

CABINET

15 February 2021

Title: Air Quality Action Plan 2020-2025	
Report of the Cabinet Member of Enforcement and Community Safety	
Open Report	For Decision
Wards Affected: All	Key Decision: Yes
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Accountable Director: Andy Opie, Operational Director of Enforcement and Community Safety	
Accountable Strategic Leadership Director: Fiona Taylor, Director of Law and Governance	
Summary	
<p>Every Local Authority that has an active Air Quality Management Area (AQMA) is required under Part IV of the Environmental Protection Act 1995 to produce an Air Quality Action Plan (AQAP) to address the identified areas of poor air quality in the Borough.</p> <p>The London Borough of Barking and Dagenham's (LBBD) existing AQAP is significantly out of date; the last AQAP was adopted in 2008 and should be revised every 5 years maximum. The AQAP has been prepared following consultation with key internal and external stakeholders who play a major part in improving air quality in Barking and Dagenham. Once adopted, the AQAP will set out our objectives to improve air quality between 2020 – 2025.</p> <p>This report provides an overview of the current position in respect of air quality in Barking and Dagenham and highlights the key areas and actions that are considered in the AQAP to improve air quality.</p>	
Recommendation(s)	
That Cabinet is recommended to:	
(i) Approve and adopt the London Borough of Barking and Dagenham Air Quality Action Plan 2020-2025 for implementation, as set out at Appendix A to the report; and	
(ii) Authorise the Operational Director of Enforcement and Community Safety, in consultation with the Cabinet Member of Enforcement and Community Safety, to approve any non-material amendments to the AQAP prior to publication.	

Reason(s)

Air pollution is a public health and environmental issue. Working to improve air quality is linked to the Council's 2nd Priority, Theme 2 "Empowering People" whereby the actions undertaken to reduce pollution and human exposure to pollution are underpinned by the principles of protecting the most vulnerable people.

Air pollution is linked to the development of chronic and respiratory illness. Local air pollution affects all populations however it also disproportionately affects the young, old and those with existing health conditions (e.g., respiratory and heart).

1. Introduction and Background

- 1.1 Barking and Dagenham suffers from some of the worst pollution in London. At the advice of Council officers in 2008, Cabinet agreed to adopt an Air Quality Management Area (AQMA) due to exceedances of legal limits for Nitrogen Dioxide and Particulate Matter. This AQMA is still adopted to date for the same pollutants.
- 1.2 The health impacts of air pollution are increasingly well understood. Air quality is increasingly being framed as a public health issue, as well as (or even superseding its status as) an environmental issue. This, as well as recent national court cases and the threat of legal action on Government for not achieving the legal limits, has helped push the issue of air quality higher up the national and local agenda.
- 1.3 LBBD's Local Implementation Plan, published January 2019, demonstrates that air quality is part of the 8 key objectives and 4 priority themes. The Borough Manifesto sets out the long-term vision for Barking and Dagenham with key priorities including the need to promote healthy, sustainable travel and to create better streets and places. The Council has integrated air quality into various Council strategy documents such as the Health and Wellbeing Strategy, The Local Plan – Core Strategy, Economic Growth Strategy and The Development Management Policies.
- 1.4 On 29 January 2020, Members declared a Climate Emergency in recognition that Barking and Dagenham needs to reduce greenhouse gas and carbon emissions and help meet national targets for the UK to attain net zero carbon by 2050. Local air pollution and climate change are directly linked in respect to atmospheric emissions being released from the combustion of fossil fuels and the negative effects on the environment and human health. They are also directly linked by energy use and sustainability.

2. Air Quality in Barking and Dagenham

- 2.1 In Barking and Dagenham levels of the noxious gas Nitrogen Dioxide (NO₂) are above legal limits set by EU Directives and enshrined in UK law. The other key pollutant of concern in Barking and Dagenham, and London, is Particulate Matter (PM). Barking and Dagenham currently meets EU Objective levels for PM₁₀, however there is no safe level or concentration of these pollutants where there is no adverse impact on health, so as a Council we are trying to reduce PM levels as far as possible.

