



Department
for Environment
Food & Rural Affairs

Consultation on the review of the Local Air Quality Management Policy Guidance

Date: March 2022

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Contents

Introduction	5
Purpose of this consultation	5
Audience	5
Responding to this consultation.....	6
Duration.....	6
After the consultation.....	6
Background to the LAQM Policy Guidance Review	7
About You.....	8
Structure of the document	10
Chapter 1 Summary - Introduction of legal changes to LAQM via the Environment Act 2021	10
Chapter 2 Summary - Local Air Quality Management Process	11
Chapter 3 Summary - Local Air Quality Management Roles and Responsibilities.....	14
Chapter 4 Summary - Air Quality Management Areas.....	15
Chapter 5 Summary - Air Quality Action Plans	16
Chapter 6 Summary – Consultation and Community Engagement	18
Chapter 7 Summary - Air Quality Disparities	20
Chapter 8 Summary - PM _{2.5}	22
Chapter 9 Summary – Transport	22
Chapter 10 Summary – Non-Transport Nitrogen Oxides (NO _x) and other sources.....	23
Chapter 11 Summary – Planning and Building Regulations	24
Chapter 12 Summary – Air Quality and Climate Change	25
Chapter 13 Summary – Government Support for Local Authorities.....	26

Introduction

This consultation is being carried out to seek views on the planned revision to the statutory Local Air Quality Management (LAQM) Policy Guidance. The guidance is being revised to reflect the legislative changes introduced through the Environment Act 2021 and clarify roles and responsibilities within local government.

This guidance relates to Local Authority action on air quality and applies to Local Authorities in England only (excluding those in London).

Purpose of this consultation

The LAQM statutory guidance sets out what local authorities should do and the legal duties with which they must comply under Part IV of the Environment Act 1995 as amended by the Environment Act 2021, to improve local air quality.

As part of this review, we are seeking views on the introduction of new areas for local authority consideration which reflect new research, policies and priorities in the field of local air quality, since the guidance was last published in 2016.

This consultation presents proposals to strengthen the LAQM framework to enable local authorities to take more effective, co-ordinated actions to achieve their air quality objectives and deliver improvements to public health.

As part of the process of revising the statutory guidance, the government is committed to consulting those likely to be affected by the legislative change. Public consultation helps to ensure that the views of those impacted by changes are taken into consideration.

The questions included in this document are designed to provide an opportunity for interested parties to express their views and opinions.

As part of the legislative changes introduced by the Environment Act 2021, we are also consulting on the designation of National Highways as a Relevant Public Authority, under Part IV of the Environment Act 2021 and the associated Regulatory Triage Assessment. This consultation will run concurrently. Proposals relating to the designation of National Highways as an Air Quality Partner are not considered below.

Audience

This is a public consultation and we welcome all views.

The questions are posed in a way to accommodate both a general audience and stakeholders with specialist knowledge in certain policy areas.

We will use the responses to this consultation to help inform the finalisation of the Local Air Quality Management statutory guidance.

Responding to this consultation

Due to the mix of questions covered in this strategy, there is no requirement to provide answers for each consultation question.

Please respond to this consultation in one of the following ways:

Online using the **Citizen Space** consultation hub at Defra <https://consult.defra.gov.uk/>

For ease of analysis, responses via the **Citizen Space** platform would be preferred, if at all possible, but alternative options are provided below if required:

By email to: Air.Quality@defra.gov.uk

By post:

Consultation Coordinator, Defra
2nd Floor, Foss House, Kings Pool,
1-2 Peasholme Green, York, YO1 7PX

Or email: consultation.coordinator@defra.gov.uk

Please note, any responses sent by post must arrive at the above address by the closing date of the consultation (6th June) to be counted. Unfortunately, any responses received after this date will not be analysed. To ensure your response is included in the analysis, please consider responding online via **Citizen Space**.

Duration

This consultation opens for ten weeks and will close on 6 June 2022.

After the consultation

A summary of the responses to this consultation and the Government response will be published and placed on Government websites at www.gov.uk/defra.

The summary will include a list of respondents and organisations that responded but not personal names, addresses or other contact details. However, information provided in response to this consultation document, including personal information, will be shared with the Devolved Administrations and may be subject to publication or release to other parties

or to disclosure in accordance with the access to information regimes e.g., Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018.

If you want information, including personal data that you provide to be treated as confidential, please say so clearly in writing when you submit your response to the consultation and explain why you need these details to be kept confidential.

