



Consultation Response: The draft Air Quality Strategy

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About the Faculty of Public Health

The Faculty of Public Health (FPH) is a membership organisation for nearly 4,000 public health professionals across the UK and around the world. Our role is to improve the health and wellbeing of local communities and national populations. As a credible and respected voice on the health impacts of the climate and ecological emergencies, FPH is in a unique position to advise on strategies to protect and promote the health and wellbeing of current and future generations. The FPH Climate and Health Committee is responsible for leading the Faculty's response on issues of sustainability, climate change and biodiversity loss in public health and formulate and approve relevant policy. Committee representation also incorporates members from Wales, who work closely with the Committee of FPH in Wales

Chapter 4: Framework for action

5 To what extent do you agree or disagree with our commitment to better align air quality reporting zones with local government boundaries?

Strongly agree.

Any other information:

Much of the air pollution in any area will come from local sources, in particular road transport, which gives considerable scope for local action. Aligning air quality reporting zones with local government boundaries would facilitate more effective data analysis, sharing and reporting in local areas. While LAs have a key role in improving air quality, they do not have complete control over all aspects. The role of Highways England and the urban motorway network is a case in point: often the worst air quality is at motorway junctions, but Highways England are not currently required to assist in addressing this. However, local authorities know their populations well and can of course improve air quality through decisions on local land use planning, environmental health, Smoke Control Areas, roads, environmental permitting and local air quality management. However, any restrictions are often met with vocal public opposition, unless the national messaging and leadership for change is made clear.

In urban areas in particular, there will be significant impacts on air quality from transboundary emissions. Individual local authorities may have little power to mitigate some of these, and this

needs to be factored into the responsibilities. The local Director of Public Health is a key figure and should be engaged in designing the local response to improving air quality. Having aligned boundaries for air quality reporting zones with local government boundaries would facilitate coordinated action between key partners across LA boundaries (including transport, planning, health and education) to reduce the health impact, mortality and health inequalities associated with air pollution. We would wish to see the role of the DPH clearly described in this work, including associated resourcing.

For local areas to be able to improve air quality we need much better air quality data, so that an evidence-based approach to reducing air pollution can be taken. This would allow greater understanding of the trends and factors which influence air pollutants within local areas, and a better assessment of the impact of public health interventions to tackle air pollution. Through this, we could develop evidence-based high impact interventions, giving the greatest co-benefits for both air quality and health. Actions to address the health impacts of air pollution can also play a critical role in supporting other local priorities, such as active travel, health inequalities and community engagement, sustainability and growth and regeneration.

Chapter 5: Summary of powers available to local authorities

6 What more could local authorities do within the existing regulatory framework to reduce pollution from inappropriate domestic burning?

Please provide details:

LAs should be supported with resources and adequate staffing to enforce restrictions and reduce pollution from inappropriate domestic burning. Locally, it is difficult for LAs to identify and enforce the legislation regarding domestic burning. It is not realistic for LAs to attempt to control what is burnt, and whilst the ability to issue fixed penalties for clean air act offences are welcomed, the significant scale of domestic solid fuel burning requires action at a national level to control the fuel and stoves which are available.

- There must be increased national regulation requiring only Eco-design burners to be sold and installed. Minimum chimney heights should also be considered.
- It should be made easier for LAs to declare smoke control areas.
- Targeted national and local messaging should be used to reduce solid fuel burning (e.g. health/environment themed campaigns).
- We support the proposed ban on retailers selling coal for domestic burning and the phasing out of smoky coal
- We would also welcome tougher emission standards and policies to incentivise a shift towards newer appliances. Trading Standards play a key role in enforcing emission standards.
- Although the mandatory certification scheme helps indicate that wood being sold is 'dry', more could be done to encourage the use of more modern burning stoves and less polluting wood
- There should be far great national focus on improving home insulation, especially in the rented sector.
- We note the adverse impact of the increase in energy costs in 2022/2023 which has led to an increase in demand for cheap but polluting firewood and wood-burning stoves. National Government must provide funding to reduce fuel poverty and achieving improved energy

efficiency and ventilation in all properties across the UK to prevent pollutants concentrating indoors and air quality worsening. However, the current funding of £3.4 billion falls short of the £104 billion required for this mass retrofit.

