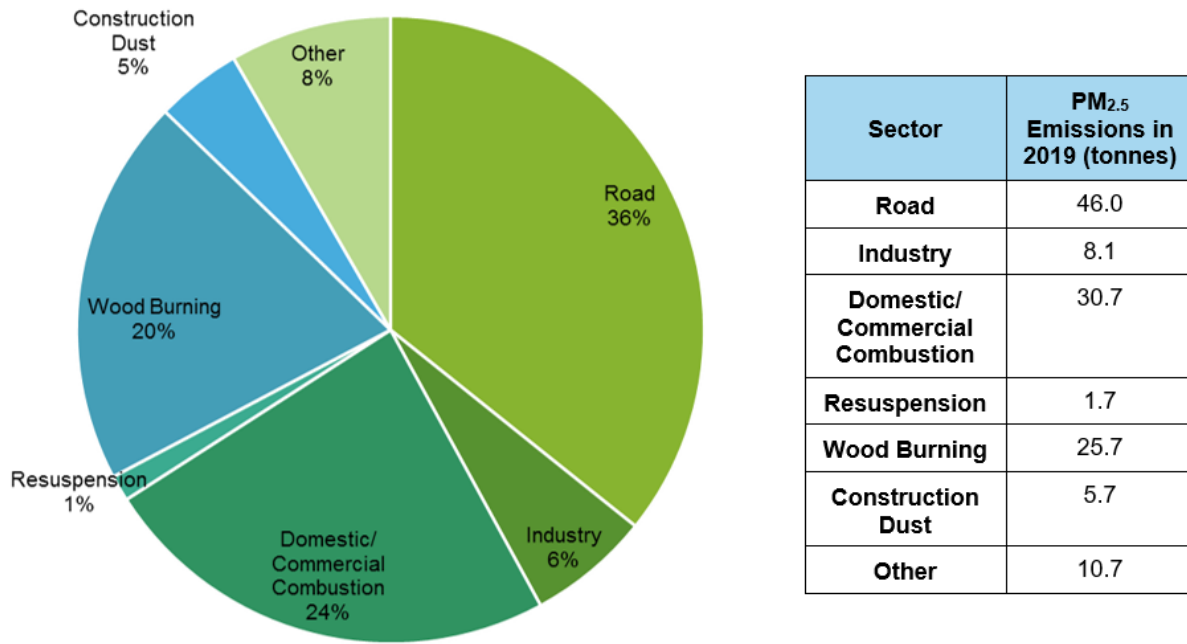


Figure 2-8: PM<sub>2.5</sub> Emissions by source (from the LAEI 2019). "Other" includes Non-Road Mobile Machinery

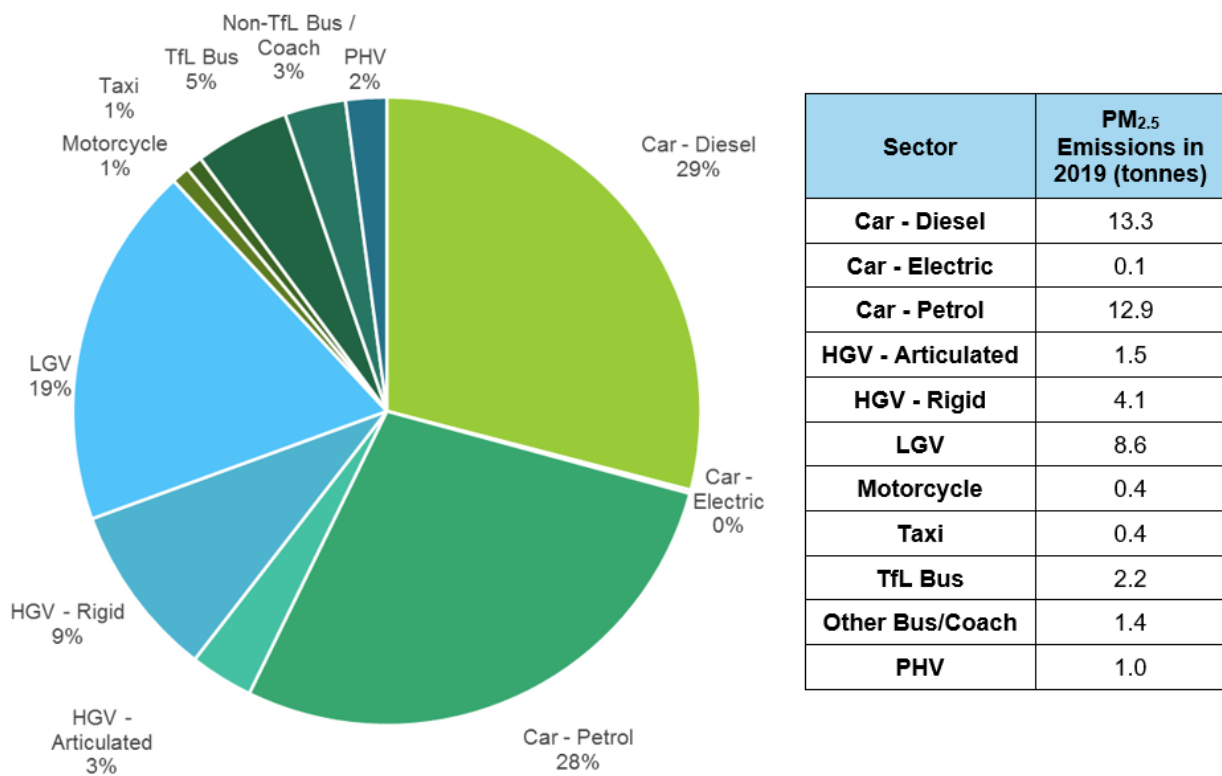


Figure 2-9: PM<sub>2.5</sub> Emissions by vehicle type (from the LAEI 2019)

## 2.4 SOURCE APPORTIONMENT

2.4.1 Source apportionment of NO<sub>x</sub> (NO<sub>2</sub> and NO) concentrations has been carried out for the 19 monitoring sites in Ealing which exceeded the UK National Air Quality Objective of 40µg/m<sup>3</sup> for annual mean NO<sub>2</sub> concentrations in 2019. This source apportionment analysis allows the main source of pollution at each site to be identified. The source apportionment analysis uses a combination of local modelling outputs and background concentration maps for the UK published by Defra. Figure 2-10 shows the locations where the detailed source apportionment was carried out.

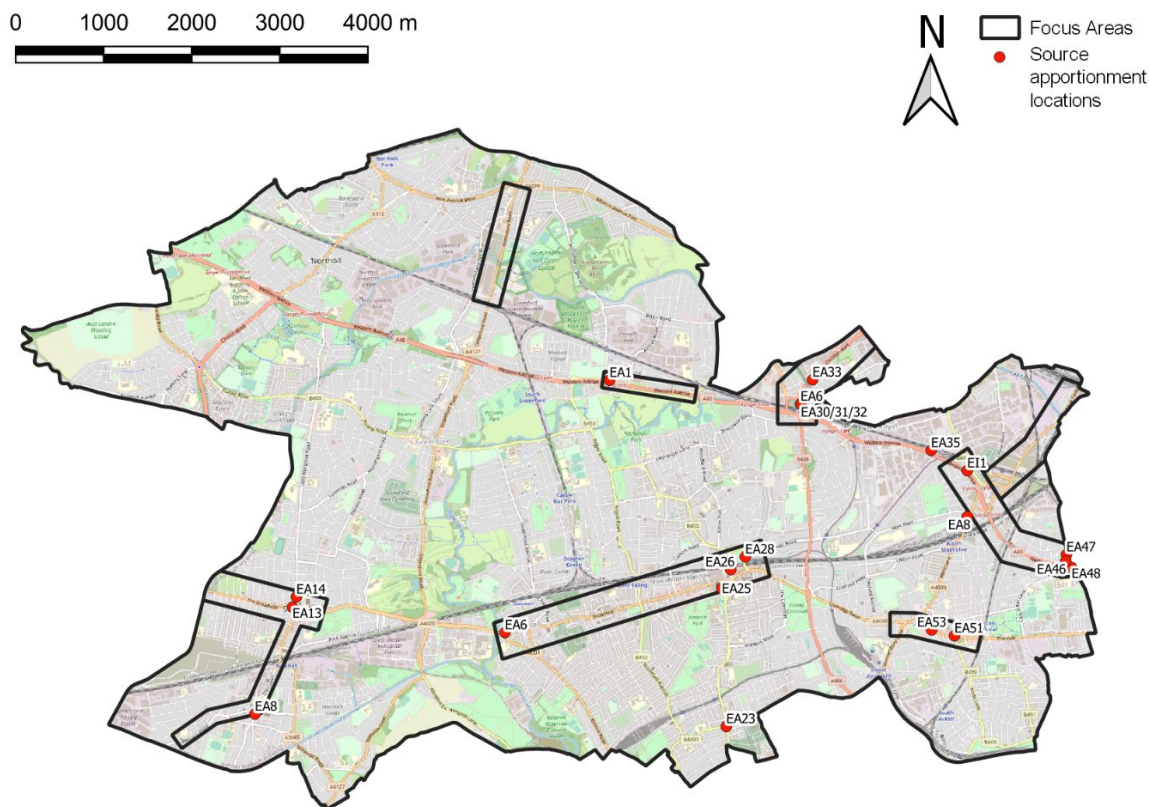


Figure 2-10: Monitoring locations across MDDC, including the Crediton and Cullompton AQMAs

- 2.4.2 Figure 2-11 shows the contribution to NO<sub>x</sub> concentrations at these sites from local roads apportioned by vehicle category. The background contribution, which includes non-road sources and more distant roads, is also included.
- 2.4.3 Across all sites there is a significant contribution to NO<sub>x</sub> concentrations from non-road sources including domestic combustion, industry, and non-local roads. These sources contribute 44% of the total NO<sub>x</sub> concentration on average at monitoring locations which exceeded the objective in 2019.
- 2.4.4 On average, the most important contributor to total NO<sub>x</sub> concentrations from local roads is diesel cars, which contribute 19% of total NO<sub>x</sub> concentrations. LGVs contribute a further 14% of the total.
- 2.4.5 The contribution of buses and coaches varies strongly by location, reflecting that traffic for these vehicles is restricted to specific bus routes; on major bus routes, buses contribute a large proportion of the total emissions from road vehicles. On average, buses and coaches contribute 10% of total NO<sub>x</sub> concentrations.

2.4.6 These results demonstrate that reducing emissions from vehicles is required in order to achieve compliance. However, reducing emissions from other sources is also necessary to reduce concentrations and safeguard the health of everybody who lives and works in Ealing.

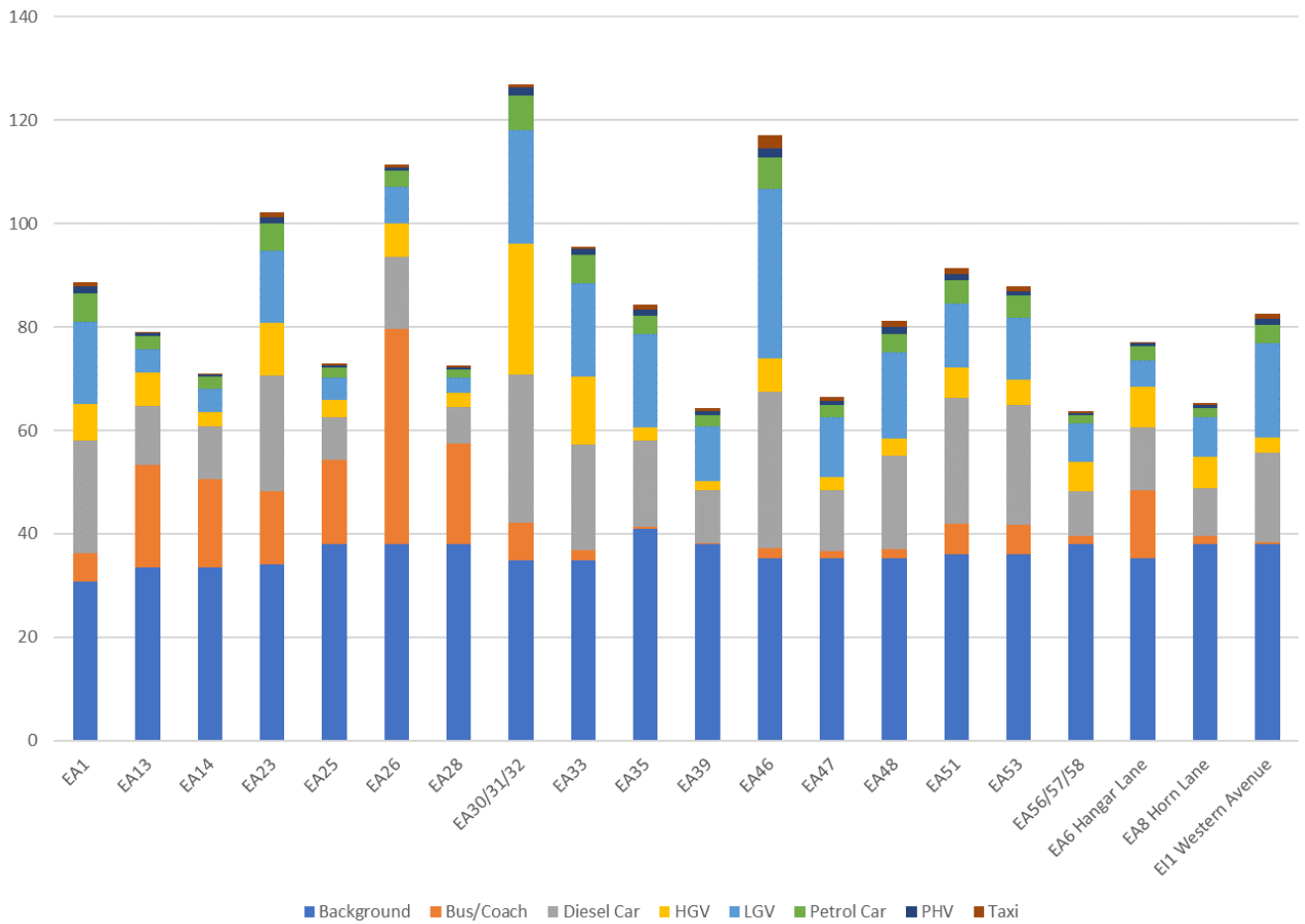


Figure 2-11: NOx source apportionment for local road transport and background for monitoring locations in Ealing, 2019, µg/m³



