

LONDON BOROUGH OF CAMDEN	WARDS: All
REPORT TITLE Camden Clean Air Action Plan 2023-2026 and Camden Clean Air Strategy 2019-2034 (SC/2022/39)	
REPORT OF Cabinet Member for a Sustainable Camden	
FOR SUBMISSION TO Culture and Environment Scrutiny Committee Cabinet	DATE 13 December 2022 14 December 2022
STRATEGIC CONTEXT We Make Camden is our joint vision for the borough, developed in partnership with our community. The Camden Clean Air Action Plan 2023-2026 (CAAP) and the Camden Clean Air Strategy 2019-2034 (CAS) support the We Make Camden Estates and Neighbourhoods mission for Camden's estates and their neighbourhoods to be healthy, sustainable and unlock creativity, and specifically the vision for a borough where "no one experiences poor health because of the air they breathe in Camden". The CAAP and CAS also work towards the We Make Camden commitment to actively tackle injustice and inequality, because air pollution disproportionately affects the health of Black, Asian and minority ethnic communities and lower income neighbourhoods and the approach for improving air quality as outlined in the CAAP will be focused on tackling this inequity. The CAAP and CAS also support and are integrated with the Climate Action Plan and the Camden Transport Strategy to deliver on the Council's net-zero ambition in addressing the climate crisis.	
SUMMARY OF REPORT This report provides Cabinet with the opportunity to consider a new statutory Clean Air Action Plan for Camden, and also a new long-term strategy for cleaner air in Camden – the Camden Clean Air Strategy 2019-2034. The Culture and Environment Scrutiny Committee is asked to consider the report and make any recommendations to Cabinet. The report details the Council's statutory duty to publish a new Clean Air Action Plan in 2023, in fulfilment of the Local Air Quality Management framework under Part IV of the Environment Act 1995. The report provides an overview of the context of air quality in Camden before summarising the structure of the Camden Clean Air Action Plan 2023-2026 and the Camden Clean Air Strategy 2019-2034. The report then goes on to describe	

the public consultation on the Clean Air Action Plan and Camden Clean Air Strategy which took place as part of the ongoing commitment to co-design the Council's approach for delivering clean air for Camden in a way which addresses community priorities and tackles the inequitable effect of air pollution on vulnerable people and specific protected groups.

Local Government Act 1972 – Access to Information

The following document(s) has been used in the preparation of this report: N/A

Contact Officer:

Harold Garner – Head of Sustainability, Air Quality and Energy

5 Pancras Square,
London N1C 4AG,
0207 974 2701

harold.garner@camden.gov.uk

Tom Parkes – Air Quality Programme Manager

5 Pancras Square,
London N1C 4AG,
0207 974 4887

tom.parkes@camden.gov.uk

RECOMMENDATIONS

That the Scrutiny Committee considers the report and makes any recommendations to Cabinet.

That Cabinet:

1. Approves the adoption of the Camden Clean Air Action Plan 2023-2026 and the Camden Clean Air Strategy 2019-2034 set out in APPENDIX 1
2. Notes that subject to 3, the Clean Air Action Plan will be delivered under existing delegations to officers
3. Should existing delegations to officers not cover the actions and steps required to put the plan into effect delegates authority to the Executive Director Supporting Communities to implement and monitor the Clean Air Action Plan

Signed:



Richard Bradbury, Director of Environment and Sustainability

Date: 30 November 2022

1. CONTEXT AND BACKGROUND

- 1.1. This report seeks approval for the adoption of the Camden Clean Air Action Plan 2023-2026 (CAAP) and the supporting Camden Clean Air Strategy 2019-2034. The CAAP and Clean Air Strategy support We Make Camden and the Council's wider environmental work on the climate crisis and public health improvement.
- 1.2. Camden declared itself an Air Quality Management Area in 2000 because the borough (as well as the majority of London) exceeded the EU Objectives for nitrogen dioxide (NO₂). As a result of the declaration, the Council has a statutory duty under the Local Air Quality Management (LAQM) system (Part IV of the Environment Act 1995) to monitor air pollution and produce and implement an Air Quality Action Plan (referred to in Camden and hereafter in this report as a 'Clean Air Action Plan') aimed at complying with the EU-derived UK National Air Quality Objectives (NAQO).
- 1.3. Exposure to air pollution is estimated to cause 36,000 premature deaths each year – 20 times more than the number of deaths caused by road traffic collisions. Of these, 4,100 are in London, and in Camden particulate matter (PM) air pollution is responsible for 7% of all deaths. Air pollution also carries a huge cost for our health and social care systems; estimated at approximately £5.3bn by 2035 if action is not taken to improve air quality.
- 1.4. The Equalities Impact Assessment in Appendix 2 describes how air pollution has a disproportionate impact upon the health of Black, Asian and minority ethnic communities and upon residents living in low income neighbourhoods, because they are typically exposed to higher pollutant concentrations and are also more likely to experience other environmental, social or health factors which can exacerbate vulnerability. Children, older people and people with existing health conditions are also more susceptible to health damage caused by exposure to air pollution.
- 1.5. In 2018 Camden committed to working towards the World Health Organization's (WHO) 2005 guidelines for air quality, and in March 2022 the Council reaffirmed its commitment to target the WHO's updated guidelines (published September 2021), to be achieved borough-wide by 2034. The WHO guidelines are more stringent than the NAQO and Camden is the only local authority to declare adoption of the tougher 2021 guidelines.
- 1.6. The incumbent Camden Clean Air Action Plan 2019-2022 was published in April 2019 after an extensive co-design process which followed the declaration to adopt WHO air quality guidelines. The CAAP 2019-22 expires at the end of this year, so a new Clean Air Action Plan must be published at the start of 2023 for Camden to fulfil its statutory duty outlined above.
- 1.7. The Camden Clean Air Action Plan 2023-2026 sets out how the Council will continue to work in partnership with Public Health and NHS organisations, communities, businesses, and other stakeholders including campaigning groups, schools, hospitals, universities, to improve air quality and protect public health in Camden in support of the We Make Camden vision for a

borough where “no one experiences poor health because of the air they breathe”.

- 1.8. The Camden Clean Air Strategy 2019-2034 is presented alongside the CAAP (within the same document) to formalise the long-term vision as described in the We Make Camden, and the Council’s commitment to take all measures to achieve the World Health Organization (WHO) air quality guidelines throughout the borough by 2034. The Camden Clean Air Strategy is not a statutory requirement and has instead been produced to accompany the CAAP (and subsequent CAAP documents).
- 1.9. Air quality in Camden has improved significantly since the adoption of our first Clean Air Action Plan in 2019. The latest fully ratified air quality monitoring data shows that annual average nitrogen dioxide (NO₂) levels reduced by an average of 35.7% from 2018 to 2021, as measured with 118 diffusion tube monitoring sites in Camden with valid data for both years. All 118 sites measured a reduction in NO₂ over this period. All four automatic monitoring sites also recorded a reduction in NO₂ (31% average reduction).
- 1.10. Particulate matter (PM) has also reduced since 2018. From 2018 to 2021, annual average PM₁₀ levels reduced by an average of 10% as measured at four automatic monitoring sites. PM_{2.5} reduced by an average of 9% across three automatic monitoring sites, although one site (Bloomsbury) recorded an increase from 10 to 11µg/m³ (still well within the 25µg/m³ legal limit for PM_{2.5}).
- 1.11. Despite the continuous improvement in air quality in Camden, there is a long way to go before achieving the WHO guidelines. Although 72% of diffusion tube monitoring sites recorded a 2021 annual mean concentration below the 30µg/m³ interim limit for 2026 set in the Camden Clean Air Strategy, all diffusion tube and automatic NO₂ monitoring locations still exceeded the 10µg/m³ WHO guideline for this pollutant by at least 50%. 2021 annual mean PM_{2.5} concentration was at least double the WHO guideline at all sites.
- 1.12. This underlines the importance of introducing an ambitious new programme for improving air quality over the next few years. It will be increasingly important for this programme to jointly address the need to reduce air pollution whilst engaging and empowering Camden’s communities to take steps to reduce their own exposure to air pollution.
- 1.13. It is particularly important to reach people with health vulnerabilities and protected groups who are disproportionately affected by air pollution, so that they have an opportunity to engage with the Council’s air quality programme and are empowered with knowledge and guidance to reduce their exposure to air pollution wherever possible. This was an important recommendation resulting from the Coroner’s 2021 Prevention of Future Deaths report after the death of the 9-year old Ella Kissi-Debrah from air pollution in Lewisham. In particular, this applies to Camden’s Black, Asian and minority ethnic communities, residents in lower income neighbourhoods, older people, people with existing health conditions, children and their parents or carers, and pregnant people.

