

**To:** Cabinet  
**Date:** 9 September 2020  
**Report of:** Transition Director  
**Title of Report:** Draft Air Quality Action Plan

<b>Summary and recommendations</b>	
<b>Purpose of report:</b>	To approve the Draft Air Quality Action Plan for public consultation
<b>Key decision:</b>	Yes
<b>Cabinet Member:</b>	Councillor Tom Hayes - Cabinet Member for Green Transport and Zero Carbon Oxford
<b>Corporate Priority:</b>	Pursue a zero carbon Oxford
<b>Policy Framework:</b>	Council Strategy 2020-24
<b>Recommendation:</b> That Cabinet resolves to:	
1. <b>Approve</b> the Air Quality Action Plan for Public Consultation	

<b>Appendices</b>	
Appendix 1	Air Quality Action Plan 2021-2025 (Draft)
Appendix 2	Risk Assessment

## Background

1. The Oxford City Council is due to publish a new Air Quality Action Plan to tackle the ongoing challenge of poor air quality and its impact on health. This is the right moment to set out a new action plan; there is currently a clear positive shift in priorities nationally when it comes to the environment. The national government is supporting a reallocation of road space to more active modes of travel and harmful emissions from homes and industry are being tackled through schemes aimed to improve energy efficiency.
2. There is a significant shift to more active travel, not least in response to the impacts of the COVID19 pandemic which has seen more people than ever enjoying the city's streets with lower levels of traffic and hence air pollution. The first couple of months of the lockdown saw significant reductions in air pollution in the city; up to a 60% reduction in NO<sub>2</sub>, with levels at the lowest ever recorded in the city since monitoring began.

3. The feedback from Oxford's residents has been overwhelmingly positive through experiencing much cleaner air and it is clear that there is support for these improvements to be maintained. A recent survey of Oxford residents by the Council showed support for making changes in the city to allow it to reopen safely and nationally support for a narrative of Build Back Better is growing.
4. Reports<sup>1</sup> are emerging which link the severity of COVID19 to air pollution and this adds to the now mounting evidence of the negative impacts of air pollution on health. Over 40,000 people die prematurely each year as a result of poor air quality in the UK. Air quality has significant impacts on health and is linked to several serious health conditions such as cancer, strokes and heart disease. The impact of early exposure to poor air quality has lifetime effects, such as high rates of obesity, asthma and low lung function.

### **Oxford Air Quality**

5. Air quality tends to be worse in cities than elsewhere in the country and the city of Oxford, in common with many UK urban areas, experiences air pollution.
6. Nitrogen dioxide (NO<sub>2</sub>) is the pollutant of most concern for the city. Parts of Oxford continue to see levels above legal limits, although there has been an overall decline of 26% in NO<sub>2</sub> since 2013. Data from the Council's most recent air quality monitoring campaign (2019) shows that there are still exceedances of the NO<sub>2</sub> annual mean limit value at six locations in the city: St. Clements Street/The Plain, St Clements Street East, George Street, St Aldates, High Street and Long Wall Street.
7. Emissions are about more than nitrogen oxides (NO<sub>x</sub>), they're also about particulate matter (PM); the city is currently fully compliant with legal limits (Ambient Air Quality Directive (2008/50/EC)) as well as World Health Organisation advisory limits for PM<sub>10</sub> and PM<sub>2.5</sub>. Oxford has seen a 31% reduction in Particulate Matter (PM<sub>10</sub>) and 36% reduction in Particulate Matter (PM<sub>2.5</sub>) in the places where it is being monitored since 2013.
8. Transport is the main source of NO<sub>2</sub> emissions, but not the only one. Some parts of Oxford with high levels of road traffic experience higher levels of air pollution.
9. The entire city of Oxford has been a designated Air Quality Management Area (AQMA) since 2010, due to the continuous exceedances of the annual mean limit value of NO<sub>2</sub> in several areas of the city.
10. An Air Quality Action Plan (AQAP) was adopted by the Council in 2013, with a set of measures targeted at improving air quality levels in the city for the period 2013-2020. Overall, the delivery of the AQAP 2013-2020 was responsible for a decline of 26% in NO<sub>2</sub> levels during this period, driven by large changes in traffic emissions.