### 3 EALING COUNCIL'S AIR QUALITY PRIORITIES

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- 3.1.1 The council's corporate plan for 2022-2026 sets out Ealing's priorities and specific, ambitious targets, all of which are designed to have a major positive impact on the quality of people's lives. In order to deliver on these targets, Ealing must work closely with other organisations and also encourage and support residents to act.
- 3.1.2 The Council Plan for 2022-2026 sets out three key priorities for the borough:
- **Creating good jobs** - returning good well-paid jobs to our borough and delivering the next generation of genuinely affordable homes.
  - **Tackling the climate crisis** - cleaning our air and ensuring the borough we build is sustainable.
  - **Fighting inequality** - that blights too many lives and disproportionately holds back all too many people from achieving their dreams and aspirations.
- 3.1.3 These priorities are supported by nine aims focussed on outcomes, including tackling inequality, climate action, and healthy lives. This Action Plan supports Ealing's priorities, in particular through improving public health, delivering a sustainable and effective transport infrastructure and by improving the parking service.
- 3.1.4 The priorities for the London Borough of Ealing are to reduce NO<sub>2</sub> concentrations to below the National Air Quality Objectives, to ensure that levels remain below the National Air Quality Objectives for PM<sub>10</sub>, and to reduce PM<sub>2.5</sub> levels in line with the Mayor's aim to meet World Health Organisation (WHO) guidelines by 2030.
- 3.1.5 The council's Air Quality Strategy 2022-2023 sets out Ealing Council's vision for improving air quality and safeguarding the health of those who live and work in Ealing. The AQS sets out the actions that Ealing Council will take to improve air quality, offers advice on how the local community can reduce their air pollution footprint, and details where reliable air quality information can be sourced from. To this end, the Air Quality Strategy highlights the Council's goals in five priority action areas:
- Reducing road traffic emissions
  - Improving indoor air quality
  - Reducing the impact of new and existing developments
  - Green infrastructure
  - Raising awareness of air quality
- 3.1.6 These action areas were developed through the source apportionment analysis described in Section 2.4, and through a public engagement exercise including an online survey and community engagement events carried out in March and April 2022 to identify key issues for Ealing residents.

## 4 POLICY CONTEXT

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### 4.1 INTERNATIONAL AND NATIONAL

#### **EU Directive 2008/50/EC**

4.1.1 The key international air quality policy that influences UK air quality policy is the EU Directive 2008/50/EC<sup>8</sup> for ambient air quality and cleaner air for Europe. This sets legally binding limits for sulphur dioxide, nitrogen dioxide, particulate matter, lead, benzene, and carbon monoxide emissions. The 2008/50/EC was made in law in England through the Air Quality Standards Regulations 2010<sup>9</sup>, which were amended in 2016<sup>10</sup>. This legislation was implemented on ambient air quality limit values, assessment, and management. The Regulations aim to designate zones in which ambient air will be managed by limiting pollutant concentrations within them at a local level.

#### **Air Quality Strategy**

4.1.2 The Air Quality Strategy<sup>11</sup> published by the Department for Environment, Food, and Rural Affairs (Defra) and Devolved Administrations, provides the policy framework for air quality management and assessment in the UK. It provides air quality standards and objectives for key air pollutants, which are designed to protect human health and the environment. It also sets out how the different sectors: industry, transport and local government, can contribute to achieving the air quality objectives. The strategy describes the Local Air Quality Management (LAQM) regime that has been established, whereby each authority must carry out regular reviews and assessments of air quality in its area to identify whether the objectives have been, or will be, achieved at relevant locations. If this is not the case, the authority must declare an Air Quality Management Area (AQMA) and prepare an action plan which identifies appropriate measures that will be introduced in pursuit of the objectives.

#### **Clean Air Strategy**

4.1.3 The UK government's plans for dealing with air pollution was developed further in the Clean Air Strategy 2019<sup>12</sup>. The strategy identifies the actions on how government and society will protect public health and the environment, secure clean growth and innovation, reduce emissions from transport, homes, farming and industry, and monitor progress.

#### **Air Quality Plan for Nitrogen Dioxide**

4.1.4 The Air Quality Plan for Nitrogen Dioxide in UK (2017)<sup>13</sup> provides a separate long-term strategy to reduce roadside NO<sub>2</sub> concentrations. This includes a ban on the sale of new diesel and petrol vehicles by 2040. In 2020, this ban was moved forward to the end of 2030<sup>14</sup>.

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<sup>8</sup> EU Directive 2008/50/EC <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32008L0050>

<sup>9</sup> The Air Quality Standards Regulations 2010 <https://www.legislation.gov.uk/ukxi/2010/1001/contents/made>

<sup>10</sup> The Air Quality Standards (Amendment) Regulations 2016 <https://www.legislation.gov.uk/ukxi/2016/1184/contents/made>

<sup>11</sup> [The Air Quality Strategy 2007](#)

<sup>12</sup> Clean Air Strategy 2019. <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>13</sup> Air Quality Plan for NO<sub>2</sub> in UK, 2017 <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017#history>

<sup>14</sup> Government takes historic step towards net-zero with end of sale of new petrol and diesel cars by 2030. <https://www.gov.uk/government/news/government-takes-historic-step-towards-net-zero-with-end-of-sale-of-new-petrol-and-diesel-cars-by-2030>

## 4.2 REGIONAL (LONDON-WIDE)

### **London Local Air Quality Management**

4.2.1 London Local Air Quality Management (LLAQM)<sup>15</sup> is set out in Policy Guidance and Technical Guidance issued by the Mayor in 2016. Supervision of the LAQM system in Greater London has been devolved to the Mayor of London, to whom powers to intervene and direct boroughs have been given under Part IV of the Environment Act 1995. These guidance documents outline changes to the LAQM system which include the introduction of an air quality Annual Status Report (ASR) to amalgamate all other reporting requirements.

### **The London Plan**

4.2.2 The London Plan 2021<sup>16</sup> sets out the Mayor's spatial development strategy for London. It brings together all relevant strategies, including those relating to transport, environment, economic development, housing, culture, health and health inequalities, and air quality. The latest version of London Plan sets out policies SI 1 and SI 2 for improving air quality and minimising greenhouse gas emissions respectively.

4.2.3 Policy SI1 'Improving Air Quality' states that "London's air quality should be significantly improved and exposure to poor air quality, especially for vulnerable people, should be reduced". It goes on to detail that development proposals should not:

- *lead to further deterioration of existing poor air quality;*
- *create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits;*
- *reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality;*
- *create unacceptable risk of high levels of exposure to poor air quality.*

4.2.4 It also states that "The development of large-scale redevelopment areas, such as Opportunity Areas and those subject to an Environmental Impact Assessment should propose methods of achieving an Air Quality Positive approach through the new development. All other developments should be at least Air Quality Neutral".

4.2.5 The policy describes Air Quality Focus Areas; these are locations which exceed EU annual mean limit values for nitrogen dioxide where there is high human exposure.

### **The Mayor's Transport Strategy**

4.2.6 The Mayor's Transport Strategy (MTS) sets out the transport vision for London. Published in March 2018<sup>17</sup>, it details how Transport for London and partners will deliver the plan over the next two decades. The goals of the Strategy include achieving the highest environmental standards.

4.2.7 The focus of the Strategy is to encourage more people to walk, cycle and use public transport. By using the Healthy Streets Approach to prioritise human health and experience in planning the city, the Mayor wants to change London's transport mix so the city works better for everyone. One of the ten healthy streets indicators is clean air. This, coupled with Government's 'The Road to Zero 18 by 2050

<sup>15</sup> London Local Air Quality Management Technical Guidance 2016  
[https://www.london.gov.uk/sites/default/files/llaqm\\_technical\\_guidance\\_llaqm\\_tg\\_16.pdf](https://www.london.gov.uk/sites/default/files/llaqm_technical_guidance_llaqm_tg_16.pdf)

<sup>16</sup> The London Plan 2021 <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/london-plan-2021>

<sup>17</sup> Mayor's Transport Strategy 2018 <https://www.london.gov.uk/sites/default/files/mayors-transport-strategy-2018.pdf>

<sup>18</sup> The Road to Zero, 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/739460/road-to-zero.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/739460/road-to-zero.pdf)

that seeks at least 50%, and as many as 70%, of new car sales and up to 40% of new van sales being ULEVs by 2030, is likely to deliver significant reductions in concentration of roadside pollutants.

### **London Environment Strategy**

4.2.8 In May 2018, the Mayor published the London Environment Strategy<sup>19</sup> (LES). The Strategy brings together in one document the approaches set out to tackle the most urgent environmental challenges in London, including air quality, green infrastructure, climate change mitigation, waste, adapting to climate change, ambient noise and low carbon circular economy. The LES provides background information on the air quality issues in London, and then sets out three principal Objectives, with associated Policies and Proposals. The three principal Objectives are:

- **Objective 4.1:** Support London and its communities, particularly the most vulnerable and those in priority locations, to help empower people to reduce their exposure to poor air quality.
- **Objective 4.2:** Achieve legal compliance with UK and EU limits as soon as possible, including by mobilising action from London Boroughs, Government and other partners.
- **Objective 4.3:** Establish and achieve new, tighter air quality targets for a cleaner London by transitioning to a zero emission London by 2050, meeting World Health Organisation health-based guidelines for air quality.

4.2.9 The LES recognises that two pollutants are of specific concern, nitrogen dioxide and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). The LES notes that London is failing to meet the legal limit for nitrogen dioxide, but that “exposure to particulate matter is damaging at any level and must be reduced”. In this regard, the LES recognises the need to go beyond legal limits, which should be treated as “starting rather than an end point”. The WHO guidelines are set much tighter for PM<sub>10</sub> and PM<sub>2.5</sub>, and the LES sets out “the timescale, and the changes needed, to achieve these tighter targets”.

4.2.10 The LES also makes specific reference to non-road transport sources: “to achieve legal compliance as quickly as possible, all sources of pollution must be addressed. This means significantly increasing efforts in relation to non-transport sources. This is vital as the proportion of total emissions from non-transport sources is expected to increase over the lifetime of this strategy as our efforts on transport start to have an effect”.

### **Low Emission Zone (LEZ)**

4.2.11 A key measure to improve air quality in Greater London is the Low Emission Zone (LEZ). This entails charges for vehicles entering Greater London not meeting certain emissions criteria and affects older, diesel-powered lorries, buses, coaches, large vans, minibuses and other specialist vehicles derived from lorries and vans. The LEZ was introduced on 4th February 2008 and was phased in through to January 2012. From January 2012 a standard of Euro IV was implemented for lorries and other specialist diesel vehicles over 3.5 tonnes, and buses and coaches over 5 tonnes. Cars and lighter Light Goods Vehicles (LGVs) are excluded. The third phase of the LEZ, which applies to larger vans, minibuses and other specialist diesel vehicles, was also implemented in January 2012. As set out in the 2010 MAQS, a NO<sub>x</sub> emissions standard (Euro IV) is included in the LEZ for HGVs, buses and coaches, from 2015.

