



13 March 2024

Title	Air Quality Action Plan Review
Purpose of the report	To make a decision
Report status	Public report
Report author	Ross Jarvis, Principal Air Quality Project Officer
Lead councillor	Councillor Ennis, Lead Councillor for Climate Strategy and Transport
Corporate priority	Healthy Environment
Recommendations	The Committee is asked: 1. To approve the Air Quality Action Plan for adoption following the conclusion of the consultation. 2. To approve the Air Quality Action Plan being sent to Defra for their approval to allow formal adoption.

1. Executive summary

- 1.1. Reading's air quality (NO₂) is improving; however, we still have some locations which are above the UK and World Health Organization (WHO) air quality limits. The Draft Air Quality Action Plan (AQAP) attached at Appendix 4 will target these locations but not just for compliance with UK or WHO standards, but to push further to improve air quality across the whole of Reading.
- 1.2. The Action Plan identifies the areas where we need to work together with business, the public and across Council departments such as Transport, Planning, Public Health and Sustainability to improve air quality. The actions identified (see table 5 of AQAP in appendix 4) are those that officers plan to work towards implementing over the next five years to benefit people's quality of life, the environment and improve the community we live in by having cleaner air.
- 1.3. The review of the AQAP was started in 2020 but delayed due to the impact of covid on travel behaviour. The Draft AQAP was presented at SEPT in November 2023 and approved for consultation.
- 1.4. The public consultation found there to be strong approval for the majority of actions (see appendix 1 for summary of responses) but low confidence in them being effective at addressing air pollution. In response some minor changes have been made to the actions, including, where the data is available, better quantification of the impact individual measures will have on air quality.
- 1.5. The purpose of this report is to present the AQAP to the Committee to be approved for adoption after considering comments received during consultation.

2. Policy context

- 2.1. The Council's new Corporate Plan has established three themes for the years 2022/25. These themes are:
 - Healthy Environment
 - Thriving Communities

- Inclusive Economy
- 2.2. These themes are underpinned by “Our Foundations” explaining the ways we work at the Council:
- People first
 - Digital transformation
 - Building self-reliance
 - Getting the best value
 - Collaborating with others
- 2.3. Full details of the Council’s Corporate Plan and the projects which will deliver these priorities are published on the [Council’s website](#). These priorities and the Corporate Plan demonstrate how the Council meets its legal obligation to be efficient, effective and economical.
- 2.4. The Environment Act 1995 requires Local Authorities to review and assess local air quality and to take action to improve air quality where exceedances of objective levels are identified. To this end Reading have declared an Air Quality Management Area and put in place an AQAP. Guidance recommends updating AQAPs every five years. The current action plan was adopted in 2016. Reading Borough Council is now fulfilling its statutory duty by updating its AQAP. These actions are linked to wider objectives including health and wellbeing, the climate emergency and social inequalities.

3. The Proposal

Current Position

- 3.1. The previous AQAP focused on actions to reduce Nitrogen Dioxide (NO₂) to achieve compliance with national objectives. As a result, our monitoring network shows there have been considerable improvements in NO₂ levels. For example, in 2016 there were exceedances of the annual average objective (40µg/m³) at 18 different locations, in 2022 there was an exceedance at only 1 location. The maximum annual average level for NO₂ in 2016 was 50µg/m³, in 2022 it was 43µg/m³.
- 3.2. The new AQAP continues to focus on reducing NO₂ to achieve compliance but combines this with actions targeting PM_{2.5}. This is to align with the increasing evidence around PM_{2.5} being the most harmful to health and the policy changes that have followed.
- 3.3. The AQAP was presented at SEPT in November 2023 and approved for consultation. The public consultation ran from 6 December 2023 to 17 January 2024.
- 3.4. 217 responses were received to the consultation. A summary of the responses to the consultation survey is attached in appendix 1.
- 3.5. 65% of respondents agreed air quality is an important issue, compared with 21% who disagree. Only 14% of respondents thought that the AQAP would effectively address air pollution, 37% did not think it would address air pollution, with 47% being unsure.
- 3.6. To interrogate the reasons why people did not think the AQAP would be effective, the comments received in relation to this have been categorised. There were a range of reasons given (See graph in appendix 2 for the full range of responses) the most common being that tougher action such as a Clean Air Zone is needed. Other popular reasons were: Bus, Park & Ride and Trains are too expensive, needs more emphasis on cycling and walking, needs more support for low emission vehicles.
- 3.7. Proposed actions from the AQAP are split into three broad categories (Cleaner Transport, Policy and Guidance Development, Public Health and Awareness) and responses to the consultation under each are looked at below.
- **Cleaner Transport** – The largest percentage of responses were in strong agreement (between 63-31% across the actions) with 14 of the 17 proposed transport related actions which are aligned to the emerging Reading Transport

