

# Air Quality Strategy 2024 - 2029

19<sup>th</sup> September 2024

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## Executive summary

The Council is committed to making the District a vibrant place to live, work and enjoy and appreciates that good air quality is an essential part of achieving this. However, it acknowledges that no one single agency, department or community has all the answers; improvements to air quality can only be achieved by taking an integrated, collaborative approach. It also recognises that economic growth and improving the local environment are not mutually exclusive.

The document provides an overview of air quality across the Tandridge District Council (TDC) area and focuses on the elements of work specifically carried out by the Environmental Health service to improve air quality in the District, through reactive and initiative-taking interventions. The strategy also sets out initiatives being implemented in the District led by other departments in the Council as well as those covering the whole of Surrey; overseen by the County Council.

In summary, the Council will consult with internal and external partners as well as stakeholders and our residents with regard to air quality. We will consider all available options to reduce pollutants by using both regulatory and non-regulatory powers to improve the air that we breathe. The wider socio-economic impacts of new developments on air quality will continue to be monitored and addressed through consultations with the planning department, informing the decision-making processes around significant infrastructure projects such as large housing developments. Polluting industries and businesses will continue to be inspected and assessed to ensure best practicable means of operation are adequately considered through the environmental permitting regime. The Environmental Health service will continue to produce an Annual Status Report (ASR) on air quality, as required by statute.

## Tandridge District Council's Air Quality Strategy

### Strategic Aims

1. To protect and maintain a good standard of air quality in the district and to ensure national air quality objectives are not exceeded.
2. To raise awareness with residents about local and county wide initiatives aimed at improving air quality.
3. To ensure that residents in areas where monitored levels are higher have access to information about air quality forecasts and advice.

### Context

The Tandridge district area is populated by trees and green spaces and is in two National Landscape areas, the Surrey Hills and High Weald (formerly known as an Area of Outstanding Natural Beauty), as designated by Natural England.

Air quality monitoring demonstrates that national air quality objectives are consistently not exceeded in Tandridge. Whilst we are achieving what is required nationally, it is our duty to produce a strategy to ensure that the good level of air quality in the district is maintained rather than waiting for a legal limit to be reached.

### Key objectives (to deliver Strategic Aims)

#### Objective 1 (strategic level)

- A. Monitor and assess air quality in the district (via monthly monitoring and annual reporting). *For more information, please refer to Section 3;*
- B. Ensuring that the requirements of UK air quality legislation are being achieved. *For more information, please refer to Section 2;*
- C. Raise awareness and increase understanding about good air quality. *For more information, please refer to Sections 5 & 6.*

#### Objective 2 (operational delivery)

- D. **Enforce** – investigate and action reports of poor air quality through service requests and inspection of industrial processes to ensure they are operating using best available techniques to control emissions. *For more information, please refer to Section 4;*
- E. **Advise** – providing air quality advice on management processes such as planning development consultations. *For more information, please refer to Section 4.*

#### Objective 3 (communications & engagement)

- F. **Inform** – signpost vulnerable residents to real time air quality information via airAlert, which will be replaced by AirText later in 2024. *For more information, please refer to Section 7.*

## Introduction

Air quality in the TDC area is good when compared to other Surrey Council authority areas, however we recognise that steps can be made to effect improvements.

As highlighted in the accompanying report, TDC does not have any Air Quality Management Areas (AQMAs); implemented when exceedances of certain pollutants are identified in specific areas. Although, rural in nature, Tandridge is affected by air pollution. The main roads in the District such as the A22, A25 and sections of the M25 and M23 all generate significant traffic pollution in the form of nitrous oxides (NO<sub>x</sub>) and particulate matter (PMs). The traffic hotspots for NO<sub>x</sub> concentrations are continuously monitored around junctions and busy stretches of roads as well as in our main population centres and across rural locations. Monitoring evidence, specifically of NO<sub>x</sub>, indicates that the pollutants arising from traffic on these routes is decreasing year on year, however there are still significant improvements to be made.

