

Item No. 17.	Classification: Open	Date: 6 December 2022	Meeting Name: Cabinet
Report title:		Air Quality Strategy & Action Plan (2023 – 2027) and Air Quality Management Area	
Ward(s) or groups affected:		All	
Cabinet Member:		Councillor Catherine Rose, Leisure, Parks, Streets and Clean Air	

FOREWORD - COUNCILLOR CATHERINE ROSE, CABINET MEMBER FOR PARKS, STREETS AND CLEAN AIR

Poor air quality has a significant impact of on human health. At Southwark, we are fully committed to doing all we can to help and encourage our services, local businesses and residents to consider the air quality impact of the choices they make and everything they do. Since the first detailed assessment of local air quality assessment was undertaken in 2002, Southwark has been taking steps to tackle the impact of poor air quality on human health.

Local air quality is a public health priority for Southwark which is captured in one of the seven key themes set out in the council plan. Performance indicators for measures to improve air quality are also included in the plan.

I am very pleased to introduce this updated and improved Air Quality Strategy and Action Plan 2023 – 2027, a five year plan to continue driving forward improvements to our air quality. The updated plan builds on the successes of the previous 2017- 2022 plan which firmly established air quality as a key concern for all. In developing the plan, comments and contributions were sought from key stakeholders and interest groups advocating for clean air, particularly young people, such as the Live + Breathe arts event as part of the We Live and Breathe campaign.

But I wish to thank all those who are advocating for change and challenging us as a council to do more. Group such as All Choked Up, Mums for Lungs and XR Southwark as well as health and environmental professionals from across the NHS and other non-governmental agencies.

I take great pleasure in promoting the many air quality improvement projects Southwark have undertaken in the past, with the recognition that there is much more for us to do.

Our major successes over the last five years include:

- Introducing School Streets at 23 schools to help improve the environment outside schools.
- We have undertaken air quality audits at 24 schools which has helped to identify action that can be taken in and around this sensitive environment.
- We have increased our monitoring of air quality by adding an extra 4 continuous air quality monitoring stations to provide a more detailed picture of air quality in Southwark.
- As new council fleet vehicles are procured emission considerations are at the forefront in the selection process for new council vehicles.

With the recent review undertaken by the World Health Organisation that resulted in a significant tightening of the guideline values there is a need to constantly strive to reduce air pollution to improve health outcomes.

This updated Air Quality Action Plan for 2023 – 2027 sets out the range of actions that Southwark will undertake to improve air quality which also support the ambition of the council to end carbon emission. It is anticipated that with air quality having a crucial and significant impact on health, new research, new technology, new ideas, new partnerships and new funding opportunities will present themselves and we will consider how these can be applied for the benefit of Southwark residents as they emerge.

Southwark fully support the Mayor of London’s aims for the improvement of air quality and we will provide an annual progress report to the Mayor detailing our performance against the actions set out within this action plan. Details of any additional actions we take including the corresponding impact will also be included in that report.

As cabinet member I am asking that cabinet, after consideration, to approve the draft Air Quality Action Plan 2023 – 2027 and Air Quality Management Area Order for publication by 1 January 2023.

RECOMMENDATIONS

1. That Cabinet approve the Air Quality Action Plan 2023 – 2027 at Appendix 1, and Air Quality Management Area at Appendix 2.

BACKGROUND INFORMATION

Air Quality Strategy and Action Plan

2. Southwark is required by Part IV Environment Act 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.

3. 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.
4. 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 now needs to be included following the introduction of World Health Organisation (WHO) guidelines, and the ambition, identified in public consultation to adopt the WHO guidelines. Therefore, the Air Quality Management Area has been revised to include all areas in the borough.

Consultation

5. 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

6. 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.
7. The 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.
8. Environment and Community Engagement Scrutiny Commission reviewed the draft Air Quality Action Plan and Air Quality Management Area order on 11 October 2022, and did not request any amendments to the draft Plan or Order.

Timetable for Implementation

9. As required by statute The Air Quality Action Plan 2023 – 2027 and Air Quality Management Area was submitted to Greater London Authority for comments on 31 October 2022.
10. A comment was received from the Greater London Authority on the Air Quality Action Plan 2023 – 2027 relating to the date by which Southwark intends that its vehicle fleet will be fossil fuel free. We advised we are working towards Southwark's commercial fleet, subject to operational requirements, being emission free by 2030. Furthermore, work has

already begun to reduce the size of the fleet through rationalising operational need and with standard combustion engine vehicles being replaced with full electric where possible. This was subsequently reflected in the Air Quality Action Plan. There were no comments on the Air Quality Management Area.