7 How do you feel local authorities can most effectively reduce pollution from industrial sources they are responsible for?

Please provide details:

LAs require resources, adequate staffing and additional inspection capacity to enforce restrictions and reduce industrial emissions. Large industries have made it expensive for LAs to prosecute, and so the national Government plays an important role in supporting LAs in enforcing regulations. National government is vital in joining up the work of different departments at local, regional and national levels to enable a more robust regulation framework. Central government should provide a country wide perspective to support and inform advice, guidance, and regulations' enforcement at local level. We welcome the Government's commitment to consider how it could boost LA regulatory capacity and capability including exploring how the fees and charges system can be improved to provide better cost recovery, and we further believe that national government should consider altering current guidance such that LAs increase the frequency of inspections to LA regulated premises. This will require additional resources should be provided to ensure LAs have sufficient capacity to do this.

More resources are also required to support LAs to undertake regular surveys of their area to identify unregulated premises. Businesses are often unaware that permitting and control of their emissions is required. Transportation associated with industrial activities also has an impact on air quality. The Government should incentivise less polluting means of transportation and delivery. Incentives can also be provided to encourage workers to cycle or use public transport. Policies should also be in place to encourage workplaces to start at different times in order to reduce peak congestion at peak times.

8 How do you feel local authorities can most effectively reduce pollution from transport and non-road mobile machinery (NRMM)?

Please provide details:

LAs should be supported with resources and adequate staffing to enforce restrictions and reduce emissions from transportation. Only with sufficient funding can LAs effectively undertake enforcement activity to reduce pollution from transportation.

We welcome the continuous investment from the Government on active and sustainable travel, including the local Capacity fund to better enable LAs to deliver active travel schemes, but we are very disappointed at the recent decision to reduce the funding available for active travel investment and interventions. Local DsPH are overwhelmingly in favour of policies promoting active travel. Increasing the modal share of walking, cycling and use of public transport, and reducing car usage will make a major impact on air quality, as well as physical fitness, reduced congestion and improved productivity.

To encourage people to be more physically active and less reliant on cars, national government should provide consistent and positive messaging about the benefits and need for using public

transport as well as active and sustainable travel. There is good evidence for the health and economic benefits of investing to support walking, cycling and use of public transport (for example through wider pavements, cycling infrastructure, planting trees, and street furniture between footpaths and roads). Public transport should also be made more affordable and accessible. Road systems which encourage continual traffic flow rather than stopping and starting can help to mitigate the impact of diesel and heavy goods vehicles. The adoption of 20mph speed limits and phased traffic lighting, where appropriate, also have positive effects such as reducing air pollution, noise pollution and road traffic injuries. This makes it safer for children to engage in more physical activity outside while supporting greater community cohesion and the viability of local businesses.

Furthermore, local initiatives can encourage a shift away from car use through road layout changes, parking restrictions and public realm improvements. Private car travel remains dominant across the country overall, this is both a cause and effect of how transport modelling and appraisals are designed and implemented. The benefits of active travel should be properly reflected in appraisal and modelling strategies. More focus should be given to improve how the overall benefits of cycling are appraised, especially the health benefits, so this can be better reflected in investment decisions.

We believe that the strategy should consider the role of low-emission vehicles in reducing pollution from transport, although moving to e-vehicles will not solve pollution caused by particulates, nor will it give the other health benefits from active travel, or the congestion reduction allowed by public transport. We would recommend, however, that Government should also encourage commercial fleet (including bus) operators to use more environmentally friendly fuels. Other recommended measures include committing to a cost-benefit analysis of a national diesel scrappage scheme and raising vehicle excise duty to reflect the impact diesel vehicles have on atmospheric levels of nitrogen dioxide.