### **Ultra-Low Emission Zone (ULEZ)**

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<sup>19</sup> London Environment Strategy, 2018, [https://www.london.gov.uk/sites/default/files/london\\_environment\\_strategy\\_0.pdf](https://www.london.gov.uk/sites/default/files/london_environment_strategy_0.pdf)

4.2.12 The current Mayor, Sadiq Khan, introduced the Ultra-Low Emission Zone (ULEZ) in the Capital on 8 April 2019. The ULEZ operates 24 hours a day, 7 days a week in the Congestion Charging zone in central London. All cars, motorcycles, vans, minibuses and Heavy Goods Vehicles need to meet exhaust emission standards (ULEZ standards) or pay an additional daily charge to travel within the zone. The ULEZ standards are Euro 3 for motorcycles; Euro 4 for petrol cars, vans and minibuses; Euro 6 for diesel cars, vans and minibuses; and Euro VI for HGVs, buses and coaches.

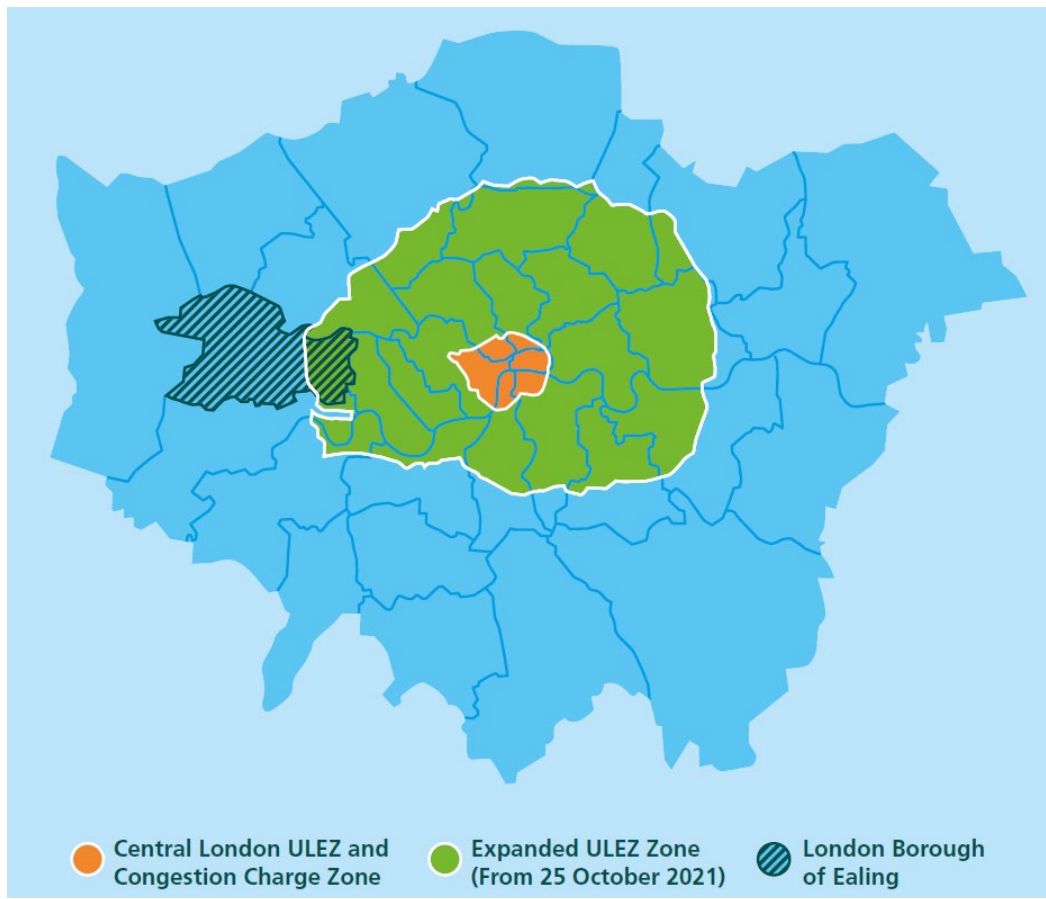


Figure 12: Expanded ULEZ area (light blue)

4.2.13 The zone was expanded beyond central London to the North and South Circular roads on 25 October 2021. As a result, a portion of the Borough of Ealing now lies within the ULEZ. This will impact traffic and emissions both inside and outside the zone.

4.2.14 The zone will be expanded across all 29 London Boroughs (the light blue region in Figure 12) on 29 August 2023, and as a result the entirety of the Borough of Ealing will lie within the ULEZ.

**GLA Supplementary Planning Guidance: Sustainable Design and Construction**

4.2.15 The GLA’s SPG on Sustainable Design and Construction (GLA, 2014a) provides details on delivering some of the priorities in the London Plan. Section 4.3 covers Air Pollution. It defines when developers will be required to submit an air quality assessment, explains how location and transport measures can minimise emissions to air, and provides emission standards for gas-fired boilers, Combined Heat and Power (CHP) and biomass plant. It also sets out, for the first time, guidance on how Policy 7.14B(c) of the London Plan relating to ‘air quality neutral’ should be implemented. The Air Quality

Neutral<sup>20</sup> and Air Quality Positive<sup>21</sup> London Plan Guidance were updated in February 2023. Further information on application of more stringent Transport Emissions Benchmarks may be found in Action 7a (see Table 7-1).

### **GLA Supplementary Planning Guidance: The Control of Dust and Emissions during Construction and Demolition**

4.2.16 The GLA's SPG on The Control of Dust and Emissions During Construction and Demolition (GLA, 2014b) outlines a risk assessment based approach to considering the potential for dust generation from a construction site, and sets out what mitigation measures should be implemented to minimise the risk of construction dust impacts, dependent on the outcomes of the risk assessment. This guidance is largely based on the Institute of Air Quality Management's (IAQM) 2014 guidance on the Assessment of dust from demolition and construction (Institute of Air Quality Management, 2016), and it states that "the latest version of the IAQM Guidance should be used".

### **West London Sub-Regional Transport Plan**

4.2.17 Ealing is the lead borough for the West Trans sub-regional partnership which also includes Brent, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow. The West London Sub-Regional Transport Plan (WLSRTP) sets out the transport strategy to address the particular challenge faced by the sub region. The plan also provides the context for individual borough Local Implementation Plans (LIPs) and helps form a bridge between the Mayor's Transport Strategy and individual local authority transport objectives. The WLSRTP identified the following challenges for the west sub-region:

- Improve north-south connectivity;
- Improve access to, from and within Key locations;
- Enhance east-west capacity and manage congestion;
- Enhance the efficiency of freight movements in the sub-region; and
- Improve land-based air quality.

## **4.3 EALING**

### **Ealing Air Quality Strategy 2022-2030**

4.3.1 The Ealing Air Quality Strategy (AQS) will be published in tandem with the Air Quality Action Plan (AQAP) in 2023. The AQS sets out Ealing Council's vision for improving air quality and safeguarding the health of those who live and work in Ealing. The AQS sets out the actions that Ealing Council will take to improve air quality, offers advice on how the local community can reduce their air pollution footprint, and details where reliable air quality information can be sourced from.

### **Ealing Corporate Plan (2021-2022)**

4.3.2 The Ealing Corporate Plan is summarised in Chapter 3 of this report.

### **Local Plan**

<sup>20</sup> Air Quality Neutral London Plan Guidance <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-neutral-aqn-guidance>

<sup>21</sup> Air Quality Positive London Plan Guidance <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance/air-quality-positive-aqp-guidance>

4.3.3 The adopted Development (Core) Strategy 2026 provides the spatial vision and policies to support the future development of the borough. The Strategy also has to conform to both the context and the policies of the London Plan. The vision is to harness opportunities for growth and development and promote improvement in appropriate locations. These locations are primarily along the Uxbridge Road/Crossrail and the A40/Park Royal corridors. These two east-west corridors include Ealing's town centres, Park Royal Industrial Estate and the five Crossrail stations. In addition to the Development (or Core) Strategy, there are development plan documents that specifically cover development sites and the implementation of development policies. A new Local Plan<sup>22</sup> has also been drafted and underwent consultation from 30 November 2022 to 8 February 2023. This new document touches almost every aspect of everyday life in Ealing from climate and transport to homes and open spaces and more.

### **Ealing Climate and Ecological Emergency Strategy 2021-2030**

4.3.4 The Ealing Climate and Ecological Emergency Strategy 2021 – 2030<sup>23</sup> sets out a plan to reduce the council's produced emissions. The intended outcome of these actions is to mitigate climate change. The strategy focusses on four themes which are energy, food, nature, travel and waste. The objectives in the energy and travel themes offer substantial co-benefits for air pollutant emissions, particular around reducing the number of vehicles travelling in and through Ealing.

### **Ealing Council Transport Strategy 2019 and Local Implementation Plan**

4.3.5 The Ealing Council Transport Strategy<sup>24</sup> sets out the transport priorities for the Council in accordance with the Mayor's Transport Strategy, with a focus on 2019-2022. It is supported by the Local Implementation Plan (LIP). As the Council's existing Transport Strategy (2019) focused on the initial 2019-22 period, it is now an opportune time to commence a wide-ranging strategic review to develop a new Transport and Active Travel strategy, work on which has been agreed by the Cabinet.

4.3.6 The LIP<sup>25</sup> is a statutory document prepared by each London borough to implement the Mayor of London's Transport Strategy. It sets out overarching borough transport objectives with an associated delivery and monitoring strategy, with reference to the Mayor's priority areas.

4.3.7 The current LIP sets out the council's current transport priorities, projects and targets for the period 2019-2022. The LIP has eight policy objectives which focus on road safety, sustainable travel, smoothing traffic flow, quality of life, healthy travel, accessibility, principal road condition and reduced contribution to climate change. The focus of the LIP includes the encouragement of sustainable travel, especially cycling. The LIP also includes 14 targets in its performance monitoring framework covering areas such as walking and cycling mode shares and PM<sub>10</sub> concentrations.

4.3.8 The Council's Transport Strategy is further supported by the Ealing Council Cycle Plan 2019-2022<sup>26</sup> which sets a policy framework for Ealing Borough to be committed to active travel through encouraging cycling. The aim of the Strategy is for the Borough to be an exemplar for cycling.

4.3.9 The Council's Transport Strategy is also supported by the Ealing Council Parking Plan<sup>27</sup> which aims to improve road safety and encourage cycling by effectively managing street parking. The Parking

<sup>22</sup> New Local Plan (Regulation 18) [https://www.ealing.gov.uk/info/201164/local\\_plan/3125/new\\_local\\_plan](https://www.ealing.gov.uk/info/201164/local_plan/3125/new_local_plan)

<sup>23</sup> Climate and Ecological Emergency Strategy 2021-2030

[https://www.ealing.gov.uk/downloads/file/15879/climate\\_and\\_ecological\\_emergency\\_strategy\\_2021-2030](https://www.ealing.gov.uk/downloads/file/15879/climate_and_ecological_emergency_strategy_2021-2030)

<sup>24</sup> Ealing's Transport Strategy 2019-2022 [https://www.ealing.gov.uk/downloads/download/5418/ealings\\_transport\\_strategy\\_2019-2022](https://www.ealing.gov.uk/downloads/download/5418/ealings_transport_strategy_2019-2022)

<sup>25</sup> Local Implementation Plan [https://www.ealing.gov.uk/info/201173/transport\\_and\\_parking/620/transport\\_strategies\\_and\\_plans/2](https://www.ealing.gov.uk/info/201173/transport_and_parking/620/transport_strategies_and_plans/2)

<sup>26</sup> Ealing Council Cycle Plan 2019-2022 [https://www.ealing.gov.uk/downloads/download/5404/cycling\\_plan](https://www.ealing.gov.uk/downloads/download/5404/cycling_plan)

<sup>27</sup> Ealing Council Parking Plan [https://www.ealing.gov.uk/downloads/download/5405/parking\\_plan](https://www.ealing.gov.uk/downloads/download/5405/parking_plan)

Plan includes emissions-based parking charges, increasing the number of Electric Vehicle Charging Points, and introducing car clubs. This reduces congestion and encourages the uptake of cleaner or electric vehicles and a shift towards public transport.

- 4.3.10 The Transport Strategy is also supported by the Travel to School Plan<sup>28</sup> which intends to increase walking and cycling to and from schools to improve pupil health through reduced congestion. The Travel to School Plan also encourages more schools to receive and maintain school travel plan accreditation (STARS), the London-wide programme.

