

<b>CABINET</b>	<b>DATE</b> 24 July 2024	<b>ITEM NO</b> 11
<b>TITLE</b> Royal Borough of Greenwich Air Quality Action Plan	<b>WARD (S)</b> All	
<b>CHIEF OFFICER</b> Director of Housing and Safer Communities	<b>CABINET MEMBER</b> Community Safety and Enforcement	
<b>DECISION CLASSIFICATION</b> Key 28-day notice published Non-exempt	<b>IS THE FINAL DECISION ON THE RECOMMENDATIONS IN THIS REPORT TO BE MADE AT THIS MEETING?</b> Yes	

1. **Decision required**

This report makes the following recommendations to the decision-maker:

- 1.1 To proceed with the formal adoption, and publication of the borough's Air Quality Action Plan 2023-2028

2. **Links to Our Greenwich missions**

- 2.1 This report relates to the Council's agreed missions as follows:

- People's health supports them in living their best life

Delivery of the AQAP will help the Council in achieving the air quality objectives and demonstrate to external regulators that the Council is committed to improving air quality within its area. Improvements in air quality will benefit everyone in the borough.

- It is easier, safer and greener to move around the borough and the rest of London
- Development delivers positive change to an area for existing and new communities
- Greenwich plays an active role in tackling the climate crisis and improving environmental sustainability, in line with our commitment of being carbon neutral by 2030

The AQAP has synergy with the Council's other corporate strategies, including the Local Development Framework, Carbon Neutral Plan and Transport Strategy, as some of the actions in the draft AQAP are relevant to

tackling not only air pollution but also climate change and, new development, and encouraging modal shift/active travel. The plan will deliver co-benefits.

- Our Council is better at listening to communities, and communities feel they are heard
- We develop networks with communities, key partners and businesses to meet need and address challenges together
- We design our services around the needs of our residents

The actions proposed in the draft plan must meet the needs of those who live, work, attend schools and play in the borough, and the consultation process seeks to engage these communities to help shape the Council's plan.

### **3. Purpose of Report and Executive Summary**

- 3.1 The draft Air Quality Action Plan (AQAP) has been produced as part of the London Local Air Quality Management System, a statutory process by which boroughs monitor, assess and take actions to tackle pollution. The plan outlines the actions that will be taken to improve air quality in the borough between 2023- 2028.
- 3.2 The revised AQAP sets out the actions the Council will take over the next 5 years (2023-2028) to deliver air quality improvement in the borough in compliance with our legal duty.
- 3.3 Boroughs are required to submit their draft Action Plans to the GLA twice. It should be submitted before the public consultation, and again afterwards. The initial submission to the GLA was in December 2022, and the second submission was in April 2024.
- 3.4 The Council needs to ensure that the actions proposed in the draft plan meet the needs of those who live, work, attend schools and play in the borough and therefore we completed statutory and public consultation between 16 August 2023 and 19 February 2024.

### **4. Introduction and Background**

- 4.1 Air pollution is an issue that is having serious impacts on our health. It is associated with several adverse health impacts, and it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.

- 4.2 The Council has a statutory duty to comply with the London Local Air Quality Management (LLAQM) Regime under the Environment Act 1995.
- 4.3 Part IV of the Environment Act 1995 requires local authorities to designate an Air Quality Management Area (AQMA) where National Air Quality Objectives are exceeded. Where an AQMA is designated, an Air Quality Action Plan must be produced identifying how National Air Quality Objectives will be met.
- 4.4 An Air Quality Management Area (AQMA) was declared for the whole of the borough in 2001, for the following pollutants:  
**Nitrogen dioxide (NO<sub>2</sub>):** The national AQS annual average limit for this pollutant has been exceeded at some of our monitoring stations.  
**Particulate Matter (PM<sub>10</sub>):** although we are meeting national AQS Limits, we are exceeding the WHO air quality guideline limit for this pollutant. This pollutant has significantly adverse effects on health particularly for the most vulnerable in our society, therefore, we have a duty to ensure concentrations of PM<sub>10</sub> remain as low as possible. We have a formal responsibility to work towards reductions of PM<sub>2.5</sub>, which is a fraction of PM<sub>10</sub>. Concentrations of PM<sub>2.5</sub> are similarly below national AQS target values but above WHO guidelines.
- 4.5 Where an AQMA is declared, the local authority is required to prepare an air quality action plan (AQAP) setting out remedial measures to address poor air quality and achieve the air quality standards and objectives. The AQAP is a statutory document.
- 4.6 The Council's previous AQAP was approved by Cabinet in 2017. This was a 5-year plan that ran up to and including October 2022. Statutory guidance issued by the GLA (London Local Air Quality Management Technical Guidance (LLAQM TG,19) requires AQAP is updated every 5 years "to reflect current policy and to improve their effectiveness.
- 4.7 An annual review of progress is completed and the annual status report for 2022 is attached at appendix 2. The annual status report is a technical document that tracks progress against the measures set out in the action plan. The decision maker should note that the year of the status report is always a year behind due to the data ratification process. The 2023 annual status report is being compiled now and is due in July. This process does not impede cabinet making a decision on this new draft plan. We continue to report on the previous action plan until a new plan is approved. If this draft

plan is approved by June cabinet we will be in a position to produce the status report based on this new action plan.