Defra is the data controller in respect of any personal data that you provide, and Defra's Personal Information Charter, which gives details of your rights in respect of the handling of your personal data, can be found at:

<https://www.gov.uk/government/organisations/department-for-environment-food-rural-affairs/about/personal-information-charter>

Background to the LAQM Policy Guidance Review

The local air quality management (LAQM) regime is the statutory process by which local authorities monitor, assess and act to improve local air quality.

The LAQM framework requires local authorities to regularly review and assess air quality in their areas and to determine whether the air quality objectives (expressed as concentration limits) set out in the Air Quality (England) Regulations 2000 (2002 as amended) are likely to be achieved. Where exceedances are considered likely, the local authority must then declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place to bring air pollution to within limits by addressing the issues identified.

At the time of publication of this consultation, over 500 Air Quality Management Areas were in place for all monitored pollutants in England. Some Air Quality Management Areas were declared as long ago as 2001.

In our Clean Air Strategy (2019) we committed to driving and enabling greater local action on air pollution by ensuring the responsibility for improving local air quality sits at the right tier of local government. The Environment Act 2021 amends the Local Air Quality Management Framework to enable greater co-operation at the local level by broadening the range of organisations that play a role in improving local air quality. Following the passage of the Act, the policy and technical guidance will be revised and published to provide further clarity on roles and responsibilities, taking account of the legislative changes.

As part of the process to improve the Local Air Quality Management Framework, we are consulting on the introduction of changes to the Framework aimed at strengthening the ability of local authorities to comply with the objectives across their areas. We are also seeking views on new areas for consideration such as air quality disparities, the importance of community engagement and air quality and climate change, to deliver an up to date framework that drives improvements in local air quality.

About You

A wide range of individuals, organisations and businesses have a strong interest in improving air quality. The questions below are intended to grasp this diversity and put your responses in perspective with those of other respondents.

Q1. Your name?

Q2. Your email address?

This is optional, but if you enter your email address you will be able to return to edit your consultation response in Citizen Space at any time until you submit it. You will also receive an acknowledgement email when you submit a completed response.

Q3. Which best describes you?

Please the category which best describes you / the organisation you are representing in your response.

- Individual
- Health Body
- Academic or research institution
- Local Government
- Business
- Community Group
- Non-Governmental Organisation
- Charity or Social Enterprise
- Consultancy
- Other
- If you answered 'Other', please provide details

Confidentiality and data protection information

A summary of responses to this consultation will be published on the Government website at: www.gov.uk/defra. An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details. Defra may publish the content of your response to this consultation to make it available to the public without your personal name and private contact details (e.g. home address, email address, etc).

If you click on 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you click on 'No' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public, but we won't make your personal name and private contact details publicly available.

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only. This consultation is being conducted in line with the Cabinet Office "Consultation Principles" and be found at: <https://www.gov.uk/government/publications/consultation-principles-guidance>.

Please find our latest privacy notice uploaded as a related document alongside our consultation document.

If you have any comments or complaints about the consultation process, please address them to:

- Consultation on the review of the Local Air Quality Management Policy Guidance
- Consultation Coordinator, Defra
- 2nd Floor, Foss House, Kings Pool,
- 1-2 Peasholme Green, York, YO1 7PX
- Or email: consultation.coordinator@defra.gov.uk

Q4. Would you like your response to be confidential?

Yes / No If you answered 'Yes', please provide your reason.

Structure of the document

This document provides background information and describes key proposals with a range of questions listed at the end of each proposal.

Chapter 1 Summary - Introduction of legal changes to LAQM via the Environment Act 2021

The Environment Act 2021 strengthens the LAQM framework to ensure more effective alignment of where duties on air quality and levers to tackle it sit. Amendments to the 1995 Act (Section 72 in conjunction with Schedule 11 of the Environment Act 2021) will enable greater co-operation between Local Authorities and all tiers of local government, including neighbouring local authorities, by introducing a clearer legislative requirement for County Councils and neighbouring local authorities to work collectively in developing and delivering local Air Quality Action Plans.

