

Item No. 5	Classification: Open	Date: 11 October 2022	Decision Maker: Environment and Community Engagement Scrutiny Commission
Report title:		Air Quality Action Plan 2023 - 2027	
Ward(s) or groups affected:		All	
From:		Director of Environment	

RECOMMENDATIONS

1. That Environment and Community Engagement Scrutiny Commission note the appended Air Quality Action Plan 2023 – 2027 and Air Quality Management Area to go forward to Cabinet Scrutiny Committee, and the Greater London Authority for further consideration and amendment, before submission to Cabinet for approval on 6 December 2022.

INTRODUCTION

2. This report provides information for Environment and Community Engagement Scrutiny Commission on consultation and development of the Air Quality Action Plan 2023 – 2027.
3. Further information is set out below in the Community Impact Statement about how the public sector equality duty is relevant to this decision to accept or amend the Air Quality Action Plan 2023 – 2027.

BACKGROUND INFORMATION

Air Quality Strategy and Action Plan

4. Southwark is required to have an Air Quality Strategy and Action Plan to address poor air quality levels in parts of the borough. The strategy and action plan must be reviewed at the end of each five year period, and a revised/updated plan published at the end of each period.
5. The current Air Quality Strategy and Action Plan 2018-2022 ends in December 2022. Poor air quality continues to be a concern in the borough, so an updated five year strategy and action plan is required for 2023 – 2027.
6. Additionally, the Air Quality Management Area declared in Southwark in 2003 does not include a small area at the southern end of the borough which following public consultation, now needs to be included. Therefore, the Air Quality Management Area has been revised to include all areas in the borough.

7. Internal review of the Air Quality Action Plan commenced in last quarter of 2021 with a briefing to Lead Member. At Lead Member's request, an officer and member working group was convened in early 2022 to review the process for revising and adopting the revised Air Quality Action Plan, and to ensure the revised Air Quality Action Plan would support other key Council priorities.

Consultation

8. Public and further internal consultation took place on the Air Quality Strategy and action Plan 2023-2027 and the revised Air Quality Management Area, generating around 1000 unique comments on the proposed actions. The comments were reviewed in detail, and revisions were made in response to the consultation comments as appropriate. Further detail is given in the section on consultation below.

Governance

9. Air Quality Steering Group (AQSG) chaired by Director of Public Health, and a number of sub groups of AQSG, met to consider further the outputs from the officer and member working group, to consider its own high level input to the Air Quality Action Plan, and to review performance indicators.
10. The Air Quality Action Plan and Air Quality Management Area, may now receive final comments from Environment and Community Engagement Scrutiny Commission.

Timetable for Implementation

11. As required by statute The Air Quality Action Plan 2023 – 2027 and Air Quality Management Area will be submitted to Greater London Authority for comments no later than 17 November 2022.
12. Once the Council has considered comments from the Greater London Authority the Air Quality Action Plan 2023 – 2027 and Air Quality Management Area will be submitted to Cabinet for adoption.
13. The proposed timetable to approve and publish the Air Quality Action Plan 2023 – 2027 and Air Quality Management are set out below. The Air Quality Action Plan will be published on Southwark's website.

Air Quality Management Area (AQMA) and Air Quality Action Plan 2023 – 2027 (AQAP)	
Activity:	Complete by:
AQMA consultation	September 2022
AQMA and AQAP to Environment Scrutiny Commission	11 October 2022
AQMA and AQAP to GLA for approval	17 November – 5 December 2022
Approval of AQMA and AQAP : Cabinet Report	6 December 2022
Scrutiny period for Cabinet decision (if called in)	6 – 30 December 2022
Publish AQMA and AQAP	31 December 2022

KEY ISSUES FOR CONSIDERATION

14. The current iteration of the Air Quality Action Plan 2023 – 2027 is presented as Appendix 1:
- Section 1 to 3 present data about air quality in Southwark, and describe the health impacts of air pollution.
 - Section 4 is the work action table. This is being finalised and is currently not available. It will set out the measures that the Council will seek to implement over the next five years.
15. The Air Quality Action Plan should be considered a living document: actions will be removed from the action table when completed, others may be added in the course of the five year lifespan of the plan as new measurement techniques and new information on health impacts of air quality emerges, and as council strategic aims evolve.
16. As discussed above the Air Quality Management Area has been revised to include all areas in the borough. This is reflected in the Air Quality Management Area draft order presented as Appendix 2.