**1.0 Sources of Air Pollution & Pollutants** - As well as vehicular pollutants affecting air quality, industry and agriculture are also contributing factors to the overall scene. Air pollution is a mix of particles and gases of both natural and human origin. The main components of air pollution are PMs, NO<sub>x</sub>, sulphur dioxide (SO<sub>2</sub>), ammonia (NH<sub>3</sub>), non-methane volatile organic compounds (NMVOCs) and ozone (O<sub>3</sub>). As a direct consequence of localised air quality, CO<sub>2</sub> largely produced from the burning of fossil fuels to generate electricity and motor vehicles, has a nullifying impact on air quality by creating an enveloping effect, and therefore reduces wider dissipation rates of the pollutants outlined above. TDC only monitor NO<sub>x</sub> levels, as legally required, and currently do not test for the other components of air pollution. Monthly results showing concentration levels of NO<sub>x</sub> at the 30 passive diffusion tube sites can be found in the latest (2022) Annual Status Report for air quality (ASR), attached at Appendix 2.

## 2.0 Legislative Background

**2.1 Clean Air Acts of 1956, 1968 and 1993** - During the 1950s central government decided that action was needed to drastically reduce the number of deaths resulting from smog (a combination of smoke and fog). The government introduced legislation to reduce the amount of smoke produced from industrial and domestic properties, by introducing the Clean Air Acts 1956 and 1968. These Acts, together with other associated clean air legislation, were repealed and consolidated by the Clean Air Act 1993 which, together with regulations and Orders made under the Act, provide the current legislative controls. Control of smoke emissions may also help reduce emission levels of a wide range of other pollutants such as particles, sulphur dioxide, polycyclic aromatic hydrocarbons (PAH) and polycyclic dioxins and difurans (PCDD/F) all of which may be present in smoke.

**2.2 Environment Act (EA) 1995** - While the Clean Air Acts focused on emission sources, the Environment Act has a different approach by setting standards or targets for specific pollutants in air. The Environment Act 1995-part IV section 80 (now schedule 11 of EA (2021) requires the Secretary of State to prepare and publish a National Air Quality Strategy containing policies with respect to the assessment or management of air quality and include statements with respect to:

- Standards relating to the quality of air;
- Objectives for the restriction of the levels at which particular substances are present in the air; and measures which are to be taken by local authorities and other persons for the purpose of achieving those objectives.
- Section 82 of the Act requires each local authority to review air quality in its area from time to time and to report both current and future air quality trends and results.
- Section 83 requires local authorities to designate an Air Quality Management Area (AQMA) where air quality objectives are not being achieved.
- Section 84 requires local authorities who have declared an AQMA to prepare an Air Quality Action Plan (AQAP) which sets out what actions it will take to work toward achieving air quality standards and

**2.3 UK Air Quality Strategy** - The current Air Quality Strategy for England, Scotland, Wales and Northern Ireland sets out air quality objectives and policy options to further improve air quality in the UK, now and into the future. The strategy sets out a way forward for work and planning in air quality issues. It details the standards and objectives to be attained for various pollutants and suggests measures to be considered to help achieve them.

**2.4 Air Quality (England) Regulations 2000 (amended 2002)** - These regulations implement the objectives of the Air Quality Strategy and state the concentration of each pollutant, the relevant time period (as prescribed by regulations) and the date by which they should be achieved.

### **3.0 District Monitoring**

**3.1** Environmental Health officers oversee the air quality monitoring of NO<sub>x</sub> at 30 passive diffusion sites located throughout the District in order to identify any relevant areas where it is considered that the government's air quality objectives could be exceeded. Local monitoring of NO<sub>x</sub> has not identified any breaks of UK air quality objectives to date.

**3.2** There is currently no monitoring of particulate matter in the Tandridge area, this is because we are not legally obliged to monitor for PMs, as there have been no exceedances of NO<sub>x</sub> recorded in the district.

**3.3** In accordance with section 79 the Environmental Protection Act 1990, officers in the Environmental Health service will from time to time proactively inspect the District for episodes that may give rise to statutory nuisance. This applies to any matter within officers' delegated powers, including air pollution, giving officers the powers to take appropriate action to mitigate where necessary. This type of monitoring is carried out periodically whilst officers are already in District on Council business or reacting to complaints, so as to make the best use of available resource.