Strategy. Opinions on the proposed actions to introduce more 20mph zones, differential emission-based parking rates, reprioritising road space away from cars, were more polarised, with the actions still having a strong agreement from a large percentage, but an equally large percentage in strong disagreement with the plan.

- **Policy and Guidance Development** – The responses show strong agreement (between 41-23%) or agreement (29-20%) across our proposed policy related actions.
 - **Public Health and Awareness** – Most people strongly agreed (69-25%) or agreed (30-19%) with the actions within this category. There was a higher level of ambivalence to some of these actions (29-17% Neither agree or disagree). This may be because people see that these actions do not have a direct impact on improving air quality, however raising public awareness of the issue is considered to be a critical function of the AQAP.
- 3.8. The consultation asked if there are any other measures that people would like to see in the action plan, and if so, what would they be. Comments received for this have been categorised (see appendix 3).
- 3.9. Many suggestions were received regarding additions to the plan. Almost all the suggested ideas are already being addressed by suggested actions in the plan or are outside the scope of Reading Borough Council's control.
- 3.10. A written response was received by Reading Friends of the Earth. They suggested improved monitoring of PM2.5; more detailed analysis of the impact of improving air quality on long-term and short-term health; and to use this information to make the case for better transport – integrating the arguments on clean air, climate change and congestion.
- 3.11. In addition to responses from the public, Defra also sent their appraisal of the Draft AQAP. They accepted the draft on the basis that their commentary is considered and incorporated into the Final AQAP. Specifically, more quantification of the measures' impacts are required for a Final AQAP to be considered acceptable, so that the AQAP clearly demonstrates how and when the measures contribute toward compliance. This would also enable a cost benefit analysis to be carried out.
- 3.12. Defra also asked for a definitive estimated year of compliance to be provided both with and without measures to demonstrate when this will be achieved.

Options Proposed

- 3.13. Most of the responses received to the consultation agreed with the proposed actions, therefore it is not proposed to make many changes.
- 3.14. There was some polarisation of views amongst the public for a limited number of transport related schemes. These schemes taken from the Reading Transport Strategy (RTS) aim to promote the development of a sustainable transport system in Reading. Objectives from the RTS such as promoting a clean green Reading with improved air quality for all; supporting healthy lifestyles; and connecting people and places by promoting the use of sustainable alternatives to the private car align with the aim of the AQAP.
- 3.15. Almost all the measures that members of the public have suggested for inclusion in the AQAP are already included. Suggestions that had not been included that it is now proposed to add to the list of actions are:
- 3.16. Tree Planting and Greening – Align with Tree Strategy, maximise tree planting and greening in 'tree corridors' along the Air Quality Management Area (AQMA) considering the choice of species to maximise the tolerance to and pollution trapping potential.
- 3.17. RBC Fleet - It is proposed to add an action to show that RBC intend to lead by example by continuing to upgrade the RBC fleet to low emission vehicles in line with the vehicle

replacement programme removing tail pipe emissions from the fleet, thereby helping to improve air quality.