Policy framework implications

17. Air pollution causes adverse health impacts, and contributes to the onset of respiratory, heart disease and cancer. Air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. Air quality is an equalities issue, because areas with poor air quality are often also the less affluent areas.
18. The Air Quality Action Plan has been produced as part of our statutory duties to work towards air quality objectives under Part IV of the Environment Act 1995 as set out in UK Clean Air Strategy 2019, and under London Local Air Quality Management.

19. An additional feature of the Air Quality Action Plan 2023 – 2019 is that it will work towards new non-statutory targets set out in World Health Organisation (WHO) objectives, in support of the Mayor of London's aim to achieve the WHO objectives across London by 2030. The WHO targets are more ambitious than the national targets set by central government.
20. The Air Quality Action Plan 2023 – 2027 contributes to:
 - a) Southwark's Borough Plan of tackling health inequalities and providing a great start in life. The Air Quality Action Plan includes actions that will directly tackle health issues that particularly affect Black, Asian and minority ethnic communities, provide support to vulnerable residents, and make it easier for residents to lead healthy and active lives. The plan includes actions that will make it easier for children and their carers to mitigate the health effects of air pollution, thereby improving their opportunities to reach their potential.
 - b) actions for tackling the climate emergency, as many sources of air pollution are also carbon emitting combustion sources.
 - c) actions that help keep Southwark safe during COVID-19. There is evidence that air pollution can worsen the symptoms of Covid-19. In addition the Air Quality Action Plan supports street space measures that improve the potential for social distancing by reclaiming street space from vehicular traffic and allocating it to active travel.

Community, equalities (including socio-economic) and health impacts

Community impact statement

21. The Joint Strategic Needs Assessment on Air Quality (Southwark Public Health, 2022) shows clear inequalities in Southwark. Some groups of people with the Protected Characteristics of age, disability, and race are identified as priority groups more vulnerable to exposure to poor air quality, and the subsequent adverse health effects. This includes people of Black ethnicity, children, older people, and people with relevant health conditions.
22. Actions to improve air quality and reduce exposure to poor air quality in the Air Quality Action Plan 2023 – 2027 will particularly benefit Southwark's most vulnerable residents and visitors, contributing to the reduction of health inequalities over the long term.
23. The equality and health impact analysis indicates that the policy shows no potential for discrimination and all appropriate opportunities have been taken to advance equality of opportunity and foster good relations between people with different protected characteristics.

Equalities (including socio-economic) impact statement

24. People from black and minority ethnic groups, and disadvantaged communities are likely to experience worse exposure to poor air quality than others, and are therefore more likely to suffer from a relevant health condition, and experience worse health consequences during episodes of higher air pollution. Children and older people are likely to experience worse health consequences for the same level of exposure.
25. Improving air quality and reducing exposure to poor air quality among large sections of Southwark's residents and visitors will reduce the socio-economic impact of poor air quality through fewer working days lost to sickness absence, and by reducing the burden on health care services.

Health impact statement

26. A robust air quality action plan with strong commitment to full implementation will create opportunities to improve air quality, and to mitigate the health impacts of poor air quality on children, older people, people with relevant health conditions, and people living and working in areas of poor air quality. This last group includes disproportionately higher numbers of black and minority ethnic communities, and other disadvantaged groups, including those experiencing socio-economic disadvantage.

Climate change implications

27. Climate change impacts as covered in the council's Climate Change Strategy have been considered while developing the Air Quality Action Plan.
28. Climate change director and climate change team officers contribute to the Air Quality Steering Group that took a lead in developing the Air Quality Action Plan 2023 - 2027.
29. Many sources of air pollution are also combustion sources that contribute to carbon dioxide emissions, the principle greenhouse gas that causes atmospheric heating and contributes to climate change.
30. The main combustion sources of poor air quality are road traffic and other internal combustion powered plant on construction sites, and gas, oil and wood combustion for space heating and catering.
31. Measures in the Air Quality Action Plan that focus on reducing emissions from combustion sources also contribute to reducing emissions of carbon dioxide. When selecting measures, greater attention has been given to those that reduce carbon dioxide and other greenhouse gas emissions.
32. Actions in the Air Quality Action Plan include encouraging sustainable travel and reducing car use, enhancing the environment and green space, and sustainable energy.