#### **Old Oak and Park Royal Development Corporation**

- 4.3.11 The Old Oak and Park Royal Development Corporation (OPDC) is developing a new centre and community for west London. Using the investment in rail infrastructure projects HS2 and Crossrail, new opportunities for development are being created in the area. The Corporation was officially launched on 1 April 2015 and is the Local Planning Authority, master developer and regeneration agency for the 650-hectare site. As a Local Planning Authority, OPDC has a duty to prepare a Local Plan. This sets out OPDC's strategy for development within its area and contains the policies that will be used to direct development and determine applications across the entire OPDC area.

#### **Joint Strategic Needs Assessment (JSNA)**

- 4.3.12 Ealing Council was given responsibility for public health in April 2013. The Council produced the JSNA<sup>29</sup> to provide clear intelligence on the current and future health and wellbeing needs of the population to inform commissioning plans and strategies. Air quality has been featured in the 2019 JSNA report that provides context for air pollution and associated impact on health and well-being of residents in the borough.

#### **Health and Wellbeing Strategy**

- 4.3.13 The Ealing Health and Wellbeing Strategy<sup>30</sup> is a long-term way of meeting the needs of the local population. The 2022-27 strategy is being developed with a focus on addressing inequalities, to be launched in early 2023. It promotes wellness, in its broadest sense, throughout Ealing's population, helping to prevent ill health. Although air quality is not specified, one of the priority areas of the Strategy is to address the broader social, economic, and environmental factors that can support people's ability to be healthy and make changes to improve their health.

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<sup>28</sup> School travel plans 2021/2022 <https://www.egfl.org.uk/services-to-schools/school-travel-plans-202122>

<sup>29</sup> Ealing Joint Strategic Needs Assessment <https://data.ealing.gov.uk/jsna/>

<sup>30</sup> Health and Wellbeing Strategy [https://www.ealing.gov.uk/downloads/download/3755/health\\_and\\_wellbeing\\_strategy](https://www.ealing.gov.uk/downloads/download/3755/health_and_wellbeing_strategy)



## 5 PROJECTS UNDERTAKEN TO INFORM THE ACTION PLAN

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### 5.1 REAL TIME AIR QUALITY DATA AND ALERTS

- 5.1.1 A Defra funded five-year (2022-2027) project is being launched, which will help strengthen communications and public messages, through evidence, using near real-time air quality data. This data is anticipated to provide greater confidence, therefore encouraging local communities to adopt more sustainable modes of travel (walking/cycling). This would help reduce peak time congestion, a particularly big problem in the West of Ealing Borough, improve local air quality, reduce exposure to poor air quality and improve public health. Key features of this project will include:
- a. a new regional website resource which will focus on local issues, engaging the public and providing key information in terms of improving knowledge and steering the public towards improvement areas;
  - b. bespoke reporting and analysis on the monitoring datasets to feed into public messaging across 5-years;
  - c. air quality alerts and forecast; and
  - d. social media Twitter feed – to be populated by the Council and its communications team.

### 5.2 REMOTE SENSING OF EXHAUST EMISSIONS IN EALING

- 5.2.1 Defra grant-funded roadside remote sensing surveys of vehicle exhaust emissions were undertaken in Ealing borough and the City of London in 2012. A key development in this work was the direct measurement of NO<sub>2</sub>, which had not been possible previously using other remote sensing equipment available in the UK. This provided a very useful dataset on the relationships between pollutants and vehicle technology, Euro class, fuel type, and vehicle dynamics, which has been applied across the UK. The results have had many implications for air quality policy. For diesel cars it was shown that total NO<sub>x</sub> emissions, whilst peaking for vehicles manufactured around year 2000, have changed little overall over the past 20 years and in that time new after-treatment technologies have increased the proportion of NO<sub>x</sub> that is NO<sub>2</sub> (known as primary NO<sub>2</sub>). A comprehensive survey of taxis was also undertaken with results indicating a halving (or more) of NO emissions from London taxis in the transition from Euro 2 to Euro 3 and a significant peak in the emissions of particulate matter at Euro 3.

### 5.3 SOUTHALL LOW EMISSION STRATEGY

- 5.3.1 The Southall Gasworks site, known as The Green Quarter, is a major regeneration scheme to convert the site into a large mixed development for affordable housing, commerce, schools, public parkland, and a central park. Due to its historical use as a gasworks and chemical works site from the 19th century until the late 1960s, there was contamination of the soil which has since been treated in a soil hospital to make the land safe and suitable for its new uses, including housing.
- 5.3.2 In recognition of the scale of the development and the potential impact of the scheme on future emissions of air pollutants and greenhouse gases, the Council commissioned the preparation of a Low Emissions Strategy (LES) for The Green Quarter in 2019. The LES aims to set a course for the development to minimise pollutant emissions and achieve net zero-carbon emissions by 2050.
- 5.3.3 In response to concerns raised by local residents, the Council have commissioned an independent air quality monitoring survey around the site and appointed a dedicated Environmental Health Officer to respond to issues raised by the local community. Near real-time data is available at

airqualityengland.co.uk. Further air quality monitoring within the borough will be undertaken between 2022 and 2027 as part of Defra funded air quality project. We have also commissioned independent soil monitoring on the site.

## 5.4 SCENARIO DEVELOPMENT IN EALING

5.4.1 In 2014 a Defra grant-funded piece of work was undertaken looking at scenario development to inform the evidence base for air quality action planning in Ealing, and add to the national evidence base<sup>31</sup>. A number of scenarios were investigated:

### **Voluntary scrappage scheme**

5.4.2 The scheme assumes that scrapped Euro 5 and older diesel cars will be replaced by a mix of Euro 6 petrol and diesel cars and that scrapped Euro 5 and older vans will be replaced by Euro 6 diesel vans. With a 10% take up of the scheme, total NOx emissions from cars and vans in 2017 were estimated to reduce by about 5% (relative to the 2017 business as usual scenario) and with a 20% take up, total NOx emissions are estimated to reduce by about 11%.

### **Reducing the number of diesel cars purchased**

5.4.3 This scenario assumes that some form of policy intervention is introduced to reduce the attractiveness of new diesel cars relative to other fuel types. It assumes that the sales of new Euro 6 diesel cars will be reduced by 25% relative to the base scenario in 2017, and that sales of alternative fuel Euro 6 compliant cars (petrol, hybrid) will increase pro rata. With this scenario, it is estimated that total NOx emissions from passenger cars in 2017 reduce by about 1% (relative to the 2017 business as usual scenario).

### **Policies to reduce idling**

5.4.4 Surveys carried out in the Ealing area in 2013 have revealed that between 8% and 40% of journey time was spent stationary, for example waiting at traffic signals. This scenario assumes that if a stop within a journey is more than 10 seconds, the vehicle engine is switched off for the duration of the stationary episode that is longer than 10 seconds. This scenario therefore quantifies the difference between all light duty drivers not switching off their engines and all light duty drivers systematically switching of their engines during stops of over 10 seconds. It is estimated that total NOx emissions from passenger cars and vans in 2017 reduce by up to 8%. This scenario by its nature, explicitly targets hotspot locations.

### **Introducing an ULEZ in Ealing**

5.4.5 A Low Emission Zone already operates in London. Larger vans, minibuses and other diesel vehicles need to meet Euro 3 emissions standards. Lorries, buses, coaches and other specialist heavy vehicles need to meet Euro 4 emissions standards. TfL LEZ regulations currently do not apply to passenger cars. This scenario sets the compliance criteria for an ULEZ as Euro 6 for diesel light vehicles, and Euro 5/6 for petrol light vehicles. This is applied to all passenger cars, vans and taxis. It is assumed that vehicles are replaced on a like-for-like basis, adopting the compliant Euro standard for the ULEZ. This scenario was estimated to reduce total NOx emissions from light vehicles by approximately 52% relative to the business-as-usual scenario.

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<sup>31</sup> Glyn Rhys-Tyler Ltd. <https://www.glynrhys-tyler.com/publications.html>

5.4.6 These broad-brush percentage reductions have been aggregated (along with some assumptions about buses and HGV emissions reductions) and applied to monitoring locations in the hotspot locations. It is recognised that this will hide significant local spatial variation. The results show that even with a significant intervention such as the ULEZ there will still be annual mean concentrations over the annual mean objective. The analysis assumes that Euro 6/VI emissions technology delivers improvements.

**Low Emissions Strategy for Acton Goods Yard, Horn Lane, Acton**

5.4.7 The Low Emissions Strategy (LES) for Acton Goods Yard, Horn Lane provides a framework for voluntary agreement between the site operators, Ealing Council and the Environment Agency to reduce emissions and improve local air quality. It aims to secure a commitment from each of the occupiers to take all reasonable steps by providing good practice measures to reduce emissions. These include measures relating to site management, staff training, visitor and HGV driver training, monitoring, inspection and maintenance, water dust suppression, HGVs and mobile machinery, materials handling and storage and conveyors. It goes on to provide a checklist for occupiers of Acton Goods Yard. The LES is very much complementary to this Air Quality Action Plan.

## 6 DEVELOPMENT AND IMPLEMENTATION OF THE LONDON BOROUGH OF EALING’S AQAP

### 6.1 CONSULTATION AND STAKEHOLDER ENGAGEMENT

6.2.1 In developing/updating the action plan we have worked with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 of the Environment Act 1995 requires local authorities to consult the bodies listed in Table 3.1. In addition, we have undertaken the following stakeholder engagement:

- *A public consultation which ran from the 5<sup>th</sup> December 2022 to the 30<sup>th</sup> January 2023.*
- *This public consultation included:*
  - *Two in-person events on the 9<sup>th</sup> and 12<sup>th</sup> December 2022;*
  - *Two webinars outlining the Air Quality Action Plan and the supporting Air Quality Strategy 2022-2030 on the 9<sup>th</sup> and 12<sup>th</sup> January 2023.*

6.1 The response to our consultation stakeholder engagement is given in Appendix A.

Yes/No	Consultee
Yes	the Environment Agency
No	Transport for London and the Mayor of London do not routinely respond to consultations.
Yes	all neighbouring local authorities
Yes	other public authorities as appropriate
Yes	bodies representing local business interests and other organisations as appropriate

### 6.2 STEERING GROUP

6.2.1 The Steering group was set up at the outset of the process and a meeting was held on the 21<sup>st</sup> February 2022 to provide background to the process and discuss measures for inclusion within the Action Plan.

6.2.2 Follow-up meetings were held with Steering Group members to finalise the Action Plan measures and develop targets and KPIs where appropriate.

6.2.3 The draft Air Quality Action Plan was then provided to the Steering Group for comment prior to the wider consultation described in Section 6.1.

## 7 AIR QUALITY ACTION PLAN

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7.1.1 Table 7-2 shows the Ealing Air Quality Action Plan. It contains:

- a list of the actions that form part of the plan;
- the responsible individual and departments/organisations who will deliver this action;
- estimated cost to the council;
- expected benefit in terms of emissions and concentration reduction;
- the timescale for implementation; and
- how progress will be monitored.

### 7.1 EVALUATION APPROACH

7.1.2 The actions are evaluated in relation to their expected impact on:

- air quality (i.e. reduction in emissions or concentrations);
- cost; and
- timescale for implementation.

### 7.2 AIR QUALITY IMPACT

7.2.1 Air quality impacts have been classified to represent 'low' to 'high' impact. The higher the impact, the greater the improvement in air quality, i.e. the greater the reduction in NO<sub>2</sub> concentrations. For each Action, the expected reduction in annual mean NO<sub>2</sub> concentrations has been determined based on professional judgement, drawing, wherever possible, on experience gained from other studies, as well as the LLAQM Borough Air Quality Action Matrix as published by the GLA. The following classification scheme has been used:

**Low:** *imperceptible*. Improvements, while a step in the right direction, are unlikely to be detected within the uncertainties of monitoring and modelling;

**Medium:** *perceptible* (a demonstrable improvement in air quality). An improvement of up to 2 µg/m<sup>3</sup> NO<sub>2</sub>. Improvement is not likely to be shown by monitoring due to confounding factors of the weather;

**High:** *significant*. Improvement of more than 2 µg/m<sup>3</sup> NO<sub>2</sub>. Can be clearly demonstrated by modelling or monitoring (a significant improvement is likely to be delivered by a package of options rather than by a single intervention).

### 7.3 COST

7.3.1 The implementation of the measures set out in this Action Plan are dependent on securing a sufficient and consistent level of funding both to support any additional staff that may be required, and to deliver the programme. In line with current London technical guidance, it is not necessary to carry out a detailed cost-benefit analysis. Rather the aim is to provide a broad indication of costs so that the proposed measures can be ranked according to the cost and the expected improvement to air quality. Costs are represented as follows:

- **'Very Low'** cost is taken to be £10K and under;
- **'Low'** cost is taken to be £10 - £50K;
- **'Medium'** cost is £50 - 500K;
- **'High'** cost is £500K - £2 million; and
- **'Very High'** cost is over £2 million.

