

To: Cabinet
Date: 20 January 2021
Report of: Transition Director
Title of Report: Air Quality Action Plan (2021-2025)

Summary and recommendations	
Purpose of report:	To approve adoption of Oxford's Air Quality Action Plan (2021-2025, as amended) following public consultation.
Key decision:	Yes
Cabinet Member:	Councillor Tom Hayes - Cabinet Member for Green Transport and Zero Carbon Oxford
Corporate Priority:	Pursue a zero carbon Oxford
Policy Framework:	Council Strategy 2020-24
Recommendation: That Cabinet resolves to:	
1. Approve the adoption of Oxford's Air Quality Action Plan.	

Appendices	
Appendix 1	Air Quality Action Plan 2021-2025 (Final version)
Appendix 2	Risk Assessment
Appendix 3	Public Consultation – Summary of questionnaire results

Background

1. The Local Air Quality Management process places an obligation on all UK local authorities to regularly review and assess air quality in their areas, and to determine whether the air quality objectives are likely to be achieved. Where an exceedance is considered likely the local authority must declare an Air Quality Management Area (AQMA) and prepare an Air Quality Action Plan (AQAP) setting out the measures it intends to put in place in pursuit of the objectives.
2. Oxford City Council declared a city-wide AQMA in 2010 for Nitrogen Dioxide (NO₂), due to continuous breaches of the national objectives for this pollutant. An AQAP was produced in 2013 in response, running till 2020.

3. Historical analysis of air quality data shows that NO₂ levels have significantly improved in the city of Oxford. In 2003 we saw NO₂ of over 70 µg/m³, while in 2019 levels were around 40 µg/m³. Since 2013, we have seen an overall decline of 26% in NO₂, 31% in Particulate Matter (PM₁₀) and 36% in Particulate Matter (PM_{2.5}) in the places where air quality is being monitored. However, air quality monitoring results from the most recent years have shown that the rate of these reductions is now slowing down. In many cases, air quality levels seem to have plateaued in the city, suggesting that more robust action to tackle air quality in the city is now required.
4. This new AQAP has been developed to succeed the previous AQAP. The AQAP outlines the complete list of actions that will be delivered by the City and its partners to improve air quality in Oxford City from 2021 to 2025. It also voluntarily sets a new lower target for NO₂, one which is tighter than the Government's own and, we believe, the first time any local authority has done so, particularly in the context of a citywide AQAP.
5. The AQAP was approved for public consultation by Cabinet in September 2020 and a public consultation exercise took place from the 10th September 2020 to the 1st November 2020, resulting in a total of 224 people taking part. Consultation feedback has been incorporated into the AQAP where appropriate and a full consultation report is available in Appendix 3.

Public Consultation

6. A draft version of the AQAP was approved for public consultation at Cabinet on 9th September. The consultation ran from the 10th September 2020 to the 1st November 2020 and resulted in participation by 224 members of the public.
7. The following stakeholder engagement was undertaken to direct people towards this consultation survey: Online consultation link and local press release; release of several social media adverts and posts, including during Clean Air day on the 8th October 2020; direct emails sent to community groups and other relevant stakeholders.
8. An AQAP booklet and public online survey were made available online, together with the draft AQAP document to facilitate the consultation. A summary of the public survey results can be found in Appendix 3.
9. During the consultation, Oxford City Council followed [LAQM PG16](#) and [Schedule 11](#) of the Environment Act 1995, and actively engaged and asked for the views of the following key statutory consultees with regards to this AQAP: Secretary of State (DEFRA); all neighbouring local authorities: Cherwell, West Oxfordshire, South Oxfordshire, and Vale of White Horse; Environment Agency; Oxfordshire County Council (Transport Authority); Highways England and Public Health.
10. The AQAP is available in Appendix 1 and was developed taking into account feedback received from members of the public and major consultees. In response to feedback, the following additions were made to the final version:
 - A more detailed explanation of the pollution reduction benefits that will result from some of the measures proposed and of future sources of funding;
 - An outline of other relevant Oxford City and Oxfordshire County Council policies that directly interact with this AQAP.