- 2.2 PM_{2.5} is particulate dust sizes less than 2.5 micrometres in diameter and are also part of UK law. This pollutant has further raised the local air pollution agenda into the environmental/public health spotlight due to the scientific evidence that this pollutant has significant negative impacts to human health. The fraction of mortality attributable to Particulate Matter in Barking and Dagenham is 6.8%, which is above the mean of 6.5% for all local authorities in London (2017, PHE). Barking and Dagenham has the 6th highest rate of asthma related hospital admissions in London.
- 2.3 The main sources of local air pollution in Barking and Dagenham are emissions from road transport, the existing building stock (mostly gas combustion) and from new development (demolition and construction). Road transport accounts for around 47% of NO₂ emissions and 19% PM₁₀ emissions; commercial and domestic heating is the source of around a quarter of NO₂ emissions, while PM emissions are produced in larger amounts by construction work (approximately 41%).
- 2.4 Three (3no.) Air Quality Focus Areas (AQFAs) have been declared by the GLA within Barking and Dagenham. AQFAs are geographic locations that exceed the NO₂ legal annual mean limit value and are locations with high human exposure. A map showing the locations of the three AQFAs and modelled concentrations of NO₂ from vehicle emissions is provided in the Appendix of this report.
- 2.5 Air quality monitoring in LBBD is undertaken by two automatic monitoring stations located in Rush Green Primary School and in Scrattons Farm Eco-Park. In July 2020, the Environmental Protection Team re-instated a relatively low cost NO₂ diffusion tube network which are placed at borough-wide roadside locations to assess the most polluted roads. The diffusion tubes will provide the Council monthly roadside concentrations of Nitrogen Dioxide which will then provide an annual average measurement required for annual reporting and monitoring purposes.
- 2.6 This report updates the Cabinet on the Council's Draft AQAP 2020 – 2025 following both consultation with the public and with the Greater London Authority (GLA). This report also provides the action planning that the Council consider delivering as part of their commitment to lower local air pollution and improve public health.

3. Health Impacts

- 3.1 Negative health impacts would likely increase within the local community should an AQAP not be adopted by Cabinet and actions not taken by the Council to minimise and mitigate Council activities. If adopted, the AQAP will have a direct and indirect positive affect on the local community by working towards lowering air pollution concentrations and increasing public knowledge of the need to consider pollution effects on their health.

4. The Air Quality Steering Group

- 4.1 During 2020, interdepartmental meetings were undertaken within an Air Quality Steering Group, chaired by Director of Enforcement and Community Safety. This includes attendees from relevant Council departments that are responsible for delivering actions within an adopted AQAP. The Environmental Protection Team

prepared the draft AQAP 2020 - 2025 to replace the current (and out of date) AQAP.

4.2 The Steering Group agreed a final draft AQAP at the end of 2020. The AQAP actions have been grouped into six categories following Greater London Authority (GLA) guidance:

- Reducing Emissions from developments and buildings
- Increasing of both public health and air quality awareness
- Reducing Emissions from delivery servicing and freight
- Reducing Emissions from Council owned vehicles i.e., Borough fleet actions
- Engaging of localised solutions
- The use of cleaner transport

4.3 The action table contains:

- a list of 49 actions that form part of the plan.
- the responsible departments/organisations who will deliver the action(s)
- expected benefit in terms of emissions and concentration reduction where possible.
- the timescale for implementation; and
- details of how progress will be monitored.

4.4 The Air Quality Steering Group will continue to meet quarterly to provide updates and progress of the AQAP actions, and it is vital that there is ongoing representation across Council services.

4.5 **External Consultation and Key Stakeholders**

4.6 The draft AQAP went out to public/external consultation from 1st October to 30th November 2020, on the Council's OneBorough Voice. The consultation had 385 visitors and 301 contributions from participants/members of the public with respect to the consultation's 9 survey questions.

4.7 The consultation's 9 survey questions are provided below for information:

- 1) Please tell us how important do you think the issue of air pollution is in Barking and Dagenham? (Very Important to Not Important)
- 2) How strongly do you agree or disagree that the Council's planning process should reduce air pollution at construction sites? (Strongly Agree to Strongly Disagree)
- 3) How strongly do you agree or disagree that the Council's planning process should reduce air pollution from commercial delivery vehicles, e.g., lorries and large vehicles? (Strongly Agree to Strongly Disagree)
- 4) How strongly do you agree or disagree with the Council carrying out a communications strategy to give people information on air pollution? (Strongly Agree to Strongly Disagree)
- 5) How strongly do you agree or disagree with the Council changing their existing vehicles to cleaner vehicles (for example by increasing the number of electric vehicles)? (Strongly Agree to Strongly Disagree)
- 6) How strongly do you agree or disagree with the Council's proposals to make Barking and Dagenham's streets healthier? (Strongly Agree to Strongly Disagree)

- 7) How strongly do you agree or disagree with the Council installing electric car charging points on the street to encourage the public to use cleaner vehicles/cars? (Strongly Agree to Strongly Disagree)
- 8) How strongly do you agree or disagree with the Council developing a plan to help reduce traffic congestion and air pollution on the A13? (Strongly Agree to Strongly Disagree)
- 9) Are there any areas of concern that you have (regarding air pollution) that you would like to raise to the Council's attention with respect to this consultation on the Air Quality Action Plan?

