To: Air.Quality@defra.gov.uk

From: Steve Dawe, Cowley Area Transport Group – [www.catg.org.uk](http://www.catg.org.uk)

19th May 2022

**SUBMISSION: Consultation on the review of the Local Air Quality Management Policy Guidance**

**Q1: Your name?**

Hazel and Steve Dawe

**Q2: Your email address:**

stevedawe@gn.apc.org

**Q3: Which best describes you?**

Community Group: Cowley Area Transport Group – [www.catg.org.uk](http://www.catg.org.uk)

**Q4: Would you like your response to be confidential?**

No

**Q5: Do you agree that authorities who do not need to declare an Air Quality Management Area should be required to produce an Air Quality Strategy to aid in the prevention of future air quality issues and reduce the long-term adverse health impacts associated with exposure to air pollution?**

Strongly agree

To note: Any Air Quality Strategy is only as good as the quality and comprehensiveness of information collection. This requirement should be coupled with resources for local government to extend monitoring to major junctions, schools on main roads, and to specific high energy or other types of emissions sources known or believed to be contributing to lowering air quality. Similarly, all known air pollutants should be subject to monitoring, especially PM2.5s.

**Q6: Do you agree or disagree with the introduction of the new reminder and warning letters for local authority air quality reports?**

Strongly agree

**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

To note: A procedure for ensuring that recorded levels of specific pollutants are below WHO or EU guidelines, whichever is the lower requirement, throughout an entire district needs to be within each Air Quality Action Plan. With some Air Quality Management Areas in place since 2001, the continuation of poor air quality resulting in deaths and ill-health is being perpetuated without comprehensive action to alleviate or eradicate pollution sources. A deadline for such processes across the UK should be identified in consultation. We note that air pollution caused 6.67m deaths globally in 2019.[[1]](#footnote-1) We note that an estimate of air pollution deaths by the WHO suggests about 64,000 such deaths per year in the UK in 2015.[[2]](#footnote-2)

**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

**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

**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

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

Power to demand immediate closure of a major emissions source injurious to public health should be available to each local authority. Road closures to alleviate the worst areas of air pollution in any given district should also be available as a power to local authorities, to protect public health.

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

Very poor

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

Such information should be more comprehensive, based upon more monitoring stations covering a wider range of pollutants. A requirement for advertising air pollution findings each month via local newspapers should be made, with local government having the required funds. The Government should move towards monitoring at each school, with results available on school websites to the public.

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

Serious under-funding of local government which requires an immediate return of the Revenue Support Grant, at levels no lower than 1.1.2010; revaluation of properties in England to determine Council Tax levels with more bands at the top to make this a far more progressive form of taxation, for now; introduction of Land Value Taxation to substitute for CT/Business rates overtime as a highly progressive form of taxation.[[3]](#footnote-3)

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

Strongly agree

To note: see answer to Q14 above

**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

To note: Local authorities should be given responsibility for checking indoor air quality, subject to consent from residents of residential accommodation and of public and private sector workplaces without such consent. Monitoring should begin with households in the lowest income groups. Promotion of public health, and of productivity, without doubt is in part dependent on indoor air quality.

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

See answer to Q16

**Q18: What actions do you think local authorities could take to help reduce PM2.5 concentrations?**

Pedestrianisation extensions in urban centres with the greatest concentrations. Pedestrian priority areas with bans on polluting vehicles at all times, subject to substantial investment requirements for private and public sector vehicle owners over a specified period of time. Large increase in Active Travel Funding, e.g. at least £2.5bn per year in England for promotion, junction alterations and completion of walking and cycling networks with colour for cycle tracks to deter vehicles. Road closures of worst areas for PM2.5s to deter traffic and force technological changes. Resources for promoting hire of electric cars and other vehicles rather than ownership with aim of reducing overall vehicle fleet, bearing in mind the role of Non-Exhaust Emissions in creating PM2.5s.[[4]](#footnote-4)

**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 PM2.5) within the guidance is helpful?**

Helpful

To note: Ammonia monitoring should become a statutory duty for local authorities.

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

Local government under-funding, see answer Q14. Problems of skills shortages may occur if our preference for more monitoring of more pollutants at more sites is accepted as a public health priority. In addition to remedial action in UK Higher Education funding/provision, it will be necessary to recruit expertise from elsewhere. Barriers to this at national level will need to be removed, and restoration of EU membership would help.

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

Local government under-funding, see answer Q14. Problems in some local authorities not giving sufficient priority to air pollution, public health or the Climate Emergency. This requires statutory responsibility extensions to ensure such irresponsible omissions are no longer possible.

**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

To Note: But they must also be required by law to be compliant within a specified period, subject to disqualification of councillors who have had responsibility for failures over time.

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

Yes

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

Yes

To note: Raw figures about air pollution are not intelligible to many people. Summaries showing which forms of air pollution are above WHO/EU guidelines (whichever is the lowest for a specific pollutant) are essential.

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

See answers above

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1. <https://www.msn.com/en-gb/news/world/pollution-caused-one-in-six-deaths-worldwide-in-2019-report-finds/ar-AAXoEKa> [↑](#footnote-ref-1)
2. <https://www.independent.co.uk/news/health/air-pollution-smoking-deaths-compare-a8818851.html> [↑](#footnote-ref-2)
3. See: <https://www.london.gov.uk/sites/default/files/final-draft-lvt-report_2.pdf> & <https://www.taxresearch.org.uk/Blog/2012/03/12/what-is-land-value-taxation/> & <https://researchbriefings.files.parliament.uk/documents/SN06558/SN06558.pdf> [↑](#footnote-ref-3)
4. See: Air Quality Expert Group – Non-Exhaust Emissions from Road Traffic, DEFRA, 2019. [↑](#footnote-ref-4)