

**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