

**Report for:** Cabinet 2<sup>nd</sup> April 2019

**Title:** **Consultation on Haringey's Draft Air Quality Action Plan 2019-24**

**Report authorised by:** Stephen McDonnell – Director of Environment and Neighbourhoods

**Lead Officer:** **Felicia Ekemezuma – Commercial Environmental Health, Pollution and Trading Standards Manager**  
[Felicia.ekemezuma@haringey.gov.uk](mailto:Felicia.ekemezuma@haringey.gov.uk)  
**0208 489 5153**

**Ward(s) affected:** All

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

## **1. 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 2019 and 2024.
- 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.

## **2. Cabinet Member Introduction**

- 2.1. This report is about the Council's current and future ambition to reduce air pollution. As with much of London, improving air quality is a key priority in Haringey because of the negative effect it has on our residents, particularly older, disabled residents and our children. We are committed to ensuring that our residents' health is protected.
- 2.2. The air quality agenda affects all aspects of the Council's work and our activities go hand in hand with our commitments to combatting climate change, developing and extending walking, cycling and the wider use of public transport. It also discourages the use of cars except where this is an access solution to older and disabled people. We have already taken steps to improve air quality in Haringey and are specifically targeting the air quality around schools with our healthy schools' initiatives. We will continue to work together with our partners to reduce the exposure of residents and visitors in Haringey to poor air quality.
- 2.3. We will encourage everyone to have their say on the draft AQAP via our public consultation. This feedback will inform the final plan, which will be submitted to Cabinet later in November 2019.

### 3. Recommendations

- 3.1 Cabinet are asked to agree to consult on the draft AQAP 2019-24 in Appendix A in accordance with the consultation plan in Appendix B.

### 4 Reasons for Decision

- 4.1. Similar to other London Boroughs, Haringey was declared an Air Quality Management Area (AQMA) in 2001, due to air quality levels for two key pollutants - Nitrogen Dioxide (NO<sub>2</sub>) and fine particulates (PM's) exceeding statutory limits.
- 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.
- 4.3. NO<sub>2</sub> is created when fuel is burnt and the main sources have been combustion engines, heating plant and construction plant/vehicles.
- 4.4. PM10 is made up from a variety of substances i.e. soot, dust and secondary particles formed by the reaction of other pollutants in the air. The main sources of particulate matter are combustion engines, biomass heating plant (wood fuelled), brake and tyre wear, construction activity/plant and HGV's.
- 4.5. There is strong evidence that NO<sub>2</sub> and PM's are harmful to health in a following way:
- **Short term exposure:** - is associated with worsening symptoms of pre-existing lung disease and asthma, as well as increased risk of cardiovascular events such as myocardial infarctions and stroke;
  - **Long term exposure:** - is associated with an increased risk of developing cardiovascular disease and cancer, reduced lung function for both children and adults and low birth weights (higher risk of complications);
  - **Vulnerable Groups** – age, the very young and old are high risk groups as well as those with pre-existing conditions i.e. diabetes, respiratory disease and obesity. Poor diet, deprivation and proximity to pollution sources also have an impact on health inequalities.
- 4.6. The draft Haringey AQAP 2019-24 will replace the previous plan which ran from 2011-18. When preparing the AQAP, the Council has a statutory duty to consult with a range of bodies, including the Mayor of London.

## 5. Alternative options considered

- 5.1. The development of an AQAP is a statutory requirement and therefore there are no alternative options. Consultation is also a statutory requirement, however there is no specified period for consultation in the statute. 8 weeks has been selected as a reasonable time to carry out detailed consultation.

## 6. Background information

- 6.1. Haringey's AQAP Action Plan has been developed with consideration to both Haringey's Corporate Plan (2015-18) and the key themes of the Borough Plan 2019-23 priorities. 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 expected to meet the requirements of the London Local Air Quality Management statutory process<sup>1</sup>.
- 6.2. 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 outside of the Council's influence (such as EU 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. The draft plan was written in collaboration with and has been approved by all the relevant internal stakeholders including the Directors of Development Management, Transport Planning, Public Health, Environment and Neighbourhoods.
- 6.3. In addition, eight air quality workshops for Council Officers, Councillors, local community groups, residents and the general public meeting were carried out in 2017. The community workshops and public meeting were held specifically to capture ideas and public opinions. Feedback from all workshops were used to inform the draft AQAP 2019-2024.
- 6.4. The draft AQAP sets out 25 actions and commitments which detail the work it is proposing the Council would do to improve air quality over the next five years.
- 6.5. The plan references policies and strategies across the Council including:
- Haringey Transport Strategy
  - Haringey Carbon Reduction Strategy
  - Haringey Development Plan

---

<sup>1</sup> LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

## **7. Statutory and Public Consultation**

- 7.1. When preparing the AQAP, the Council has a statutory duty to consult with a range of bodies. The consultation period is not defined in the statute, but as a key policy, a minimum consultation period of 8 weeks is normally used by the Council. Other councils have consulted on their Air Quality Action Plans for between 4 and 12 weeks.
- 7.2. The Council has the discretion as to what form the consultation will take. It is proposed to use an online questionnaire, which will also be available in accessible formats. During the consultation period it is proposed three community events to provide opportunities for further stakeholder engagement. (Further details of the proposed consultation are contained in the Consultation Plan in Appendix B)
- 7.3. The Mayor of London is a key statutory consultee and should approve the final AQAP prior to publication. In addition, the Council must consult:
- the Secretary of State;
  - the Environment Agency;
  - Transport for London (who will provide a 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.
- 7.4. Comments received during the statutory consultation will be collated and incorporated into a final AQAP 2019-2024 for Cabinet to consider.
- 7.5. Cabinet are asked to note that the findings of the consultation will inform the final equality impact assessment and AQAP that will be put to Cabinet to consider in November 2019.