This will be achieved by the introduction of a new power for the Secretary of State to designate “Relevant Public Authorities” who may then be required to act as ‘Air Quality Partners’ within the Local Air Quality Management (LAQM) Framework. Air Quality Partners are required to co-operate with local authorities to reduce pollution levels where there are exceedances, or likely exceedances, of LAQM pollution limits. The Environment Act 2021 requires there to be a public consultation before any Relevant Public Authority is designated and we are running a concurrent consultation on the designation of National Highways as a Relevant Public Authority. In addition to widening the range of bodies that play a role in improving local air quality, the Environment Act 2021 also strengthens local Air Quality Action Plans by requiring local authorities to provide dates by when measures will be taken and to revise an action plan if further measures need to be taken to secure air quality objectives. These improvements will drive local action to improve air quality.

To increase transparency and accountability on local air quality, the Environment Act 2021 requires the Secretary of State to make an annual statement to Parliament on progress towards securing air quality standards and objectives, and the steps Government has taken in support of this. It also introduces a requirement to review the national Air Quality Strategy within 12 months of the measures coming into force and every 5 years thereafter. The first review of the national Air Quality Strategy will consider the current local level objectives and the role of local authorities in helping us achieve our new national PM_{2.5} targets. This is alongside developing a stronger support and capability-building framework to ensure local authorities have the necessary tools to take the action needed locally to reduce people’s exposure to air pollutants. We will clarify the powers and levers that are available to local authorities and include actions that focus on reducing the impacts to

vulnerable groups and communities that are disproportionately impacted by air pollution, for example, schools, care homes and deprived neighbourhoods.

The first review of the national Air Quality Strategy will be published in 2023. Further revisions to the statutory LAQM policy and technical guidance may be required to reflect this.

Chapter 2 Summary - Local Air Quality Management Process

Local Air Quality Strategies: taking a preventative approach

Early preventative action can improve local air quality, avoid exceedances and reduce the long-term health impacts associated with air pollution. We are seeking your views on the introduction of a requirement on local authorities who do not need to declare Air Quality Management Areas, to draw up a Local Air Quality Strategy, setting out measures that can be taken locally to reduce community exposure to air pollution.

Local authorities should consider prevention and reduction of polluting activities in preference to only taking steps to reduce air pollution once exceedances have been identified. There is no safe level of PM_{2.5} under which no health harm has observed, therefore it is important to drive down exposure.

The format and structure of local Air Quality Strategies can be more flexible than Air Quality Action Plans for which local authorities are required to use the template provided on the LAQM website.

Q5. Do you agree or disagree that authorities who do not need to declare an Air Quality Management Area should be required to produce a local Air Quality Strategy

to aid the prevention of future air quality issues and reduce the long-term adverse health impacts associated with exposure to air pollution?

Strongly agree

Somewhat agree

Neither agree or disagree

Somewhat disagree

Strongly disagree

Don't know / no opinion

Introduction of reminder and warning letters: improving local authority compliance

In order to assess the progress made in meeting air quality standards and objectives, we need to ensure the data we receive from local authorities is robust and regularly provided. Low levels of compliance with the framework risks degrading the coverage and quality of the picture LAQM offers on pollution hotspots at the local level.

Whilst many local authorities submit their reports and Air Quality Action Plans by the specified deadline, some fail to do so. There is a need to improve local authority compliance with the LAQM system, in terms of timely submissions of the reports and the quality and ambition of Air Quality Action Plans. Local authority Air Quality Action Plans are a key driver for action to improve local air quality and reduce the impact of air pollution on local communities. Failure to produce an Action Plan and regularly review actions to improve local air quality will impact local authorities' ability to ensure air quality standards are achieved.

Enhanced enforcement can ensure air quality is a priority at the local and regional level.

We are seeking views on the proposal to introduce a system of reminder and warning letters for local authorities' Annual Status Reports and Air Quality Action Plans.

The table below outlines the proposed reminder and warning process for Annual Status Reports:

Timescale	Enforcement	Recipient
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Six months before deadline - January	Pre-reminder letter	From the Air Quality and Industrial Emissions (AQIE) Deputy Director to all local authority Chief Executives and relevant directors reminding them of LAQM statutory requirements.
Two months before deadline - April	Final pre-reminder letter	From Defra's LAQM team to all Air Quality officers reminding them of June deadline
One month overdue - July	Reminder letter	From Defra's LAQM team to Air Quality Officer at non-submitting local authorities
Three months overdue - September	Warning Letter	From the AQIE Deputy Director to relevant director/s - environment & public health
Four months overdue - October	Final Warning letter	From the AQIE Deputy Director to relevant director/s - environment & public health
Six months overdue – December	Ministerial letter (Section 85 direction)	LA Chief Executive

