

Air Quality Action Plan

Report of the Director, Public Health and the Director, Regeneration and Strategy

1. Purpose of Report

- 1.1 The Council declared a climate emergency in January 2019. One of the contributing factors to climate change is the burning of fossil fuels and subsequent impacts on air quality. Action to improve air quality in Calderdale is inextricably linked to mitigation of climate change.
- 1.2 The purpose of this report to request that Cabinet adopt the updated Air Quality Action Plan (AQAP) attached as Appendix 2. This action plan updates and replaces the previous action plan which ran from 2009 [AQAP09] to 2018. This is an update on the March 2019 plan as Council requested additional information. All reports can be accessed [here](#).
- 1.3 It is requested that Cabinet give greater consideration to both the governance for delivering against these actions and the resources required to implement the Plan.

2. Need for a decision

- 2.1 This AQAP has been produced as part of our statutory duties required by the Local Air Quality Management frameworkⁱ. It outlines the action we will take to improve air quality in Calderdale between 2019 and 2030 with a specific focus on the Air Quality Management Areas.
- 2.2 Her Majesty's Government advice is that emphasis within AQAPs should be twofold:
 - To develop measures that will provide the necessary emissions reductions to achieve the air quality objectives within specified timescales; and
 - Act as a live document which is continually reviewed and developed, to ensure current measures are progressing and new measures are brought forward.ⁱⁱ
- 2.3 The public health impacts of poor air quality are well documented. It is estimated that over 100 deaths per year are attributed to poor quality as well as exacerbating respiratory conditions for people with existing illness. DEFRA¹ expects the highest level of support from local authorities (e.g. Chief Executive and Council level) to ensure that all parts of a local authority are working effectively together. The public can be given further confidence that the work being taken forward to tackle air quality is supported at the highest level through engagement in and sign-off of this AQAP and through improved governance.

3. Recommendation

It is recommended:

- 3.1 That the Council be recommended to approve the Air Quality Action Plan 2019- 2030 attached at Appendix 1 for adoption in compliance with statutory requirements as set out in the Local Air Quality Management Framework, Policy Guidance (PG 16.)
- 3.2 That the Council establish a governance structure as based on the recommendations in Policy Guidance¹⁶ (PG 16) and Technical Guidance¹⁶ (TG 16) and identify the necessary resource to deliver against the objectives as set out in the AQAP, building upon existing activity and action.
- | 3.3 That the governance structure will form part of the Council's emerging Climate Emergency Working Group and will have close links to the Transport Working Group
- 3.4 That a targeted action plan promoting a healthy low emissions neighbourhood is progressed in Sowerby Bridge with potential to develop in other areas.
- 3.5 That a high profile communications campaign to raise awareness of issues be developed and the clean air day: 20th June be used to launch the campaign as part of climate emergency action.

4. Background and/or details

4.1 Development of an Action Plan

- 4.1.1 Section 82 of the Environment Act 1995 provides that every local authority shall review the air quality within its area, both present and the future air quality. Section 83 requires local authorities to designate an Air Quality Management Area (AQMA) where air quality objectives are not being achieved, or are not likely to be achieved, as set out in the Air Quality (England) Regulations 2000. Once the area has been designated, Section 84 requires the local authority to develop an Action Plan detailing remedial measures to tackle the problem within the AQMA. Calderdale developed an AQAP in 2009 and now a refreshed AQAP in 2019.
- 4.1.2 Calderdale currently has seven Air Quality Management Areas, all declared because the annual average concentration of nitrogen dioxide is being, or is likely to be, exceeded. Preliminary investigation suggests that the annual mean objective may be exceeded in 8th area around the A58 at New Bank and Godley Lane, Halifax, and the Council is gathering further evidence to decide whether an AQMA (Calderdale No. 8) should be declared.
- 4.1.3 Data from our Air quality monitoring over the past 5 years shows that NO₂ levels have stayed stable or decreased slightly. The continuous monitoring stations at Hebden Bridge and Sowerby Bridge show a decrease in the annual average for nitrogen dioxide, although some of the diffusion tubes in those areas continued to show concentrations above the annual mean objective. This fluctuation highlights the need for continued action across Calderdale.

- 4.1.4 Particulate matter levels have increased slightly. However there are again wide fluctuations dependent on weather conditions and traffic flow/density. The poorest air quality with respect to particulate matter is consistently seen on and around November 5th.
- 4.1.5 The aim of the Plan is to set out actions to improve air quality across the Borough with a specific focus on the Air Quality Management Areas. This is discussed thoroughly in the attached report *Calderdale's Air Quality Action Plan 2019*, and was discussed with Scrutiny in the report December 5th, 2018.
- 4.1.6 The AQAP plan has now been consulted on. The consultation report is attached within the appendix and discussed in more detail in section 8 of this report.
- 4.1.7 Whilst there have been slight improvements in nitrogen dioxide levels this action plan alone may not lead to legal compliance in all our AQMAs.
- 4.1.8 It is recognised that action to improve air quality is not fully in the regulatory gift of the local authority. Actions must involve citizens, businesses, other public sector bodies and leadership from national government.
- 4.1.9 The actions contained within the plan will continue to be monitored and update in line with emerging best evidence and cost effectiveness.
- 4.1.10 However the local authority has a duty to lead and can further build on existing work for example since 2010 there has been 500,000 miles less travelled in business mileage.