9 How do you feel local authorities can most effectively reduce pollution from agriculture?

Please provide details:

We agree that LAs have a role to play in reducing pollution from agriculture and we support the proposed Government actions on the continued investment in slurry storage infrastructure to reduce ammonia emissions. Moreover, we are delighted to see the proposal to consult on bringing dairy and intensive beef farms within scope of environmental permitting as well as a proposed consultation on new restrictions for lower emission techniques for slurry and digestate spreading and storage.

10 How do you feel local authorities can most effectively improve indoor air quality?

Please provide details:

With sufficient resources, LAs can significantly improve indoor air quality through tackling factors such as domestic burning, smoking, outdoor air quality, ventilation exchange rates and the design and condition of the building. However, research is required to identify the most effective interventions to reduce the health impact of indoor air pollution.

Indoor air pollution is of at least equal concern as outdoor air pollution, as an average person spends around 80% of their time indoors. As for outdoor air pollution consistent national messaging is required to drive behaviour change and reduce exposure to sources of indoor pollution. This should

include the delivery of strong public health messages to reduce solid fuel burning. The Government should also consider mandating Volatile Organic Compound (VOC) containing household products to include messages on the health impacts of VOC exposure in their product labels. Resources should be provided to support LAs for public messaging and enforcing regulations.

We welcome the Government's commitment to develop new guidance on mould and damp for the housing sector. There are striking health inequalities associated with air pollution, as people with low incomes are more likely to have existing medical conditions, live in areas with poorer outdoor and indoor environments (for example, near to industry or busy roads), and have worse access to good quality housing and green spaces. The Air Quality Strategy should take into consideration the impact of health inequalities in its proposals.

The Government should support households to improve insulation to prevent mould from forming in the first place. The Government should also update the Housing Health and Safety Rating System (HHSRS) risk assessment which has been identified by the Government as a priority. This risk assessment framework enables property inspections to identify where damp and mould is likely to adversely affect residents. In addition, the Government should provide continued support for addressing fuel poverty and allocate more resources (e.g. grant) to support LAs to improve sub-standard housing. It is vital to ensure housing has adequate ventilation and better insulation to prevent pollutants concentrating indoors and air quality worsening. Ventilation in all settings should follow appropriate standards, therefore ensuring professionals are more familiar with the best practice on indoor air quality.

Smoking tobacco products also contributes to indoor air pollution and is a significant driver of health inequalities, with half of the difference in life expectancy between the least deprived and the most deprived areas being caused by smoking. The Government should ensure all social housing in communal buildings is smoke-free, making stop-smoking a norm and protecting non-smoker populations from the harms of second-hand smoke. We would also like to see more restrictions on the sales of tobacco containing products and vapes. We recognize the role of housing, fire, social services and the NHS in protecting our communities from second-hand smoke.

In addition to the factors outlined above (smoking, ventilation, mould and damp), domestic burning and outdoor air quality also affect indoor air quality. Measures should be taken to restrict the use of polluting wood and promote sustainable transportation. Please refer to question six and eight for more detailed explanation.

11 How do you feel local authorities can most effectively communicate air quality information?

Please provide details:

Engaging the public is important if we are to achieve the national air quality targets as outlined in the air quality strategy, as it allows businesses, industries, and the public to understand how their choices can impact on others and the wider environment.

Whilst it is important for LAs to share air quality information with their communities, it is also vital that this is backed up with strong and consistent national messaging relaying the detrimental impact of air pollution. LAs should be supported in ongoing information provision around air quality monitoring and issues to allow the public to be suitably informed. More research should also be done to determine what innovative approaches would be effective in engaging groups most

susceptible to poor air quality. These groups, of course often have no responsibility or the poor air quality in their area, and we need to be clearer about applying the 'polluter pays' principle.