## 7.4 ACTION PLAN

7.4.1 Following guidance for all London boroughs, the actions have been grouped into seven categories: monitoring and core statutory duties; emissions from developments and buildings; public health and awareness raising; delivery servicing and freight; borough fleet actions; cleaner transport; and localised solutions. These are aligned to the Council’s Air Quality Strategy priorities as shown in Table 7-1.

**Table 7-1: Alignment between the council’s Air Quality Strategy priorities and Air Quality Action Plan measures**

Air Quality Action Plan category	Air Quality Strategy priorities
Monitoring and core statutory duties	Monitor the performance of the Air Quality Strategy and Air Quality Action Plan
Emissions from Developments and Buildings	Reducing the impact of new and existing developments Green infrastructure Wood burning and indoor air quality
Public health and awareness raising	Raising awareness of air quality
Delivery servicing and freight	Reducing road traffic emissions
Borough fleet actions	Reducing road traffic emissions
Cleaner transport	Reducing road traffic emissions
Localised solutions	Reducing road traffic emissions Reducing the impact of new and existing developments Green infrastructure

Table 7-2: Air Quality Action Plan

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
Monitoring and core statutory duties	1	Ealing to maintain the borough's 3 continuous monitoring stations and 60 diffusion tubes.	Air quality team	Low	No emissions/concentrations benefit but critical in terms of understanding emissions, concentrations, and the monitoring and evaluation of the Action Plan.	Ongoing	KPI: All monitors fully calibrated & serviced every year. Target: Over 90% date capture at all sites. KPI: Submission of statutory annual status report on time each year.	Details of our monitoring can be found here: Latest Annual Status Report Additional monitoring to be an integrated part of planning process, to enable assessment, mitigation and protection against adverse impacts from construction.
Monitoring and core statutory duties	2	Seek funding for a PM2.5 monitor from S106	Air quality team	Low	No direct emissions/concentrations benefit but critical in terms of understanding emissions and concentrations in the Borough. This will also enable better monitoring and evaluation of the effectiveness of this Air Quality Action Plan in terms of PM <sub>2.5</sub> concentrations.	2022 - 2023	Output: Decision regarding location of monitor. KPI: Installation of new PM <sub>2.5</sub> monitor	Ealing Council is investigating the possibility of augmenting the existing monitoring network with low-cost sensors.
Monitoring and core statutory duties	3	Commission and maintain monitoring of air pollution around the Southall Gasworks site	Air quality team	Medium	No direct emissions/concentrations benefit but crucial to understanding air quality in the air and developing future measures if required.	Monitoring commissioned 2021; to continue through period covered by this plan	Output: Detailed monitoring data including all relevant pollutants for the Southall Gasworks site.	
Emissions from developments and buildings	4	Ensuring emissions from construction are minimised	Development Management in association with Environment Protection	Low	High. Emissions from construction and demolition dust account for 20.9% of PM <sub>10</sub> emissions in Ealing, and 4.4% of total PM <sub>2.5</sub> emissions in Ealing.	Ongoing	Target: 100% of relevant applications to include appropriate conditions on construction dust mitigation.	During construction, developers and contractors should follow the guidance set out in The Control of Dust and Emissions during Construction and Demolition SPG: carry out an Air Quality and Dust Risk Assessment, submit an Air Quality and Dust Management Plan for the construction, implement mitigation measures and carry out site monitoring.  Enhanced planning conditions with greater emphasis on Construction and Environment Management Plans are being developed. Opportunities for spot

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
								<p>checks for planning conditions will also be investigated.</p> <p>The Council will investigate engagement opportunities with the London Low Emission Construction Partnership to review work in other boroughs.</p> <p>Medium to high risk sites will be required to install AQ monitors.</p>
Emissions from developments and buildings	5a	Ensuring enforcement of Non-Road Mobile Machinery (NRMM) air quality policies	Development Management in association with Environment Protection	Low	<p>n/a. Benefits potentially significant but not quantifiable.</p> <p>Emissions from NRMM have increased since 2013, and now account for 7.8% of total NO<sub>x</sub> emissions, 1.5% of PM<sub>10</sub> emissions, and 3.2% of PM<sub>2.5</sub> emissions in Ealing.</p>	Ongoing	<p>Target: 100% of relevant applications to include a condition on use of only NRMM Low Emission Zone-approved machinery.</p> <p>KPI: This information reported annually.</p>	<p>The NRMM Low Emission Zone requires that all engines with a power rating between 37 kW and 560 kW meet an emission standard based on the engine emission “stage”.</p> <p>LBE has signed-up for the pan London GLA NRMM scheme delivered by Merton Council, responsible for enforcing NRMM standards at major construction sites in the borough. <i>There are now 15 such sites being identified with agreement of Development Management.</i></p> <p>Ealing is 75% compliant as of 2022, based on 26 audits completed that calendar year.</p>
Emissions from developments and buildings	5b	Reduce emissions from onsite diesel- or petrol-powered generators at construction sites	Air quality Team	Low	<p>n/a. Benefits potentially significant but not quantifiable.</p> <p>Emissions from NRMM have increased since 2013, and now account for 7.8% of total NO<sub>x</sub> emissions, 1.5% of PM<sub>10</sub> emissions, and 3.2% of PM<sub>2.5</sub> emissions in Ealing.</p>	Ongoing	<p>Target: 100% of major developments to commit to no diesel or petrol generators.</p>	<p>LBE advise construction sites to avoid the use of diesel-or-petrol powered generators and use mains electricity or battery powered equipment.</p> <p>All major developments will be requested to commit to no diesel or petrol powered generators in their Dust/Air Quality Management Plans.</p>
Emissions from developments and buildings	6	Reduce emissions from CHP	Development Management in association with Environment Protection	Low	<p>n/a. Benefits potentially significant but not quantifiable.</p>	Ongoing	<p>Target: Conditions attached to ensure that 100% of new energy installations are compliant with the latest London Plan.</p> <p>KPI: To be reported on annually.</p>	<p>LBE now discourages the use of small scale and unabated gas CHPs that exacerbate air pollution.</p> <p>We seek compliance with London Plan policies that require developers to quantify the impact of CHPs on air quality to support their ‘air quality neutral (AQN)/air quality positive (AQP)</p>



Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
								proposal, as opposed to accepting qualitative treatment.
Emissions from developments and buildings	7a	Enforce Air Quality Neutral policies	Development Management in association with Environment Protection	Low to Medium	n/a. Benefits potentially significant but not quantifiable.  Reduces the contribution to pollution from new developments, and minimises exposure of residents of new developments.	Ongoing	Target: 100% of eligible developments meeting the air quality neutral standards per year.  KPI: To be reported on annually.	LBE encourages developers to harness and maximise energy from renewables and using technology (air/ground source heat pumps and PV). All eligible developments must provide appropriate AQN/AQP documentation/mitigations.  LBE may apply more stringent Transport Emissions Benchmarks (TEB) than those designated for the area (Outer/Inner London) for developments in areas of poor air quality and AQFAs, when calculating emissions (NOx, PM <sub>2.5</sub> ) using approach that set out in the latest AQN & AQP guidance and Defra policies and comparing it to total predicted emissions, before applying costs against damage to environment.
Emissions from developments and buildings	7b	Reduce emissions from emergency diesel- or petrol-powered generators	Development Management in association with Environment Protection	Low	Medium.	Ongoing	Target: Conditions attached to any developments that propose any emergency generators onsite.  KPI: To be reported annually.	LBE now request developers to consider alternative technology to diesel generators. If viable alternatives can't be found, then developers will be requested to submit post installation emission testing by an accredited laboratory to ensure NOx emissions at the flue meet emission standard of 150mg/Nm-3 (at 5% O2). Substituting diesel generators for alternative cleaner power (mains electricity) can be undertaken at construction sites, emergency power back-ups, roadside servicing and repairs, fast-food kiosks/outlets on high streets, leisure events, summer festivals, wherever there is relevant exposure and risk to public health. Construction plans including diesel generators at construction sites must be NRMM compliant.
Emissions from developments and buildings	8	Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new developments	Development Management in association with Environment Protection	Low	Green infrastructure schemes can transform urban areas and help to provide improved public spaces. Whilst it can be hard to quantify air quality	Ongoing	Target: 100% of major development applications to integrate green space/communal gardens.  KPI: To be reported annually	Developers of larger developments are required to create on-site green space (external amenity) and infrastructure.  There is a chapter in the Core Strategy on Green Space. This is to maximise

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Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
					exposure improvements from such schemes it may therefore be useful to consider such schemes as part of the Healthy Streets approach or to look at the measures of success built into Green Infrastructure proposals.			benefit sensitive demographics with large exposure (schools, care homes etc).
Emissions from developments and buildings	9	Declaring Smoke Control Zones and ensuring they are fully promoted and enforced.	Environment Protection	Low	Medium Solid Fuel burning including biomass contributes to up to 31% of urban derived PM <sub>2.5</sub> , and 20% of PM <sub>2.5</sub> emissions in Ealing (2019).	Ongoing	<p>Target: 100% targeted action against retailers/wholesale businesses selling non-authorised solid fuels.</p> <p>Target: Raise awareness of the impact of solid fuel burning</p> <p>Target: 100% smoke complaints investigated within 48 hours</p> <p>Target: Publish Ealing Air Quality Strategy, including information on the impacts of solid fuel burning and advice for households.</p>	The Ealing Air Quality Strategy, to be published in 2023, which will include a chapter on indoor air quality and wood burning, which will highlight the importance of reducing solid fuel burning impacts.
Emissions from developments and buildings	10	Promoting and delivering energy efficiency and energy supply retrofitting projects in workplaces and homes through EFL retrofit programmes such as RE:FIT, RE:NEW and through borough carbon offset funds	Development Management in association with Sustainability officers	Low	High Domestic and commercial heating accounts for 33% of total NOx emissions, 7% of total PM <sub>10</sub> emissions, and 15% of PM <sub>2.5</sub> emissions in Ealing. This scheme will deliver NOx reductions for all gas energy efficiency measures and any boilers either replaced with ultra-low NOx plant or by a connection to a local district heating network. In addition, there are energy savings related with updating boiler efficiency.	Ongoing	<p>Target: 100% of housing specifications will contribute to zero carbon outcomes;</p> <p>Target: 100% council owned homes will have an average EPC rating B (SAP points) by 2030;</p> <p>Target: 100% new council owned housing will be built to zero carbon standards by 2022;</p> <p>Target: % of Council-led programs to carry out 1000 large-scale energy efficiency measures and 4000 small-scale energy efficiency measures on private homes by 2030 (private residential).</p>	<p>The council will seek additional funding to extend its successful retrofit programmes.</p> <p>Ealing had extended GHG Scheme until 31<sup>st</sup> March 2022. Details can be found here: <a href="#">Green homes save money – Around Ealing</a>;</p> <p>The Healthy Homes Ealing telephone helpline offers energy efficiency advice to Ealing residents.</p>
Emissions from developments and buildings	11	Master planning and redevelopment areas aligned with Air	Development Management, Transport and	Very Low	Medium impact on emissions from new developments.	December 2022	Target: 100% of housing developments/regeneration projects to use energy from	See further information in the Climate and Ecological Emergency Strategy

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
		Quality Positive and Healthy Streets approaches	Environment Protection				renewables and non-combustible technologies, e.g. air source heat pump (ASHP) and ground source heat pumps (GSHP), with aim to improve AQ and reduce exposure.	
Public health and awareness raising	12	Public Health department taking shared responsibility for borough air quality issues and implementation of Air Quality Action Plans	Public Health	Medium	n/a Benefits potentially significant but not quantifiable.	Ongoing	Target: Ensure that the Director of Public Health signs off statutory Annual Status Reports and new Air Quality Action Plans.	DPH already briefed by way of a briefing note and works closely with Environment Protection via Public Health consultant.
Public health and awareness raising	13	Engagement with businesses to encourage active changes to improve air quality, particularly anchor institutions – such as NHS, schools, and Ealing Council – and their local supply chains.	Public Health	High	n/a Benefits potentially significant but not quantifiable.	Ongoing	Output: Ealing Council will create an internal working group to focus on engaging with businesses on air quality.  KPI: Monitor the progress of local businesses, anchor institutions, and local supply chains targeted,	Working with the voluntary sector is very active and is likely to link into hospitals and pharmacies. Provision of support to others re: work on engagement.  Further stakeholder engagement work potentially includes liaison with primary care networks (GP surgeries etc) that might target vulnerable groups and members of society.  Awareness raising is also being enabled through work with Integrated Care Partnership (ICP) partners and through development activity for the Health and Wellbeing Strategy 2022-27.
Public health and awareness raising	14	Supporting direct alert service such as airTEXT, and promotion and sharing of high pollution alert services through community engagement and school events	Environment Protection /Public Health	Very Low	Low	Ongoing	High pollution alert service information to be incorporated into Health Protection Forum and relevant extreme weather response/planning forums e.g. Winter planning.  Awareness raising of airTEXT/high pollution alert services to be undertaken with primary care during 2022-23.	Ealing has signed-up to both the GLA's air pollution alerts and the airTEXT service; these are shared with schools, GP surgeries and care Homes.  We are exploring new ways to boost airTEXT membership via SMS. Ealing will continue engagement with GPs surgeries, via Public Health, to target and protect vulnerable groups from impacts of air pollution, by increasing free subscription of airTEXT. Access to airTEXT will be promoted in the Air Quality Strategy, to be published in 2022. airTEXT is also promoted on social media channels.