**3.4** TDC is working with the Joint local Authority partnership to assess the Gatwick Airport National Infrastructure Planning Application which is assessed under the Planning Inspectorate through the Development Consent Order (DCO) process. The application is complex, and 12 local Authorities from Sussex and Surrey are working together to ensure a long-term sustainable approach to Air Quality monitoring around the airport. A number of control documents are being sought through the DCO process to ensure that suitable measures are put in place for both long term operational air quality monitoring from the airport as well as monitoring and mitigation of air quality impacts generated through construction.

## 4.0 Controls

**4.1 Environmental Permitting Regulations (EPR 2016)** -The Environmental Permitting (England & Wales) Regulations 2016) aims to prevent and minimise the risk of pollution and to secure protection of air, water and soil and is an effective preventative intervention in controlling environmental harm. Applicable industrial processes and certain businesses are required to apply for a permit under the legislation. They are inspected periodically to ensure the processes they are undertaking are using best practicable means to mitigate any polluting activities they undertake. The processes that involve high levels of pollution are categorised accordingly, which reflects in the frequency of inspections as well as the cost of the applicable permit. Frequency of inspections and setting of fees are based on specific risk assessments relevant to the processes being carried out. The EPR is underpinned by the Local Authority Pollution Prevention and Control (LAPPC) Permitting Regime, which provides the framework for officers to control and issue applicable permits.

**4.2 Industrial Emissions Directive UK (IED:2.6.** Formally an EU directive, the IED (UK) is primarily concerned with large industry emitting high volumes of pollutants. On the whole, the Environment Agency (EA) issue permits, except for smaller emitters that fall under The EPR, regulated by the local authority (see 4.1). The terms of the permit must consider the whole environmental performance of the relevant plant, including emissions to the air and are issued applying best available technique principles to ensure all mitigating measures are in place. Environmental Health Officers play an important role by investigating complaints about activities that may fall under the IED regime by referring matters to the relevant agencies for them to carry out their regulatory functions.

**4.3 Planning Consultations** - The Environmental Health service are consulted on proposed planned development projects for their professional views on a variety of potential stressors including the impact of air quality. During 2022/2023, the service consulted on 110 planning consultations. The planning development consultation phase involves preventative intervention by the service, particularly with larger developments that are required to submit an air quality assessment, outlining steps to minimise air polluting activities. The role of the Environmental Health service is to ensure preventative activities highlighted in air quality assessment reports are adhered to in conjunction with the planners as part of a Construction Environmental Management Plan (CEMP).

**4.4 Considering Air Quality through the Tandridge Planning Strategy** - Inclusion of air quality objectives in the Tandridge Local Plan provides context for new developments to minimise exposure and the emission of air pollutants. New emission sources suitably mitigated to be as low as reasonably practicable. Officers from the Environmental Health service will continue to provide comments and guidance to planning colleagues on proposed new developments that could impact local air quality.



**4.5 Service Requests and Complaints** - These are reactive and require investigation by an officer from the Environmental Health service. The type of complaints relating to air quality often involves domestic bonfires which are usually infrequent and not normally actionable under legislation. However, where sufficient evidence has been provided by the complainant, and the investigating officer is satisfied a problem exists enforcement action in the form of an abatement notice under the Environmental Protection Act 1990 must be served on the perpetrator. A subsequent breach of an abatement notice may result in prosecution proceedings initiated at Magistrates' court against the alleged offender.

**4.6 Construction sites** are often a source of pollution, not only from vehicular movements but also because of wilful burning by operatives on site. The Environmental Health service receive a number of complaints from residents about construction site burning. Complaints of this nature can be one off incidents; however episodes of burning can cause high levels of localised pollution, affecting the immediate vicinity and local amenity. Again, enforcement action can be utilised in these cases.

**4.7 Wood burning stoves** should be installed in accordance with current building regulations and by approved fitters. The occupiers are responsible for the stove's use and maintenance and must ensure properly seasoned wood or environmentally certified fuels are used. The Environmental Health service receive and investigate complaints from local residents where it is believed inappropriate materials are being used as fuel. Appropriate action can be taken to mitigate harmful effects to reduce polluting episodes in these instances.