### **Overview**

11. Oxford City Council has a statutory duty (under the local air quality management regime set out in Part IV of the Environment Act 1995) to "prepare a written plan in pursuit of the achievement of the air quality standards and objectives in the designated Air Quality Management Area (AQMA).

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<sup>1</sup> <https://www.theguardian.com/world/2020/jul/13/compelling-evidence-air-pollution-worsens-coronavirus-study>

12. The new Air Quality Action Plan (AQAP) needs to outline the actions the Council and its partners will take to improve air quality in Oxford between 2021 and 2025.
13. Oxford City Council's main priorities for the period 2021-2025 are focused on the reduction of emissions from transportation. These priorities concern the delivery of two major schemes: Oxford's Zero Emission Zone (ZEZ) and Connecting Oxford; the former seeks to reduce emissions from vehicles in parts of the city while the latter seeks to reduce the number of private cars on the city's roads.
14. The new AQAP will seek to build upon these proposals and identify new measures to complement and link them together. By supporting and building upon existing proposals, tangible improvements in air quality can be achieved quicker at scale.
15. The draft AQAP at Appendix 1 is fully integrated with Oxford's Local Plan 2016-2036 and with Oxfordshire's Local Transport Plan, and is aligned with the findings of the Citizen's Assembly on Climate Change and this Council's response in December 2019.
16. The draft AQAP sets for the first time a new target for Oxford for air pollution reduction. It sets a stricter target for NO<sub>2</sub> reduction for the city than the legal target set by the Government. It is believed that this will be the first time that a local authority in the UK has set a local target for NO<sub>2</sub> in a citywide AQAP.

### Local Target

17. To reflect the Council's commitment to tackling air pollution the draft AQAP sets out a new local target for NO<sub>2</sub>. This is much lower than the legally binding target set by the 2008 Ambient [Air Quality Directive](#) (ED/2008/50/EC) and has been introduced to drive the reduction of air quality locally in order to protect health.
18. During the COVID19 pandemic the Council has received feedback from residents who have been enjoying much cleaner air as a result of reduced traffic and who wish to see it go further and faster in locking in the benefits experienced as a result of the "lockdown".
19. The legal target for NO<sub>2</sub> is 40 ug/m<sup>3</sup> as set out by The 2008 Ambient [Air Quality Directive](#) (ED/2008/50/EC), however research<sup>2</sup> shows that this target is not going to achieve the safest level of air quality. Studies<sup>3</sup> show that harmful effects of air pollution are seen at levels below the legal levels of air quality, that is, those previously considered to be safe. The overall objective of this new draft AQAP for the whole of the Oxford city area is to:

**Achieve a local mean annual mean NO<sub>2</sub> target of 30 ug/m<sup>3</sup> in the city of  
Oxford by 2025**

20. According to the Committee on the Medical Effects of Air Pollutants ([COMEAP](#)), a 1 ug/m<sup>3</sup> reduction in NO<sub>2</sub>, would lead to about 420,000 to 903,000 life years saved in the UK over the next 106 years, associated with an increase in life expectancy (at

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<sup>2</sup> [https://www.biologicalpsychiatryjournal.com/article/S0006-3223\(18\)30064-7/fulltext](https://www.biologicalpsychiatryjournal.com/article/S0006-3223(18)30064-7/fulltext)

<sup>3</sup> <https://www.sciencedaily.com/releases/2018/08/180803103315.htm>

birth) of around 2 to 5 days. It is therefore expected that a 10 ug/m<sup>3</sup> reduction in NO<sub>2</sub> will lead to a significant improvement in health of residents and visitors to Oxford.

21. The local target is not legally binding, but progress will be reported annually through the publication of the Air Quality Annual Status Report.

### **Actions**

22. According to the latest [Source Apportionment Study](#) completed by Ricardo Energy and Environment, the transport sector in Oxford continues to be by far the largest contributor (68%) to total NO<sub>x</sub> emissions in the city, followed by domestic combustion (19%), combustion from industry and services (12%) and others: waste, agriculture, solvents, nature (<1%).

23. Under the new draft AQAP, a set of actions and measures have been developed that can be considered under 4 key priority areas of intervention:

- Developing Partnerships and Public Education;
- Support for the uptake of Low and Zero emission vehicles;
- Reduce the need to travel and explore opportunities for mode shift and increasing the uptake of sustainable transport;
- Reducing emissions from domestic heating, Industry and Services;

24. The actions are to be delivered by a range of partners including Oxfordshire County Council (which has been closely involved in developing the draft AQAP because of their role as the local transport authority).