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
Public health and awareness raising	15	Raise public awareness about air quality and provide accurate resources for the public to use to find out about air pollution in Ealing.	Environment Protection/Public Health	Low	Low	Ongoing	Provide detailed, transparent information and resources in the Ealing Air Quality Strategy for the public to use to understand the health impacts of poor air quality, what Ealing Council are doing, and what they can do to help.	The draft Ealing Air Quality Strategy 2022-2030 was published in 2022. This document aims to provide accurate resources for the public to use to find out about air pollution in Ealing.
Public health and awareness raising	16	Encourage schools to join the TfL STARS accredited travel planning programme <i>Further engagement with GPs surgeries, via Public Health, to target and protect vulnerable groups from impacts of air pollution, by increasing free subscription of airTEXT.</i>	Transport/Public Health	Low	Medium	2022 - 2025	STARS accreditation KPIs: Gold: 20; Silver: 6; Bronze: 13; and Schools engaged & registered on STARS: 3;  42 schools achieved or working towards TfL STARS accreditation	Health protection role already embedded in Public Health.  Input from Public Health team on active travel (linked to healthy child weight interventions) in collaboration with awareness raising engagement with schools undertaken by Transport as regards to influencing pupils' behaviour, leading to active travel and improved local air quality along school routes .
Public health and awareness raising	17	Improvement of air quality in and around schools. Extend schools audits to all polluted schools (and potentially to other vulnerable groups, such as nurseries).	Environment Protection / Public Health	Low	Low	As and when ASRs and AQAPs are completed, reviewed or updated (every 5-year interval).	21 school streets implemented as at March 2023; further twice yearly roll out (likely to be 4-5 each time) until 50 are delivered.  872 School children cycle trained; Cycle improvements; 24/7 bus lanes; Air quality monitoring extended to a further 5 schools in 2022	Discussions underway for applying to pilot a healthy school 'Superzone' in 2023.  Also see further information in Action 26.  This may also link to opportunities in the Mayor's London Health Inequalities Strategy 2018-28 (Implementation Plan 2021-24) , for example development of up to 50 School Superzones, where school becomes the focus of a local neighbourhood area
Delivery Servicing and Freight	18	Update of Procurement policies to reduce pollution from logistics and servicing	Transport/ Development Management	None	Low	Complete	100% contractors are FORS accredited;  75% sites are NRMM compliant/self-compliant	Whilst vast majority of servicing contractors are FORS accredited and NRMM polices are actively enforced through scheme led by Merton, however engagement with Procurement needs to be had in near future to further reduce pollution from logistics and servicing  <a href="https://www.london.gov.uk/sites/default/files/gla_group_rpp_v7.12_final_template_for_web.pdf">https://www.london.gov.uk/sites/default/files/gla_group_rpp_v7.12_final_template_for_web.pdf</a>

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
Delivery Servicing and Freight	19	Reducing emissions from deliveries to local businesses and residents: <i>Council to take action to raise awareness of Air Quality amongst the business community, by preparing briefing to Ealing's largest businesses. Briefing will seek to promote use of Evs, using London Mayor's Cleaner Vehicle Checker</i>	Transport and Development Management	Low to Medium	Medium	Short term	KPI: % of business CPZs to be implemented	Highways Programme developed and Industrial CPZ programme commenced. Preliminary design complete Park Royal Industrial Estate To follow LAEI trajectory on base year figure: 990 tonnes in 2013  Source TfL LIP3 Outcomes data To follow LAEI trajectory on base year figure: 98 tonnes PM <sub>10</sub> and 55 tonnes PM <sub>2.5</sub> in 2013 Source  TfL LIP3 Outcomes data pack. <a href="#">London Mayor's Cleaner Vehicle Checker</a>
Borough Fleet Actions	20	Reducing emissions from council fleets: Migrate existing small vehicle fleet to electric vehicles	Facilities Management	Low	Medium	Ongoing	Target: To acquire 40 EV vans  Target: 100% vehicle fleet to be EVs by 2025	WestTrans has secured FORS Champion status for LBE in recognition of the procurement practices – including FORS accreditation requirements for any procured freight/fleet function. The Council is holding discussions with all teams to move vehicle fleet to EVs as much as possible.  However, currently there are no full EVs able to tow over 2 tonnes on the market. Instead, these medium and large vehicles will be replaced with Euro VI standard vehicles on contract hire for 3-4 years, by which time there should be suitable replacement EVs available.  Facilities Management to investigate promoting EV with local businesses, by taking advantage of government grants.
Borough Fleet Actions	21	Reducing emissions from council fleets: Smarter Driver Training for drivers of vehicles in Borough Own Fleet i.e. through training of fuel-efficient driving and providing regular re-training of staff	Facilities Management	Low	Low	Ongoing	KPI: Number of training sessions carried out	FM/ICT use vehicle telematics to monitor driver behaviour. This highlights speeding, harsh driving, idling etc. This information is then fed back to drivers to improve driver behaviour.
Localised solutions	22	Green Infrastructure (GI)	Development Management, Transport,	Low	Low	Ongoing	Borough to develop GI targets in conjunction with its LIP and Core strategy	Green Infrastructure is being developed following Policy 6.3 of the Ealing Development Strategy 2026.

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
			Highways, Environment Protection, Regeneration					Defra Air Quality Grant provided improvements for Horn Lane which includes green landscaping and SUDS.
Localised solutions	23	Liveable Neighbourhoods	Transport in partnership with Environment Protection and Regeneration	High	Low to Medium	Ongoing.	Borough to seek funding for implementation of area-based air quality schemes when available.	West Ealing Liveable Neighbourhood (WELN) scheme. This is aimed at eliminating air quality hotspots by reducing car journeys through encouraging mode shift and provision of Green Landscaping and SUDS.  The Ultra Low Emissions Zone (ULEZ) was extended to cover Acton Oct 2021; further extension which will cover the entirety of Ealing is planned to take place by the 29 August 2023.
Localised solutions	24	Support communities wishing to enact temporary road closures, support and encourage resident-led Play Streets, and identify opportunities to increase the size and number of School Streets	Transport/ Highways/ Street Services	Low	High in targeted areas	Ongoing	Target: Increase number of school streets to 50 by 2027.	The resident-led play streets initiative has resulted in 25 registered play streets in the borough. Ongoing work will encourage them to return as traffic increases.  Ongoing work will identify opportunities to increase the number and size of the successful School Streets.
Cleaner transport	25	Ensuring that Transport and Air Quality policies and projects are integrated	Shared responsibility between Transport, Street Enforcement and Environment Protection	Medium	Low	Ongoing	Target: 100% of AQ and Transport policies and projects to be integrated.  Target: 100% of major road schemes to include integrated air quality monitoring	Examples of current integrated policies include policies on school travel plans, LENs, school streets, modal shift to walking and cycling, emissions-based parking charges that promoting cleaner vehicles and electric vehicles.
Cleaner transport	26	Discouraging unnecessary idling by taxis and other vehicles	Environment Protection/ Transport/ Street Enforcement	Low	Medium at pollution hotspots; low on overall emissions.	2022 and ongoing	Target: Identify pollution hotspots for additional anti-idling measures.  Target: 100% AQ hot spots to have anti-idling signage.  Target: 100% AQ hot spots with anti-idling signage to have civil enforcement.	LBE's approach combines public awareness and education, anti-idling signage and enforcement to target idling hotspots such as schools and bus and taxi ranks.  Ealing participates in the Mayor of London's Idling Action London campaign, which delivers idling action events, school workshops, and business engagement.  Anti-idling signage already exists at some major roads, e.g., Madeley Road, but further anti-idling signage is planned

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
								<p>for 2023 and beyond. Future signage may include health messages.</p> <p>The key implication, is for enforcement via a borough-wide traffic management order (TMO) under section 6 of the Road Traffic Regulation Act 1984, based on the exemplar TMO provided by Idling Action London, which has also been implemented in other London boroughs. A borough-wide TMO would provide consistency and parity across the borough and enable any enforcement to equitably take place across the whole borough.</p>
Cleaner transport	27	Using parking policy to reduce pollution emissions	Street Services/ Highways	Low	Low to Medium	2022	<p>Output: Existing 100% emissions-based parking scheme for long-term parking to be extended to 'short stay' visitor parking.</p> <p>Seek opportunities to reclaim carriageway as part of public realm improvements including SUDs</p>	<p>The implementation of 100% emissions-based permit parking for long-term parking is complete.</p> <p>Low emission vehicles are offered a discount in pay &amp; display and car parking spaces. There is a scale categorising each vehicle into one of 4 carbon dioxide (CO<sub>2</sub>) bands, with an additional surcharge added to diesel vehicles which are not Euro 6.</p>
Cleaner transport	28	Installation of Ultra-low Emission Vehicle (ULEV) infrastructure	Transport/ Highways	Low to High depending on uptake	Medium. Emissions from private cars account for 24% of total NOx emissions in Ealing. Electric vehicles do not emit NOx, so any shift from convention vehicles to EVs will reduce NOx emissions.	Ongoing	<p>Target: Reduce walking time to an electric vehicle charging point to 10 minutes by 2023.</p> <p>Target: Reduce walking time to an electric vehicle charging point to 5 minutes by 2025.</p> <p>Target: Increase number of electric vehicle charging points to 2000 by 2026.</p>	<p>Ealing Council has successfully implemented 220 EV charging points in Ealing during the previous Air Quality Action Plan. Building on this success by increasing the availability of charging points is a priority for the Council going forward. Additional provision will focus on streets further than 10 minutes from an EV charging point, and areas with street parking.</p> <p>Ealing Council will require all new parking spaces to be passively equipped for EV charging going forwards.</p>
Cleaner transport	29	Provision of infrastructure to support cycling	Transport	High	High. Emissions from private cars account for 24% of total NOx emissions in Ealing, 19% of total PM <sub>10</sub> emissions, and 20% of total PM <sub>2.5</sub>	Ongoing	<p>Target: Deliver Uxbridge Road walking &amp; cycling corridor project which will separate cyclists from other road traffic. Uxbridge Road is a key nexus for cyclists in the Borough.</p>	<p>Improve interconnectivity through identifying key cycle routes. Targets follow MTS trajectory on base period figures.</p>

Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/ concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
					emissions. Modal shift away from car use will decrease these emissions.		<p>Target: Increase the number of cycle hangars in the Borough to 150 by 2026.</p> <p>Target: % of Londoners to do at least 20 minutes active travel daily: 38% for 2021 and 70% for 2041; 46% by 2026 % of Londoners living within 400m of the London-wide strategic cycle network: 16% and 69% in 2021 and 2041 respectively; 29% by 2026.</p>	<p>91% of Ealing Residents are within five minutes' walk of a bus service and 99% are within seven minutes (both at average walking speed).</p> <p>Improved PTAL is desirable in Park Royal, Norwood Green and parts of Greenford, Northolt, Perivale and Southall.</p> <p>Northolt and Southall active travel schemes that will see reclamation of carriageway.</p>
Cleaner transport	30	Increase cycle training with schools and adults	Transport		Low. Training will increase uptake of cycling, which will reduce emissions from transport. However, the effectiveness is difficult to quantify.	2022 – 2027 (annually)	Target: Support at least 450 adults in cycle training annually	<p>Further training events postponed due to Covid-19</p> <p>Cycle training individuals trained (917) exceeded target (447) from previous Air Quality Action Plan;</p> <p>School children cycle trained (872);</p> <p>Dr Bike Events (77)</p>
Cleaner transport	31	Provision of infrastructure to support pedestrians	Transport	High	High. Emissions from private cars account for 24% of total NOx emissions in Ealing, 19% of total PM <sub>10</sub> emissions, and 20% of total PM <sub>2.5</sub> emissions. Modal shift away from car use will decrease these emissions.	Ongoing	<p>Target: Completion of Uxbridge Road walking &amp; cycling corridor project which will improve pedestrian safety and accessibility to bus services along this route.</p> <p>Target: Improve pedestrian experience in town centres to make walking to amenities more attractive.</p> <p>Target: Ensure sustainable/active travel is included in new developments.</p> <p>Target: Seek to create new routes across roads, railways and canals where severance is an issue.</p> <p>Target: Investigate potential for modal filters or temporary road closures on key pedestrian routes.</p>	<p>A 20mph speed limit was successfully introduced across Ealing to improve road safety.</p> <p>The provision of additional pedestrian infrastructure in town centres and areas of severance is aligned with the Transport Strategy goal to make the Borough accessible to those with a mobility impairment.</p>



Action category	Action ID	Action name and description	Responsibility	Cost	Expected emissions/concentrations benefit	Timescale for implementation	Outputs, Targets and KPIs	Further information
Cleaner transport	32	Increasing the proportion of electric and hydrogen vehicles and low emission vehicles in Car Clubs	Transport	Low	Low. The car club fleet in London is almost 100% Euro 5 or Euro 6 compliant. In the general fleet, EVs have the potential to reduce NO2 concentrations by up to 1% at receptors on main roads with the highest exposure to road traffic emissions.	Ongoing	Target: 100% of car clubs to be EV (proportional to demand)	WestTrans has been working on increasing the EV and hybrid fleet within car clubs in Ealing. Future targets are based on expanding on this work to switch all vehicles to EVs.  A Zipcar Flex floating car club with Electric Vehicles was introduced in Acton/Ealing in July 2021.