- 4.8 This report introduces the Councils proposed, revised and updated AQAP for 2023-2028, and seeks a decision to formally adopt the plan.
- 4.9 A consultation ran for a period of 26 weeks. This was 14 weeks longer than the minimum statutory requirement to allow for as much opportunity for engagement as possible. After this period, the responses were reviewed, and a report produced. (Appendix 3: Consultation results: Consultation Report on the Draft Air Quality Action Plan)
- 4.10 As required in the 1995 Act, the consultation included a range of persons and organisations as set out in schedule 11 as follows:
- The LGA
  - the Secretary of State;
  - the Environment Agency;
  - Transport for London (who will provide a joint response with the GLA);
  - neighbouring boroughs
  - other public authorities as the borough considers appropriate;
  - bodies representing local business interests and other persons/ organisations as considered appropriate.
- 4.11 The revised AQAP sets out the actions the Council will take over the next 5 years (2023-2028) to deliver air quality improvement in the borough in compliance with our legal duty. The AQAP has been produced to comply with relevant statutory guidance issued by the Mayor of London and follows the format of the London Local Air Quality Management (LLAQM) Borough Air Quality Action Matrix 2019 produced by the GLA. The matrix has 25 actions that GLA expect boroughs to deliver locally to as part of their LLAQM action planning obligations.

## 5. **Available Options**

- 5.1 To agree the formal adoption and publication of the draft Air Quality Action Plan 2023-2028.
- 5.2 To do nothing

## 6. **Preferred Option**

6.1 The preferred option is to formally adopt and publish the draft Air Quality Action Plan 2023-2028 (5.1).

## 7. **Reasons for Recommendations**

7.1 An Air Quality Action Plan is required to fulfil the following legislative & policy requirements.

- London Local Air Quality Management (LLAQM) Policy Guidance 2019 (LLAQM.PG (19))
- Part IV of the Environment Act 1995, as amended by the Environment Act 2021

## 8. **Consultation Results**

8.1 Key internal partners were consulted to produce this draft plan, and to agree to the measures and indicators within the matrix.

8.2 The public consultation was held via Commonplace.is which is a citizen engagement platform used by public and private organisations to involve stakeholders in decision making and local plans, obtain feedback and analyse data from feedback received. The consultation was open between 16 August 2023-19 February 2024.

8.3 The consultation provided a summary of the AQAP which set out the key themes and priority areas. A copy of the full draft AQAP was also available. Consultees were asked to respond to 10 questions.

8.4 In total, the number of responses received through commonplace was 275.

8.5 48% of respondent agreed with the 10 priorities as set out in the plan. Other question received a mix of responses with a varying level of confidence in proposals. Full details of response can be found in Appendix 3: Consultation results: Consultation Report on the Draft Air Quality Action Plan

## 9. **Next Steps: Communication and Implementation of the Decision**

9.1 The Communications Team will be asked to promote the Air Quality Action Plan.

9.2 The plan will appear on the Councils webpages and be promoted amongst resident groups, businesses, and schools.

10. **Cross-Cutting Issues and Implications**

<b>Issue</b>	<b>Implications</b>	<b>Sign-off</b>
<b>Legal</b> including Human Rights Act	<p>Part 3 of the Councils Constitution provides that Cabinet has delegated authority to agree new corporate policies and strategies which would result in a key decision being taken following consultation.</p> <p>Section 82 of the Environment Act 1995 as amended provides that every local authority shall review the air quality within its area, both at the present time and for the likely future air quality. In carrying out its review and developing its Air Quality Action Plan the Council is under a duty to consult with statutory consultees as set out at paragraph 4.10 of the report. The consultation report is Appendix 3.</p>	<p><i>Azuka Onuorah</i>  <i>Interim Head of</i>  <i>Legal services</i>  <i>20<sup>th</sup> May 2024</i></p>
<b>Finance</b> and other resources	<p>This report makes the following recommendations to Cabinet:</p> <ul style="list-style-type: none"> <li>• To proceed with the formal adoption, and publication of the Boroughs Air Quality Action Plan 2023-2028</li> </ul> <p>There are no financial implications arising from the content of this report.</p> <p>The report author indicates that this is a key decision.</p>	<p>Joanne Stark            Head of            Accounting &amp;            Business            Change            17<sup>th</sup> May 2024</p>
<b>Equalities</b>	<p>The decisions recommended through this paper have a remote or low relevance to the substance of the Equality Act. There is no apparent equality impact on end</p>	<p>Ella Smallcombe            Head of            Environmental            Health            (Pollution &amp;</p>

	users. The recommendations in this report make no specific to the Council's Equality and Equity Charter and the Council's Equality Objectives 2020-2024.	Residential) 15/5/2024
<b>Climate change</b>	<i>This report has a significant contribution to the Greenwich Carbon Neutral Plan agreed by Cabinet on 18 November 2020. Many of the proposed actions contribute to the Carbon Neutral Plan regarding, new and existing buildings and transport.</i>	<i>Ella Smallcombe Head of Environmental Health (Pollution &amp; Residential) 15/5/2024</i>
<b>Risk management</b>	There is a risk, that should the plan not be adopted the Council would not comply with its statutory obligations to prepare a plan or demonstrate its compliance with its duties under the relevant legislation	<i>Ella Smallcombe Head of Environmental Health (Pollution &amp; Residential) 15/5/2024</i>

## 11. **Report Appendices**

11.1 The following documents are to be published with and form part of the report:

Appendix 1: Draft Air Quality Action Plan 2023-2028

Appendix 2: Air quality annual status report 2022

Appendix 3: Consultation results: Consultation Report on the Draft Air Quality Action Plan

## 12. **Background Papers**

Royal Borough of Greenwich Air Quality Action Plan 2017 - 2021

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