### **Monitoring and Assessment**

25. The key to the success of the new Air Quality Action Plan will be the ability to monitor and report the progress of measures and assess their impact. This will allow the AQAP to be further developed and ensure transparency and accountability.

26. The new AQAP will be subject to an annual review. Progress each year will be reported in the Annual Status Reports (ASRs) produced by Oxford City Council as part of its statutory Local Air Quality Management duties. The Council will endeavour to share the annual updates with the largest number of citizens and give them the most robust scrutiny through the Council's scrutiny function.

### **Public Consultation**

27. There is a statutory duty to conduct public consultation on the draft AQAP. It is proposed that this will be carried out from the 10<sup>th</sup> September to the 31<sup>st</sup> October (7 weeks), enabling a post-consultation report to the Cabinet in November 2020.

28. The consultation will be widely publicised and responses can be made in both paper and online formats.

### **Climate Change/Environmental Impact**

29. The draft AQAP contains measures and targets to reduce emissions from a range of the Council's programmes that are designed to reduce impacts on climate and air pollution.

### **Financial implications**

30. The draft AQAP includes 30 actions which are aimed at achieving compliance with legal and local limits of air pollution. The actions present no immediate financial implications for the Council. The majority of actions will be delivered by existing staff and under existing work programmes. Of the 30 actions just 5 are not fully funded at this stage. Further details are outlined below.

31. Two actions outlined in the draft AQAP will be subject to further and separate budget processes, namely the Zero Emission Zone and Connecting Oxford which are major programmes being overseen by a joint member led Oxford City Council and Oxfordshire County Council Steering Group.

32. For the remaining three actions which are not fully funded at this stage, the draft AQAP commits to 'exploring possibilities' and it is expected that external grant funding will be required to deliver these actions. The Council has significant success at securing external funding for the delivery of its sustainability objectives and it will build on this success to secure funding and partnership with innovation partners.

33. A number of actions in the draft AQAP are the responsibility of Oxfordshire County Council and hence present no financial burden for the Council. These actions have been included in the AQAP following extensive engagement with Oxfordshire County Council through a joint AQAP steering group.

### **Legal issues**

34. Section 82 of the Environment Act 1995 ("the Act") provides that every local authority shall review the air quality within its area, both at the present time and the likely future air quality within the programme of Local Air Quality Management established under requirements within Part IV of that Act .

35. Local authorities have a duty under Section 83(1) of the 1995 Act to designate those areas where the air quality objectives (as set out in the Air Quality (England) Regulations 2000) are not being met, or are likely to be shown to be at risk of not meeting them, and where people are likely to be regularly present, as AQMAs. Once the area has been designated, Section 84 requires the local authority to develop an Action Plan, to include public consultation, detailing remedial measures to tackle the problem within the AQMA. The Council may amend or revoke an area as appropriate in the light of subsequent reviews.

36. The local annual mean target for NO<sub>2</sub> is legally non-binding and does not override any legal targets set by central government.

### **Level of risk**

37. A risk assessment is available for review on Appendix 2

### **Equalities Impact**

38. Air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are often the less affluent areas. Poor air quality affects people in different groups differently. Minority groups and low income households might be disproportionately impacted by poor air quality.
39. Older people have around twice the level of risk of hospitalisation and death associated with poor air quality and babies and children are also particularly vulnerable. People with pre-existing asthma or chronic obstructive pulmonary disease (COPD) are very vulnerable to air pollution. Similarly, obese people (children in particular) are also at risk.
40. While nationally levels of air pollution are often highest in areas of deprivation, this same pattern is not seen in Oxford, mainly due to the majority of these areas being located away from high levels of traffic, such as estates. However there are high levels of air pollution on routes used by children and in areas with high levels of young people, such as the city centre which has a large student population.
41. The delivery of the range of measures set out in this draft AQAP will reduce air pollution levels across the whole city, which in turn will contribute to reduce health inequalities. It is therefore expected that the draft AQAP will have a positive impact on reducing inequality in Oxford.

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**Background Papers:** None