The table below outlines the proposed reminder and warning process for Air Quality Action Plans:

Timescale	Enforcement letter	Recipient
AQAP 2 months overdue (e.g. 14 months post AQMA designation or 5 years & 2 months since previous AQAP publication)	Reminder letter	From Defra's LAQM team to Air Quality Officer at non-compliant LA
AQAP 4 months overdue	Warning Letter	From the AQIE Deputy Director to Environment Health / Air Quality Manager at non-compliant LA
AQAP 6 months overdue	Final Warning letter	From the AQIE Deputy Director to Environmental Health / Air Quality Manager at non-compliant LA

AQAP 8 months overdue	Ministerial letter: Section 85 direction	LA Chief Executive
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Q6. Do you agree or disagree with the introduction of the new reminder and warning letters for local authority air quality reports?

Strongly agree

Somewhat agree

Neither agree or disagree

Somewhat disagree

Strongly disagree

Don't know / no opinion

Chapter 3 Summary - Local Air Quality Management Roles and Responsibilities

Part IV (Sections 80 to 91) and Schedule 11 of the Environment Act 1995 sets out the legal obligations on local authorities in relation to LAQM. The Environment Act 2021 amends Part IV of the Act to clarify duties and enable greater cooperation between different levels of local government, neighbouring authorities and other relevant public authorities in the preparation of Action Plans so that a more strategic view is taken in respect of the achievement of air quality objectives.

Measures were developed as a result of consultation responses to the Clean Air Strategy (2019) and extensive stakeholder engagement, both as part of the development of the Clean Air Strategy and between its publication and the introduction of the Environment

Bill/Act, including engagement with a variety of local leaders and stakeholder organisations and the scientific community.

Public Health Roles and Responsibilities

Taking action to improve air quality is crucial in order to improve population health. Directors of Public Health have a crucial role to play in shaping how local approaches can help clean up air in their area most effectively by assessing the public health impacts of local air pollution and providing advice and guidance on taking appropriate action to the public and their colleagues in local authorities. They can play a critical leadership role in making air pollution a strategic priority for senior local decision makers with shared goals and purposeful, co-ordinated action across local government and local health services, working closely with the community.

To ensure that Directors of Public Health are fully briefed on the scale of local air pollution and health considerations are fully integrated into local Air Quality Action Plans, we are seeking views on the introduction of a requirement for all local authority Annual Status Reports and Air Quality Action Plans to be signed off by Directors of Public Health.

Q7. Would you agree or disagree that requiring Directors of Public Health to approve Air Quality Action Plans would increase Public Health engagement in local air quality management?

Strongly agree

Somewhat agree

Neither agree or disagree

Somewhat disagree

Strongly disagree

Don't know / no opinion

Chapter 4 Summary - Air Quality Management Areas

Where normal annual monitoring and local intelligence shows a persistent exceedance (or risk of exceedance) the local authority is encouraged to consider moving immediately to declaring and establishing (or extending) an Air Quality Management Area and hence to

the development of action plan measures to remediate the problem. It is suggested that only local authorities who, until now, have had few air quality problems, or have sufficient doubts, should consider the necessity of obtaining further supporting information, with the methods used briefly set out in their annual report.

It is important to note that by additional supporting information we are not advocating production of a Detailed Assessment as per the old system. We would expect local authorities to gather evidence sufficient to enable a judgement to be made following guidance and quality assurance processes set out in Technical Guidance. A summary of this additional evidence gathered should be included in the next annual report, but local authorities should not delay declaration of an Air Quality Management Area until the report's publication but move to declare an Air Quality Management Area as soon as it is satisfied. Any unnecessary delay in Air Quality Management Area declaration delays Air Quality Action Plan development and the subsequent implementation of remedial actions.

Q8. How long should local authorities be given to collect additional monitoring or modelling evidence of an exceedance before declaring an Air Quality Management Area?

0 - 6 months

7- 12 months

13 - 18 months

More than 19 months

Chapter 5 Summary - Air Quality Action Plans

Where review and assessment of local air quality has required that an Air Quality Management Area be declared, the local authority is required to develop and publish an Air Quality Action Plan for the purpose of securing that air quality standards and objectives are achieved in the area.

