

Air Quality Strategy Report

Approval of Air Quality Strategy

Planning Policy Committee Thursday, 19th September 2024

Report of: Deputy Chief Executive

Purpose: For agreement of the Air Quality Strategy

Publication status: Open

Wards affected: All

Executive summary:

This report is being put before the committee to draw their attention to the requirement for Tandridge District Council to produce an Air Quality Strategy (AQS), attached at Appendix 1, and for their approval of the same.

The requirement for an AQS is for local Councils, such as Tandridge, who do not have any Air Quality Management Areas (AQMAs) within their respective boundaries. AQMAs are area specific and declared when there are pollution exceedances of certain pollutants. However, there is an expectation for local authorities to take preventative action, through a local AQS, rather than waiting for a legal limit to be breached.

Air quality is continually monitored at 30 passive diffusion sites located throughout the District, these are situated at traffic hot spots as well as in rural areas, in order to gain a representative of the overall picture. The monitoring sites test for nitric oxide and nitrogen dioxide, collectively referred to as NO_x. Monitoring is aligned to 12 monthly exposures annually, consisting of 4-6 weeks for each site. Tubes are replaced at the time of collection; the ones exposed for the relevant time period are sent away to be analysed before the results are returned. Monitoring for NO_x is a legal requirement for local authorities, the results are used to produce the Annual Status Report for air quality (ASR), which is submitted to the Department for Environment, Food & Rural Affairs (DEFRA) for appraisal.

Air pollution is a mix of particles and gases of both natural and human origin. The main components of air pollution are particulate matter (PM), NO_x, sulphur dioxide (SO₂), ammonia (NH₃), non-methane volatile organic compounds (NMVOCs) and ozone (O₃). Whilst not a direct consequence of localised air quality, CO₂ has a nullifying impact on the local environment by creating an

enveloping effect, and therefore reducing dissipation rates of other pollutants. These pollutants are emitted from a range of sources including traffic, agriculture, industry, waste and domestic heating. Currently, there is no evidence of a safe level of exposure. Tandridge only monitor NOx levels and currently do not test for the other components of air pollution. However, a Surrey wide modelling exercise was carried out in the District to understand PM levels, showing generally low emissions levels. Monthly results showing concentration levels of NOx at the 30 passive diffusion tube sites can be found in the Annual Status Report (ASR), provided for reference at Appendix 3.

This report supports the Council's priority of:

Protecting and enhancing our environment.

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Recommendation to Committee:

It is recommended to Committee that the contents of this report are noted and the accompanying Air Quality Strategy is approved.

Reason for recommendation:

To provide information on the existing work carried out by the Environmental Health officers in mitigating polluting episodes under their control, as well as regularisation of industry, consultation on planned developments and the continuous monitoring of the main pollutants caused by traffic emissions. As Tandridge does not have any areas within its borders that exceed legal levels of the main pollutants from traffic emissions, there is no requirement for an AQMA. As this is the case, we are expected to produce an AQS. The AQS aims to support the Council's priorities by becoming a greener, more sustainable District, whilst helping to tackle climate change; a significant risk to this Council as well as nationally and internationally.

1.0 Introduction and Background

- 1.1** According to Public Health England, air pollution has been classified as the biggest environmental risk to UK public health¹. Long term exposure to air pollution in England is equivalent to between 26,000 and 38,000 deaths per year². The true public health burden is likely to be even higher. For comparison, in the UK COVID-19 was attributed to 70,000 deaths in 2021 and there were 9,641 deaths related to alcohol-specific causes in the same year³.
- 1.2** Awareness of poor air quality has increased in recent years in part due to high profile coroner rulings and growing legal recognition of the impacts of poor air quality on health.
- 1.3** With an estimated population of 87,900 (2021 census)⁴ and an area of just over 95 square miles, Tandridge is largely a rural District, interspersed with small to medium sized population centres. Locally, air quality is generally acceptable, however this is very much area specific, for example, the largely rural nature of Tandridge lends itself to wide open spaces and farmland, with some industrial sites. Therefore, it is important to factor in the contributions of agriculture and rural industry, as part of the overall picture of air pollution. In urban centres, traffic and domestic combustion are the sectors that more strongly contribute to particulate matter and NOx emissions.
- 1.4** Nationally, and locally, air pollution has reduced significantly since the 1950s and air quality is generally good across most of Tandridge. Whilst there have been long-term reductions in the main air pollutants, recent trends show that there is still significant improvement to be made.
- 1.5** Going forward, areas where air quality measures may be needed could be because of new developments within the district's population centres, along the A road network and in close proximity to junctions and road links that suffer from high levels of congestion. These areas may require specific air quality measures such as AQMAs in the future unless preventative measures are implemented with localised controls. Therefore, it is critical planning development activity is undertaken with adequate controls and reasonable mitigative measures to limit air pollution up to and during the build phase as well as beyond completion.
- 1.6** As well as overseeing the passive diffusion monitoring sites in the District, Environmental Health officers play a critical role in the management of local air quality. Their role is one of prevention by implementing measures through the environmental permitting regime, as well as providing expert opinion as planning development consultees. Additionally, reactive intervention through responding to service requests and complaints are important facets in the control of polluting episodes throughout the District.