33. It is intended to monitor the achievement of actions in the Air Quality Action Plan, including those that contribute to climate change, through the new Corporate PI recording system.

Resource implications – this report and these recommendations

34. There are no financial or staffing implications to this report, as the costs and staff time associated with producing the Air Quality Action Plan 2023 – 2027, including the public consultation costs, and costs of implementing any recommendations in this report were and will be met from existing resources.

Resource implications – future implementation

35. Adoption of the Air Quality Action Plan 2023 – 2027 and continued action to combat air pollution has future resource implications to implement the actions in the action plan. Some actions may be implemented from within existing resources. Other actions may require internal or external project funding. Some air quality projects are run in partnership with other boroughs and organisations.

36. Internal project funding is sought each year through the capital bids process, and any financial, budget and staffing issues will be dealt with through that process. In the past five years, capital bids have funded the various projects including;

- ‘#onething’ air quality awareness campaign;
- car free days;
- schools air quality audits
- school and nursery air quality starter grants
- replacement of pool cars with fully electric vehicles
- assessment of emissions from council owned medium combustion plant (mainly estates communal heating and hot water boilers)

37. External funding is sought whenever suitable funds are opened for applications. In the past five years, sources have included the Mayor’s Air Quality Fund, and Defra’s Clean Air Fund. All financial, budget and staffing issues associated with externally funded projects will be dealt with through the reporting process and subject to scrutiny and approvals from Departmental Contract Review Board.

38. Over the past five years, Southwark has led or participated in air quality projects arising from bids for external funds. Projects have included;

- Trials of anti idling signage at Tower Bridge during bridge lifts
- Walworth Low Emission Neighbourhood
- alpha-beta phase redevelopment of the airTEXT air quality alerts
- installation of a heat pump system in a Southwark school

- anti-idling action
 - Non road mobile machinery construction sites enforcement
 - Road sweeping impact on re-suspended road dust
39. Other sources of air quality project funds, including match funds for externally funded projects, have been obtained from s.106 payments paid to mitigate air quality impacts of development, the parking revenue fund, the internal Digital Innovation Fund, and Impact on Urban Health charity. Future sources of funds for air quality projects may include the Carbon Fund.
40. Examples of projects financed from these sources include;
- upgrades of monitoring equipment in the Air Quality Monitoring Stations, and expansion from two stations to six (Parking Revenue Account funds)
 - a pilot digital discovery project on the airTEXT air quality alerts system (a precursor to the Defra funded project mentioned above) (funded by Southwark's Digital Innovation Fund and Impact on Urban Health charity)
41. Air quality projects follow a system of reporting from inception to completion. Where future air quality projects have staffing or capital resource implications, advice and comments will always be sought from the finance and governance department and relevant departmental finance officers.

Legal implications

42. Due to the current levels of air pollution in Southwark, there is a legal requirement to have an Air Quality Management Area, and an Air Quality Action Plan.

Financial implications

43. Financial implications have been described under resource implications above, and no additional advice has been sought on this report from Director of Finance.

Consultation

Consultation approach

44. Prior to public consultation, internal consultation and review of the air quality action plan took place through Air Quality Steering Group. As required by the Local Air Quality Management framework, the air quality team at the GLA were sent and have reviewed the pre-consultation draft. Comments relating to actions and targets were noted and discussed at Air Quality Steering Group, and other minor comments on the layout of tables were incorporated.
45. The public consultation was advertised in advance with the required

statutory newspaper notices, and at Southwark Council offices.