Currently the requirement is that Air Quality Action Plans should be prepared ideally within 12 months of the declaration of an Air Quality Management Area. It is intended in the latest version of the guidance that the ambiguity around this is removed. The question included below queries whether a longer period between Air Quality Management Area declaration and Air Quality Action Plan completion should be considered in light of the amount of assessment work and local engagement required.

Q9. How long do you think local authorities should be given to produce their Air Quality Action Plans post Air Quality Management Area designation?

0 - 12 months

13 - 18 months

19 - 24 months

More than 25 months

Unlike review and assessment, the action planning and delivery elements of LAQM are not thought to be working well. Air Quality Action Plans are being generated, but they are not for the most part resulting in improvements to air quality on the scale needed.

The Environment Act 2021 amends Part IV of the Environment Act 1995 to strengthen requirements on local authorities to prepare Air Quality Action Plans to ensure air quality standards or objectives are achieved in Air Quality Management Areas, and to specify how air quality targets will be achieved and maintained, and dates by which measures will be carried out.

Air Quality Partners

The Environment Act 2021 introduces a new concept “air quality partners” into the LAQM framework. Air Quality Partners are required to assist local authorities with reasonable requests (for example by providing information on a source of air pollution) and contribute to action plans being developed by local authorities. Air Quality Partners may be: a neighbouring local authority; a designated Relevant Public Authority; the Environment Agency. County councils in two tier authorities are similarly required where relevant to collaborate with local authorities and to commit to actions for inclusion in Air Quality Action Plans.

We are consulting separately on the designation of National Highways as a Relevant Public Authority.

Strategic partnership working: role of local partnerships

Local air quality could benefit from a more co-ordinated strategic approach to improve air quality across regions. We want to encourage regional voluntary co-operation and co-ordination within local government to help drive improvements in local air quality, wherever it makes sense to do so.

Local authorities are encouraged to consider establishing local partnerships to manage air quality, for example, by allowing environmental health officers across authorities to work closely together, share resources and best practice, carrying out review and assessment across their area to produce joint reports. It should also help to identify, at an early stage, situations where air quality in one Local Authority may be adversely affected by decisions made in a neighbouring Local Authority, and to pursue joint solutions to shared problems.

Local authorities may also want to consider regional collaborations/strategic partnership working when engaging Air Quality Partners. For example; Mayoral Combined Authorities could play a co-ordinating role; upper tier authorities could potentially facilitate cross local authorities working within their area; existing Air Quality partnerships between authorities may be used; ad hoc co-ordinating bodies could be set to tackle a specific question; an Air Quality Partner / Relevant Public Authority could potentially co-ordinate discussions with multiple local authorities.

Q10. Do you agree or disagree that in the future online Air Quality Action Plans, which can be kept up to date, should be made available to the public?

Strongly agree

Somewhat agree

Neither agree or disagree

Somewhat disagree

Strongly disagree

Don't know / no opinion

Q11. If you have any further comments on the overall Local Air Quality Management process, please add these here

Chapter 6 Summary – Consultation and Community Engagement

Public access to air quality information

Following the inquest into the death of Ella Adoo Kissi-Debrah, on 21st April 2021 the Coroner published his Prevention of Future Deaths Report in which he raised low public awareness of information on air quality as an area of concern. The Government recognises the need to increase public awareness and support individuals to reduce both their own contribution to emissions and their personal exposure to air pollution. Accessible, understandable, local-level data is needed to help communities make informed choices. The Government has committed to reviewing existing sources of

information, including UK Air and the Daily Air Quality Index (DAQI), to include more specific messaging for different population groups.

Local authorities are encouraged to provide local communities with clear, accurate and timely information about local air quality that enables them to understand the local problem and make conscious choices to change behaviours that put them at risk of exposure to poor air quality and/or reduce their contribution to air pollution. Communications with local communities should be as meaningful and practical as possible, offering advice and ideas for changes that can be made to reduce exposure. We would like to ensure that local air quality information is currently accessible and understandable.

Q12. What do you think of the air quality information that is currently available to the public?

Very Good

Good

Neither good nor poor

Poor

Very Poor

Don't know / no opinion

Q13. What improvements do you think could be made to air quality communication?

Engaging local communities

Involving local communities and neighbourhood groups in local air quality will widen the understanding of air quality issues associated with public health and can increase community trust and understanding of the need for local action.

Effective local leadership and engaging local communities on the measures being proposed and the need to take action can help ensure community buy in and enable local authorities to anticipate the full effects of proposed measures. Many local authorities are already looking at ways of involving local communities in decision-making on how local pollution hotspots can be addressed.