- A new Appendix to show the extent of Oxford's Air Quality management Area (AQMA):
 - A new chapter providing more detail about the public consultation and the steps taken to achieve effective development and implementation of this AQAP.
 - Further clarity about the Council's prioritisation of air quality actions proposed
 - Where the new local target for NO₂ will apply and how it will be monitored and reported upon.
11. No new key areas of intervention or air quality actions were added as a result of the public consultation. According to the results of the public consultation, 84% of the participants either "Agree" or "Strongly Agree" with the four key areas of intervention proposed in the plan.
 12. 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.
 13. The AQAP outlines a list of thirty air quality actions under four key priority areas, all of which will be delivered by Oxford City Council, and a range of other partners including Oxfordshire County Council that, as local transport authority, have responsibility for many of the actions related to transport modal shift.
 14. The final version of the AQAP is fully integrated with Oxford's Local Plan 2016-2036 and Oxfordshire's Local Transport Plan, aligned with the findings of Oxford's Citizens' Assembly on Climate Change and this Council's December 2019 Cabinet response to those findings, as well as the Council's Scrutiny Climate Emergency Review Group's recommendations and the responses, and incorporates the list of suggestions made and agreed by councillors, at the City Council's Cabinet meeting on 9th September.
 15. This AQAP, for the first time, sets a new target for Oxford for air pollution reduction. It sets a stricter target for NO₂ reduction for the city than the legal target set by Government. It is believed that this will be the first time that a local authority in the UK has set a local target for NO₂ in a citywide AQAP.

Local Target

16. To reflect the Council's commitment to tackling air pollution, this AQAP sets out a new local target for NO₂. 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.
17. During the COVID19 pandemic the Council 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".
18. The legal target for NO₂ is 40 ug/m³ as set out by The 2008 Ambient [Air Quality Directive](#) (ED/2008/50/EC), however research¹ shows that this target is not going

¹ [https://www.biologicalpsychiatryjournal.com/article/S0006-3223\(18\)30064-7/fulltext](https://www.biologicalpsychiatryjournal.com/article/S0006-3223(18)30064-7/fulltext)

to achieve the safest level of air quality. Studies² 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 AQAP for the whole of the Oxford city area is to:

**Achieve a local mean annual mean NO₂ target of 30 ug/m³ in the city of Oxford
by 2025**

19. The local target is not legally binding, but progress will be reported annually through the publication of the Air Quality Annual Status Report.
20. The results of the public consultation for this AQAP show that members of the public are very supportive of this new local target for NO₂, with 72% of the participants saying that they “*Strongly Agree*” and 14% saying that they “*Agree*” with the adoption of the local target.

Actions

21. 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_x emissions in the city, followed by domestic combustion (19%), combustion from industry and services (12%) and others: waste, agriculture, solvents, nature (<1%).
22. Under this AQAP, a set of actions and measures have been developed that can be considered under four 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;
23. The complete list of thirty air quality actions under these four key areas have been prepared, considering the results of the source apportionment study, and took into consideration the results of the public consultation.

Monitoring and Assessment

24. The key to the success of the new Air Quality Action Plan is 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.
25. The 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.

² <https://www.sciencedaily.com/releases/2018/08/180803103315.htm>

Climate Change/Environmental Impact

26. This 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

27. This AQAP includes thirty 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 thirty actions just five are not fully funded at this stage. Further details are outlined below.
28. Two actions outlined in this 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.
29. For the remaining three actions which are not fully funded at this stage, this 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.
30. A number of actions in this 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

31. 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 .
32. 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.
33. The local annual mean target for NO₂ is legally non-binding and does not override any legal targets set by central government.

Level of risk

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

Equalities Impact

35. 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.
36. 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.
37. 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.
38. The delivery of the range of measures set out in this AQAP will reduce air pollution levels across the whole city, which in turn will contribute to reduce health inequalities. It is therefore expected that this AQAP will have a positive impact on reducing inequality in Oxford.

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Background Papers: None