4.2 **Actions Plan key priorities:**

Priority 1 – *promoting high quality alternatives to private vehicle use*, recognising the contribution of diesel vehicles to air pollution.

Priority 2 – *improving the transport network infrastructure for all road users*, as **set out in the Council's Transport Strategy and Local Plan**

Priority 3 – *developing awareness of impacts and implementing remedies*; integrating the priorities of other strategies and frameworks, such as public health (active travel), sustainability (carbon reduction strategy) and local planning (sustainable development)

Priority 4 – encouraging public engagement and interest through improved communication and community involvement

4.3 **Specific actions to deliver on priorities; the Strategy Group has identified four actions to take forward:**

- 4.3.1 To increase focus and support on lobbying, influencing and engaging key internal and external partners to support improvements in public transport, active modes and low emission vehicle take up; for example, West Yorkshire Combined Authority; DEFRA, DfT; Highways England; First Bus; and CMBC Planning and Transport Services. This includes lobbying to ensure improvements identified for rail links are progressed.

Retrofitting of buses is a key action which would help to reduce emissions. First Bus has confirmed that 39 First Buses will be retrofitted in Calderdale May 2019. This fleet size is 95 in Halifax with 14 already Euro VI or equivalent. WYCA/Bus 21 will progress further improvements in this area.

- 4.3.2 Mitigating effects of air pollution; this includes placing bus stops further away from the kerb; creating 'green screens' to absorb pollutants:

Schools on main roads to trial 'green screens' to help mitigate effects of air pollution. First school identified for this action will be Burnley Road Academy and we will be closely monitoring the impact and working with the school children to raise awareness of the issue. This is now in situ from April 2019.

- 4.3.3 Monitoring: Continue to monitor the air quality management areas for NO₂. Identify areas for monitoring PM_{2.5}

Officers are developing the Council's web pages specifically to show the data collected and the relationship between air quality and traffic flow. We are striving to include real time air pollution information and traffic counts. We are purchasing new technology to allow for 'handheld' monitoring.

- 4.3.4 To increase public and stakeholder awareness of air quality issues building on national activity and developing communications material which focuses on regular key messages to residents, businesses and schools using social media, print media and engagement.

This includes trialing a focused campaign to measure the impact of measures on travel behaviour through a 'Healthy Neighbourhood' approach. Measure will include:

- High quality improvements to the public realm, access to EV charging, improvements to crossing and cycling facilities; improvements to bus waiting facilities and rail station interchange.
- Building on the ECO stars scheme with freight owners which WYCA have initiated to encourage cleaner vehicles and improved driving.
- Producing the necessary legal orders to support neighbourhoods to apply for periodic road closures to allow development of play streets
- Developing schools/community material which can be downloaded from the website
- Develop messages for social media encouraging business and commuters to make transportation choices which help improve air quality in the area – #cleanaircalderdale
- High quality marketing materials for use at events such as National Clean Air Day 20 June 2019
- Pilot Sowerby Bridge area as a healthy low emission

4.4 Monitoring progress

- 4.4.1 Delivering outputs from the Action Plan will not on its own achieve compliance. Reducing the causes of pollution will require action and support from central government, commitment from businesses and communities. The public should be aware that this is the case and this should form part of a wider communication campaign and lobbying campaign.
- 4.4.2 As $PM_{2.5}$ is a pollutant for which there is no recognised safe level and for which there is significant public health concern, it is appropriate for Calderdale to set out how they are addressing this and other pollutants including any links with the Public Health Outcome Framework. The Annual Status Report, which we are submitting to DEFRA this month, provides the opportunity for Calderdale Council to report on the development and progress of our strategy.
- 4.4.3 The existing internal council Strategy Group which currently oversees the proposals within the action plan and reports on implementation consists of representation of Council Officers and the Portfolio Holder. This group coordinates council activities across directorates but does not have the wide ranging representation as recommended in TG 16. While officers are making some headway air quality improvement objectives are not consistently addressed across the authority.
- 4.4.4 The working group should have cross-party representation, co-opted business and stakeholder representation.
- 4.4.5 The enforcement review presents further opportunity to ensure air quality interventions e.g. idling buses are actioned.
- 4.4.6 The improvement of our air quality does not lie within one department or within one organisation but is the responsibility of all members of our community and Government. It is critical that we raise awareness of this issue and encourage and enable all members of our society to act to bring about this change to protect public health.