4.8 The consultation responses have been collated and considered. The consultation responses provide strong support for the AQAP:

- 48% of respondents strongly agreed that the Council should be installing electric car charging points on the street to encourage the public to use cleaner vehicles/cars. 8% strongly disagreed.
- 41% of respondents strongly agreed that the Council's planning process should reduce air pollution at construction sites. 5% strongly disagreed.
- 49% of respondents strongly agreed that the Council's planning process should reduce air pollution from commercial delivery vehicles, e.g., lorries and large vehicles? 7% strongly disagreed.
- 42% of respondents strongly agreed with the Council carrying out a communications strategy to give people information on air pollution. 5% strongly disagreed.
- 37% of respondents strongly agreed with the Council changing their existing vehicles to cleaner vehicles (for example by increasing the number of electric vehicles). 8% strongly disagreed.
- 44% of respondents strongly agreed with the Council's proposals to make Barking and Dagenham's streets healthier. 8% strongly disagreed.
- 34% of respondents strongly agreed with the Council installing electric car charging points on the street to encourage the public to use cleaner vehicles/cars. 12% strongly disagreed.
- 43% of respondents strongly agreed with the Council developing a plan to help reduce traffic congestion and air pollution on the A13. 11% strongly disagreed.

4.9 Question 9 invited participants to provide areas of concern with respect to this consultation on the Air Quality Action Plan. The questions have been answered where relevant in the appendices of the AQAP. A summary of the responses from the consultation is provided below:

- GREEN INFRASTRUCTURE
- RIVER ROAD FOR DUST AND HEAVY TRAFFIC (NOTE: SIGNIFICANT COMMENTS ON THIS)
- THE A13 AND TRAFFIC LEVELS (NOTE: SIGNIFICANT COMMENTS ON THIS)
- CYCLING INFRASTRUCTURE (LACK OF IT)
- NO 'BORIS/SANTANDER' BIKES
- DEVELOPMENT AND LACK OF GREEN SPACE WITHIN / OVER DEVELOPMENT
- IDLING VEHICLES ESPECIALLY AT SCHOOLS / 'THE SCHOOL RUN'
- NEED FOR ELECTRIC VEHICLE CHARGING POINTS

- CITY OF LONDON MARKETS MAKING TRAFFIC WORSE AT RIVER ROAD/A13
- MORE PUBLIC TRANSPORT NEEDED
- CPZ's / COST IMPLICATION OF AQAP TO PUBLIC (NOTE: SIGNIFICANT COMMENTS ON THIS)

4.10 The list below highlights the key stakeholders who will provide a pivotal role in the delivery of the AQAP:

- Environmental Protection (Environmental Health)
- Public Health
- Be First - Regeneration
- Legal Services
- My Place including Housing, Public Realm
- Transport Planning and Policy including Development Management.
- Inclusive Growth
- Fleet Services
- Parking Services
- GLA
- TfL
- Department for Transport (for LIP funding)

5. Consultation with the Greater London Authority (GLA)

5.1 The Mayor's London Local Air Quality Management (LLAQM) framework is the statutory process used by Local Authorities to review and improve air quality within their areas.

5.2 After public/external consultation of the draft AQAP ended on 30 November 2020 and after the action plan had been amended in response to the consultation comments (where relevant), LBBD were then required under LLAQM framework to consult the GLA.

5.3 LBBD consulted the GLA on 15 December 2020 and received consultation comments in reply on the 22 December 2020. The comments received during this statutory consultation have been collated and incorporated into the final draft AQAP which was then sent back to the GLA for their final comment. On 7 January 2021, the draft AQAP was given provisional approval by the GLA. The Operational Director for Enforcement & Community Safety, Andy Opie, received the formal approval letter on 14 January 2021 as can be found in Appendix C of the report.

5.4 This final draft AQAP was presented to the Corporate Strategy Group (CSG) on 21 January 2021 and was cleared for Cabinet approval.