Currently, communication of air quality information is often not prioritised and air quality information is often only available via webpages and social media. Most people are not aware of this information and as a result it has not been able to achieve a wide audience. We welcome the provision and distribution of information on air quality through social media and we agree that more work is required to communicate this information to the public. The most vulnerable members of society and health care professionals should know where to obtain information of local air quality. They should be regularly notified, particular when incidents or occasions of poor air quality take place. More work could be carried out with schools so that people are aware of the sources of poor air quality. We would like to see School Streets adopted as the default model., supported by funding for ANPR enforcement. Work could also be carried out with local businesses on delivery and commuting time to avoid high concentration of air pollutants during rush hours.

12 Do you feel that there are additional powers relating to air quality which should be available to local authorities?

Yes.

If yes, please provide details:

LAs should be supported with resources, adequate staffing and additional inspection capacity to enforce restrictions and reduce pollution. Large industries have made it expensive for LAs to prosecute, and so the national Government plays an important role in supporting LAs in enforcing regulations. Enforceable restrictions should also be imposed within the existing regulatory framework. The Government should also provide consistent messaging regarding air pollution.

The Government could consider adopting the Polluter Pays Principle and fund LA interventions with fees and charges from the industry.

13 What further support could government provide to help with actions taken locally to tackle air quality?

Increased guidance, Face to face teach-ins on topics, Virtual teach-ins on topics, Enforcement pro-formas or templates, Sharing space or website for best practice examples of local working, Knowledge hub including assets for local authorities, Other (please specify below)

If you selected 'Other', please provide details:

Guidance, face to face teach ins, virtual teach ins, enforcement pro-formas/templates, sharing space/ website and knowledge hub are all useful. However, unless the Government can provide strong central messaging and enforceable regulations (not just guidance), with funded capacity for enforcement, these measures will have limited effectiveness.

Additional funding is also required for enforcement and education. The Government should provide more resources to place/environmental teams in LAs. More funding could also be allocated via an Air Quality Grant.

More public health funding is also needed to reduce harm and mortality caused by air pollution. In England, local authorities' public health funding has suffered a 26% cut (in real terms on a per person basis) since 2015/16. It is estimated that £0.9 billion will be needed annually to restore funding to 2015/16 levels. Although DsPH have been acting to manage these cuts they have reached the limit of available efficiencies. In the UK, 40,000 deaths a year are attributed to exposure to outdoor air pollution through increased risk of diseases such as heart disease, stroke, respiratory diseases and cancer. Public health needs to be funded sustainably and adequately in line with local population health need.

Chapter 6: PM2.5 Target Implementation

14 To what extent do you agree or disagree that a new approach needs to be employed to promote consideration of the PM2.5 targets in the planning system?

Strongly agree

Please add any additional comments:

It is crucial to develop a new approach to promote consideration of the PM2.5 targets in the planning system to reduce the health impact of air pollution. PM2.5 has the strongest epidemiological link to health outcomes and is used for the Public Health Outcomes Framework indicator 3.01. At this size the particles can be inhaled deep into the lungs. The very smallest particles, ultrafine PM0.1, (the smallest fraction of PM2.5) are nano-particles smaller than 0.1 microns and are thought, once inhaled, to be able to pass directly into the bloodstream.

Planning policies have a huge impact on the emission and concentration of PM2.5. Much of the PM in urban environments, particularly those close to roads, can come from traffic sources and comprises soot, part burnt diesel and petrol compounds that form benzene-based carcinogens, heavy metals, silica, bitumen, rubber and organic and other waste matter from road surfaces. PM2.5 can also be composed of particles from combustion products, products from abrasion of engine components, brakes and tyres on road surfaces, generated during construction and agricultural processes, as well as components generated by chemical reactions in the air. These are all factors that could be affected by planning. A new approach should therefore be developed to promote consideration of the PM2.5 targets in the planning system to reduce the health impact of air pollution.