Online consultation

46. As noted in Resource Implications above, no additional funds were allocated to the consultation process. In accordance with this constraint, advice was sought from the council's internal consultation team on the design and format of consultation most likely to be effective. As the Air Quality Action Plan (AQAP) is a complex, long and technical document that has evolved gradually since 2003, an online format was strongly advised. The consultation was divided into the sections shown below, allowing people to choose to answer only the parts that were of interest to them personally.
- Monitoring
 - Emissions from developments and businesses
 - Public Health
 - Delivery servicing and freight
 - Borough fleet actions
 - Localised solutions
 - Cleaner transport
47. The online consultation was published, inviting open comments on all aspects of the AQAP. Due to restrictions on public consultation imposed by the pre-election period, the consultation started later than originally anticipated, and ran for eight weeks between May and July 2022.
48. An invitation to take part in the consultation was circulated to stakeholders and an email circulation list of around 7000 regular consultees, as well as a list of stakeholders established by the guidance.
49. One of the early consultation responses suggested providing an additional screened view of the consultation, highlighting a few headline actions in each of the sections, to obtain further responses from people with less time to devote to an in depth response. This idea was accepted, and a screened view of the consultation was added, with the option to look at all the areas and questions as originally formatted, if preferred. The consultation was promoted again to the same group of people by way of a reminder of the ongoing consultation. In addition, the Empowering Communities team promoted the ongoing consultation on their social media accounts.

Citizens Juries

50. An approach was made to climate change team to explore whether it would be possible to additionally consult on the air quality action plan via the climate change citizens' juries. Given the synergy between air pollution and climate change, with many air pollutants arising from combustion sources or other greenhouse gas sources, it was hoped there would be an opportunity to conduct some more in depth consideration of

the air quality action plan proposals.

51. However, the terms of reference of the citizens' juries meant that the juries themselves were expected to identify the issues of concern, and asking them to consider a particular topic would have defeated this aim. However, Environmental Protection Team (EPT) have reviewed the approach taken by the Climate Change team and their experience of setting up citizens juries, and have gained an overview of the costs and administrative demands of setting up air pollution juries to conduct any future review of air quality actions.

Outreach

52. EPT have offered to deliver a presentation on the Air Quality Action Plan to each of the 23 Empowering Communities Program ward meetings, and to take feedback from any subsequent discussion. None of the ward meetings have yet expressed an interest, however this remains a future option to validate or expand on the existing consultation feedback and responses.

Initial analysis of responses

53. Reminders were sent to all stakeholders a week before the online public consultation closed. This prompted a marginally late in depth response from 'Mum's for Lungs', which was accepted, and which has been included in analysis. A further in depth response was received from the Environment Agency.
54. A total of 262 responses from unique individuals or organisations were received, containing slightly over 1,000 individual comments on the Air Quality Action Plan 2023 - 2027. The consultation as initially designed generated 66 of these responses over the course of eight weeks, and the screened view of the consultation resulted in an additional 196 responses received through the link to the screened view.
55. One response was opposed on principle to the council having an air quality management area or action plan, and was opposed on principle to the UK following standards set by the World Health Organisation. One further response particularly opposed having Low Traffic Neighbourhoods. Apart from these two responses, the consultation feedback largely endorsed the actions included in the plan, and included many helpful suggestions to make the language more clear, and to define performance indicators.
56. Some responses would not directly translate into actions for the air quality action plan, but are still relevant to other council plans. To help align the air quality action plan with the Borough Delivery Plan, Climate Emergency Action Plan and the Movement Plan, these responses will be passed to the appropriate teams, as part of the cross team aim for the plans to each use consistent language, and for the actions to align.

Emerging changes

57. The consultation produced little in the way of new ideas for innovative actions. This is not unusual and should be expected for a document that has been gradually evolving since 2003 with the input from previous consultations. However, responses received have provided useful insights on which types of actions the public feel should be emphasised, and how air quality actions should support and align with other actions in the council plans to improve quality of life. The responses also made useful suggestions for improvements to the effectiveness of the plan, including changes to key performance indicators (KPIs) and language to demonstrate commitment.
58. A number of responses called for the council to be more ambitious in existing targets, suggesting for example that instead of having an action to 'explore' the possibility of improvements, we should 'commit' to these. There was support for expanding the Air Quality Management Area to cover the whole borough, and for committing to WHO guideline standards of air quality over the existing national standards. There was support for continuing to use the planning system to secure high air quality standards in new development and new building heating systems, and for new development to have access to green space. A large proportion agreed that work should be done with commercial catering establishments, to reduce emissions from commercial catering.
59. There was also strong support for public information campaigns, work with schools and communities to encourage active travel and healthy streets, and to create clean air zoning around schools, health care locations, and care homes. There was support for working to increase low emission freight, for 'greening' the council's own vehicle fleet, to have more low emission neighbourhoods like the Walworth LEN, and to work to reduce vehicle idling. There was moderately strong support (62%) for extending the ULEZ to the M25. There was strong support for encouraging low emission vehicles over standard vehicles, and for introducing more electric vehicle charging points.