Local authorities are encouraged to involve local communities from the outset of the development of an Air Quality Action Plan. It is important to ensure community engagement includes members of the local community who reflect the diversity of that community, those most impacted by poor air quality and those who might be affected by

potential measures to improve it. A principle guiding community engagement is to ensure that those who will be affected have a genuine opportunity to have their constructive ideas, as well as their opinions, considered when making decisions on the future shape of their local area.

We are seeking views on means of ensuring those that are most impacted by poor air quality are involved in decisions relating to both actions and how local authorities can best approach community engagement.

Q14. What barriers or facilitators do you feel there are to local authorities carrying out effective community engagement on air quality issues?

Chapter 7 Summary - Air Quality Disparities

Although air pollution can be harmful to anyone, some people are more affected due to where they live, the level of air pollution they are exposed to in their day-to-day lives, or their inherent susceptibility to health problems exacerbated by air pollution. Those who are more susceptible include older people, children, those with pre-existing cardiovascular or respiratory disease, pregnant women, communities in areas of deprivation, higher pollution and low-income communities.

Generally, more air pollution sources and higher pollutant concentrations are found in more socially disadvantaged areas. Consequently air pollution tends to cause most harm to people in socially deprived groups. For those on low incomes, problems are potentially compounded as they are more likely to have existing medical conditions, to live in areas with poorer outdoor and indoor environments and have less access to jobs, healthy food, decent housing and green spaces, which all contribute to poorer health.

It is important to consider how vulnerability to the impact of pollution is unevenly experienced by different groups in society. Where possible action needs to be focussed on areas of both high pollution and high deprivation. This will help to reduce scenarios where air pollution is exacerbating the existing health disparities associated with deprivation and will provide a focus for the most effective actions in terms of improving public health.

Local authority air quality officers should work with public health professionals to integrate LAQM effectively with other local initiatives aimed at reducing health risks and disparities in effected communities. Local authorities may be able to utilise existing data sets for their administrative areas on deprivation and air quality monitoring and modelling to identify key pollution/deprivation hotspots for focussed action.

Q15. Do you agree or disagree that local authorities should take further targeted measures where areas of both high pollution and high deprivation persist?

Strongly agree

Somewhat agree

Neither agree or disagree

Somewhat disagree

Strongly disagree

Don't know / no opinion

Indoor Air Quality

The UK population generally spends around 80-90% of their time indoors. How we heat and cook in our homes, the cleaning and decorating products we use and the use of certain construction materials can all be sources of indoor air pollution, contributing to the build-up of harmful levels within homes, especially if there is inadequate ventilation.

The addition of information on indoor air quality in the LAQM guidance is being proposed. Although indoor air quality is not a LAQM statutory duty, local authorities may wish to provide information to the public on ventilation and on how to improve indoor air quality, particularly in light of air quality disparities.

Q16. Though consideration of indoor air quality is not a statutory duty for local authorities, do you think inclusion of information on this topic within the guidance is helpful?

Helpful

Neither helpful nor unhelpful

Unhelpful

Don't know / no opinion

Q17. If you have any further comments on air quality disparities or the inclusion of information on indoor air quality, please add these here

Chapter 8 Summary - PM_{2.5}

PM_{2.5} can penetrate deeply into the lungs and enter the bloodstream and other organs including the heart and brain. PM_{2.5} has both short term and long-term impacts on human health. Short-term exposure to elevated levels is known to exacerbate the impact of pre-existing respiratory and cardiovascular health conditions, with elderly people and children being the most vulnerable groups. Long-term exposure is linked to a number of health conditions including asthma and other respiratory disease, cardiovascular disease, cancer, and there is increasing evidence of links to certain types of cognitive decline. It is known that there is no safe lower limit for PM_{2.5} exposure.

The Environment Act 2021 establishes a legally binding duty to set a target on fine particulate matter (PM_{2.5}), in addition to a long-term target on air quality, by the Act's 31st October 2022 deadline. The Government launched [a consultation on proposed national air quality targets](#), alongside other environmental targets, on 16 March 2022.

A new concentration target for PM_{2.5} will act as a minimum standard across the country, and a population exposure reduction target will prioritise action that is most beneficial for public health and drive continuous improvement. This dual-target approach will ensure that action is taken to tackle the highest concentrations and will drive measures to reduce emissions from a wide range of sources that will contribute to reducing particulate matter across the whole country.