2. PROPOSAL AND REASONS

- 2.1. As required by the LAQM system (under Part IV of the Environment Act 1995), the Council has a statutory duty to produce a Clean Air Action Plan setting out how it will improve air quality to achieve compliance with the NAQO.
- 2.2. This report proposes that the Camden Clean Air Action Plan 2023-2026 and Camden Clean Air Strategy 2019-2034 provided in Appendix A is adopted.
- 2.3. The CAAP 2023-26 fulfils the Council's statutory duties, but by focusing on the overarching commitment to meeting the WHO air quality guidelines it also goes beyond the legal requirements by targeting a more significant improvement in air quality than the threshold set in the NAQO. It also seeks to deliver a more comprehensive reduction in the health damage caused by air pollution in Camden because it addresses indoor air pollution and occupational pollution exposure, which is not a statutory LAQM requirement for Clean Air Action Plans.
- 2.4. The CAAP 2023-26 additional focus on indoor air pollution and health supports the wider organisational approach to combating ill health associated with damp and mould in homes. The CAAP notes the establishment of the Council's new Damp and Mould team, while the proposed promotion of information to help reduce indoor air pollution and damp will help to ensure Camden citizens of all tenures have the tools they need to protect their health from poor indoor environmental conditions, and can easily access other services to take further remedial action where this is necessary.
- 2.5. The CAAP 2023-26 targets a range of 'Clean Air Outcomes' for cleaner air and improved health in Camden and describes the actions the Council and partners will take to achieve these over the next four years.

The Clean Air Outcomes are categorised under seven key themes:

- Reducing emissions from construction and development
 - Reducing emissions from buildings
 - Reducing emissions from transport
 - Supporting communities and schools
 - Indirect emissions and lobbying (reducing emissions from sources outside our direct control)
 - Public health and awareness
 - Indoor air quality and occupational exposure
- 2.6. The Clean Air Outcomes are presented in a way which reflects the level of control and influence the Council has over sources of pollution. For example, the proposed activity under the 'Reducing emissions from transport' theme focuses on creating an enabling framework for modal shift away from motorised transport through policies and projects under the Camden Transport Strategy, while recognising that the Council has limited control over vehicle emission standards or the nature of through traffic in Camden.
 - 2.7. Conversely the 'Indirect emissions and lobbying' theme is included because much of the particulate matter air pollution in Camden is transported from sources elsewhere in the UK and internationally and it is therefore important

that the Council seeks to affect change to air quality legislation at the national level to limit such pollution.

- 2.8. Each theme is accompanied by supporting evidence and background information so that any person reading the document can gain an understanding of the key issues and the factors which, in some cases, limit the Council's ability to directly control air pollution.
- 2.9. The CAAP 2023-26 also contains an introductory section explaining the health effects of air pollution exposure and the actions that have been taken in Camden as part of the previous CAAP 2019-22. After describing the Clean Air Outcomes the Council will seek to deliver, the document sets out a series of recommendations for individuals, businesses and schools to support readers to take initial steps towards reducing air pollution and exposure to it.
- 2.10. The Camden Clean Air Strategy 2019-34 is embedded within the CAAP document and frames the CAAP as the second in a series of statutory, co-designed and participatory Camden Clean Air Action Plans working towards Camden's WHO air quality targets and the We Make Camden vision for a borough where no one experiences poor health because of the air they breathe. The Camden Clean Air Strategy lists seven long-term strategic commitments which are intrinsic in this, including a commitment to tackle the disproportionate impact of air pollution upon Black, Asian and minority ethnic communities and lower income neighbourhoods.
- 2.11. Responding to the Council's commitment to develop Camden's Clean Air Action Plan with the wider community, this plan, as with the previous CAAP 2019-22, has been developed with the support of the Camden Clean Air Partnership which is made up of residents, schools, community groups and businesses.