- 3.18. It is proposed to remove the Cross Thames Travel Scheme (Measure no. RDAQ10) from the list of actions. Although popular with respondents to the consultation (55% strongly agree) it is unlikely to be achievable in the lifespan of the AQAP (2024 to 2029).
- 3.19. Reading Friends of the Earth suggested a health impact analysis of actions on public health. This is similar to a project that an air quality grant bid was submitted to Defra in November for. The suggestion links in with the proposals to increase PM_{2.5} monitoring, undertake health promotion work with the NHS and implement an air alert service for residents, (measure nos. RDAQ27, RDAQ29 and RDAQ31) although it is acknowledged that it is not obvious from the current description. This will be made clearer in the final version.
- 3.20. Following the appraisal response of the AQAP from Defra, efforts are being made to quantify each actions impact on NO₂ in line with the recommendation. However, it is apparent that this will not be possible for some of the transport schemes due to the early stage that they are at in their development. Officers have proposed to use what data there is to quantify measures as accurately as possible for now and to add in additional data as schemes are developed.
- 3.21. Defra have been asked if this approach is acceptable, they have responded by saying that they appreciate that it may be difficult for LAs to quantify all measures and that we should use what information is available and update the plan when further data becomes available.
- 3.22. We will also follow the other recommendation from Defra, to estimate the year of compliance. This is expected to be during the lifespan of the action plan.
- 3.23. When NO₂ compliance has been achieved for three consecutive years LAs are required to revoke their AQMA. This would mean that we would no longer be required to have an air quality action plan, although there is still a requirement for an air quality strategy.

Alternative Option

- 3.24. There is no alternative option, the AQAP is a statutory requirement when an AQMA is in place.

4. Contribution to strategic aims

- 4.1. The development and delivery of the AQAP will help to deliver the following service priorities in the Council's Corporate Plan:

- **Healthy Environment** - Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease, lung conditions and cancer. The actions taken under the proposal would help to improve air quality which would directly contributing to the service priority from the Council's Corporate Plan
- **Thriving Communities** – Poor air quality disproportionately affects the most vulnerable adults and children. Those living in more deprived areas also tend to be exposed to higher levels of air pollution, therefore by improving air quality the proposal will help to tackle these inequalities in our society.

5. Environmental and climate implications

- 5.1. All the actions within the AQAP aim to improve local air quality. The main pollutants of concern for local air quality are Nitrogen Dioxide and Particulate Matter (PM₁₀ and PM_{2.5}), from sources of combustion. Measures to lower these pollutants, such as those encouraging active travel, or less/better burning of solid fuels simultaneously also lower Carbon emissions. In so doing these projects help the Council work towards the target of being zero carbon by 2030.

5.2. A Climate Impact Assessment has been completed in respect of this report. It suggests a 'net medium positive' impact arising from the adoption of the AQAP.

6. Community engagement

6.1. The consultation process as laid out in the Local Air Quality Management guidance was followed to ensure that all stakeholders were able to comment on the proposed plan prior to adoption. This included steering group members, statutory consultees and the public.

7. Equality impact assessment

7.1. Under the Equality Act 2010, Section 149, a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.2. The strategy has been developed in line with these requirements and the delivery of individual elements of the strategy be subject to further Equality Impact Assessments (EIA) as they are developed.

8. Legal implications

8.1. The Environment Act 1995 requires Local Authorities to review and assess local air quality and to take action to improve air quality where exceedances of objective levels are identified. Reading Borough Council is fulfilling its statutory duty by updating its AQAP.

9. Financial implications

9.1. The development of the draft AQAP used consultancy management support (Phlorum) paid for through grant funding. The redrafting work was £5000, which is being covered by a combination of remaining grant funding and the Environmental Protection and Nuisance team budget.

10. Timetable for implementation

10.1. Following Council approval being given at SEPT the AQAP must be sent to Defra for final approval before it can be formally adopted.

11. Background papers

11.1. There are none.

Appendices

1. Summary Report of Consultation Responses
2. Graph Showing the Reasons Given for Why the AQAP Will Not Effectively Address Air Pollution
3. Graph Showing the Additional Measures People Would Like to See Included in the AQAP
4. Reading Air Quality Action Plan 2024-2029