Whilst responsibility for meeting the PM_{2.5} target sits with national government; local authorities have an important role to play in delivering reductions in PM_{2.5}. Local authorities have powers in a number of areas to tackle emissions of PM_{2.5} or its precursors, for example, enforcement of domestic combustion legislation, and certain environmental permitting decisions. In light of this, we are asking how local authorities might approach increasing their role on PM_{2.5}. This will inform future policy development, including the review of the Air Quality Strategy, as required by the Environment Act 2021.

Q18. What actions do you think local authorities could take to help reduce PM_{2.5} concentrations?

Chapter 9 Summary – Transport

Transport is a major source of air pollution in the UK. As such, transport measures will play a significant role in improving air quality and public health.

There are a range of measures and effective actions local authorities can take to reduce levels of pollutants from vehicles, either directly or indirectly, such as promoting Zero Emission Transport, Clean Air Zones, School Streets, Low Traffic Neighbourhoods, Active Travel Promotion and Traffic Control Systems.

Traffic management measures including junction design and speed limits should be carefully considered. Measures to reduce traffic levels and to promote use of low and zero

tailpipe emission vehicles will often be the most effective in reducing pollution levels. It must be noted however that non-exhaust particulates from vehicles are likely to remain a key source of primary PM_{2.5} emissions.

Local authorities and their partners should consider both “soft” measures such as marketing and information to encourage people to use sustainable transport modes and “hard” measures such as improvements to infrastructure and services.

Chapter 10 Summary – Non-Transport Nitrogen Oxides (NO_x) and other sources

Power stations, domestic and industrial combustion processes are considered here. Non-road mobile machinery is also considered as is medium combustion plant and specified generators. There is a section on local authority permitting and non-regulated plant.

Ammonia: formation of secondary PM_{2.5}

This information has been included, as though not a LAQM statutory duty, ammonia plays a role in the formation of secondary PM_{2.5}. It can also be significant when considering planning applications as ammonia (together with Nitrogen Oxides (NO_x) emissions) can contribute to exceedance of critical loads of nitrogen deposition, resulting in development near vulnerable sensitive habitats having planning permission delayed or even refused.

Ammonia impacts upon human health, it also impacts and on ecosystems, causing damage and biodiversity loss through nitrogen enrichment, and soil acidification. It is toxic to some plant life; lichens and mosses are particularly sensitive. In the UK agriculture is the predominant source of ammonia generating around 88% of emissions. Agricultural sources include organic manures, livestock housing and manufactured urea-based fertilisers.

Digestate from the anaerobic digestion (AD) of, for example, manures and slurries, food waste and sewage sludge is a source of ammonia emissions and it will be important to control ammonia emissions from this source as the use of AD increases in response to the net zero agenda. If digestate is stored or separated at the AD plant site this is a point source of ammonia emissions, there are also some ammonia emissions from the AD process. Ammonia can have substantial negative effects on sensitive habitats, so local authorities must consider whether a habitats risk assessment is needed as part of the planning process for new AD plants. The Environment Agency can require measures to tackle emissions as part of the permit controls for the operation of a waste-fed anaerobic digester and the storage of waste digestates. Ammonia emissions from digestate stores can be reduced by covering them.

Q19. Though consideration of ammonia is not a statutory duty for local authorities do you think inclusion of information on this pollutant, (particularly as a precursor to PM_{2.5}) within the guidance is helpful?

Helpful

Neither helpful nor unhelpful

Unhelpful

Don't know / no opinion

Chapter 11 Summary – Planning and Building Regulations

The planning system can play a crucial role in managing or improving air quality. The National Planning Policy Framework sets out that planning policies and decisions should sustain and contribute towards compliance with national objectives for air pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. So far as possible these opportunities should be considered at the plan-making stage, to ensure a strategic approach and limit the need for issues to be reconsidered determining individual applications. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

Environmental assessment processes also have a key role to play in ensuring that planning policy statements, local plans and individual projects, including nationally significant infrastructure projects, expressly consider air quality issues in all development-related decision-making.

Planning policy is a key factor for local authorities in carrying out their air quality functions, close cooperation between planning and air quality officers is essential.

Local authorities may benefit from producing a supplementary planning document (SPD) on air quality. An SPD provides more detail or guidance on an air quality policy in an adopted Local Plan and is a material consideration in local decision making on development.