## Appendix A: Summary of consultation

### A.1 INTRODUCTION

This appendix sets out details of the consultation covering the Ealing Air Quality Action Plan and the supporting Air Quality Strategy. It summarises the feedback received and the response from the Council.

The key groups involved in this consultation included:

- **Statutory consultees** including the Greater London Authority, the Environment Agency and all neighbouring boroughs.
- **Interest groups** including local and national campaign groups and environmental charities.
- **Members of the public.** In total, 204 responses were received from the public. The public consultation process also included the Ealing Air Quality Strategy 2022 – 2030.

#### A.1.1 Summary of consultation process

The consultation period ran for eight weeks, from 5 December 2022 to 30 January 2023. The majority of responses were received through an online questionnaire, accessed through the Council's consultation website. Responses could also be provided by email to the dedicated consultation inbox.

In addition, the following activities were undertaken to support the public consultation:

- A series of social media posts by the Council throughout the consultation period.
- Distribution of leaflets promoting the consultation to Ealing residents.
- Two in-person events on the 9<sup>th</sup> and 12<sup>th</sup> December 2022, which aimed to raise public awareness of the consultation, explain its scope, and offer the opportunity for questions.
- Two webinars outlining the Air Quality Action Plan and the supporting Air Quality Strategy 2022-2030 on the 9<sup>th</sup> and 12<sup>th</sup> January 2023.

Following analysis of the feedback received, a revised final version of the AQAP was produced in spring 2023.

Responses from statutory consultees, interest groups and members of the public are summarised in sections A.2, A.3 and A.4 respectively.

### A.2 RESPONSES FROM STATUTORY CONSULTEES

#### A.3.1 GLA

Consultee	Category	Response
GLA	Statutory consultee	<ul style="list-style-type: none"> <li>• Response pending</li> </ul>

#### A.3.2 Environment Agency

Table A.1 – Summary of Responses of consultation – Environment Agency

Consultee	Category	Response
Environment Agency	Statutory consultee	<ul style="list-style-type: none"> <li>• Is pleased to note that Ealing regularly participates in the Heathrow Air Quality Cluster Group</li> <li>• Suggests that the new AQAP makes reference to the forthcoming 'air quality positive' guidance.</li> <li>• Suggests that the plan should include reference to the 2023 ULEZ expansion to include the whole borough.</li> <li>• Notes an ambiguity in the contribution of Non-Road Mobile Machinery to PM<sub>10</sub> and PM<sub>2.5</sub> emissions.</li> <li>• Suggests that Section 5.12 include a commitment to working with professional partners such as the Environment Agency on Acton Goods Yard.</li> </ul>

		<ul style="list-style-type: none"> <li>• Suggests that the London Plan SI 8E position on enclosure should be referenced in 'The London Plan' section of the Air Quality Action Plan, page 13 and adopted by Ealing Borough.</li> <li>• Notes that the plans to help residents switch to lower emissions vehicles and encourage walking and cycling will help to tackle both the climate crisis and improve air quality.</li> </ul>
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### A.3 RESPONSES FROM INTEREST GROUPS

Table A.2 – Summary of Responses of consultation – interest groups

Consultee	Category	Response to consultation
<b>Friends of the Earth</b>	Interest group	<ul style="list-style-type: none"> <li>• Suggests that the AQAP and associated AQS are too long and detailed and could be more accessible.</li> <li>• Suggests a need for more real-time air pollution monitoring stations, potentially including portable monitoring stations.</li> <li>• Raises question of the contribution of sources inside vs outside Ealing to concentrations.</li> <li>• Suggests moving material on policy context to appendices.</li> <li>• Suggests a range of potential further actions with potential benefits for the environment and public exposure to air pollution, including:                             <ul style="list-style-type: none"> <li>○ Promoting vegetated front gardens</li> <li>○ Discouraging purchase and use of SUVs</li> <li>○ Retrofit of existing buildings to reduce emissions from housing stock (Action 10).</li> <li>○ Exploring more effective ways to publicise problem of solid fuel burning and enforcing reducing in log burners.</li> <li>○ Monitoring compliance with anti-idling signage, and stronger publicity.</li> <li>○ Considering changes to pelican crossings to support pedestrians.</li> </ul> </li> <li>• Suggests need for more detail on benefits of proposed measures and quantification of objectives in order to evaluate the effectiveness of the proposed measures</li> </ul>
<b>Mums for Lungs</b>	Interest group	<ul style="list-style-type: none"> <li>• Welcomes the AQAP and associated measures, including 20mph speed limit across the borough and prioritisation of schools and school-related traffic.</li> <li>• Suggests a range of further actions with potential benefits for the environment and public health and safety, including:                             <ul style="list-style-type: none"> <li>○ Aim to reduce vehicle traffic</li> <li>○ More action on enforcement of 20mph speed limit</li> <li>○ Phasing out use of diesel cars</li> <li>○ Increased parking charges and reduced on-street parking</li> <li>○ Repurposing of parking spaces to create public realm improvements</li> <li>○ Review of funding strategy for School Streets</li> <li>○ Use of School Superzones to support sustainable and safe active travel for all school runs (covered in Action 17)</li> <li>○ Efforts to raise public awareness of risks of wood burning</li> </ul> </li> <li>• Urges Council to add more detail on rationale for and prioritisation of actions, as well as how delivery will be assessed to ensure public accountability and effective use of funds.</li> </ul>

## A.4 CONSULTATION RESPONSES FROM THE PUBLIC

### A.4.1 Demographic profile of respondents

The respondent profile for the online consultation is provided in Table A-3. Overall, 198 respondents (of 204 total respondents) provided demographic information with their response. Compared to the population of Ealing residents, groups including those who are White British, those who are over the age of 35 and men were more likely to respond to the consultation.

Table A-3: Respondent profile

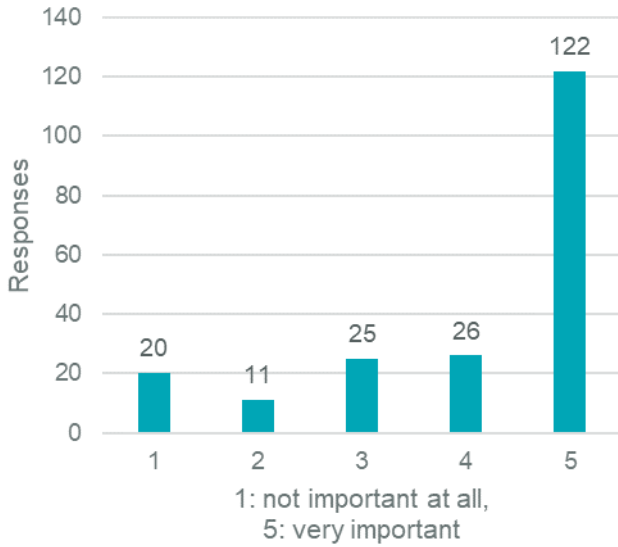
	Sub-category	Number of responses
Age	Under 18	1
	18-24	1
	25-34	17
	35-44	27
	45-54	51
	55-66	42
	65+	41
	Prefer not to say	21
Gender	Female	70
	Male	95
	Prefer not to say	33
Limiting illness/disability	Limiting illness/disability	22
	None	154
	Prefer not to say	22
Ethnicity	White - English, Welsh, Scottish, Northern Irish or British	106
	White - Irish	12
	White - Roma	2
	White - Other	30
	Any other White background	3
	Mixed or multiple ethnic groups - White and Black Caribbean	1
	Mixed or multiple ethnic groups - White and Black African	1
	Mixed or multiple ethnic groups - White and Asian	4
	Asian or Asian British - Indian	12
	Asian or Asian British - Pakistani	1
	Asian or Asian British - Bangladeshi	1
	Asian or Asian British - Chinese	1
	Any other Asian background	1
	Black, Black British, Caribbean or African - Caribbean	1
	Arab	1
	Any other ethnic group	16

### A.4.2 Findings

A majority of respondents to the consultation (73%) felt that air quality is important to them. However, this is likely to reflect the fact that individuals who feel strongly about the issue are more likely to respond to the consultation.

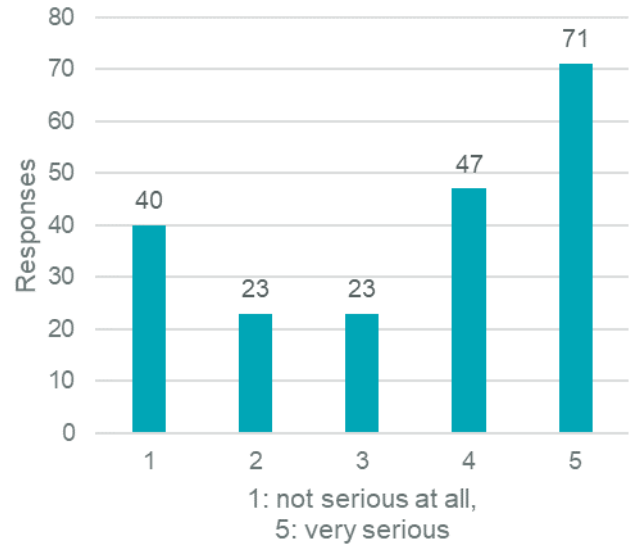
While the majority of respondents also feel that air quality is a problem in Ealing, there is less agreement on this point. While 35% believe that air quality is a very serious problem in this area, 20% of respondents believe that air quality is not at all a serious issue in Ealing.

#### How important is air quality to you?



Base: All respondents (204)

#### How much of a problem do you think air quality is in Ealing?

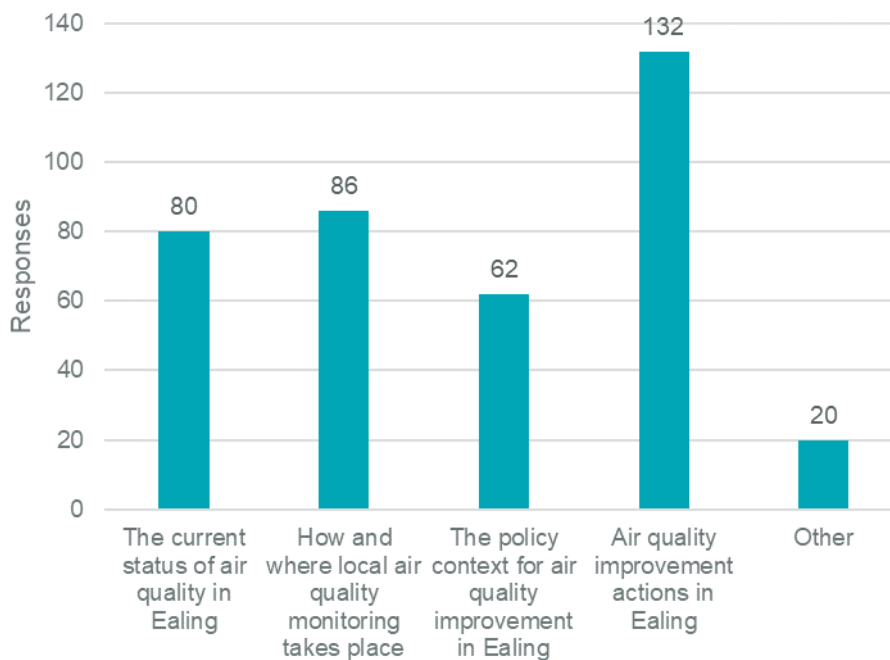


Base: All respondents (204)

Respondents were asked to select the areas of the Air Quality Action Plan that they were most interested in. A majority of respondents (65% of the total) selected air quality improvement actions in Ealing as one of the most important areas, while the policy context for air quality improvement in Ealing was seen as least important by respondents.

