

Report for: Cabinet, 22 April 2025

Item number: 14

Title: Consultation on Haringey's Draft Air Quality Action Plan 2025-2030

Report authorised by : Barry Francis – Director of Environment and Resident Experience

Lead Officer: Joe Baker – Head of Carbon Management,
joe.baker@haringey.gov.uk, 020 8489 3976

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Key decision

1. Describe the issue under consideration

- 1.1. Haringey is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP sets out the commitment and actions Haringey will take to improve air quality between 2025 and 2030.
- 1.2. A draft AQAP has been developed to meet these requirements (Appendix A).
- 1.3. Haringey is required by Schedule 11 of the Environment Act 1995 to consult on the AQAP with a range of persons and organisations. This process is set out in Appendix B.

2. Cabinet Member Introduction

We are pleased to present Haringey's Air Quality Action Plan setting out measures to improve air quality in Haringey between 2025 and 2030. This Action Plan replaces the Council's third plan 2019-2024, published in 2019.

Haringey is committed to making the borough a better place to live and work. Air quality affects everyone living and working in the borough and is therefore an integral part of this vision.

A number of initiatives are already in place to improve air quality both London-wide and at a local level and these are already working well. We will build on these initiatives to further encourage active travel, implementation of transport improvements, reduced emissions from new developments and reduced exposure for residents.

This Action Plan sets out how we will work together towards meeting national air quality objectives for nitrogen dioxide (NO₂) and PM₁₀. We cannot achieve this alone, and we will be taking a partnership approach both across Haringey and with the adjoining boroughs.

Haringey had been awarded Cleaner Air Borough Status by the GLA, meaning that the following principles were met: political leadership; taking action; leading by example; using the planning system; informing the public and integrating air quality into the public health system. While the GLA no longer awards Clean Air Borough Status to individual boroughs, these principles and examples of best practice continue to be incorporated into this action plan

3. Recommendations

- 3.1. Cabinet are asked to note the content of the draft Air Quality Action Plan, set out in Appendix A.
- 3.2. Cabinet are asked to agree to consult on the Draft AQAP 2025-30 in accordance with the consultation plan in Appendix B.
- 3.3. Cabinet are asked to delegate the sign off of the Final AQAP, following the public consultation in accordance with the consultation plan in Appendix B, to the Director of Environment and Resident Experience, and the Director of Public Health, in consultation with the Cabinet Member for Climate Action, Environment and Transport.

4. Reasons for decision

- 4.1. Haringey was declared an Air Quality Management Area (AQMA) by the Council in 2001, due to air quality levels for two key pollutants, Nitrogen Dioxide (NO₂) and Particulate Matter (PMs) exceeding statutory limits. Haringey's Annual Air Quality Report shows that national, regional and local projects and programmes have reduced the number and concentrations levels of air pollutants in the borough. Despite this, there remain several areas of the borough that fail the UK Air Quality Standards, and all areas in Haringey fail the World Health Organisation (WHO) Standards.
- 4.2. Under Part 4 of the Environment Act 1995, Haringey is required to provide an AQAP to address the areas of poor air quality identified within the AQMA. With specific requirement to monitor and work towards the reduction of Nitrogen Oxides (commonly referred to as NO₂ and NO_x) and Particulate Matter (commonly referred to as PM's, PM₁₀, and PM_{2.5}.)
- 4.3. NO₂ is produced when fuel is burnt and the main sources of NO₂ in Haringey have been identified as road transport and domestic and commercial gas sources i.e. boilers for heat/power.

- 4.4. PMs are made up from a variety of substances i.e. soot, dust and secondary particles formed by the reactions of other pollutants in the air. The main sources of particulate matter in the borough are road transport, construction, domestic biomass/wood burning and resuspension.
- 4.5. The Government states that poor air quality is the largest environmental risk to public health in the UK, with an estimated 28,000-36,000 deaths per year attributed to it. Exposure to NO₂ and PMs are harmful to human health in the following ways:
- **Short term exposure** is associated with the worsening of pre-existing conditions such as lung disease and asthma, as well as increased risk of cardiovascular events such as strokes.
 - **Long term exposure** is associated with an increased risk of developing cardiovascular disease, respiratory conditions, cancer, dementia and leads to reduced life expectancy.
 - **Vulnerable Groups** such as the elderly, the very young, those with pre-existing health conditions (i.e. diabetes, respiratory disease) and those who are pregnant are more at risk and can be affected by pollution even on lower pollution days.
- 4.6. The Haringey Health and Wellbeing Strategy (2024-2029) highlights the impact that poor air quality has on the population of the borough, and this is a key objective within the Healthy Place shaping theme in that document. Air Quality impacts on our population are also reflected by the Council's Joint Strategic Needs Assessment (JSNA) on Air Quality. These two documents show the linkages, the co-benefits of projects and workstreams to improve our borough air quality. Both of these documents have been used to inform and shape the actions within the draft Haringey AQAP 2025-2030.
- 4.7. The draft Haringey AQAP 2025-2030 will replace the previous plan which ran from 2019-2024. When preparing the AQAP, the Council has a statutory duty to consult with a range of bodies, including the Mayor of London.
- 4.8. Cabinet delegating the sign-off of the final AQAP to the Director of Environment and Resident Experience, and the Director of Public Health, in consultation with the Cabinet Member for Climate Action, Environment and Transport. This is following GLA guidance and ensures that Haringey undertakes its statutory duty under Part 4 of the Environment Act 1995 to have an up-to-date AQAP in place.