**4.8 Small Waste Incineration Plant (SWIP)** – SWIPs are a permitted activity and issued in line with schedule 13A of the Environmental Permitting Regulations. They must reflect the requirements of article 44 of the Industrial Emissions Directive; this means they fall into the category of 'smaller' emitters of pollution and are therefore regulated by the Environmental Health service. Larger SWIPs are regulated by the EA and are permitted by them accordingly (see 4.2). They are sometimes used by small industries that create waste oil as part of their daily activities. However, they emit extremely high levels of pollution and often go undeclared by users because of the prohibitive cost in obtaining a permit. Officers from the Environmental Health service will investigate suspected use when intelligence is received about the operation of a SWIP by ensuring the business operator applies for the appropriate permit or ceases the practice with immediate effect; enforcement action can be taken to ensure compliance where necessary.

**4.9 Minimum Energy Efficient Standards Regulations (MEES)** – MEES applies to all private rented dwellings, whereby they must meet the current minimum standards of energy efficiency as shown on the Energy Performance Certificate (EPC). Inefficient dwellings can have negative effects on the environmental CO<sub>2</sub> burden. Officers from the Environmental Health service will always check these standards are in place when investigating any complaints relating to disrepair in the private rented sector. Where minimum standards are not met or there is no valid EPC, officers can take action to ensure compliance with the regulations.

**4.10 Polluting vehicles** on the public highway are sometimes a source of complaints received by the Environmental Health service, however the service have no powers under delegated legislation to deal with these issues. Enquirers and complainants are sign posted to the appropriate enforcing body in these incidences.

## **5.0 Initiatives and Campaigns to Reduce Air Pollution – TDC**

**5.1 TDC Climate Change Strategy Action Plan** – The plan were created in recognition of a climate emergency declared in February 2020 with a pledge to make operations carbon neutral by 2030. The strategy is based on the following objectives:

- Reducing emissions from our estate and operations.
- Reducing energy consumption and emissions by promoting energy efficiency measures, sustainable construction, renewable energy sources and behaviour change.
- Reducing consumption of resources, increasing recycling and reducing waste.
- Supporting council services, residents and businesses to adapt to the impacts of climate change.

**5.2 TDC Taxi Licensing Policy for Hackney Carriage and Private Hire.** The new taxi licensing policy encourages drivers to adopt more energy efficient vehicles with the incentive to reduce vehicle licence fees. This includes alternative fuels with different technologies, such as electric vehicles. This is to reduce levels of CO<sub>2</sub> and NO<sub>x</sub> emitted. The Council may offer reduced licence fees for vehicles that produce lower carbon dioxide or nitrous oxide emissions, or that are solely electric/hydrogen powered (i.e. zero emissions). This proposal is under review and will continue to be on an annual basis. The aim is for all vehicles licensed to be zero carbon by 2030 at the latest, however the policy will be reviewed in 2027/2028 to reflect any Government changes.

**5.3 How will the TDC Taxi Licensing Policy for Hackney Carriage and Private Hire be achieved?** Working in partnership with neighbouring authorities to deliver the 2023-2028 Licensing Policy for Hackney Carriage and Private Hire. From 1 April 2027 proprietors will be required to have vehicles of at least Euro 4 standard to renew their licence; and Euro 4 (Petrol), Euro 6 (Diesel) or to be zero-emission capable, to receive a new licence. As outlined in 5.2, the aim is for all vehicles licensed to be zero carbon by 2030 at the latest. TDC will work with neighbouring authorities and other partners to improve the infrastructure for electric vehicle charging on Council owned land including car parks and investigate the option for installing additional infrastructure on other sites.

**5.4 Air Quality - Information on the TDC Website.** The monthly results showing levels of NOx from the passive monitoring sites located throughout the District are shown in the ASR. The ASR is attached as appendix 3.

**5.5 Raise public awareness on District wide air quality issues and initiatives.** Utilise the Councils website and social media platforms to raise air quality initiatives. For example, “Clean Air Night” initiative to increase public knowledge and information on the health impacts of domestic burning through effective public communication. Encouraging the community to take actions to reduce their contributions to local air quality emissions.

**5.6 Publish ASR -** In fulfilment of Part IV of the Environment Act 1995 Local Air Quality Management, the ASR reports on actions taken to address local air quality as well various initiatives and campaigns to help reduce air pollution.