Consultation respondent demographics

60. Consultation responses were reasonably evenly spread across the district, but were received in greatest numbers from Walworth and Dulwich. There has been recent public consultation on air quality in Walworth and Dulwich because of the Walworth Low Emission Neighbourhood, and Low Traffic Neighbourhoods in both Walworth and Dulwich. When people respond to an air quality related consultation, they are asked whether they would like to be contacted about future similar consultations, so previous consultees in Walworth and Dulwich appear to have been self-selected to respond to the Air Quality Action Plan consultation.
61. Responses to the equalities section of the questionnaire showed that

there was a reasonable spread of people across age bands over the age of 25, but minimal response from people aged 24 or under. Most respondents were of white ethnicities, with smaller numbers from Black and other Minority Ethnic backgrounds. Around 15% of people described themselves as having a disability. More men than woman responded, in the ratio of around 4 to 3. About half respondents described themselves as heterosexual, with a further quarter preferring not to say or providing no answer. Around a quarter expressed non-heterosexual sexual orientations.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

Director of Public Health

62. The health effects of air pollution are well documented, contributing to cardiovascular and respiratory illnesses as well as cancer. These effects are experienced unequally, with children, older people, and those with certain chronic illnesses most affected. Measures to improve air quality can not only boost health and reduce health inequalities, but also benefit the economy and the environment. As such, Public Health recognises the importance of tackling air quality, and is fully supportive of the Air Quality Action Plan.
63. We are pleased to contribute to the Council's work on air pollution including by chairing of the Air Quality Steering Group by the Director of Public Health, supporting a number of air pollution projects, and producing a Joint Strategic Needs Assessment (JSNA) about the health effects of air pollution in Southwark. We recognise the limitations of the role of local authorities in improving air quality and call on central government to be more ambitious with their air pollution targets.
64. This report does not include a procurement or provide information in respect of contracts, major regeneration, or significant risks, and therefore comments from Director of Law and Governance, Strategic Director of Finance and Governance, or Head of Procurement are not required and have not been sought.

Background Papers	Held At	Contact
Emerging Joint Strategic Needs Assessment on Air Quality 2022 <i>Publication expected October 2022, before Cabinet, but after the report deadline for this report. Link will be provided in Cabinet report for consideration 6 December 2022</i>	Public Health Southwark Council 160 Tooley Street Southwark	Sangeeta Leahy 07756 214 405

Consultation and Summary Responses	Regulatory Services Southwark Council 160 Tooley Street Southwark	Environmental Protection Team Paul Newman paul.newman@southwark.gov.uk
Equality and Health Impact Analysis	Regulatory Services Southwark Council 160 Tooley Street Southwark	Environmental Protection Team Paul Newman paul.newman@southwark.gov.uk

APPENDICES

No.	Title
Appendix 1	Draft Air Quality Action Plan 2023 – 2027
Appendix 2	Air Quality Management Area draft Order

AUDIT TRAIL

This section must be included in all reports.

Lead Officer	Anju Sidhu Head of Regulatory Services	
Report Author	Paul Newman Team Leader.	
Version	V7 for Environmental Scrutiny Commission.	
Dated	11 October 2022	
Key Decision?	No	
CONSULTATION WITH OTHER OFFICERS / DIRECTORATES / CABINET MEMBER		
Officer Title	Comments Sought	Comments Included
Director of Law and Governance	No	No
Strategic Director of Finance and Governance	No	No
List other officers here	Director of Public Health	Yes
Cabinet Member	Yes/	Yes/No
Date final report sent to Constitutional Team / Scrutiny Team	Date/month/year e.g. 6 October 2022	