Detailed comments were received suggesting that the policy section, while providing useful information, could be placed in an appendix rather than in the main text of the AQAP.

#### Please select the areas of the Air Quality Action Plan that you are most interested in

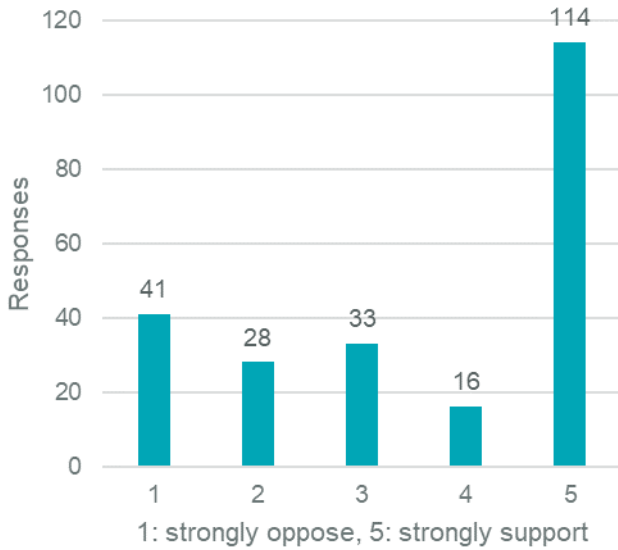


Base: All respondents (204)

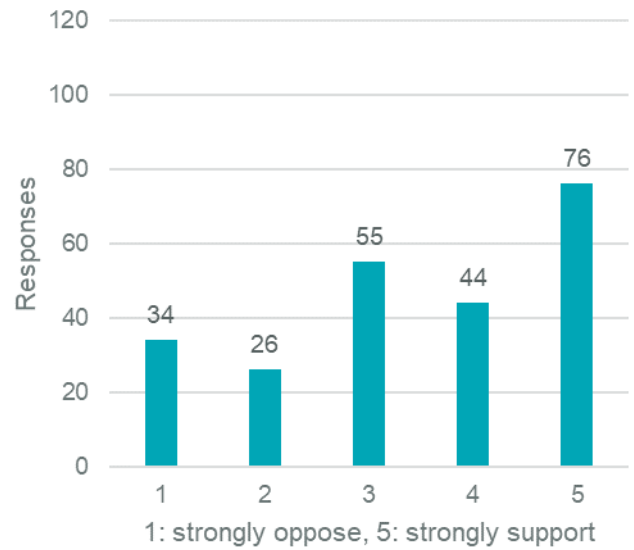
### How strongly do you support or oppose the measures highlighted in these priority action areas?

Respondents were asked whether they support or oppose measures highlighted in each of the Council's priority action areas. A breakdown of responses to each priority is provided below.

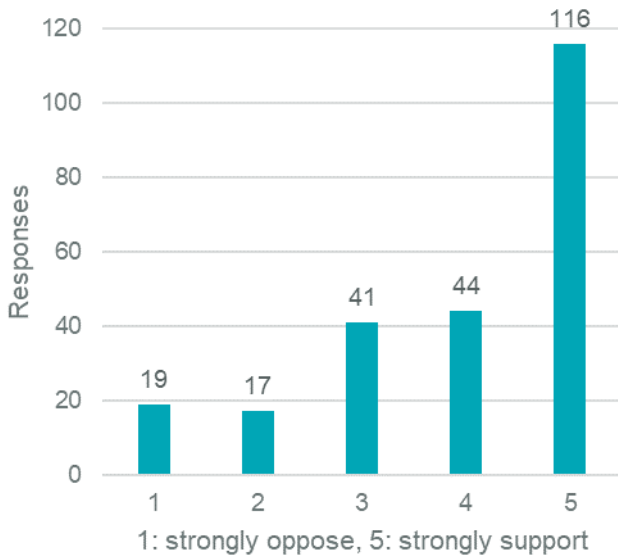
#### Reducing road traffic emissions



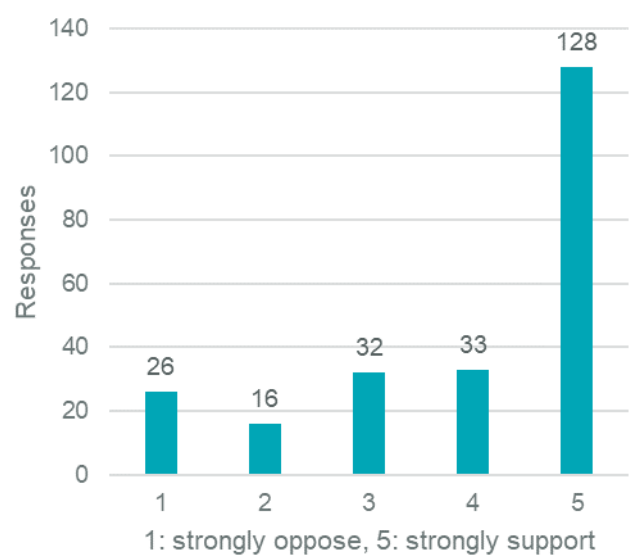
#### Improving indoor air quality



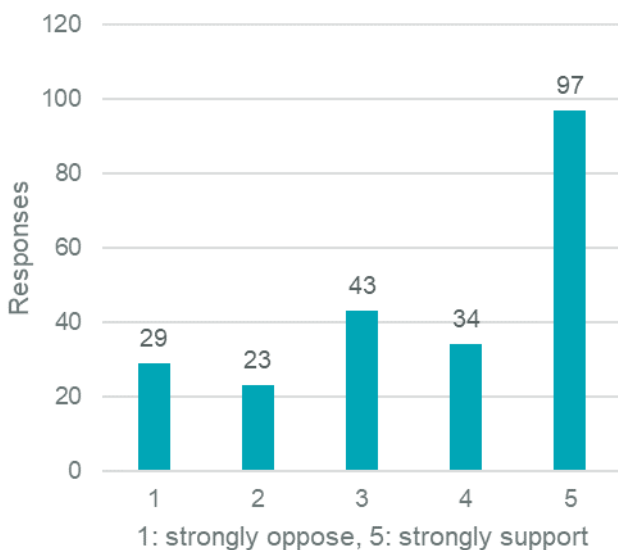
#### Reducing the impact of new and existing developments



#### Green infrastructure



#### Public health and awareness raising



Respondents were broadly supportive of the measures relating to all priority action areas. Measures aimed at reducing the impact of new developments and green infrastructure were particularly strongly supported. Measures relating to improving indoor air quality received the lowest overall level of support, with many responses highlighting a need for further action on wood burning.

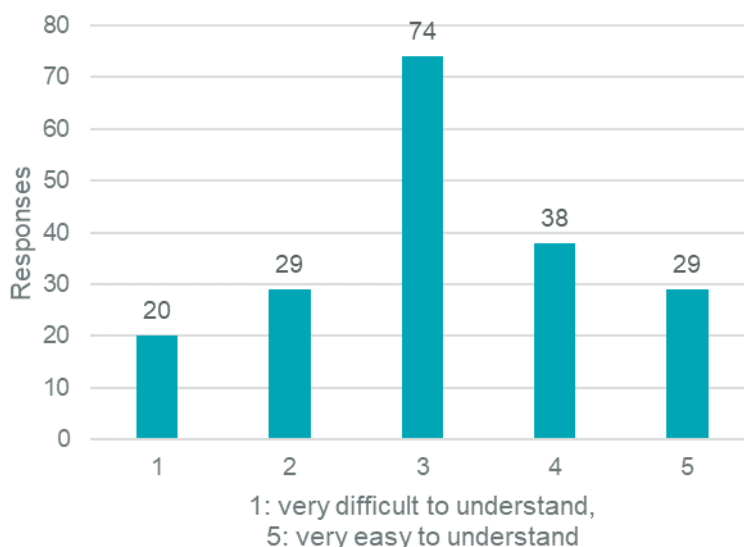
Many respondents felt that there were specific actions that were inadequate or not sufficiently ambitious. The following areas were most likely to be mentioned as needing more action:

- Greater focus / more actions on wood burning
- Greater focus / more actions on tackling vehicle emissions
- Greater focus / more actions on trees and protecting green space
- Tackling air pollution around schools
- Enforcement of existing policies, particularly around anti-idling.

Some respondents felt that the expected benefits from individual measures were unclear, particularly relating to the impact of the measures on pollutant concentrations. Concerns were also raised around how the measures address inequality in Ealing.

A significant minority of respondents commented that the document is relatively long and therefore difficult to understand. This is further demonstrated in the responses to question included below.

**How clear and easy to understand did you find the Air Quality Action Plan?**



Base: All respondents (204)

Responses also highlighted the need for consistency between the AQAP and the Air Quality Strategy 2022-2030, and suggested that clarity would be improved by ensuring that the two documents follow similar formats.

Concern was expressed about potential adverse health impacts of air pollution, particularly for those groups who are more vulnerable to the effects of poor air quality. The vulnerable population in Southall is highlighted as an example.

The importance of using and publishing air pollution data and secondary data to understand the effectiveness of measures included in the Council’s AQS and AQAP.

#### **A4.4. Proposed changes to the Draft Air Quality Action Plan**

The Council carefully considered all of the consultation responses that were received. Through the consultation process, several changes were incorporated into the final AQAP. A summary of these changes is set out below for ease of reference.

##### **Accessibility**

In recognition of the technical nature of this Air Quality Action Plan, the Council has developed an Air Quality Strategy to provide a less technical summary of air quality in the Borough and provide a broader roadmap for the Council's ambitions for air pollution over the next decade. Following consultation feedback, the Air Quality Strategy has been amended to ensure that it fulfils this role, including the provision of an executive summary. Changes were made to the Air Quality Action Plan to ensure consistency between the two documents where necessary.

##### **ULEZ expansion**

Following the consultation response from the Environment Agency, references to the ULEZ have been updated to note the forthcoming expansion of the ULEZ to include the whole Borough in 2023.

##### **Amendment of action 6 to include reference to air quality positive**

Following the consultation response from the Environment Agency, Action 6 has been updated to include reference to forthcoming Air Quality Positive guidance.

##### **Amendment of Sections 3 and 7 to highlight links between AQAP and AQS**

Following relevant comments and suggestions from members of the public and local groups, paragraph 3.5 of the Air Quality Action Plan has been updated to include information on the AQS and include the Council's air quality priority action areas.

A table demonstrating the links between the AQAP measures and the AQS air quality priorities has been added to Section 7 as Table 7-1.

##### **Amendment of Sections 2.4 and 3 to better highlight rationale for measures**

Following relevant comments and suggestions from members of the public and local groups (Mums for Lungs, Friends of the Earth Ealing and Clean Air for Southall and Hayes), the following changes have been made to provide more information on the rationale underpinning the actions in the Air Quality Action Plan:

- 1 Section 2.4 has been expanded to include more details on the source apportionment analysis and demonstrate how the results have led to the development of the action plan measures.
- 2 Section 3 has been updated with additional information on how the council's priority action areas have been derived.
- 3 Additional information on targets and KPIs have been included for measures.

##### **Amendment of action 2 on PM<sub>2.5</sub> monitoring**

Additional information has been provided on the Council's ambition to increase PM<sub>2.5</sub> monitoring in the borough and investigate the possibility of using portable monitors in order to facilitate monitoring and evaluation of the Air Quality Action Plan measures.

##### **Amendment of action 9 on Smoke Control Zones**

Reference to the Air Quality Strategy's section on wood burning and indoor air quality has been added to action 9.

##### **Amendment of references to Non-Road Mobile Machine in Section 2**

Following the consultation response from the Environment Agency, Figures 2-6 and 2-8 of the AQAP have been amended to note that Non-Road Mobile Machinery is included in the "Other" category in these plots.



## Appendix B: Reasons for not pursuing Action Plan Measures

Table B-1: Action Plan Measures Not Pursued and the Reasons for that Decision

Action category	Action description	Reason action is not being pursued
None	None	None