## **6.0 Initiatives and Campaigns to Reduce Air Pollution – Surrey County Council**

**6.1 SAMHE (Schools’ Air Quality Monitoring for Health & Education) Project**  
This initiative is carried out by the SAAG and led by them, TDC provide locally based information to feed into the project. The initiative is to Improve understanding of air quality in schools for all age groups by offering them a free indoor air quality monitor linked to an interactive educational web app to help understand indoor air quality. The project gives pupils the opportunity to contribute to scientific research, working together with scientists and thousands of other pupils nationally towards achieving a cleaner, healthier indoor-air school environment.

**6.2 Clean Air Night Campaign -** Surrey wide campaign 13/12/2023 – 24/01/2024 to shine the light on the uncomfortable truth about wood burning and the high level of damage to the environment caused. The campaign is likely to be repeated again over a similar period for 2024/2025.

**6.3 SCC Local Transport Plan –** The programme is aimed at transforming public transport networks to achieve net zero emissions by 2050. The fourth Local Transport Plan (LTP4) sets out plans for transforming their transport network from 2022 up to 2032 and beyond by building on the opportunities to deliver wide-ranging improvements for cleaner, healthier and safer transport throughout Surrey.

**6.4 Accelerating the uptake of ZEVs (Zero Emission Vehicles) –** Electric and other potentially ZEVs are essential to removing carbon emissions from transport as well as NOx, PMs and other air pollutants. These include cars, vans, buses, taxis and HGVs. The government is leading on the uptake of ZEVs at a national level, through policies including a ban on new petrol and diesel car and van sales by 2030 and hybrid cars by 2035. At a local level, this policy area will look to accelerate uptake by providing public charging points and encouraging the private sector to do likewise, providing ZEV car clubs, ensuring our own fleets are zero emission, and by awareness raising.

**6.5 Action Surrey** – Although not affiliated with SCC, Action Surrey are a free energy advice service for Surrey residents. Their purpose is to assist residents through grant funding processes aimed at helping homes become more energy efficient, whilst improving comfort and reducing energy costs. Applicable grants include the Housing Upgrade Grant (HUG), that aims to help lower income owners-occupiers upgrade the energy efficiency of their homes; eligibility criteria apply. The HUG can be used to improve private rented properties, where eligibility criteria are met, although the landlord must contribute to one-third of the cost. The TDC website publicises the availability of Action Surrey grants for residents.

**6.6 Surrey Air Alliance Group** - The SAAG was set up to lead the work on air quality in Surrey and is attended by Environmental Health officers concerned in air quality work as well as those from other agencies committed to improving air quality. The objective of the group is to disseminate information and advice to the public and to provide a means to co-ordinate work to develop area wide strategies to reduce emissions and improve air quality. Group meetings are held quarterly and provide a forum to share policy updates, technical knowledge, good practice and engage collectively with public health and transport colleagues.

## 7.0 Notification Services

**7.1** AirAlert (<https://airalert.info/surrey/Default.aspx>) is a free service for residents warning of pollution levels capable of affecting health, it is targeted at alerting residents when poor air quality is predicted in their area. This service will be replaced by airText (<https://www.airtext.info/>) later in 2024, which offers an increased range of information (air quality, UV, pollen and temperature forecasts) via, SMS text message, email and voicemail.

## 8.0 Consultation

The Council will exchange data and aim to consult with the following when writing or amending Air Quality Reports:

- The Secretary of State
- The Environment Agency
- The Highways Agency
- The County Highways Authority
- Neighbouring local authorities
- Local businesses
- Local communities and residents' groups
- The Primary Care Trust

## **9.0 Monitoring and Evaluation.**

The Council will continue to periodically monitor progress against air quality standards recorded in the District. This will be incorporated into the on-going work of the Environmental Health service, in conjunction with our partners as well as various stakeholders. Methods of evaluation will be determined by non breaches of air quality standards. TDC will continue to operate an air quality monitoring regime at the 30 passive monitoring sites and will fulfil DEFRA's annual reporting requirements in the form of the ASR. The Council will publish copies of reports to be made available to the public upon request. Environmental Health will take the lead in measuring improvements in air quality and continue to work with colleagues in other council departments, partner agencies, communities and neighbouring authorities, with the overall aim of improving air quality.

- END -