## **8. Timetable**

- Cabinet consideration of the proposal to consult on draft AQAP 2019.
- 8 weeks consultation May – mid July 2019.
- Amendment and Final Draft – end of July 2019
- Cabinet consideration of the final AQAP November 2019.

## **9. Contribution to strategic outcomes**

- 9.1. The draft AQAP aligns with the Borough Plan vision and objectives to actively manage and drive improvements in air quality across the borough. Improving air quality and reducing exposure to pollutants contributes to positive outcomes across all the key priorities:

Priority 1 - Housing - a safe, stable and affordable home for everyone, whatever their circumstances,

Priority 2 - People - our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential,

Priority 3 - Place - a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green,

Priority 4 - Economy - a growing economy which provides opportunities for all our residents and supports our businesses to thrive and

Priority 5 - Your Council - the way the council works.

The Borough Plan also publishes Equality Principles, Partner Statements and Key Pledges for our relationships with Residents, Business and the Voluntary and Community Sector.

## **10. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)**

### **11. Finance**

11.1 This report recommends of the adoption of the draft Air Quality Action Plan 2019-2024 and to proceed with the consultation on that plan.

11.2 There are no direct cost implications for this decision and any existing agreed actions will be funded from existing agreed budgets.

11.3 Officers will continue to identify external funding sources and where appropriate use of s106 funding to deliver the outcomes outlined in the action plan.

11.4 The monitoring of the financial expenditure for agreed capital and revenue projects supporting these strategies will be included in the regular council wide monitoring procedures.

### **12. Procurement**

12.1 Strategic Procurement notes the contents of this report and that the report does not refer to a specific procurement.

12.2 Strategic Procurement will work with service to deliver the Air Quality Action Plan to ensure appropriate inclusion within future procurement requirements and policy.

### **13. Legal**

13.1 Air quality standards and objectives are set out in the Air Quality (England) Regulations 2000. The Council has a duty to review the quality of air within their area under Part IV of the Environment Act 1995.

13.2 Where the relevant standards and objectives are not being met, the Council has a duty to designate an air quality management area and prepare an action plan.

- 13.3 The action plan must include the time(s) within which the Council proposes to implement its measures and include proposals submitted by the Mayor of London for the exercise of the Mayor's powers.
- 13.4 Where preparing an action plan, the Council must consult the Mayor of London, the Secretary of State, the Environment Agency, the Highway Authorities for the area, neighbouring local authorities, appropriate public authorities exercising functions in the vicinity, bodies representing local business interests, and other bodies or organisations as considered appropriate.
- 13.5 The Council must have regard to the guidance issued by the Mayor of London. The Mayor of London also has broad powers to direct the Council to take action in respect of air quality, and the Council must comply with any such direction.
- 13.6 The Mayor of London expects action plans to be updated at least every 5 years.

## **14. Equality**

- 14.1 The Council has a Public Sector Equality Duty 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 those protected characteristics and people who do not
  - Foster good relations between people who share those characteristics and people who do not.
- 14.2. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/belief, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 14.3. Air pollution is associated with a number of adverse health impacts and it is recognised as a contributing factor in the onset of heart disease and cancer. There is a strong association between air pollution and equalities issues. It particularly affects the most vulnerable in society, including children and older people, and those with long-term health conditions. Moreover, areas with poor air quality are also often the less affluent areas, in which BAME communities constitute a relatively high proportion of the resident population
- 14.4. The Air Quality Action Plan will improve outcomes for individuals and groups who share protected characteristics including age, race and ethnicity, and disability. By taking action to mitigate the effects of air pollution, the Council is working to address a known inequality in terms of environmental quality.
- 14.5. An Equality Impact Assessment has been undertaken to support the draft Haringey Air Quality Action Plan. The Assessment provides further details on

how the strategy will support work to tackle inequalities, such as those relating to health in Haringey. (See appendix C)

#### **15. Use of Appendices**

- Appendix A – Draft Air Quality Action Plan 2019-24
- Appendix B – Consultation Plan
- Appendix C - EQIP

#### **16. Local Government (Access to Information) Act 1985**

- **London Local Air Quality Management (LLAQM) Policy Guidance 2016**
- [www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs](http://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs)

External links – Haringey Council is not responsible for the contents or reliability of linked web sites and does not necessarily endorse any views expressed within them. Listing should not be taken as endorsement of any kind. It is your responsibility to check the terms and conditions of any other web sites you may visit. We cannot guarantee that these links will work all of the time and we have no control over the availability of the linked pages.