11. The timetable followed to approve and publish the Air Quality Action Plan 2023 – 2027 and Air Quality Management is set out below. The Air Quality Action Plan will be published on Southwark’s website once adopted by Cabinet.

Air Quality Management Area (AQMA) and Air Quality Action Plan 2023 – 2027 (AQAP)	
Activity:	Complete by:
AQAP consultation	May to July 2022
AQMA consultation	September 2022
AQMA and AQAP to Environment Scrutiny Commission	11 October 2022
AQMA and AQAP to GLA for approval	31 October – 17 November 2022
AQSG final review of AQMA and AQAP	31 October – 17 November 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

12. The process and public consultation to review the Air Quality Action Plan has followed the statutory guidance. Officers consulted internally with officers from across the council with responsibilities to maintain and review other policies and plans, to ensure that the draft Air Quality Action Plan is well linked with and aligned to other policies and plans across the council. This includes Southwark’s Council Delivery Plan, the Movement Plan, and the Climate Action Plan.
13. The final version of the Air Quality Action Plan 2023 – 2027 is presented as Appendix 1, incorporating final proposed amendments arising from a GLA comment:
 - Sections 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 sets out the measures that the Council will seek to implement over the next five years.

14. 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.
15. 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

16. 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.
17. 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.
18. 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.
19. The Air Quality Action Plan 2023 – 2027 contributes to:
 - a) Southwark's Council Delivery Plan which has themes on closing the gap to tackle inequalities and provide a great start in life, amongst other commitments. 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.

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

Community impact statement

20. 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.
21. 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.
22. 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

23. 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.
24. 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

25. 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

26. Climate change impacts as covered in the council's Climate Change

Strategy have been considered while developing the Air Quality Action Plan.

27. 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.
28. 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.
29. 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.
30. 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.
31. Actions in the Air Quality Action Plan include encouraging sustainable travel and reducing car use, enhancing the environment and green space, and sustainable energy.
32. 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

33. There are no financial or staffing implications to producing the Air Quality Action Plan 2023 – 2027, as the costs and staff time, including the public consultation costs, and costs of publication were and will be met from existing resources. Future resource implications of actions proposed in the Air Quality Action Plan 2023 – 2027 are set out below.

Resource implications – future implementation

34. 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.
35. 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)
36. 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.
37. 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.
38. 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.
39. 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).
40. Work is being done across council divisions to ensure that resource planning for air quality improvements is a key consideration in delivery of work programs across the council. This work is coordinated through a Director level chaired Air Quality Steering Group (AQSG).
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 both the pre-consultation and final drafts. 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. 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 requested a presentation, 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 valuable and helpful 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. The consultation also confirmed that the plan contains the ideas that will be most effective at combatting poor air quality.
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.
62. Over the course of the Air Quality Action Plan 2023 to 2027, new and additional ways will be sought of increasing interactive public engagement around considering and setting air quality policy, which will be especially beneficial among hard to reach groups.

SUPPLEMENTARY ADVICE FROM OTHER OFFICERS

63. 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.

Director of Public Health

64. 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.
65. 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.

BACKGROUND DOCUMENTS

Background Papers	Held At	Contact
Emerging Joint Strategic Needs Assessment on Air Quality 2022 https://www.southwark.gov.uk/assets/attach/6353/Final-Air-Quality-JSNA-March-2018.pdf	Public Health Southwark Council 160 Tooley Street Southwark	Sangeeta Leahy 07756 214 405
Consultation and Summary Responses https://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=7341&Ver=4	Regulatory Services Southwark Council 160 Tooley Street Southwark	Environmental Protection Team Paul Newman paul.newman@southwark.gov.uk
Equality and Health Impact Analysis https://moderngov.southwark.gov.uk/ieListDocuments.aspx?CId=302&MId=7341&Ver=4	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

Lead Officer	Anju Sidhu Head of Regulatory Services	
Report Author	Paul Newman Environmental Protection Team Leader	
Version	Final	
Dated	28 November 2022	
Key Decision?	Yes	
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
Date final report sent to Constitutional Team		28 November 2022