5. Alternative options considered

5.1. To not undertake an Air Quality Action Plan

The development and implementation of an AQAP is a statutory requirement and therefore there are no alternative options.

5.2. To not consult on the Air Quality Action Plan

When preparing the AQAP, the Council also has a statutory requirement to consult with a range of bodies. The Mayor of London is a key statutory consultee and should approve the final AQAP prior to publication. In addition, the Council must consult:

- Secretary of State;
- The Environment Agency;
- Transport for London (Joint response with the Mayor of London);
- All neighbouring boroughs and/or neighbouring district and county councils;
- Other public authorities as the borough considers appropriate;
- Bodies representing local business interests; and
- Other persons/organisations as considered appropriate.

The consultation period is not defined in the statute, but as a key policy, a minimum consultation period of 6 weeks is normally used. Other councils have consulted on their Air Quality Action Plans for between 4 and 12 weeks. It is proposed to use an online questionnaire using the Commonplace platform, which will also be available in accessible formats. During the consultation period it is proposed two community events to provide opportunities for further stakeholder engagement.

6. Background information

- 6.1. Haringey's draft AQAP has been developed with consideration to both Haringey's Corporate Delivery Plan (2024-2026) and the key 'Calls to Action' outlined in the Haringey 2035 Borough Vision. It is a legal requirement for Local Authorities to work towards the air quality objectives under part IV of the Environment Act 1995 and relevant regulations made under that Act. The Council is also expected to meet the requirements of the London Local Air Quality Management statutory process.¹

The draft AQAP outlines how Haringey will effectively use local levers to tackle air quality issues within its control and lead by example. It is recognised that there are many air quality policy areas that are out of control of the Council's influence (Such as national standards, national vehicle taxation policy, taxis and buses). We will continue to work with, and lobby regional and central government on such policies and issues. This draft Action Plan was written in collaboration with and

¹ The London Local Air Quality Management Framework. <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/pollution-and-air-quality/working-london-boroughs>

has been approved by all the relevant internal stakeholders and the services with the greatest impact on air quality levels in the borough. These include Development Management, Public Health, Transport Planning, Smarter Travel, Regulatory Services and Strategic Procurement.

The draft AQAP sets out 23 measures which detail the work it is proposing the Council would do to improve air quality over the next five years. The plan makes reference to policies and strategies across the Council, and within these strategies there are policies and projects that reflect our air quality ambitions. These key Strategies and Action Plans include:

- Haringey Health and Wellbeing Strategy
- Haringey Development Plan
- Haringey Council Housing Energy Action Plan
- Haringey Affordable Energy Strategy
- Haringey Climate Change Action Plan
- Haringey Procurement Strategy
- Haringey Corporate Delivery Plan
- Haringey Parks and Green Space Strategy
- Haringey Transport Strategy
- Haringey Parking Strategy
- Haringey Ultra Low Electric Vehicle Action Plan
- Haringey Walking and Cycling Action Plan

6.2. In reviewing the Air Quality Action Plan (2019-2024) the Council and other agencies, have delivered several policies and projects that have delivered significant air quality improvements. Some highlights include:

- The launch of the London wide Ultra Low Emission Zone (ULEZ). Reducing PM2.5 exhaust emissions from cars in outer London by 22 per cent compared to without the expansion. NOx emissions from cars and vans are estimated to be between 13 and seven per cent lower than a scenario without the expansion. The cleaner air in London brought about by the low emission zone has contributed to a 4.5% reduction in long-term health problems and an 8% decrease in respiratory issues like asthma and bronchitis (University of Bath, 2023).
- Implementation of 34 School Streets to reduce road danger, improve air quality and tackle congestion near schools, making it easier and safer to travel to school, while protecting children from air pollutants. With nitrogen oxide (NOx) levels reduced by 26% on average around each school.
- Implementation of three Low Traffic Neighbourhood's creating healthier streets by reducing the volume of motor traffic on residential streets as well as encouraging a modal shift to active travel for short journeys.
- The borough has benefited from a growing number of community lead Play Streets. This has reduced local traffic in neighbourhoods, improved local air quality, and increasing street space for active travel, and for individuals and families to engage with each other.
- Installation of 231 Electric Vehicle charging points across the borough.