Concerningly, the WHO Air quality guidelines 2021 have not been mentioned in the consultation. The targets set in the consultation (an annual mean concentration of 10 µg/m³ or below and a reduction in average population exposure by 35% by 2040, compared to a 2018 baseline) do not align with WHO target for PM2.5 (an annual mean concentration of 5 µg/m³ or below). It is also less ambitious than the Clean Air Plan in Wales which states- 'Our aim is for concentrations across Wales to be below the WHO guideline for PM2.5 where it is possible, and lower still where there is sufficient potential and there is high public exposure or risk to sensitive receptor groups'. The Government should set a more ambitious target to reduce the health harm of PM2.5.

In addition, training should be provided to air quality specialists within LAs in relation to modelling of PM2.5 levels to ensure that the impacts of new development are fully reviewed and assessed. National guidance should provide clarity as to what level of development requires potential impacts from PM2.5 to be formally assessed.

Health is an important asset for economic productivity. Given the health impact of PM2.5, it is important to promote the consideration of PM2.5 in the planning system. Most importantly, public health should be placed at the centre of future national planning policy to improve population health and wellbeing, reduce the social cost of poor health and deliver on the levelling up mission.

15 What do you think are the merits or drawbacks of a design-stage emission prevention approach as set out in this chapter?

Please provide details:

Influencing the design of a scheme at an early stage can ensure that considerations of the environmental and health impacts of emissions are placed at the heart of planning policies. It could also enable the involvement of Planning Directorate/ OHID at an early stage. Nonetheless, further measures should be taken to ensure that final planning decisions can minimise the amount of pollution and its associated health impact. For example, there should be mechanisms to ensure that measures to curb air pollution proposed at the initial stage of a project are followed through at the end. There should also be consequences for not implementing the proposed measures (e.g. fiscal penalties).

Air quality modelling and impact assessments that are provided in support of planning applications are welcomed as they allow LAs to review and consider impacts when making decisions. However, there should be clarity on how important the consideration of P.M2.5 impacts is when making planning decisions. LAs should be supported with sufficient resources and training to enable rigorous review of planning applications and technical modelling provided in support of major developments where PM2.5 impacts may occur.

16 Are there any additional assessment approaches or points we should consider when developing proposals to integrate the PM2.5 targets in the planning system?

Yes

If yes, please provide details:

The Government should adopt a Health in All Policies approach and consider the impact of planning decisions on public health and health inequalities. The use of a health impact assessment should be encouraged in the planning system to ensure that considerations of health, wellbeing and disparities can inform planning decisions.

While many of the complexities to local plan preparation are not within the scope of public health, they nevertheless frame public health involvement in the plan-making process. It is therefore crucial to ensure that the planning system enables public health professionals to have a say in the planning process, so that local public health and other health strategies can influence the planning processes and address identified health and wellbeing needs and priorities.

There are striking health inequalities associated with air pollution, as people with low incomes are more likely to have existing medical conditions, live in areas with poorer outdoor and indoor environments (for example, near to industry or busy roads), and have worse access to good quality housing and green spaces. Smoking tobacco products is also a significant driver of health

inequalities, with half of the difference in life expectancy between the least deprived and the most deprived areas being caused by smoking.

It is important that the planning system, its operators and users acknowledge and take proactive steps to support, not undermine, people's ability and desire to look after their health and wellbeing. This includes taking consideration of population physical and mental health outcomes in planning. This also includes ensuring that planning decisions will not disadvantage certain population groups or geographical areas over others, thereby exacerbating existing health inequalities. Having strong and explicit policies supporting actions on health improvement and reducing health inequalities will continue to be an important foundation for planning for health.

We believe health should be at the heart of levelling up as neither economic success nor wellbeing can be achieved in isolation.