3. OPTIONS APPRAISAL

- 3.1 Camden has a statutory duty to produce a Clean Air Action Plan under Part IV of the Environment Act 1995. There are therefore no alternative options.

4. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?

- 4.1. Other than the failure to publish a new statutory Clean Air Action Plan, the greatest legal risk is a failure to deliver further improvement to air quality in Camden, as required through the LAQM system. This risk is mitigated by the inclusion of a range of outcomes and actions within the CAAP 2023-26 to tackle air pollution directly and to encourage and empower Camden's communities, businesses and other stakeholders to take action to help improve air quality in the borough.
- 4.2. Air quality has already improved significantly in Camden and this trend is expected to continue unless political and economic circumstances cause a regression from the current path towards cleaner vehicles, machinery and heating systems.

- 4.3. Much of Camden is now compliant with the NAQO legal limits. 118 NO₂ monitoring sites in Camden recorded valid data in both 2018 and 2021. In 2018, 53% of these sites recorded an annual mean NO₂ concentration above the legal limit. In 2021, this had declined to 8% and those sites which were non-compliant were almost exclusively located along the Transport for London Road Network, the Strategic Road Network and London Distributor roads.
- 4.4. The legal limits for PM₁₀ and PM_{2.5} have been met at all monitoring sites in Camden in each of the past 20 years.
- 4.5. On this basis there is a very low legal or regulatory risk associated with the targets set in the new CAAP, and this is partly the result of Camden's ambitions exceeding those of national Government, and partly due to the significant progress that has already been made in improving air quality in London. In the unlikely event that air quality in Camden does deteriorate and pollution levels rise above the NAQO, it is worth noting that historically no punitive measures have been taken against London local authorities for NAQO exceedances where local authorities have a Clean Air Action Plan in place to reduce pollutant concentrations.
- 4.6. The most likely risk is that the CAAP 2023-26 is insufficient to move the Council towards WHO compliance by 2034 or the 2026 interim targets set out in the CAAP. The WHO guidelines are not legally binding and there is currently no legislative risk for failing to achieve these within the timeframe outlined in the CAAP.
- 4.7. The reputational risk of failing to make sufficient progress towards the WHO guidelines has been mitigated by explaining in the CAAP the nature of the challenge in meeting these objectives; notably the influence of air pollution entering Camden from outside of London or the UK, and the lack of regulatory controls or effective enforcement powers over a range of emission sources, including some local sources such as domestic and commercial solid fuel burning and garden fires.
- 4.8. In the case of domestic wood- and coal-burning, the complexity of the legislative framework presents a significant challenge for local authorities in enforcing smoke control area rules. The CAAP seeks to address the limitations of existing regulations by combining a focus on building the community's understanding of the pollution impact of solid fuel burning, with advocacy and partnership working with Government, the GLA and London Councils to secure more effective enforcement powers. In parallel, the Council will continue to seek to enforce through existing legislation wherever possible, and residents will be signposted to the Council's Environmental Health response service to report instances of chimney smoke whenever it is considered appropriate and where it may be prejudicial to health or a statutory nuisance.
- 4.9. The overall purpose of the CAAP is to convey the commitment of Camden Council to take all possible action to realise the We Make Camden vision for the borough, but also to help empower Camden citizens with the knowledge and confidence to take action individually or collectively to help to clean Camden's air and reduce their own exposure to air pollution.