- Working closely with the Planning Service (Development Management and emerging Planning Policies) to ensure that the air quality impacts from and upon new developments are appropriately assessed and mitigated, and strengthening policies.
- The Councils domestic retrofit projects have included air quality metrics in the measures to be installed and the way the scheme is delivered.
- A Public Health Joint Strategic Needs Assessment (JSNA) on the levels of air pollutants across Haringey, with a mapping of these impacts on the population and the health service.

7. Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes’?

- 7.1. The proposal to undertake a consultation on the draft Air Quality Action Plan will deliver a key outcome in the “Better air quality in Haringey” section of the Corporate Delivery Plan 2024-2026, which is to develop and adopt a new Air Quality Action Plan.
- 7.2. In addition, this draft plan will support the delivery of key Council Strategies such as the Climate Change Action Plan, Walking and Cycling Action Plan and Development Plan.

8. Carbon and Climate Change

- 8.1. As referenced by both national and regional policies and guidance, the final adoption of an air Quality Action Plan will reduce both the borough’s air pollution levels alongside carbon emissions, alongside a reduction in energy usage through the implementation of the various measures listed in the action plan.
- 8.2. These measures include, delivering energy efficiency and energy supply retrofitting projects, the enforcement of Non-Road Mobile Machinery (NRMM) emission policies and the provision of infrastructure to support a model shift to walking and cycling to name a few.
- 8.3. This action plan is complementary to and refers to the Council’s Climate Change Action Plan.

9. Statutory Officers comments (Director of Finance (Procurement), Head of Legal and Governance, Equalities)

Finance

The recommendation of the report is to consult on the draft AQAP set out in Appendix A. The acceptance of the recommendation will incur minor cost in printing materials and advertising and will be contained within existing budgets.

If the implementation of any of the actions contained in the AQAP after the result of the consultation, have financial implications, these will be advised at the time.

Procurement

Strategic Procurement have been consulted in the preparation of this report.

Strategic Procurement note that the recommendations in section 3 of the report and that they are not a Procurement related decision.

Strategic Procurement have no objections to the recommendation of the report.

Assistant Director of Legal & Governance

The Assistant Director of Legal & Governance has been consulted in the preparation of this report.

In accordance with Section 83 of the Environment Act 1995 (as amended) the Council designated the London Borough of Haringey as an Air Quality Management Area in 2001. Upon implementation, the Council is required to prepare an action plan setting out the steps it will take to secure and maintain improvements in air quality standards.

The prescribed air quality standards are set out in the Air Quality (England) Regulations 2000 (as amended). The action plan should also specify a date by which it will take the steps specified in the Plan.

The Council is permitted to revise the Action Plan if further or different measures are required to be taken to achieve or maintain air quality improvements.

The local authority is under a statutory duty to consult on the Air Quality Action Plan as set out at Schedule 11, Environment Act 1995. The Act does not specify timescales for consultation. The Council is required to consult those set out in Appendix B. Consultations need to take place before any decisions are made with consultees provided with sufficient information to provide a considered response which are then given due consideration before the draft plan is finalised.

There are no legal reasons preventing Cabinet from approving the recommendations in this report.

Equality

The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

The decision outlined in this report is to launch the public consultation for the draft Air Quality Action Plan 2025-2030 and to delegate the sign off of the final AQAP following the consultation to the Director of Environment and Resident Experience and the Director of Public Health, in consultation with the Cabinet Member for Climate Action, Environment and Transport.

A comprehensive Equality Impact Assessment (EQIA) was conducted as part of the development of the AQAP (Appendix C). The EQIA identified that the AQAP will positively impact all residents in the borough as a result of improved air quality. Groups most affected by or vulnerable to poor air quality will be particularly positively impacted, such as older people, children, disabled people, people from ethnic minority backgrounds and people from socioeconomically deprived backgrounds. Where potential negative impacts have been anticipated as a result of specific measures within the AQAP (e.g. traffic calming measures), scheme specific EQIAs will be undertaken. The public consultation will be used to identify any further impacts which are specific to one or more protected characteristic.

10. Use of Appendices

Appendix A – Draft Air Quality Action Plan 2025-2030.

Appendix B – Consultation Plan.

Appendix C - EQIA

11. Local Government (Access to Information) Act 1985

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