An SPD can provide detailed information for developers about areas where sensitive development (such as residential, nurseries, schools, hospitals and care homes) should

not go ahead and requirements for air quality assessments for different types and sizes of development. Detailed information about potential use of mitigation can also be included.

Without such policy in place, it can be much more difficult to ensure inappropriate development on air quality grounds can be refused. An SPD can make demonstrating non-compliance with an air quality policy in a local plan simpler, increasing the likelihood of achieving local targets on air quality as part of sustainable development. For instance, a local authority may have clearer grounds to refuse an application (entirely or partially) on air quality grounds.

Q20. What barriers are there are to getting an Air Quality Supplementary Planning Document in place locally, if any?

Chapter 12 Summary – Air Quality and Climate Change

Climate change is driven by emissions of greenhouse gases which result in large-scale shifts in weather patterns. The UK government is working towards achieving net zero greenhouse gas emissions by 2050 and a 78% reduction in carbon dioxide emissions on 1990 levels by 2035.

Local air quality pollutants and greenhouse gases, such as carbon dioxide can often have the same sources. Areas where there are synergies between reducing local air pollutant and greenhouse gas emissions include improving energy efficiency, the use of renewable electricity production and the use of low emission vehicles, public transport and alternatives such as walking and cycling.

It will also be important to avoid any focus wherever possible on the actions that benefit one area but could be negative for the other. Biomass burning gained support as it was considered potentially carbon neutral, but it has negative implications for air quality such as increased PM_{2.5} emissions, the introduction of biomass burning in populated areas can have significant adverse impacts for public health. Through harmonising their policy proposals and actions, local authority officers working on air quality and climate change can efficiently move to improving air quality and towards net zero.

Q21. What are the barriers to local authority air quality and climate change officers working together, if any?

Chapter 13 Summary – Government Support for Local Authorities

Defra's Air Quality Grant

Defra's annual Air Quality Grant scheme provides funding to local authorities to carry out projects in local communities to tackle air pollution and reduce emissions affecting schools, businesses and residents. Local authorities are encouraged to submit applications for projects that contain measures relating to their Local Air Quality Action Plans to help deliver compliance in areas of current and projected exceedance of air pollution standards and objectives (and for priorities set out for the grant that year). Failure to provide information in accordance with the LAQM reporting requirements may adversely affect the ability to gain funding through the grant where there is the requirement to provide evidence to show the level / risk of any exceedances within a local authority area.

Q22. Do you think that local authorities should be compliant with their Local Air Quality Management reporting duties to be able to apply for Government grant funding on air quality?

Yes

No

Don't know / no opinion

The Air Quality Hub: supporting local capability building

Funded by Defra's Air Quality Grant, the Air Quality Hub is a free online knowledge sharing resource for those working in the field of local air quality management. It has been developed by the Low Emission Partnership and its focus is on facilitating information exchange between local authority professionals.

The Air Quality Hub features a range of content areas related to strategy measures that local authorities can adopt, as well as more specific practitioner advice notes that focus on various aspects of air quality management planning, monitoring and enforcement. The Hub also includes a growing library of relevant case studies and a forum for direct peer to peer communication.

To facilitate information exchange, support local capability building and sharing of good practice, it is proposed that all local authorities in receipt of Defra's Air Quality Grant must provide a summary final report of the project for inclusion on the Air Quality Hub.

Q23. Do you think local authorities should provide outcome summaries for grant funded projects on the Air Quality Hub to support building capacity?

Yes

No

Don't know / no opinion

LAQM data dashboard

The LAQM dashboard has been developed to provide an interactive summary with at a glance awareness of local air quality within individual local authorities and enable electronic capture of diffusion tube data. The dashboard is a new feature of the LAQM portal and is available to local authorities through their individual report user areas on the LAQM portal. The dashboard will provide up to date information on whether local authorities are meeting local air quality objectives and where there are areas of elevated public exposure. It will also enable local authorities to compare and contrast local authority progress in tackling local concentration hotspots.

The LAQM dashboard can increase transparency for the public.

We are seeking your views on whether there is support for this local authority data being made available to the public.

Q24. Do you think local authority air quality data should be shared with the public through the Local Air Quality Management dashboard?

Yes

No

Don't know / no opinion

Q25. Do you have any further comments on the proposed changes to the Local Air Quality Management guidance?