¹ Public Health England, 'Estimating local mortality burdens associated with particulate air pollution', 2014, www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution

² Chief Medical Officer's annual report 2022: air pollution

³ <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/alcohol-specificdeathsintheuk/2021registrations>

⁴ <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000215/>

- 1.7** Other than the current financial commitments involved in the on-going management of air quality by the Environmental Health team at the Council, it is not anticipated that there will be any financial implications through the adoption of the strategy. However, if there are legislative changes to broaden air quality monitoring to include other vehicular pollutants or a policy change at Government level in the future, there could be additional financial burdens placed upon the Council. Moreover, there are no known potential fraud implications that could be associated with the strategy.

2.0 Key implications

Comments of the Chief Finance Officer

Within the bounds of current known legislation, there are no immediate financial implications arising from this report, as this report is a strategy document i.e. Air Quality Strategy. As such, the Section 151 Officer supports the report.

Comments of the Head of Legal Services

The strategy fulfils the statutory requirement of the Environment Act 1995 as amended by the Environment Act 2021 to publish an Air Quality Strategy setting out air quality standards, objectives, and measures for improving ambient air quality every 5 years.

The Environment Act (1995) sets out the Local Air Quality Management (LAQM) process which requires local authorities to regularly review and assess air quality in their areas.

The Environment Act (2021) makes amendments to the LAQM process and gives greater powers to Local Authorities. It includes new legal responsibilities for county councils to actively support district and borough councils air quality work and sets legally binding air quality targets for PM2.5.

3.0 Risk Implications.

There are no known risk implications relating to the strategy, however the opportunities available to the Council in its adoption are far reaching, including: contributing to better health outcomes for our residents, improved health for those with respiratory conditions and reducing the burden on the HNS. The AQS lays out what the Environmental Health Service are already doing to mitigate polluting episodes as well as the on-going monitoring measures in place. The monitoring regime for vehicular pollutants forms a part of a continuous sampling programme of work undertaken by the Environmental Health Service.

It is not considered that there are any additional financial implications nor are there any negative reputational impacts in the implementation of the strategy.

4.0 Options

4.1 Option 1 - Recommend Members approve the AQS as it is a requirement for local authorities who do not have AQMAs.

This report is being raised to make the Committee aware of the requirement for an AQS, therefore no other options are applicable.

A risk of not approving the AQS could have far-reaching reputational implications for the Council as it could be suggested that they are not taking their responsibilities for air quality seriously.

4.2 Option 2 - The Committee could choose not to produce an AQS, however this would go against guidance from DEFRA who have requested an AQS is to be raised by Councils that do not have AQMAs within their boundaries. If the Council chose to ignore their obligations of creating an AQS, it could be viewed as short-sighted and a failure to take their responsibilities for air quality seriously.

4.3 Option 3 - The Committee could choose to adopt the Annual Status Report (ASR) for air quality to form the basis of an AQ strategy, however this would not satisfy the requirement for the Council to produce a strategy as the ASR is based on what the Council have already done as opposed to what it intends to do and is therefore a headline report covering the previous year's activities in relation to air quality.

5.0 Consultation

As there are no realistic options to be considered it is believed there is no basis or reason for the AQS to go out to consultation with other departments, internal or external agencies or the public. However, consideration of views from committee members are to be considered and where necessary future consultation is recommended.

6.0 Equality

There are no known equality issues in relation to the adoption of the Air Quality Strategy, however an equality impact assessment has been provided as a background paper and can be found at appendix 2.

7.0 Background Papers

Included as references in the introduction:

¹ Public Health England, 'Estimating local mortality burdens associated with particulate air pollution', 2014,

www.gov.uk/government/publications/estimating-local-mortality-burdens-associated-with-particulate-air-pollution

² Chief Medical Officer's annual report 2022: air pollution

³<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/alcoholspecificdeathsintheuk/2021registrations>

⁴ <https://www.judiciary.uk/wp-content/uploads/2021/04/Ella-Kissi-Debrah-2021-0113-1.pdf>

⁵ <https://www.ons.gov.uk/visualisations/censuspopulationchange/E07000215/>

Appendices:

- Appendix 1 - Air Quality Strategy
- Appendix 2 - Equality Impact Assessment
- Appendix 3 - ASR

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