- 4.10. A further risk is that the CAAP places unrealistic financial pressure on the Council, rendering the plan unworkable. We have mitigated this by developing the CAAP with teams across the Council to ensure that actions are deliverable within existing resources. The CAAP aligns with and supports the Camden Climate Action Plan and the Camden Transport Strategy. This ensures that all of these interdependent strategic plans are mutually supportive and working towards the same objectives. Indeed, the commitment within the CAAP to work towards WHO air quality guidelines provides justification for a variety of ambitious measures introduced through the Camden Transport Strategy.
- 4.11. The adoption of an ambitious CAAP will be essential for unlocking access to grant funding, which will enable the delivery of air quality projects without imposing significant financial pressure on the Council. For example, having a current Clean Air Action Plan is a pass/fail eligibility requirement for applying to Defra's Air Quality Grant Scheme.
- 4.12. Camden's first CAAP 2019-22 has been seen as the benchmark for air quality plans in London, and its robustness has helped the Council to secure almost £1.5m of external funding to support the Council's air quality programme since its adoption in 2019, including £1m from the Mayor of London's Air Quality Fund (MAQF) and £400,000 from Defra.
- 4.13. A final risk for consideration is that the cost of living crisis may reduce the positive impact of the new CAAP and Camden Clean Air Strategy because the public engagement and awareness-raising initiatives proposed through the CAAP may gain less attention with a more pressing societal issue. This will be mitigated by ensuring that all communications and engagement activities undertaken during delivery of the CAAP are sensitive to the developing situation and the specific needs and experiences of the target audience.
- 4.14. Air pollution places a significant financial burden upon society through increased health and social care costs. At an individual level, exposure to air pollution can make people ill and less able to work. The CAAP programme of outcomes and actions will help to improve air quality in Camden and will empower people to reduce their own exposure to air pollution. Although the effect will be impossible to quantify, this will constitute a reduction in overall health costs at a collective and individual scale and will make people more resilient to other adverse circumstances.

5. CONSULTATION/ENGAGEMENT

- 5.1. The statutory duty to produce a Clean Air Action Plan includes a requirement for public consultation and engagement with specific statutory consultees. Beyond this, it is essential to secure public support for the Council's air quality programme and the measures proposed for delivery as part of the CAAP. Finally, the CAAP itself serves as a tool for engaging Camden's communities to increase awareness about air pollution as a health risk, and to empower people to take action to safeguard their wellbeing whilst protecting Camden's environment.
- 5.2. The draft CAAP consultation ran from 13 August to 16 October 2022 on the Council's We Are Camden consultation hub. The consultation followed two co-

design workshops which took place in February 2022 with the Camden Clean Air Partnership, and this was framed as a continuation of the co-design approach adopted during the development of the previous CAAP 2019-22.

- 5.3. The consultation was designed to provide an opportunity for people to contribute constructively to the creation of the CAAP and the identification and prioritisation of actions to improve air quality in Camden, rather than simply seeking 'yes' or 'no' public approval for the CAAP. This approach was taken as part of the commitment to ongoing participatory co-design. The overarching narrative in the CAAP itself (and in the consultation materials) sought to frame the CAAP as the next phase in Camden's journey to cleaner air; the CAAP conveyed how air quality had improved significantly in Camden, and contextualised this within the long-term Camden Clean Air Strategy ambition to achieve the WHO guidelines and to realise the We Make Camden vision.
- 5.4. The consultation was publicised on the Council's social media accounts including paid-for advertising. Email notifications were sent to tenants' and residents' associations and businesses on the Camden Climate Change Alliance mailing list. Additionally, the consultation was promoted through the Camden Learning headteachers' news e-bulletin, and Camden Newsletter.
- 5.5. An advert was placed in an October edition of the Camden New Journal and columns from the Cabinet Member for a Sustainable Camden featured in the Ham & High newspaper.
- 5.6. Camden's Public Health team coordinated with Voluntary Action Camden to feature the consultation in several e-bulletins. Additionally, the consultation was shared by Public Health among the North Central London Paediatric Asthma Network, and was sent to GPs and pharmacists in the borough.
- 5.7. Members of the Camden Clean Air Partnership supported the consultation by promoting it within their networks. Specifically, the Camden Clean Air Initiative and Somers Town Neighbourhood Forum proved helpful in encouraging the consultation call for participation.
- 5.8. The Council directly contacted 101 charities and third-sector organisations, including several which were explicitly recommended by the Council's Equalities and Disproportionality Service.
- 5.9. In-person drop-in sessions were held at Holborn, Kentish Town, Kilburn and Swiss Cottage libraries in October, in addition to a presentation to the Confederation of Private Tenants, a session with the Early Years Parent Champion volunteer group at Harmood Children's Centre, and a health event at London Irish Centre.
- 5.10. Letters were sent to statutory consultees: the Mayor of London, the Secretary of State for Environment, Food and Rural Affairs, the Environment Agency, and neighbouring local authorities.
- 5.11. In total, 113 responses were submitted to the consultation, including 107 through the online survey, three paper survey responses, and three email responses. A summary of the 110 survey responses is provided in Appendix