6. Proposal and Issues

6.1 It is proposed that the draft LBBD Air Quality Air Plan 2020 - 2025 (which has followed the 6 recommended themes provided by the GLA and has gone through the statutory consultation processes) is approved by Cabinet.

- 6.2 It is a statutory requirement that an AQAP be produced for declared Air Quality Management Areas. The current AQAP is significantly out of date and needs superseding.

7. Options Appraisal

- 7.1 The option to approve the AQAP 2020 -2025, would aid planning and delivering of the AQAP within the Steering Group meetings and fulfil LBBD's requirement to have an adopted AQAP.
- 7.2 The option not to approve the AQAP could mean that the planning and delivery would need to be revised and different actions considered. This would likely have a serious negative impact on achieving delivery of the AQAP within the near future.

8 Timetable for Implementation

- 8.1 The action plan document provides details of all the responsible departments with actions to ensure they are delivered as planned and on time.
- 8.2 Updates and progress on the delivery of each action will be required at the quarterly Steering Group meetings. Information from the quarterly meetings will be collated by the Environmental Protection Team to provide update to the GLA as required under the Mayor's London Local Air Quality Management, as referred to in section 5.1 of this report.

9. Financial Implications

Implications completed by David Folorunso, Finance Business Partner

- 9.1 There are no direct cost implications for this decision and any agreed actions will be funded from the existing agreed budgets for the service area. If additional actions are required to improve the air quality, the funding sources will need to be identified.

10. Legal Implications

Implications completed by Deirdre Collins, Senior Lawyer Litigation Team

- 10.1 Air quality standards and objectives are set out in the Air Quality (England) Regulations 2000. The Council has a duty to review the quality of air within their area under Part IV of the Environment Act 1995.
- 10.2 The action plan must include the time(s) within which the Council proposes to implement its measures and include proposals submitted by the Mayor of London for the exercise of the Mayor's powers.
- 10.3 The Department for Food, Environment and Rural Affairs, in conjunction with Public Health England and Department of Health, Social Services and Public Safety have published the Clean Air Strategy in May 2018.

11. Other Implications

11.1 **Staffing Issues** – The proposed actions in the Draft AQAP 2020 -2025 do not have a direct significant negative impact on existing and future staff or staffing levels. Existing staff resource within Enforcement Service is well placed to finalise and deliver the AQAP. Internal departments responsible for agreed actions will be adequately resourced by existing and future staff and staffing levels. As part of the Air Quality Steering Group Meetings, key departmental contacts attend and agree how that department can commit resources to actions.

11.2 **Corporate Policy and Equality Impact** – The Borough Manifesto, Theme 5 'Health and Social Care' and Theme 7 'Environment' are addressed by the Draft AQAP and the actions to reduce local air pollution.

Adoption of the Draft AQAP will improve:

- the short, medium- and long-term health of those who live, work and visit the borough.
- breaking down disproportionate health inequalities within the borough both geographically and demographically
- more sustainable travel modes which in turn has direct and indirect positive changes in transport efficiencies and economic productivity. Delivery of cleaner air does not prejudice economic growth.
- lowering greenhouse gas and carbon emissions which in turn contributes towards LBBD corporate carbon reduction targets.

11.3 **Equality Impact Assessment** – An EIA has been undertaken and is attached as Appendix D. This highlights how the community are disproportionately affected by poor air quality and detail mitigation actions. By delivering the actions in the AQAP would contribute to increasing healthy life expectancy and reducing early death from cardiorespiratory diseases.

11.4 **Safeguarding Adults and Children** – The link between health inequalities and pollution is complex however studies show that the greatest burden of air pollution usually falls on the most vulnerable in the population, particularly the young and elderly and those with existing health conditions that are exacerbated by pollution.

Adoption of the Draft AQAP would positively improve the health of the most vulnerable persons at risk of air pollution including the adults and children. Agreed actions in the AQAP would target emission sources and increase the public's protection to air pollution exposure.

Public Background Papers Used in the Preparation of the Report:

- The GLA's 'Borough Air Quality Action Matrix', published 2019
https://www.london.gov.uk/sites/default/files/air_quality_action_matrix.pdf

List of appendices:

- **Appendix A – Draft Air Quality Action Plan (AQAP) 2020 - 2025**
- **Appendix B – Local Focus Areas**
- **Appendix C – Approval Letter from GLA to Andy Opie**
- **Appendix D – Equality Impact Assessment AQAP**