4.5 Further work

- 4.5.1 The adoption of this plan by Cabinet will support efforts to reach legal compliance in our AQMA areas. This compliance will continue to be monitored through the Annual Status Report.
- 4.5.2 A focus on delivery of the priorities as set out in the plan will continue to be progressed within existing resources and through external funding where possible.
- 4.5.3 A targeted action plan promoting a healthy low emissions neighbourhood is progressed in Sowerby Bridge with potential to develop in other areas. Timescales and specific outputs are reliant on the implementation of the Corridor Improvement Plan and Masterplan which include infrastructure and public realm improvements to encourage modal shift.

- 4.5.4 Officers are working with the Energy Savings Trust who has been commissioned by DEFRA to promote and share best practice and ensure effective and insight led communications campaigns across the north of England.
- 4.5.5 The plan will be reviewed and revised as the evidence best develops to ensure we are implementing cost effective interventions.
- 4.5.6 Requests have been made with partner organisations to establish more electric vehicle charge points.
- 4.5.7 There is a pressing need to develop evidence based business cases to ensure that any short term national or regional funding opportunities can be utilised.

5. Options considered

- 5.1 Continue with the status quo. Officers are monitoring and implementing actions but progress against the key objectives will be more limited due to lack of wider stakeholder engagement.
- 5.2 Improve the governance and oversight of the delivery of the AQAP which will enable the authority to work with other partners, prioritise actions and strengthen our local influence.

6. Financial implications

- 6.1 Any additional budget requirements to deliver against the actions within the AQAP will be managed where possible within the existing budgets, for example, additional communication material.
- 6.2 Officers are preparing business cases to strengthen our position when bidding for external funding as opportunities arise.
- 6.3 Additional resources have been identified over the course of the past few months this includes 10k for communications a £50k grant from DEFRA and resources from within the local transport plan
- 6.4 Budget Council on 25 February agreed additional budget of £60k per annum commencing in 2019/20 to ensure there is sufficient capacity to take forward the Council's work on climate change and allow the Council to play a critical education and community leadership role. Elements of the AQAP may therefore be funded from within this additional budget if necessary or used as match funding.

7. Legal Implications

- 7.1 Sections 82 ('Local Authority Reviews') and 83 ('Designation of air quality management areas') of the Environment Act 1995 require Local Authorities to review and assess air quality within their areas, and declare AQMAs where objectives are not being achieved. Section 84 sets out the requirement to produce an Action Plan.

- 7.2 The Air Quality (England) Regulations 2000, as amended by the Air Quality (England) (Amendment) Regulations 2002 set out the air quality objectives to be achieved. The latter instrument added or amended limits for benzene and carbon monoxide.
- 7.3 The requirement to submit an Annual Status Report derives from the Statutory Guidance on LAQM, Policy Guidance PG16, issued under Section 88, Part IV of the Environment Act 1995. The Local Authority must have regard to this guidance. Both PG16 and the Technical Guidance TG16 constitute statutory guidance, so the Council must take both these documents into account in performing its LAQM duties. The expected content of the ASR and AQAP are described in these documents.

8. Consultation

- 8.1 There is a statutory requirement for Local Authorities to consult about their Air Quality Action Plan and a formal consultation took place in the early summer of 2018. The draft of the current Air Quality Action Plan was publicised on the Council's website, by social media and by email, and placed in main libraries. The consultees included:
- Neighbouring local authorities
 - DEFRA
 - The Highways Agency
 - The Environment Agency
 - Public Health England
 - The public
- 8.2 Responses were received from DEFRA, Highways England and Calderdale Friends of the Earth as well as a small number of individuals. The responses were reviewed and amendments made to the Air Quality Action Plan where it was considered appropriate. The summarised consultation responses, together with commentary, are included in the Air Quality Action Plan in Appendix E.
- 8.3 The Scrutiny Panel commented on the document and approved the principles as set out in the AQAP.

9. Environment, Health and Economic Implications

- 9.1 The Air Quality Action Plan will provide a variety of Environmental, Health and Economic improvements. Improved air quality supports the health of vulnerable people and will positively impact on the health of new born children. Many of the actions in the plan will support actions and help mitigate climate change. Measures to improve health e.g. modal shift in transport help improve economic productivity. The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion.

10. Equality and Diversity

- 10.1 There are numerous equality benefits including addressing inequality associated with improved air quality. Poor air quality impacts on the most disadvantaged in our society.

11. Summary and Recommendations

- 11.1 Delivery of the Air Quality Action Plan further builds on existing council priorities linked to improved health and well-being, sustainability, reducing inequalities and is part of the response to a climate emergency.

For further information on this report, contact:

Mary Farrar	Corporate Lead Transportation
Telephone:	01422 392336
E-mail:	Mary.farrar@calderdale.gov.uk

The documents used in the preparation of this report are:

1. Annual Status Report
2. Local Air Quality Management Framework

The documents are available for inspection at:

Princess Buildings, Halifax

i Part IV of the Environment Act 1995
Local Air Quality Management
Policy Guidance (PG16)
April 2016 DEFRA

ii Part IV of the Environment Act 1995
Environment (Northern Ireland) Order 2002 Part III
Local Air Quality Management
Technical Guidance (TG16)
February 2018 DEFR