3, including an analysis of the demographic profile of the respondents, and a breakdown of respondents' perceptions of the key sources of air pollution in the borough and how air quality in Camden had changed.

5.12. As a response to consultation feedback, a one-page summary of the CAAP 23-26 will be published as an accompaniment. This will provide an at-a-glance summary of air quality in Camden, including its importance as a consideration for everyone's health, the major sources of air pollution in the borough, and the headline actions and activities delivered through the Council's air quality programme as part of the CAAP.

5.13. The main CAAP document itself will be amended slightly to reflect updated public health statistics and NHS references, based upon recommendations from a consultation email response from the UK Health Security Agency.

6. LEGAL IMPLICATIONS

6.1. Legal comments are contained in the body of the report.

7. RESOURCE IMPLICATIONS

7.1. The finance team have been consulted and there are no significant financial implications foreseen from this report. Actions of the plan will be delivered within the Council's existing resources.

8. ENVIRONMENTAL IMPLICATIONS

8.1. The CAAP commits to the delivery of projects to improve local air quality and protect public health. Many direct interventions and behaviour change activities to reduce emissions of air pollution will have co-benefits for climate because many sources local air pollutants also produce greenhouse gases. For example, work to reduce pollution from domestic wood- and coal- burning will provide a climate and ecological benefit in addition to the local improvement in air quality and public health, because wood and coal fuels are the most climate-damaging heating fuels.

8.2. The linkages between Camden's air quality, climate and transport strategy programmes will ensure that the CAAP will be implemented without causing any adverse effects upon climate.

8.3. As such, the CAAP has a positive impact upon Camden's environment.

9. TIMETABLE FOR IMPLEMENTATION

9.1. The intention is to publish the Camden Clean Air Action Plan 2023-2026 as soon as practicable after Cabinet, so that it shall take effect from 1 January 2023 and will supersede the Clean Air Action Plan 2019-2022 as the Council's statutory Air Quality Action Plan, fulfilling the Council's duties under Part IV of the Environment Act 1995.

9.2. The CAAP will be implemented from 2023 to 2026, and a successor Clean Air Action Plan 2027-2030 will be developed during 2026.

- 9.3. Subject to Cabinet approval, the Camden Clean Air Strategy 2019-2034 shall be adopted in tandem to the CAAP 2023-26 but shall last until 2034. It will again accompany successor Clean Air Action Plan documents to highlight the overarching links with We Make Camden and the long-term commitment to meet WHO air quality guidelines borough-wide by 2034. The 2019-2034 title of the Camden Clean Air Strategy reflects the period between the publication of the first Clean Air Action Plan after adoption of WHO guidelines in Camden and the deadline for when this must be achieved.

APPENDICES

APPENDIX 1 – Camden Clean Air Action Plan 2023-2026 and Camden Clean Air Strategy 2019-2034

APPENDIX 2 – Equalities Impact Assessment

APPENDIX 3 – Summary of consultation responses

REPORT ENDS